

## 6.5

## ACCESSIBILITY POLICY

This Accessibility Policy outlines the strategy of Mattina Mechanical Limited to achieve accessibility and otherwise meet the requirements of the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”).

### STATEMENT OF COMMITMENT

Mattina Mechanical Limited (MML) is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity and are committed to meeting the needs of people with disabilities in a timely manner, and we will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the AODA.

MML 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

MML 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

### ACCESSIBILITY COORDINATOR

MML has appointed an Accessibility Coordinator who will provide primary oversight and guidance on the implementation of AODA accessibility standards as well as prepare accessibility reports, facilitate access for persons with disabilities to the building or premises, and address all other matters to comply with the AODA.

As appropriate, the Accessibility Coordinator will also support and work with managers, supervisors and employees to ensure ongoing compliance, to remove barriers, and to improve accessibility. The Accessibility Coordinator will review the Company’s various accessibility policies, practices and procedures at least once every calendar year.

## **ACCESSIBILITY POLICIES**

MML 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.

## **MULTI-YEAR ACCESSIBILITY PLAN**

MML 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.

## **INFORMATION AND COMMUNICATION**

The Company 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 supports are available upon request.

The Company’s commitment does not necessarily apply to products and product labels, 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, the Company 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.

## **TRAINING**

In accordance with the *AODA*, MML will provide training to employees 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 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 communication with persons with various types of disabilities as well as those who use an 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 disabilities is having difficulty accessing our goods or services

Training will take place as soon as practicable and upon completion the Accessibility Coordinator will keep a record of the training provided, including the date on which the accessibility training took place and the number of people trained.

## **CONTRAVENTIONS**

The Accessibility Coordinator, as well as managers and supervisors of the Company, 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 disciplinary action, up to and including dismissal.

## **MORE INFORMATION**

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 the Company's Accessibility Coordinator at:

**Name / Position:** David Prazeres, Human Resources

**Address:** 211 Lanark Street, Unit A, Hamilton Ontario

**Email:** info@mattina.ca

**Phone / Fax:** 905-544-6380

This Accessibility Policy will be made publicly available. Accessible formats of this document are available for free, upon request.

### **Accessibility Standard for Customer Service**

Mattina Mechanical Limited (MML) is committed to excellence in serving all customers including people with disabilities. Ontario Regulation 191/11 the Integrated Accessibility Standard (IAS) is a regulation under the Accessibility for Ontarians with Disabilities Act (AODA).

#### Assistive devices

We will ensure that all employees are trained and familiar with various assistive devices we may have on site or that we provide that may be used by customers with disabilities while accessing our goods or services.

#### Communication

We will communicate with people with disabilities in ways that take into account their disability.

### Service animals

We welcome people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public.

### Support persons

A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises.

### Notice of temporary disruption

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, MML will notify customers promptly. This clearly posted notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available.

The notice will be placed in a conspicuous area at all locations that are affected.

### Training

MML will provide training to all employees who deal with the public. This training will be provided to all new employees during their orientation once hired.

Training will include:

- An overview of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard's plan
- MML related to the customer service standard
- How to interact and communicate with people with various types of disabilities
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- How to use the any equipment or devices available on-site or otherwise that may help with providing goods or services to people with disabilities
- What to do if a person with a disability is having difficulty in accessing MML's goods and services
- Staff will also be trained when changes are made to the plan

### Feedback process

Customers who wish to provide feedback on the way MML provides goods and services to people with disabilities can do so by contacting the Accessibility Coordinator.

All feedback, including complaints, will be acknowledged by management and forwarded to Human Resources for further investigation. Customers can expect to hear back within 5 business days.

Any policy of MML that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

## 6.6 Accessible Employment Policy

### *Purpose*

Mattina Mechanical Limited is committed to developing and utilizing inclusive and accessible employment practices that preserves current and potential future employee dignity, independence, right to equal opportunity and integration. We will ensure the needs of people with disabilities are met in a timely manner by working with the individual to identify, prevent and remove barriers to accessibility. MML strives to provide an inclusive, accessible workplace to all employees that do not define individuals by their limitations. We are committed to meeting the accessibility requirements under the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”).

The purpose of this policy is to set out how MML will meet its commitment to ensuring that our recruitment, performance management and other employment programs, practices and policies are fair, accessible, inclusive of persons with disabilities, and are provided to all employees and prospective employees in a manner that is free from discrimination.

