



**Accessibility for Ontarians with Disabilities  
Act, 2005**

**Accessibility Policy and Accessibility Plan**

**October 24, 2023**

**Emco Corporation (“Emco”)**

# **Accessibility Policy and Accessibility Plan - Ontario**

## **Purpose**

To establish policies, practices and procedures to ensure Emco is accessible to customers and to others in Ontario in accordance with the Accessibility for Ontarians with Disabilities Act, 2005 (the “Act”) including Ontario Regulation 191/11 Integrated Accessibility Standards.

## **Statement of Organizational Commitment**

Emco is committed to meeting the accessibility needs of persons with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Act. Emco’s core values complement its commitment to treat all people in a way that allows them to maintain their dignity and independence. We believe in integration, inclusion and equal opportunity.

## **Application**

This policy applies to all Ontario teammates who deal with the public, other organizations, or third parties on or off Emco premises and applies to those teammates who participate in developing Emco’s policies, practices and procedures governing the provision of goods and services to the public.

## **Principles and Practices**

### Training

Emco will provide training, as soon as practicable, on the requirements of the accessibility standards of the Act and of the Human Rights Code as it pertains to persons with disabilities to:

- (a) all teammates;
- (b) all persons who participate in developing Emco’s policies; and
- (c) all other persons who provide goods, services or facilities on behalf of Emco.

The training on the requirements of the accessibility standards and on the Human Rights Code referred will: be appropriate to the duties of the teammates and other persons; be provided on an ongoing basis; be recorded (including the dates on which the training is provided and the number of individuals to whom it is provided); and commenced prior to January 1, 2015 and recurs every two years.

## Information and Communications

### *Feedback*

Emco has developed processes for receiving and responding to feedback and will ensure that the processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request.

Emco will notify the public about the availability of accessible formats and communication supports.

Emco implemented the feedback process before January 1, 2015 and has updated it in 2023.

### *Accessible Formats and Communication Supports*

Emco will, upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability at a cost that is no more than the regular cost charged to other people.

Emco will consult with the person making the request in determining the suitability of an accessible format or communication support.

Emco will notify the public about the availability of accessible formats and communication supports.

Emco implemented this process before January 1, 2016.

### *Accessible Websites and Web Content*

Emco ensured its websites and web content conformed with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level A by January 1, 2014.

Emco will ensure its core customer facing websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level AA by December 31, 2023.

## Employment Standards

### *Recruitment*

Emco has and continues to notify its teammates and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.

During the recruitment process, Emco notifies job applicants when they are 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, Emco 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 disability.

#### *Notice to Successful Applicants*

When making offers of employment, Emco notifies the successful applicant of its policies for accommodating teammates with disabilities.

#### *Informing Teammates of Supports*

Emco informs its teammates of its policies used to support its teammates with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account a teammate's accessibility needs due to disability. Emco provides the required information to new teammates as soon as practicable after they begin their employment. Emco will provide updated information to its teammates whenever there is a change to existing policies on the provision of job accommodations that take into account a teammate's accessibility needs due to disability.

#### *Accessible Formats and Communication Supports for Teammates*

Where a teammate with a disability so requests, Emco will consult with the teammate to provide or arrange for the provision of accessible formats and communication supports for information that is needed in order to perform the teammate's job and information that is generally available to teammates in the workplace. Emco will consult with the teammate making the request in determining the suitability of an accessible format or communication support.

#### *Documented Individual Accommodation Plans*

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

1. The manner in which a teammate requesting accommodation can participate in the development of the individual accommodation plan.
2. The means by which the teammate is assessed on an individual basis.
3. The manner in which Emco can request an evaluation by an outside medical or other expert, at Emco's expense, to assist Emco in determining if accommodation can be achieved and, if so, how accommodation can be achieved.
4. The manner in which the teammate can request the participation of a representative from the workplace in the development of the accommodation plan.
5. The steps taken to protect the privacy of the teammate's personal information.
6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.

7. If an individual accommodation plan is denied, the reasons for the denial will be provided to the teammate.
8. The means of providing the individual accommodation plan in a format that takes into account the teammate's accessibility needs due to disability.

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

#### *Return to work process*

Emco has developed and has in place a return to work process for its teammates who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and will document the process.

The return to work process outlines the steps Emco will take to facilitate the return to work of teammates who were absent due to disability, and, will use documented individual accommodation plans as part of the process.

