

AODA		
The Integrated Accessibility Standard		
Multi-Year Accessibility Plans		
Revision Date & No.: 11252014.000		
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1 POLICY

- 1.01 Hunter Douglas Canada LP (the “Company”) will establish, implement and maintain a multi-year accessibility plan, which outlines the organization’s strategy to prevent and remove barriers and meet its requirements.
- 1.02 The multi-year accessibility plan will indicate how the Company intends to implement the requirements of the Integrated Regulation within legislated timelines. It will also address the identification, removal and prevention of barriers to people with disabilities in the organization.
- 1.03 Specifically the multi-year plan will:
- a) Provide a framework for developing cohesive accessibility initiatives which identify, remove and prevent barriers.
 - b) Establish action plans for meeting those goals and initiating accountability at various levels
 - c) Seek input and suggestions from the wider organizational community

2 PURPOSE

- 2.01 The purpose of this policy is to create a workable multi-year accessibility plan that outlines the organization’s strategy to prevent and remove barriers and meets its requirements under the Integrated Regulation. This plan will meet the needs of all customers and employees with disabilities, and provide a mechanism for planning, reviewing and evaluating the implementation of the AODA Accessibility Standards.

3 SCOPE

- 3.01 This policy applies to all employees and all facilities of the Company in Ontario.

4 RESPONSIBILITY

- 4.01 It is the responsibility of the Company to assess current policies, practices and procedures, premises, access to goods and services, and information and communication systems to identify barriers for persons with disabilities.
- 4.02 It is the responsibility of the Company to address the identified barriers and develop a five-year plan for the removal and prevention of these barriers.
- 4.03 It is the responsibility of the Company to post the plan in a visible place on the premises and on the corporate website.

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- 4.04 It is the responsibility of the Company to provide all information relating to the plan in alternative formats upon request.
- 4.05 It is the responsibility of the Company to review and update the plan at least once every five years.

5 DEFINITIONS

- 5.01 **“Accessible formats”** may include, but are not limited to, large print, recorded audio and electronic formats, Braille, and other formats usable by persons with disabilities.
- 5.02 **“Accommodation”** means the special arrangements made or assistance provided so that persons with disabilities can participate in the experiences available to persons without disabilities. Accommodation will vary depending on the person’s unique needs.
- 5.03 **“Communication supports”** may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language, and other supports that facilitate effective communications.
- 5.04 **“Communications”** means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent, or received.
- 5.05 **“Dignity”** means service is provided in a way that allows the individual to maintain self-respect and the respect of other persons.
- 5.06 **“Equal Opportunity”** means service is provided to individuals in such a way that have an opportunity to access goods or services equal to that given to others.
- 5.07 **“Independence”** means when a person is able to do things on their own without unnecessary help or interference from others.
- 5.08 **“Information”** includes data, facts and knowledge that exist in any format, including text, audio, digital or images, and that convey meaning.
- 5.09 **“Integration”** means service is provided in a way that allows the individual to benefit from equivalent services, in the same place, and in the same or similar way, as other individuals, unless an alternate measure is necessary to enable the individual to access goods or services.
- 5.10 **“Reasonable efforts”** means taking approaches that meet the required needs of the individual.

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6 REFERENCES and RELATED STATEMENTS of POLICY and PROCEDURE

Accessibility for Ontarians with Disabilities Act, 2005
Integrated Accessibility Standards, Ontario Regulation 191/11
Statement of Organizational Commitment
Accessibility and human rights training policy

7 PROCEDURES

7.01 Multi-year accessibility plan

IASR compliance date: Large organizations, January 1, 2014.

The Company will work to improve accessibility by developing a multi-year accessibility plan that conforms to the Regulation which outlines a phased-in strategy to prevent and remove barriers and address the current and future requirements of the AODA and its standards.

7.02 The multi-year plan must be reviewed and updated at a minimum of once every five years.

7.03 The plan will be publically posted on the website.

7.04 Upon request, the plan will be provided in accessible formats.

7.05 When a person with a disability makes a request for an alternative accessible format or communication support, that person must be consulted as to their needs. The plan must be provided in a timely manner and the cost of providing the plan in an accessible format must not be more than the regular cost charged to other people.

7.06 **Procuring or acquiring goods, services or facilities – n/a**

7.07 **Self-service kiosks – n/a**

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7.09 **Training**

IASR compliance date: Large organizations, January 1, 2015.

The Company will ensure that by January 1, 2015 training is provided to all employees, persons who deal with customers and the public on the company's behalf, and to persons participating in the development and approval of its policies, practices and procedures on the requirements of the Regulation and on the **Human Rights Code** as it pertains to persons with disabilities.

The Company will maintain a record of the dates when training is provided and the number of individuals to who it was provided. Training will re-occur when there are changes to the accessibility policies.

7.10 **Requirements under the Information and Communications Standard**

Commitment to accessibility policies, practices and procedures

IASR compliance date: Large organizations, January 1, 2014.

The Company will commit to making information and communication systems and platforms accessible to person with disabilities and address how it will be achieved.

