

Policy Name: INTEGRATED ACCESSIBILITY STANDARDS (IAS) – ACCESSIBILITY POLICY,
STATEMENT OF COMMITMENT AND MULTI-YEAR ACCESSIBILITY PLAN
Issue Date: December 17, 2014
Last Review Date: December 1, 2017
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1. DEFINITIONS

“**Accessible Format(s)**” includes, but is not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with Disabilities.

“**Barrier(s)**” means any obstacle that impedes or prevents a person with a Disability from fully participating in all aspects of society and includes, but is not limited to, attitudinal barriers, information or communications barriers, technological barriers, organizational barriers, and architectural and/or physical barriers.

“**Communication Support(s)**” includes, but is not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

“**Disability**” means the corresponding definitions in section 2 of the *Accessibility for Ontarians with Disabilities Act, 2005* and section 10(1) of the *Ontario Human Rights Code*, which include the following impairments, conditions and disorders:

- (a) any degree of physical Disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
- (b) a condition of mental impairment or a developmental Disability,
- (c) a learning Disability, or a dysfunction in 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 were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

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2. PURPOSE

The purpose of this document is to affirm ERCO Worldwide, A Division of Superior Plus LP’s (“**ERCO**”) commitment to meeting the diverse needs of people with Disabilities and to set forth our policy and multi-year accessibility plan for compliance with the requirements of the Integrated Accessibility Standards (the “**IAS**”) under the *Accessibility for Ontarians with Disabilities Act, 2005* (the “**AODA**”).

3. SCOPE

This policy applies to all Ontario-based staff of ERCO. The policy – with the exception of the “Employment Requirements” set out under section 5, part (iii) – also applies to all Ontario-based volunteers of ERCO as well as all non-Ontario-based staff and volunteers of ERCO that deal with members of the public or other third parties in Ontario on behalf of ERCO.

4. STATEMENT OF COMMITMENT

ERCO is committed to meeting the diverse needs of people with Disabilities in a timely manner that is consistent with the principles of independence, dignity, integration and equality of opportunity, and will do so by striving to identify, prevent and remove Barriers to accessibility wherever possible as well as by meeting the accessibility requirements under the AODA.

5. MULTI-YEAR ACCESSIBILITY PLAN

ERCO is committed to complying with the accessibility requirements under the IAS and to reviewing and updating our accessibility plan as set out in this policy at least once every 5 years.

The following is a summary of the accessibility requirements under the IAS that apply or may in the future apply to ERCO, and the associated timelines for compliance under the IAS. The summary is intended only as a guide to inform and assist ERCO in our accessibility compliance initiatives.

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(i) GENERAL REQUIREMENTS

SELF-SERVICE KIOSKS

If and when ERCO designs, procures or acquires “self-service kiosks”, we will consider what, if any, accessibility features could be built into the kiosks to best meet the needs of customers and clients with Disabilities – having regard to the accessibility needs, preferences and abilities of the widest range of users – and we will strive to include accessibility features in the self-service kiosks being designed, procured or acquired where possible.

A “self-service kiosk” means an interactive electronic terminal, including a point-of-sale device, intended for public use that allows users to access one or more services or products or both.

TRAINING

ERCO will ensure that all employees and volunteers in Ontario, and any other persons who provide goods, services or facilities to the public or other third parties in Ontario on behalf of ERCO or who participate in developing ERCO’s policies on the provision of goods, services or facilities to the public or other third parties in Ontario, will receive training on the requirements of the IAS and on the Ontario *Human Rights Code* as it pertains to persons with Disabilities.

Training will be provided in a manner that is appropriate to the duties of the employees, volunteers and other persons, and will be provided as soon as practicable after staff or volunteers commence their duties and on an ongoing basis with respect to any changes to this policy.

ERCO will maintain a record of the training it provides to staff and volunteers, including the dates on which the training is provided and the number of individuals to whom it is provided.

(ii) INFORMATION AND COMMUNICATIONS REQUIREMENTS

NOTE: The following accessibility requirements related to information and communications do not apply to products and product labels, “unconvertible” information or communications, and information that ERCO does not control directly or indirectly through a contractual relationship.

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Information and communications are considered “unconvertible” if it is not technically feasible to convert the information or communications, or the technology to do so is not readily available.

Wherever information and communications are determined to be “unconvertible”, ERCO will ensure that the person with a Disability who is requesting the information or communication is provided with: (i) an explanation as to why the information or communication is unconvertible; and (ii) a summary of the unconvertible information or communication.

EMERGENCY PROCEDURE, PLANS OR PUBLIC SAFETY INFORMATION

Wherever ERCO prepares emergency procedures, plans or public safety information and makes the information available to the public, we are committed to providing the information in an Accessible Format or with appropriate Communication Supports as soon as practicable upon request.