### Recruitment and Selection

When recruiting and assessing potential job applicants, including internal candidates, MML will take the following steps to notify the public and MML employees that, when requested, the Company will accommodate people with disabilities both during recruitment and selection processes as well as during employment:

- All job posting, the ‘Careers’ and ‘Contact us’ sections of the website will contain ‘Mattina Mechanical Limited is committed to ensuring an accessible, inclusive workplace free from discrimination. We welcome and encourage applications from people with disabilities. Accommodations for applicants with disabilities will be made available upon request throughout the entire recruitment and selection process.’
- Upon selection for interviews or testing candidates will be informed that accommodation for the process and materials can be provided upon request
- MML will work with an applicant that requests accommodation to determine how to best provide suitable 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, and in their orientation
- All MML employees will be provided with updated information whenever there is a change to existing policies on the provision of job accommodations that take into account employee needs due to disability

### Performance Management / Career Development / Redeployment

The Company will take into account the accessibility needs of its employees with known disabilities as well as any documented individual accommodation plans when engaged in the following processes:

- **Performance Management** – Involves activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success

- **Career Development and Advancement** – Includes both (1) the provision of additional responsibilities within an employee’s current position and (2) the movement of an employee from one job to another in an organization that may be higher in pay, provide greater responsibility and/or be at a higher level in the organization (or any combination); where the addition of such responsibilities or movement is usually based on merit and/or seniority
- **Redeployment** – Involves the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, if a particular job or department has been eliminated by the Company

### Contraventions

The Accessibility Coordinator, as well as managers and supervisors of the Company, will monitor existing and new practices and procedures to ensure compliance. A failure by any employee to comply with this Accessible Recruitment and Employment Policy, or any other policy, practice or procedure related to accessibility issues, the removal of barriers, or the *Human Rights Code*, may result in disciplinary action, up to and including dismissal.

### Accessible formats

Accessible formats of this Accessible Recruitment and Employment Policy are available for free, upon request.

## **6.7 Return to Work & Accommodation Policy**

### **Statement of Commitment**

Mattina Mechanical Limited is committed to developing and utilizing inclusive and accessible employment practices that preserves current and potential future employee dignity, independence, right to equal opportunity and integration. We will ensure the needs of people with disabilities are met in a timely manner by working with the individual to identify, prevent and remove barriers to accessibility. MML strives to provide an inclusive, accessible workplace to all employees that do not define individuals by their limitations. We are committed to meeting the accessibility requirements under the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”).

### **Purpose**

This Return to Work & Accommodation Policy outlines the MML’s return to work process for employees who are off due to disability and require disability-related accommodations in order to return to work, and otherwise meet the requirements of the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”) Ontario Regulation 191/11.

Before an employee will be permitted to return to work following an absence due to disability, MML must be able to satisfy itself that the employee:

- Can perform his or her assigned tasks safely and effectively
- If required, is provided with workplace accommodation which is appropriate to the restrictions imposed by the employee’s disability

The employee is expected and required to cooperate in the return to work and accommodation process by providing or facilitating the provision of the necessary medical information, by communicating with MML in a timely manner at all stages of the process, and by actively participating in the process.

## **Definitions**

Disability (as defined by the AODA):

- 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; (“handicap”)

Individual Accommodation Plan: A document that outlines individual accommodations for employees with disabilities.

## **Responsibilities**

### **Employer**

- Provides the employee with return to work information
- Helps resolve any problems with treatment if request to do so by the employee
- Maintains regular contact with the employee
- Ensures work practices are safe for returning employee
- Assists with identifying accommodations
- Assists with analyzing the demands of each job task

### **Employee**

- Brings the request for accommodations for a disability to the attention of management
- Gets and follows the appropriate medical treatment
- Provides updates about their process, including information about his/her functional ability to perform the job
- Provides his/her health care provider with return to work information
- Participate in the development of the accommodation plan
- Provide medical documentation outlining the disability and the need for accommodation
- Participate in an annual meeting to review the plan

## **Human Resources**

- Develop the individual accommodation plan in accordance with documented restrictions and limitations of the employee
- May request the employee be evaluated by an outside physician or medical expert and the employers expense, to assist in determining appropriate accommodation
- Meet with the employee and supervisors to discuss the plan
- Provide the plan in an accessible format that considers the needs of the employee
- Ensure all information collected during the development of the plan will remain confidential unless written consent is obtained by the employee
- Review the plan with the employee on an annual basis

## **Supervisors**

- Participate in the development of the accommodation plan
- Monitor and evaluate the plan once implemented
- Participate in the yearly review of the plan

Health care provider(s), health and safety professional(s) and workplace representatives requested by the employee may also participate in this process.