The Company will establish an accessibility policy, procedures and practices for providing accessible information and communications that take into account a person's disability when communicating or providing information. This includes:

- Posting the policy on the corporate website
- Providing the policy in an alternative format upon request
- Ensuring that the cost of providing this policy in an accessible format is not more than the regular cost charged to other people

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Multi-year plan

IASR compliance date: Large organizations, January 1, 2014

The Company will include the requirements under the information and communications standard in its multi-year plan, which outlines the organization's strategy to provide accessible information and communications. This includes:

- Assessing barriers to information and communications systems/platforms
- Determining the accessibility of the company's information components and systems
- Establishing a company standard for documents that will be as accessible as possible without the need for accessible formats (i.e., font style, font size, colour contrast, plain language).
- Posting the plan on the corporate website and providing the plan in accessible format upon request.
- Reviewing and updating the plan at least once every five years.

Emergency procedures, plans or public safety information

N/A

Feedback

IASR compliance date: Large organizations, January 1, 2015

The Company will ensure that its feedback processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request. This includes:

- When an accessible format is requested, the person making the request is consulted to determine suitability of format
- The public is notified about the availability of accessible formats and communication supports

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Providing information and communications in accessible formats and with communications support

IASR compliance date: Large organizations January 1, 2016

The Company 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. This includes:

- Assessing and reviewing the communication needs of people with visual, hearing, learning, and cognitive disabilities and the barriers to communication that exist in our organization.
- Notifying the public about the availability of accessible formats and communication supports
- Consulting with a person with a disability when alternative accessible formats and communication supports are requested
- Having a process in place for customers to request and to be provided with information and communication in an accessible format and explaining when an accessible format is not feasible
- Posting this information on the company website
- If the information or communications are unconvertible, upon request, the organization will provide an explanation of why it is unconvertible, and provide a summary of the unconvertible information or communications

Accessible websites and web content

IASR compliance dates: Large organizations, January 1, 2014 – new websites and web content on those sites must conform with WCAG 2.0 Level A, and January 1, 2021 – all websites and web content must conform with WCAG 2.0 Level AA, other than success criteria 1.2.4 Captions (Live) and success criteria 1.2.5 Audio Descriptions (Pre-recorded).

The Company will ensure that all new websites and web content comply with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 at Level A and increasing to Level AA (for all websites and content) by 2021. This includes:

- Conducting an assessment of the organization’s website and testing for accessibility

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- Committing and planning to make the website accessible and outline the course of actions and timelines needed to achieve web accessibility based on the results of our assessment and compliance with the law
- Obtaining tools and resources to build or make the website accessible
- Monitoring website accessibility and compliance with the guidelines and the law

7.11 **Requirements under the employment standard**

The Company will include the requirements under the employment standard in its multi-year plan, including the following:

- Workplace emergency response information
- Assessment of barriers in employment
- Support information for new employees
- Accessible formats and communication
- Documenting individualized plans
- Performance assessment, career development, advancement and redeployment

Workplace emergency response information

IASR compliance date – January 1, 2012

The Company will provide individualized workplace emergency response information to employees who have disclosed a disability.

With the employee's consent, provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.

The individualized workplace emergency response information will be reviewed:

- When the employee moves to a different location in the organization
- When the employee's overall accommodations needs or plans are reviewed, and
- When the employer reviews its general emergency response policies

Assessment of barriers in employment

The Company will identify, remove, and prevent barriers in employment by evaluating existing policies and procedures as well as the overall workplace.

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Recruitment

IASR compliance date – Large organizations, January 1, 2016

The Company will promote employment opportunities for the designated groups including persons with disabilities.

On the company’s website and in job advertisements, specify that accommodation is available for job applicants with disabilities.

The Company will inform candidates about the availability of accommodations:

- When called for an interview
- During the selection process
- At the time of job offer
- At orientation

Support information for new employees

IASR compliance date – Large organizations, January 1, 2016

The Company will inform employees of policies and supports for employees with disabilities as soon as practicable after new employees begin employment. The Company will update information provided to employees as policies change.

Accessible formats and communication

IASR compliance date – Large organizations, January 1, 2016

The Company will, upon request by an employee with a disability, provide accessible formats and communication supports for information in the workplace in consultation with the employee making the request.

Document individualized plans

IASR compliance date – Large organizations, January 1, 2016

The Company will develop a written process for developing individual accommodation plans for employees with disabilities.

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The Company will develop and implement a return-to-work process for employees absent due to disabilities who require accommodation to return to work.

Performance assessment, career development, advancement, and redeployment

IASR Compliance date – Large organizations, January 1, 2016

The Company will ensure that its procedures take into account the accessibility needs of employees with disabilities and their individual accommodation plans:

- When assessing their performance
- In managing their career development and advancement
- When redeploying them

7.12 **Requirements under the transportation standard**

N/A

7.13 The Company will monitor and evaluate accessibility initiatives and changes to applicable legislation and/or regulations. Changes to policies, plan and initiatives will be incorporated as required.

7.14 **Contact information**

If you have any questions on this policy, want to provide feedback or have a complaint, please contact the Human Resources Manager.