

# Accessibility Policy & Multi Year Plan

Policy 11.0

Current Rev Date

2-Feb-21

Sinalite

## 1. ACCESSIBILITY POLICY

- 1.1 This Accessibility Policy outlines the strategy of Sinalite to achieve accessibility and otherwise meet the requirements of the Accessibility for Ontarians with Disabilities Act, 2005 (“AODA”).

## 2. STATEMENT OF COMMITMENT

- 2.1 Sinalite is committed to treating all people in a way that allows them to maintain their dignity and independence. Sinalite believes in integration and equal opportunity for both the public and its employees. We are committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the AODA.
- Sinalite is committed to providing our services, programs, goods and facilities to persons with disabilities in a manner that:
- Is free from discrimination
  - Seeks to provide integrated services
  - Is in an accessible format, and
  - Takes into consideration a person’s disability
- 2.2 Sinalite relies on all of its employees, volunteers and partners to assist with maximizing accessibility within the Company by:
- Identifying potential barriers and proposing ways to remove them
  - Participating in training
  - Learning how to interact with persons with disabilities, including those who require the use of a support person or service animal
  - Learning how to use existing accessibility devices

## 3. ACCESSIBILITY POLICIES

- 3.1 The Company will develop, implement and maintain any other accessibility policies, plans or procedures and take all other measures as may be required by the AODA or any of the regulations or accessibility standards. Sinalite will update all applicable parties when changes are made to this policy and relating documents.

## 4. MULTI-YEAR ACCESSIBILITY PLAN

- 4.1 Sinalite will maintain a Multi-Year Accessibility Plan (“Accessibility Plan”) which will be made available in an accessible format, upon request. The Accessibility Plan will be reviewed and updated regularly, but no less than once every five (5) years. In addition, the Company will maintain policies governing how we will meet our requirements under the AODA, including policies related to customer service, employment, information and communication. The Company will provide copies of these policies in an accessible format, upon request.

## 5. INFORMATION AND COMMUNICATION

- 5.1 Sinalite is committed to meeting the communication needs of people with disabilities. We will consult with people with disabilities to determine their information and communication needs. Accessible formats and communication support are available upon request. The Company’s commitment does not necessarily apply to products, unconvertible information or communications and information that our Company does not control directly or indirectly through a contractual relationship. If it is determined that information or communications are unconvertible, Sinalite will provide the person requesting the information or communication with an explanation as to why the information or communications are unconvertible as well as a summary of the unconvertible information or communications.

## 6. EMPLOYMENT

- 6.1 Recruitment: Information will be posted about the availability of accommodations for applicants with disabilities in the Company's recruitment process. Sinalite shall notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used.  
If a selected applicant requests accommodation, Sinalite shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.  
Sinalite will, when making offers of employment, notify the successful applicant of our policies for accommodating employees with disabilities.
- 6.2 Employment Accommodation: Upon request, Sinalite will arrange for alternative formats and communication support for, Sinalite policies, procedures, performance management, career development, redeployment, general employee information and job requirements - during this time Sinalite will consult with the employee making the request in determining the suitability of accessible format or communication support. In the event an employee discloses his or her accommodation requirements, Sinalite will provide individualized workplace emergency response information to said employee, if the disability is such that the individualized information is necessary. If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, Sinalite shall provide the workplace emergency response information to the person designated by Sinalite to provide assistance to the employee.
- 6.3 Return to work: In the event that an employee suffers short or long term workplace injury and or illness, Sinalite will work with said employee to provide a plan that will facilitate the employee's return to work, up until the point of undue hardship. If deemed necessary a short term modified role will be offered to the employee, along with a plan(see modified work form) to gradually increase their workload until they are given clearance by a physician indicating that they are cleared for a full return to work. Sinalite and said employee will cooperate with the Workplace Safety Insurance Board to ensure early and safe return to work. In the event an employee suffers short or long term non-workplace injury/illness. Sinalite will make an effort to provide a plan that will facilitate the employee's return to work. If available a short term modified role will be offered to the employee, along with a plan to gradually increase their workload until they are given clearance by a physician indicating that they are cleared for a full return to work. Sinalite will also accommodate modes of accessibility as defined by Accessibility for Ontarians with Disabilities Act.
- 6.4 Sinalite will consider the accessibility needs, including documented individual plans, of employees with disabilities during the company's performance management process. These will also be considered in the event of redeployment, or when offering career development or advancement opportunities.

## 7. TRAINING

- 7.1 In accordance with the AODA, the Company will provide training to employees, volunteers and other staff on Ontario's accessibility laws and on the Human Rights Code as it relates to people with disabilities. Training will be provided in a way that best suits the duties of the employees, volunteers and other staff. This training will include instruction on the following:
- Purposes and requirements of the AODA, including the Customer Service Standard (Regulation 429/07) and the Integrated Accessibility Standards (Regulation 191/11)
  - How to interact and communicate with persons with various types of disabilities as well as those who use assistive devices, or require the assistance of a service animal or support person
  - How to use equipment or devices available from the Company that may help with the provision of goods or services to a person with a disability
  - What to do if a person with a particular type of disability is having difficulty accessing our goods or services
- 7.2 Training will take place as soon as practicable and upon completion Human Resources will keep a record of the training provided, including the date on which the accessibility training took place and the number of people trained.