## **Return to Work**

Any employee who is returning to work following an unexpected or planned absence due to disability (including pre-approved absences to receive care or treatment relating to the disability), is required to provide medical clearance from his or her treating physician which must include the following information (clearly legible):

- a) Confirmation of the dates on which the employee was unable to work due to disability
- b) Confirmation that the employee received care from the treating physician during the period of absence
- c) Treating physician's name, contact and business information
- d) Confirmation that the employee is fit to return to work

If applicable, details of any disability-related restrictions which may require accommodation (see below). Where the employee requires disability-related accommodations in order to return to work, the employee must inform MML, in writing, of the need for accommodation at least three (3) days in advance of the return to work date. MML and the employee will then follow the process set out below with respect to the development and maintenance an individual accommodation plan.

### **6.7.1 Individual Accommodation Plans (Form AODA 1)**

Where an employee's disability interferes with their ability to perform the assigned duties and responsibilities of their position, such that accommodation may be required, it is necessary in the interests of health and safety that this information is brought to the attention of the MML as soon as reasonably possible.

For this process to be successful, any employee seeking accommodation is required and expected to disclose sufficient confidential medical information about the nature and extent of their disability to the MML and to otherwise assist with facilitating the accommodation / return to work process. The employee has a positive duty to participate and cooperate in the process, and to do so in a timely manner.

To assist with predictability and clarity in the accommodation process, MML has created the following process for developing and maintaining documented individual accommodation plans for employees with disabilities requesting accommodation on account of a disability:

a) Employee Request for Accommodation

1. Where an employee requires accommodation on account of a disability, the employee shall bring this to the attention of the employee's supervisor, and/or human resources as soon as possible, and no later than:
  - (a) Immediately, where the need for accommodation comes to the employee's attention during the course of a shift; or
  - (b) At the start of the employee's next scheduled shift, where the need for accommodation comes to the employee's attention after hours.
2. Unless otherwise impractical or unreasonable to do so, all employee requests for accommodation shall be accompanied by appropriate documentation from the employee's treating physician.
3. If an employee's need for accommodation comes to the employee's attention due to a sudden event, incident or change in circumstances, such that the employee is unable to secure medical documentation from the employee's treating physician (or other specialist) before returning to work:
  - (a) The employee shall immediately (or at the start of the next shift, as appropriate) provide his or her supervisor, manager and/or human resources with any detailed information available to the employee relating to the nature and scope of the employee's medically-based restrictions.
  - (b) The information shall be provided **in writing** and **shall contain sufficient details** so as to permit the MML to assess appropriate temporary modified work, including:
    - (i) Any physical or other restrictions known to the employee;
    - (ii) Date on which the restrictions first presented;
    - (iii) Date(s) on which the employee sought medical treatment, if any;
    - (iv) Most recent date on which the employee was assessed by the employee's treating physician (or other specialist) relating to the present request for accommodation; and
    - (v) Next date on which the employee anticipates being assessed by his or her treating physician (or other specialist).
  - (c) By the end of the **next business day** (regardless of whether the employee is scheduled to work), the employee shall inform Human Resources, **in writing**, of the date on which the employee is scheduled to be medically assessed by the

employee's treating physician (or other specialist). All appointments must be scheduled at the earliest possible date.

4. In all other cases, the employee shall provide medical documentation from the employee's treating physician (or other specialist) at the commencement of the next scheduled shift, and before performing any work.
5. All documentation, including medical documentation, relating to an employee's request for accommodation, shall be promptly forwarded to Human Resources.

b) Temporary Modified Duties

6. Upon receipt of a request for accommodation, Human Resources will determine if it is appropriate in the circumstances to provide temporary modified duties pending receipt of appropriate medical documentation from the employee's treating physician (or other specialist), or whether it is necessary to keep the employee off of work pending receipt.
7. If deemed appropriate, modified duties shall be made available to the employee for up to five (5) days without supporting medical documentation from the employee's treating physician (or other specialist). A further five (5) day extension may be provided, at the discretion of Human Resources, in exceptional circumstances.
8. Any temporary modified duties shall be appropriate to the circumstances, including:
  - (a) Nature of the restrictions identified by the employee;
  - (b) Existing individual accommodation plan, if any;
  - (c) Existing modified duties, if any;
  - (d) Nature and amount of modified duties available; and
  - (e) Any other relevant considerations.
9. To protect the health and safety of all employees, and others, and to permit MML to maintain efficient business operations, any employee seeking accommodation on account of a disability who fails to produce appropriate medical documentation from his or her treating physician (or other specialist) within the timelines set out in this Policy, may be kept off of work until the information is provided. Human Resources will maintain the discretion to extend any timelines, if appropriate in exceptional circumstances.