ACCESSIBLE WEBSITES AND WEB CONTENT

NOTE: The accessible website and web content requirements apply only with respect to:

- (i) ERCO’s websites that are accessible to the public (i.e., excludes intranet websites but includes websites accessible only by customers);
- (ii) websites and web content, including web-based applications, that ERCO controls directly or through a contractual relationship that allows for modification of the product; and
- (iii) web content published on a website after January 1, 2012.

ERCO will ensure that all “new internet websites and web content” conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAB) 2.0 Level A requirements, except where doing so is not practicable having regard to, among other things, the availability of commercial software or tools or both, and any significant impact on an implementation timeline that was planned or initiated before January 1, 2012.

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“New internet websites and web content” means either a website with a new domain name or a website with an existing domain name undergoing a “significant refresh”.

A “significant refresh” means changing more than 50% of the content, design or technology of the website, such as:

- (i) creating, rewriting or reorganizing more than 50% of the website’s content, including graphics, text, widgets, etc.;
- (ii) changing more than 50% of the design elements, including layout, navigation, placement and style; or
- (iii) changing more than 50% of the web publishing platform/model such as the content management system (CMS), Cascading Style Sheet (CSS) or HTML structure.

FEEDBACK

Wherever ERCO has existing processes for receiving and responding to feedback, we will provide or arrange for the provision of Accessible Formats and Communication Supports upon request in order to ensure that all such processes are accessible to people with Disabilities.

ACCESSIBLE FORMATS AND COMMUNICATION SUPPORTS – COMPLIANCE DATE: JANUARY 1, 2016

Upon request, ERCO will take all reasonable steps to provide or arrange for the provision of Accessible Formats and Communication Supports in a timely manner so that people with Disabilities can access our publicly available information.

In each case, ERCO will take into account the accessibility needs of the person with a Disability making the request and will consult with the person to determine the suitability of an Accessible Format or Communication Support.

Accessible Formats and Communication Supports will be provided at no additional cost to the person with a Disability making the request.

ERCO will notify the public of the availability of Accessible Formats and Communication Supports.

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ERCO Worldwide, A Division of Superior Plus LP

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ACCESSIBLE WEBSITES AND WEB CONTENT – COMPLIANCE DATE: JANUARY 1, 2021

NOTE: The accessible website and web content requirements apply only with respect to:

- (i) ERCO’s websites that are accessible to the public (i.e., excludes intranet websites but includes websites accessible only by customers);
- (ii) websites and web content, including web-based applications, that ERCO controls directly or through a contractual relationship that allows for modification of the product; and
- (iii) web content published on a website after January 1, 2012.

ERCO will ensure that all internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAB) 2.0 Level AA requirements other than success criteria 1.2.4 Captions (Live) and success criteria 1.2.5 Audio Descriptions (pre-recorded), except where doing so is not practicable having regard to, among other things, the availability of commercial software or tools or both, and any significant impact on an implementation timeline that was planned or initiated before January 1, 2012.

(iii) EMPLOYMENT REQUIREMENTS

NOTE: The following accessibility requirements apply only in respect of ERCO’s employees in Ontario and do not apply in respect of volunteers or other non-paid individuals.

WORKPLACE EMERGENCY RESPONSE INFORMATION

Wherever ERCO is aware of the need for individualized emergency response information due to an employee’s Disability, we are committed to accommodating the employee by preparing and providing him or her with individualized emergency response information that is suitable in the circumstances.

If the employee with a Disability who receives the individualized workplace emergency response information requires assistance and provides his or her consent, ERCO will provide the individualized workplace emergency response information to a person who is designated to assist the employee in case of an emergency.

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RECRUITMENT – COMPLIANCE DATE: JANUARY 1, 2016

ERCO will notify the public and our employees in Ontario that, when requested, we will provide accommodation for applicants with Disabilities who participate in our recruitment processes.

During the recruitment process, ERCO will notify all job applicants that are selected to participate in an assessment or selection process that we will provide reasonable accommodations, upon request, to a person with a Disability in relation to the materials or processes to be used in the assessment or selection process. In any case where an applicant with a Disability requests an accommodation, we will 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 his or her Disability.

As part of all offers of employment, ERCO will notify successful job applicants of our policies for accommodating employees with Disabilities.

INFORMING EMPLOYEES OF DISABILITY-RELATED SUPPORTS – COMPLIANCE DATE: JANUARY 1, 2016

ERCO will notify our employees in Ontario of our existing policies in respect of employees with Disabilities including, but not limited to, any policies regarding job accommodations that take into account an employee’s accessibility needs due to Disability. We will also provide updated information to our employees in Ontario with respect to any changes to our existing policies regarding employees with Disabilities and job accommodations for Disability-related needs.

All new employees in Ontario will be notified of our existing policies in respect of employees with Disabilities and job accommodations for Disability-related needs as soon as practicable after beginning their employment.