## 8. CONTRAVENTIONS

- 8.1 Human Resources, as well as managers and supervisors will monitor existing and new practices and procedures to ensure compliance. A failure by any employee to comply with this Accessibility Policy, the Multi-Year Accessibility Plan, the Customer Service Policy, or any other policy, practice or procedure related to accessibility issues, the removal of barriers, or the Human Rights Code, may result in corrective action taken against the offending employee, up to and including dismissal.



- Information will be posted about the availability of accommodations for applicants with disabilities in the Company's recruitment process
- Job applicants who are individually selected for an interview and/or testing shall be notified that accommodations for material to be used in the process are available, upon request
- An applicant requesting accommodation will be consulted about how to best provide accommodation in a manner that takes into account the applicant's disability
- Successful applicants will be notified about the Company's policies for accommodating employees with disabilities as part of their offer of employment

14.3 Individual Accommodation Plans and Return to Work Processes

Sinalite will take the following steps to develop and put in place a process for developing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability:

- Inform employees, as soon as practicable after they commence employment, of the policies used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability
- Provide updated information to all employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability
- Implement a written process for developing and maintaining documented individual accommodation plans for employees with disabilities, including: (1) information regarding accessible formats and communications supports, and (2) individualized workplace emergency response information
- Implement a documented return to work process for employees returning to work due to disability and requiring disability-related accommodations, which will outline the steps the Company will take to facilitate the employee's return to work

14.4 Performance Management, Career Development and Redeployment Processes

Sinalite will take into account the accessibility needs of its employees with disclosed disabilities as well as any individual accommodation plans when applying performance management, career development and redeployment processes. Upon request, Sinalite will consult with an employee with a disability to provide or arrange for the provision of accessible formats and communication supports for information that is needed in order to perform the employee's job as well as information that is generally available to employees in the workplace.

**15. WEBSITE / COMMUNICATIONS**

- 15.1 The Company will consult with its information technology and website support partners to ensure that:
- All new websites and content on those sites conform with WCAG 2.0, Level A
  - All websites and content conform with WCAG 2.0, Level AA by no later than January 1, 2021
  - Existing feedback processes are accessible to persons with disabilities upon request

**16. TRAINING**

- 16.1 In accordance with the AODA, regulations and standards, the Company will provide training to our employees, volunteers and other staff on Ontario's accessibility laws and on the Human Rights Code as it relates to people with disabilities. The Company will take the following steps to ensure, that it has a training program in place to ensure employees, volunteers and other staff are provided with the training needed to meet Ontario's accessible laws:
- Develop training materials on the Integrated Accessibility Standards and the Human Rights Code
  - Develop a process to maintain records of who has received training and the dates on which accessibility training took place
  - Develop a process whereby new employees will receive training as soon as practicable at the start of their employment
  - Provide the established training to all employees, student placements and other staff

**17. DESIGN OF PUBLIC SPACES**

- 17.1 Sinalite will ensure that all public spaces owned or operated by the Company that are newly constructed or redeveloped beginning January 1, 2017, comply with the Built Environment standards as set out in the Integrated Accessibility Standard, including standards relating to (but not necessarily limited to) the following elements:

- Exterior paths of travel (outdoor sidewalks, walkways, ramps, stairs and curbs)
  - Parking (number and type of accessible spaces, aisles and signage)
  - Services (service counters, queuing guides and waiting areas)
- 17.2 Sinalite will also develop procedures for preventive and emergency maintenance of the accessible elements in public spaces within 30 days of completion of construction and/or redevelopment, as well as dealing with temporary disruptions when accessible elements in public spaces are not in working order.

#### **18. AVAILABILITY OF ACCESSIBILITY PLAN**

- 18.1 This Accessibility Plan will be included in the Employee onboarding and will be provided in an accessible format, upon request. This Accessibility Plan will be reviewed and updated regularly, but no less than once every five (5) years.

#### **19. FEEDBACK PROCESSES**

- 19.1 Sinalite will review its internal and external feedback processes (if any) to ensure they are accessible to people with disabilities upon request. The Company will also ensure that all publicly available information is made accessible in a timely manner, if requested.

#### **20. MORE INFORMATION**

- 20.1 For more information on this or any other accessibility policy, or to receive a copy of any of the policies or other documents or records required by the AODA, please contact Human Resources at:  
Name: Derek Stott  
Position: Human Resources Manager  
Address: 335 Steelcase Rd East, Markham Ontario L3R 1G3  
Email: derek.stott@Sinalite.com  
Phone: 905-474-5375
- 20.2 This Accessibility Policy will be made publicly available. Accessible formats of this document are available for free, upon request.