



AODA – Accessibility for Ontarians with Disabilities Act

The purpose of the Accessibility Policy builds on OMEGA TOOL CORP's code of conduct to promote and maintain an environment that enables the participation of persons with disabilities either as employees or customers of the company and to also educate our employees about the importance of facilitating access for persons with disabilities and the provisions of OMEGA TOOL CORP's policy. It applies to all hourly, salary, apprentices, customers, clients and contract workers and is in line with Ontario's *Accessibility for Ontarians with Disabilities Act (AODA)*.

This commitment involves enabling accessibility for persons with disabilities in a way that respects the dignity and independence of all people. Everyone, whether a person's disability is apparent or not, will be treated with courtesy and have their need for accommodation respected whenever they interact at OMEGA TOOL CORP. The company is also committed in keeping with compliance with applicable legislation, regulations, and standards in relation to persons with disabilities.

The following definitions apply to this policy:

"Accessible" is defined as something that can be easily accessed or used by a person with a disability.

"Accommodation" is a means, through reasonable efforts, of preventing and removing barriers that impede individuals with disabilities from participating fully in services provided by OMEGA TOOL CORP.

"Assistive device" is any device used by people with disabilities to help their daily living such as wheelchairs, walkers, canes, electronic communication devices, etc.

"Barriers to accessibility" means anything that prevents a person with a disability from fully participating. This includes, but not limited to, a physical barrier, architectural barrier, communication barrier, attitudinal barrier or a technology barrier.

"Customer" is any person who visits or uses the services of OMEGA TOOL CORP.

"Disability" defined, means:

- a) Any degree of physical disability, infirmity, malformation, or disfigurement that is caused by bodily injury, birth defect or illness
- b) A condition of mental impairment or developmental disability;
- c) A learning disability or a dysfunction on one or more of the processes involved in understanding or using symbols or spoken language
- d) A mental disorder or
- e) An injury or disability for which benefits are being claimed or received

"Employee" includes persons who are permanent or temporary employees of OMEGA TOOL CORP, and/or independent contractors.

"Service animal" is an animal that is being used because of a person's disability. This is either readily apparent or is supported by a letter from a medical practitioner.

"Support person" accompanied a person with a disability to help them with communication, mobility, personal care, or medical needs or to access the services of OMEGA TOOL CORP.

"Third-party contractors" is any person or organization acting on behalf of OMEGA TOOL CORP.

POL-HR-011

Approved by: E. Mesic

Rev. 0, Date: Sept. 15, 2016



In dealing with all persons OMEGA TOOL CORP and its employees will respect the following principles:

- a) OMEGA TOOL CORP. will strive to ensure that persons with disabilities have equal opportunity to access the company's goods and services in an integrated manner, where possible, without the need for adaptation, unless alternative measures are necessary.
- b) OMEGA TOOL CORP. will support its employees with disabilities, including, but not limited to, policies on the provision of job accommodation that take into account an employee's accessibility needs due to a disability. OMEGA TOOL CORP will provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that take into account an employee's accessibility needs due to disability.
- c) OMEGA TOOL CORP. will permit people with disabilities to use assistive devices to access our building and will allow people with disabilities along with their required support person or animal, to access all areas of our premises that are open to customers.

Training

OMEGA TOOL CORP. will make reasonable efforts to ensure that this policy and any practices and procedures arising from this policy are adhered to by its employees. Training will also be provided to new staff members or those employees who commence new duties that involve direct interaction with customers and will receive training or updates when changes are made to the policy, practices or procedures.

Training will include a review of the purposes and requirements of the Act and instructions about the following:

- a) How to interact and communicate with persons with various types of disability
- b) How to interact with persons with disabilities that use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a person.
- c) What to do if a person with a particular type of disability is having difficulty accessing the company.

Recruitment

OMEGA TOOL CORP. will inform applicants of the availability of accommodations for applicants with disabilities in its recruitment process.

- a) If a selected applicant requests an accommodation, OMEGA TOOL CORP. will consult with the applicant and provide a suitable accommodation in the manner that takes into account the applicants accessibility need due to a disability.
- b) When making offers of employment, OTC will notify the successful applicant of its policies for accommodating employees with disabilities.

OMEGA TOOL CORP. will make reasonable efforts to communicate with persons with disabilities in ways that take into account their disability. Where it is possible or reasonable OMEGA TOOL CORP. will provide technology to support accessible and effective communications with persons with disabilities, including through its website and telephone services.

Upon request from an employee with a disability, the Human Resources Department along with department manager will consult the employee to arrange for the provision of accessible formats and communication supports for information that is needed in order to perform the employee's job and for

POL-HR-011

Approved by: E. Mesic

Rev. 0, Date: Sept. 15, 2016



information that is generally available to employees in the workplace and determine the suitability of an accessible format or communication support.

When services that are normally provided to a person with a disability are temporarily unavailable notice of the disruption will be provided by the department responsible.

OMEGA TOOL CORP. will develop, maintain and document an Accessibility plan outlining the company's strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities. The Accessibility plan will be reviewed and updated at least once every 5 years and will be included in the updated Employee Policy Information found on the QMS.

Return to Work Process

1. OTC maintains a documented return to work process for its employees who have been absent from work due to a disability.

Individual Accommodation Plans

2. OTC will develop and maintain a written process establishment of documented individual accommodation plans for employees with disabilities by request, and or employees who are returning to work after a disability leave of absence.
The plans will include individual accommodation needs as they relate to job or workspace accommodation, communication or technology.

The plans will take into account accommodation needs in all aspects of the employee lifecycle including recruitment and selection, performance management and career development or advancement.

OTC shall provide individuals with the opportunity to provide feedback on the services provided to customers with disabilities. Feedback can be given to any Manager in person or by email, hand written or telephone. Where feedback involves a complaint, efforts will be made to address the matter immediately, however in all cases feedback and complaints will be responded to within 15 days.

Submitting Feedback to:

HR Department
2045 Solar Crescent
Oldcastle ON N0R1L0

Or (519) 737-1201 x 216

This policy will be available on our website and the QMS.