

## **AODA Corporate Policy**

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### **STATEMENT OF COMMITMENT**

Kruger Products Inc. (KPI) is committed to excellence. We strive to provide goods and services, information and communication, employment and our environment in a way that respects the dignity and independence of persons with disabilities. We believe in integration and equal opportunity. 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. We are committed to meeting the requirements of applicable legislation, including the Integrated Accessibility Standards outlined in the Accessibility for Ontarians with Disability Act, 2005 (AODA) and the Human Rights Code,

### **GENERAL PROVISIONS**

a) Multi-Year Accessibility Plan

KPI Multi-Year Accessibility Plan outlines the organization's strategy to prevent and remove barriers and meet requirements under the Integrated Accessibility Standards. The Multi-Year Plan and annual status reports is posted on the Company's website and made available in an accessible format upon request. The Multi-Year Plan will be reviewed and updated once every five years.

b) Procuring or Acquiring Goods, Services or Facilities

KPI will incorporate accessibility criteria and features when procuring or acquiring goods, services, or facilities, except where it is not practicable to do so. In the event it is not practicable to do so, an explanation will be provided upon request.

c) Training

KPI will ensure that training is provided as required by the Integrated Accessibility Standards. The content of the training will include the requirements of the accessibility standards referred to in Ontario Regulation 191/11 and the Human Rights Code as it pertains to persons with disabilities. The training provided will be appropriate to the duties of those being trained.

Training will be provided as soon as practicable, as well as on an ongoing basis if changes to this policy occur. KPI will keep records of the training, including the date on which training is provided and the number of individuals to whom it is provided.

### **INFORMATION AND COMMUNICATIONS STANDARDS**

KPI is committed to meeting the communication needs of persons with disabilities in accordance with the Integrated Accessibility Standards. We will consult with people with disabilities to determine their information and communication needs.

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Upon request, KPI will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner in determining the suitability of an accessible format or communication support, KPI will consult with the person making the request. If KPI determines that information or communications are unconvertible, it will provide the individual requesting the information or communication with an explanation as to why the information or communications are unconvertible and a summary of the unconvertible information or communications.

### a) Feedback

KPI will receive all feedback and has an access tab on its website for receiving and responding to feedback and will ensure that these processes are provided in an accessible manner and with communication supports upon request.

### b) Accessible Website and Web Content

KPI will make its internet website and web content conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG 2.0) as required by the Integrated Accessibility Standard.

## **EMPLOYMENT STANDARDS**

KPI is committed to fair and accessible employment practices.

The Employment Standards regulation outline requirements for the accommodation of persons with disabilities during the recruitment process and during employment at KPI.

### a) Recruitment

KPI will notify employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.

Specifically, KPI will:

- 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 an accommodation, 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;
- notify successful applicants of the policies for accommodating employees with disabilities when making offers of employment.

### b) Informing Employees of Supports

KPI will inform its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability.

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This information will be provided to new employees as soon as practicable after they begin their employment and will be updated for all employees whenever there is a change to the existing policies.

### **c) Accessible Formats and Communication Supports for Employees**

Upon request by an employee with a disability, KPI will consult with the employee to provide or arrange for the provision of suitable accessible formats and communication supports for:

- Information that is needed in order to perform the employee's job; and
- Information that is generally available to employees in the workplace.

### **d) Workplace Emergency Response Information**

KPI will provide individualized workplace emergency response information to employees who have a disability if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation. KPI will provide the information as soon as practicable after becoming aware of the need for accommodation.

If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, KPI will provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.

KPI will review the individualized workplace emergency response information:

- when the employee moves to a different location in the organization,
- when overall accommodation needs or plans are reviewed, and
- when the employer reviews its general emergency response policies.

### **e) Documented Individual Accommodation Plans**

KPI will develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities. The process will include the following elements:

The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan;

- The means by which the employee is assessed on an individual basis;
- The manner in which the KPI may request an evaluation by an outside medical or other expert, at the company's expense, to assist with determining if accommodation can be achieved and, if so, how to achieve accommodation;
- The manner in which the employee can request the participation of a representative from the workplace;
- The steps taken to protect the privacy of the employee's personal information;
- The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done;
- If an individual accommodation plan is denied, the manner in which the reasons for the denial are to be provided to the employee;

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- The means of providing the accommodation plan in a format that takes into account the employee's accessibility needs;

Individual accommodation plans will:

If requested, include any information regarding accessible formats and communications supports provided; if requested, include individualized workplace emergency response information; and identify any other accommodation that is to be provided.

### f) Return to Work Process

KPI will have in place a documented return to work process for employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work. The process will outline the steps KPI will take to facilitate the return to work of employees absent due to disability and include documented individual accommodation plans.

### g) Performance Management, Career Development and Advancement, Redeployment

KPI will take into account the accessibility needs and/or individual accommodation plans of employees when:

- Using performance management processes;
- Providing career development and advancement; and
- Using redeployment.