c) Medical Documentation

10. Medical documentation provided in support of a request for accommodation shall be prepared by the employee's treating physician, or other specialist, and shall include, but is not necessarily limited to, the following:
  - (a) Brief description of the nature of the disability requiring accommodation (specific diagnosis not required);
  - (b) Full details of any and all medically-based limitations;
  - (c) Expected duration of each limitation;

- (d) Prognosis for recovery, including estimated date (if there is one) on which each limitation is expected to be lifted or adjusted;
  - (e) Confirmation of whether the employee is undergoing a treatment plan, and whether any material changes to the treatment plan have been made or are anticipated (specific details of the treatment plan are not required, unless otherwise needed in order to provide appropriate accommodation); and
  - (f) Next scheduled date on which the employee will be re-assessed by their treating physician (or other specialist).
11. Any medical documentation provided in support of an accommodation request shall be reviewed by Human Resources to ensure its sufficiency and completeness. Any deficiencies in the medical information will be brought to the attention of the employee.
  12. It is the employee's responsibility to ensure that MML has all of the information necessary to permit a meaningful search for appropriate accommodation.
  13. In the event Human Resources determines that evaluation by an outside medical or other expert is required in order to assist MML in determining if accommodation can be achieved and/or how accommodation might be achieved, the employee shall first be provided with the opportunity to obtain the requisite information from the employee's treating physician (or other specialist). If an outside medical or other expert is engaged at MML's request, this shall be at MML's expense.
  14. All medical documentation pertaining to an employee's accommodation needs shall be securely kept by Human Resources.

d) Development of Individual Accommodation Plan

15. Human Resources will identify all of the medically-based restrictions and limitations by reviewing the medical documentation provided by the employee's treating physician (or other specialist), as well as any other medical information provided by an outside medical or other expert.
16. Human Resources, in conjunction with the employee and their Supervisor and other members of senior management, as appropriate, will review MML's operations to determine what accommodations may be available which would satisfy the identified restrictions. In conducting this assessment, priority will be given to accommodating the employee into their **existing position**, with or without modifications, including job assistance (such as having an employee assist with certain tasks), removing or modifying certain duties, and/or doing an ergonomic assessment.
17. If it is determined that reasonable accommodation is not available in the employee's existing position, consideration will be given to the following, in order of priority (and with or without modifications):
  - (a) Similar positions within the same department;
  - (b) Other positions within the same department / at the same or similar rate of pay;
  - (c) Other positions on the same shift;
  - (d) Other Departments within the same Division;

- (e) Any other available positions at MML.
18. Employee requests for accommodation will be dealt with on an individual basis, having regard to:
- (a) Medical documentation and other relevant information on file;
  - (b) Present position; duties and responsibilities; and terms and conditions of employment;
  - (c) Employee's skill set; and
  - (d) Work that the employee might be able to perform, within their medical restrictions, with a reasonable level of training.
19. Upon identification by Human Resources, in conjunction with Management, of a position understood to be suitable and a reasonable accommodation of the known medically-based restrictions and limitations, Human Resources, with the employee will prepare, the Individual Accommodation plan, which will contain the following information:
- (a) Employee name, contact information and employee number
  - (b) Date
  - (c) Detailed list of all medically-based limitations identified in the documentation provided by the treating physician or other specialist(s)
  - (d) Identification of any existing accommodations (medical or otherwise) or any modified duties, if any
  - (e) Identification of the proposed position, shift, department, supervisor/manager
  - (f) Detailed list of all adjustments required to be made of the proposed position in order to provide suitable and reasonable accommodation
  - (g) Next date on which the employee is scheduled to be re-assessed by the employee's treating physician or other specialist, if known. Or, alternatively, if no date scheduled (or known), the next date on which the employee is expected to provide MML with an update on the employee's restrictions/limitations
  - (h) Date of next review
20. The employee's documented individual accommodation plan shall **not** include any other personal or confidential medical or other information (such as specific diagnosis or treatment information), unless reasonably required to effect the accommodation.