#### *Performance management*

Emco takes into account the accessibility needs of teammates with disabilities, as well as individual accommodation plans, when using its performance management process in respect of teammates with disabilities. For the purposes of this policy, "performance management" means activities related to assessing and improving teammate performance, productivity and effectiveness, with the goal of facilitating teammate success.

#### *Career Development and Advancement*

When providing career development and advancement, Emco take into account the accessibility needs of its teammates with disabilities as well as any individual accommodation plans. For the purposes of this policy, "career development and advancement" means providing additional responsibilities within a teammate's current position and the movement of a teammate from one job to another in the organization (that may be higher in pay, provide greater responsibility or be at a higher level in the organization or any combination of them) and, for both additional responsibilities and teammate movement, is usually based on merit or seniority, or a combination of them.

#### *Redeployment*

Emco takes into account the accessibility needs of its teammates with disabilities, as well as individual accommodation plans, when redeploying teammates with disabilities. For the purposes of this policy, "redeployment" means the reassignment of teammates to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.

## Accessibility Plan

The following plan was reviewed annually until January 1, 2017, and then every 5 years thereafter, by a member of the Human Resources Department and Legal Department.

| Barrier Type  | Examples  | Action Required  | Completion: Date and by Whom  |
|---------------|---|--|---|
| Architectural | Building design: exterior to a building, interior of a building, washrooms, parking areas, hallways, floors, stairs, lobbies/entranceways, offices, lighting, sidewalks   | For new profit centers or those undergoing redevelopment, ensure all walkways and public spaces comply with the Act and O. Reg. 413/12 (walkways, ramps, stairs, parking and so on). Ensure that when accessibility to public spaces may become temporarily unavailable due to maintenance or emergencies that the lease for the location addresses this and there is a plan in place that addresses the needs of the specific situation.  | From January 1, 2017 onward<br>Audit/Regional Vice<br>President/Profit Center Manager |
| Physical      | Objects added to the environment: doors, furniture, workstations, bathroom hardware (knobs, locks), product displays, counter height (counters in bathrooms and counters in profit centers for servicing customers) | Newly constructed profit centers or those undergoing redevelopment will ensure all service counters and queuing or waiting areas comply with the Act and O. Reg. 413/12 and are barrier free; all Ontario teammates will receive awareness training to facilitate access and remove barriers for those with disabilities. Ensure that when accessibility to public spaces may become temporarily unavailable due to maintenance or emergencies that the lease for the location addresses this and there is a plan in place that addresses the needs of the specific situation. | From January 1, 2017 onward<br>Audit/Regional Vice<br>President/Profit Center Manager |
| Communication | Difficulties receiving information: in person or by telephone, difficulties interacting with  | Develop processes for receiving feedback including accessible formats and communication supports on request and draw   | January 1, 2016<br>Human Resources/IS   |

|               |   |  |   |
|---------------|---|--|---|
|               | teammates, difficulties receiving training  | on feedback to improve communication difficulties; internal audit of profit centers and National Support Center to assess any potential communication barriers   |   |
| Information   | Inadequate or incomprehensible signage, difficulties reading brochures, forms, manuals, web sites, fax transmission, equipment labels, computer screens, paper catalogues/flyers.   | Develop processes for receiving feedback (accessible formats and communication supports on request); revise web content on emcoltd.com and affiliate sites to be WCAG 2.0 Level AA compliant; internal audit of profit centers and National Support Center regarding signage, materials, equipment | Information: January 1, 2015<br>Feedback and formats: January 1, 2016<br>Websites: core customer facing sites January 1, 2021<br>Web Developer/IS<br>/Human Resources/<br>Audit |
| Policy        | Rules, regulations and protocols that prevent teammates from doing their job as well as possible or from serving the public, or that restrict the public or public participation: job postings, hiring, interviewing, protocols, safety and evacuation and meetings | Develop accommodation plans as necessary; implement employment standard requirements under O. Reg. 191/11; internal review of SPIs to determine whether existing policies present barriers to those suffering from disabilities  | January 1, 2015 and ongoing<br>Legal/Human Resources  |
| Attitudinal   | Teammates who do not know how to communicate with people with disabilities  | Provide training to all teammates per policy and legislative requirements to educate and facilitate communication with people with disabilities  | Ongoing<br>Human Resources/Audit/Legal  |
| Technological | Computers, fax machines, telephones, standard software, proprietary software, photocopiers, web sites, keyboards, mice, switches and printers   | Review of any issues arising from feedback process as well as internal review to determine whether disabled persons encounter barriers when using current technology; implement such corrective measures as may be required resulting from feedback process or internal review                     | Ongoing<br>Human Resources/IS   |