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ACCESSIBLE FORMATS AND COMMUNICATION SUPPORTS FOR EMPLOYEES – COMPLIANCE DATE:
JANUARY 1, 2016

Upon request, ERCO will consult with an Ontario-based employee with a Disability in order to provide or arrange for the provision of reasonable Accessible Formats and Communication Supports for the employee with respect to all: (i) information that is needed by the employee in order to perform his or her job; and (ii) information that is generally available to employees in the workplace.

ERCO will also consult with the employee requesting Accessible Formats or Communication Supports to determine the suitability of an Accessible Format or Communication Support.

INDIVIDUAL ACCOMMODATION PLANS – COMPLIANCE DATE: JANUARY 1, 2016

ERCO will develop and have in place a written process for the development of documented individual accommodation plans for employees with Disabilities that have come to ERCO's attention, which will include the following elements:

- (i) the manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan;
- (ii) the means by which the employee is assessed on an individual basis;
- (iii) the manner in which ERCO can request an evaluation by an outside medical or other expert, at ERCO's expense, to assist ERCO in determining if accommodation can be achieved and, if so, how accommodation can be achieved;
- (iv) the manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan;
- (v) the steps taken to protect the privacy of the employee's personal information;
- (vi) the frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done;

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- (i) if an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee;
- (ii) the means of providing the individual accommodation plan in a format that takes into account the employee’s accessibility needs due to Disability;
- (iii) if requested, any other information regarding Accessible Formats and Communication Supports that the employee requires with respect to information needed by the employee to perform his or her job and any other information that ERCO generally makes available to employees in the workplace;
- (iv) if required in the circumstances, the individualized workplace emergency response information for the employee; and
- (v) any other accommodations that will be provided to the employee.

RETURN TO WORK PROCESS – COMPLIANCE DATE: JANUARY 1, 2016

ERCO will develop and have in place a documented return to work process for employees in Ontario who have been absent from work due to a Disability and who require Disability-related accommodations in order to return to work.

The return to work process will outline the steps that ERCO will take to facilitate the return to work of employees who have been absent from work due to Disability and will incorporate the use of individual accommodation plans as part of the process.

PERFORMANCE MANAGEMENT, CAREER DEVELOPMENT AND ADVANCEMENT, & REDEPLOYMENT – COMPLIANCE DATE: JANUARY 1, 2016

Wherever ERCO uses “performance management” or “redeployment” in respect of our employees, or provides “career development and advancement” to our employees, we will take into account the accessibility needs of employees with Disabilities as well as their individual accommodation plans.

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“Performance management” means any activity related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.

“Career development and advancement” includes providing additional responsibilities within an employee’s current position and the movement of an employee from one job to another within ERCO that may be higher in pay, provide greater responsibility or be at a higher level in the organization, or any combination thereof, and is usually based on merit and/or seniority.

“Redeployment” means the reassignment of employees to other departments or jobs within ERCO as an alternative to layoff, when a particular job or department has been eliminated.

(iv) COMPLIANCE STRATEGY

ERCO believes that our staff and customers are our best resources for assisting us to identify, prevent and remove Barriers to accessibility and thereby ensure that the diverse needs of people with Disabilities are met or exceeded.

For various reasons, Barriers to accessibility can often be difficult to identify. Our staff and customers, including in particular those persons with Disabilities, are often in the best position to recognize the existence of any accessibility Barriers and their impact on people with Disabilities, and to alert ERCO so that we can take appropriate action to prevent or remove the Barriers wherever reasonably possible.

Accordingly, ERCO will take the following steps to facilitate the identification, prevention and removal of accessibility barriers wherever it is reasonably possible to do so:

- in order to promote an understanding of and appreciation for the accessibility requirements under the IAS, as well as the importance of identifying, preventing and removing Barriers to accessibility, ERCO will ensure that all staff in Ontario are provided with a copy of this policy and are encouraged to review the policy and to raise any questions that they may have regarding the policy with our Legal Department;
- ERCO will encourage, welcome and appreciate all feedback from staff and customers regarding any Barriers to accessibility and more generally on how we can best achieve our goal of striving towards a Barrier-free environment;

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- ERCO will take a proactive approach to accessibility wherever reasonably possible by striving to have regard to and incorporating Disability-related needs and accessibility issues in general in all aspects of our business and decision-making; and
- ERCO will strive to work cooperatively and consult with any person with a Disability who brings to our attention an issue or concern regarding accessibility, and we will take all reasonable steps in the circumstances to address the Disability-related needs of the individual.

6. QUESTIONS ABOUT THIS POLICY

All questions regarding this policy, including with respect to the steps that ERCO intends to take in order to comply with its requirements under the IAS, should be referred to ERCO's Legal Department.