e) Consultation with Employee

21. Once suitable reasonable accommodation has been identified, Human Resources will meet with the employee to review the proposed individual accommodation plan.
22. The employee shall have the opportunity to identify any errors, omissions or adjustments which may need to be made to the plan.
23. Although consideration will be given to any suggestions provided by the employee as to alternative ways in which the employee might be accommodated, MML will make the

final determination regarding the accommodation to be provided, so long as the accommodation is appropriate given the known medically-based restrictions/limitations.

f) Implementing Individual Accommodation Plan

24. Once finalized, the employee's individual accommodation plan shall be signed by Human Resources, the employee and the supervisor. Copies of the individual accommodation plan shall be provided to the employee, the employee's supervisor / manager, and placed in the employee's file.
25. The employee shall receive a copy of their individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.
26. Where an employee is accommodated outside of the employee's regular unit, the employee's wages and other benefits are charged back to the original unit. All day-to-day directions, scheduling, discipline and other related matters fall to the managers and supervisors of the accommodated unit.
27. Human Resources shall regularly review each employee's individual accommodation plan, by the date set out in each employee's plan, and in any event at least once per year.
28. It is expected that the employee will provide updated medical information from the employee's treating physician (or other specialist) promptly upon any of the following trigger events (even if the information merely confirms the existing limitations):
  - (a) Employee's medically-based restrictions or limitations change, whether the change is an improvement to or worsening of existing limitations, or new limitations being added;
  - (b) Employee seeks to add or remove any limitations or restrictions, or otherwise amend the individual accommodation plan;
  - (c) Employee's medical condition and/or restrictions are reassessed by his or her treating physician (or other specialist);
  - (d) Employee goes off work for medical reasons related to the disability being accommodated;
  - (e) Employee submits a claim for STD, LTD, WSIB or EI disability benefits; or
  - (f) Date for employee to provide update, as set out in the individual accommodation plan, is reached.
29. In the event the employee's restrictions, limitations or medical needs change following the implementation of the individual accommodation plan, the employee shall promptly bring this information to the attention of MML so that amendments can be made to the individual accommodation plan.
30. If the plan is no longer applicable, the employee work location or position changes, or the nature of the employee's disability changes, the employee and Human Resources will review the situation and update the plan.

31. Any failure by the employee to: provide timely and adequate medical information regarding any request or amended request for accommodation; cooperate in the accommodation process; only work within the employee's stated medical restrictions; or otherwise comply with the employee's obligations under this policy may give rise to discipline, up to and including dismissal.
32. If an employee's request for accommodation is denied for any reason, the employee shall be informed of the reason(s) for the denial. Reason(s) shall be provided in writing, or in an appropriate alternative format if needed to account for the employee's accessibility needs on account of their disability.

### Information and Communication Supports

When developing an employee's individual accommodation plan, and on an ongoing basis, as appropriate, we will consult with employee with disabilities to:

- Identify categories and types of information and communications that are needed in order for the employee to perform his or her job, as well as those which are generally available to employees in the workplace
- Determine the employee's information and communication needs
- Determine the process by which information and communications will be made available in accessible formats and with appropriate communication supports
- Include individualized workplace emergency response information, if required
- Identify any other accommodation that is to be provided, and for how long

If it is determined that information or communications are unconvertible, the Company will, in a timely way, provide the employee 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.

### Individualized Workplace Emergency Response Information

MML shall provide individualized workplace emergency response information to each employee who has a disability, provided that:

- The disability is such that the individualized information is necessary for the employee to respond in the event of a workplace emergency, and
- MML is aware of the need for accommodation due to the employee's disability

The information shall be provided as soon as practicable after MML is made aware of the need for accommodation due to disability, and will be reviewed when the employee moves to a different location in the organization, when the employee's overall accommodation plans / needs are reviewed, and when MML reviews its general emergency response policies.

If an employee who receives individualized workplace emergency response information requires assistance, MML will – with the consent of the employee requiring assistance – designate one

or more persons to provide the assistance, and provide them with the information necessary to provide the required assistance.

### Contraventions

The Accessibility Coordinator, as well as managers and supervisors of MML, will monitor existing and new practices and procedures to ensure compliance. A failure by any employee to comply with this **Return to Work & Accommodation Policy**, or any other policy, practice or procedure related to accessibility issues, the removal of barriers, or the *Human Rights Code*, may result in disciplinary action, up to and including dismissal.

### Accessible Formats

Accessible formats of this Return to Work Policy are available for free, upon request.

## **MULTI-YEAR ACCESSIBILITY PLAN**

### **PURPOSE**

This Multi-Year Accessibility Plan (“Accessibility Plan”) outlines the short and long-term strategies of the Company to prevent and remove barriers, improve opportunities for people with disabilities, and otherwise meet the requirements of the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”).

### **STATEMENT OF COMMITMENT**

Mattina Mechanical Limited (MML) is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity and are committed to meeting the needs of people with disabilities in a timely manner, and we will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the *AODA*.

The Company has appointed an Accessibility Coordinator with the mandate of ensuring compliance with the Company’s obligations under the *AODA*. However, the Company also relies on all of its employees, volunteers and partners to assist with maximizing accessibility within the Company by:

- Identifying potential barriers to accessibility 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

### **STRATEGY FOR COMPLIANCE**

The Accessibility Coordinator, including his or her designates, will regularly but no fewer than once per year:

- Review the *AODA*, regulations and accessibility standards with a view to ensuring ongoing compliance
- Review existing policies and strategies and evaluate their effectiveness at removing barriers to accessibility, making changes as needed
- Identify new barriers to accessibility and develop and implement removal strategies
- Review all individualized workplace emergency response information, making changes as needed
- Evaluate physical accessibility to all premises owned or operated by the Company in Ontario in which the Company does business to ensure barrier-free accessibility

- Evaluate communication methods as well as the manner in which goods and services are provided to the public and other third parties to ensure barrier-free accessibility
- Arrange for and/or provide necessary training
- Prepare and file any required accessibility compliance report(s)
- Ensure all required documents required by the *AODA*, regulations and standards are posted in appropriate locations and otherwise made available in accessible formats

## **EMPLOYMENT**

The Company is committed to fair and accessible employment practices which are inclusive of persons with disabilities. To this end, the Company will provide individualized workplace emergency response information to employees who have a disability.

### ***Recruitment***

The Company will review its recruitment and assessment practices to ensure compliance with the Employment Standard by no later than **January 1, 2016**. The Company will take the following steps to notify the public and staff that, when requested, the Company will accommodate people with disabilities during the recruitment and assessment processes and when people are hired:

- 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

### ***Individual Accommodation Plans and Return to Work Processes***

By no later than **January 1, 2016**, the Company 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

### ***Performance Management, Career Development and Redeployment Processes***

By no later than **January 1, 2016**, MML will take into account the accessibility needs of its employees with known disabilities as well as any individual accommodation plans when applying performance management, career development and redeployment processes.

Upon request, the Company 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.

### **WEBSITE / COMMUNICATIONS**

MML will consult with its website support partners to ensure that:

- All new websites and content on those sites conform with WCAG 2.0, Level A by no later than **January 1, 2014**
- All websites and content conform with WCAG 2.0, Level AA by no later than **January 1, 2021**

The Accessibility Coordinator, including his or her designates, will also consult with website support partners to ensure that:

- Existing feedback processes are accessible to persons with disabilities upon request by **January 1, 2015**
- All publicly available information is made accessible upon request by **January 1, 2016**

### **TRAINING**

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. Training will be provided in a way that best suits the duties of the employees, volunteers and other staff and will include instruction on:

- 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 communication with persons with various types of disabilities as well as those who use an 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 disabilities is having difficulty accessing our goods or services

The Company will take the following steps to ensure, by **January 1, 2015**, 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, volunteers and other staff

Notwithstanding the timelines set out above, training will take place as soon as practicable for all current affected employees, volunteers and other staff of the Company.

## **DESIGN OF PUBLIC SPACES**

The Company 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)

The Company will also develop procedures for preventative and emergency maintenance of the accessible elements in public spaces, as well as dealing with temporary disruptions when accessible elements in public spaces are not in working order.

## **AVAILABILITY OF ACCESSIBILITY PLAN**

This Accessibility Plan will be included in the Human Resources Manual 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.

## **FEEDBACK PROCESSES**

By **January 1, 2015**, the Company 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 by **January 1, 2016**, all publicly available information is made accessible in a timely manner, if requested.

## **MORE INFORMATION**

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 the Company's Accessibility Coordinator at:

**Name / Position:** David Prazeres, Human Resources  
**Address:** 211 Lanark Street, Unit A, Hamilton Ontario  
**Email:** info@mattina.ca  
**Phone / Fax:** 905-544-6380

This Accessibility Policy will be made publicly available. Accessible formats of this document are available for free, upon request.