

Signature Aluminum Canada Inc. Integrated Accessibility and Accessible Customer Service Policy

1. Purpose

Under the Accessibility for Ontarians with Disabilities Act, 2005 all public and private sector organizations must meet the requirements of accessibility standards established by regulation. This policy establishes the Integrated Accessibility Standards Regulation in the areas of Employment, Information and Communications, Transportation and Public Spaces for Signature Aluminum Canada Inc. in accordance with Ontario Regulation 191/11, Ontario Regulation 413/12 and with the Ministry of Community and Social Services. The intent of the regulation is to "streamline, align and phase-in accessibility requirements and allow for progress on accessibility and reduce the regulatory burden for obligated organizations". The Integrated Accessibility Standards Regulation came into force July 1, 2011.

2. Scope and Responsibilities

This policy has been drafted in accordance with the regulation and addresses how Signature Aluminum Canada Inc. achieves accessibility through meeting the regulation's requirements. It provides the overall strategic direction that Signature Aluminum Canada Inc. will follow to provide accessibility supports to Ontarians with disabilities.

The requirements of the Regulation include the following:

- Customer Service Standard
- Establishment, implementation, maintenance and documentation of a multi-year accessibility plan, which outlines the organizations strategy to prevent and remove barriers and meet its requirements under the Regulation;
- Incorporation of accessibility criteria and features when procuring or acquiring goods, services, or facilities;
- Training; and
- Other specific requirements under the Information and Communications, Employment, Transportation Standards and Public Spaces.

This policy is guided by the following principles:

Independence

Signature Aluminum Canada Inc. will ensure that a person with a disability is allowed to do things on their own without unnecessary help or interference from others.

Dignity

Signature Aluminum Canada Inc. will provide service in a way that allows a person with a disability to maintain self-respect and the respect of other people.

Integration

Signature Aluminum Canada Inc. will provide service in a way that allows the person with a disability to benefit from the same services, in the same place, and in the same or similar way as other customers, unless a different way is necessary to enable them to access goods, services or facilities.

Equal opportunity

Signature Aluminum Canada Inc. will provide service to a person with a disability in such a way

that they have an equal opportunity to access your goods, services, or facilities as what is given to others.

3. Policy Statement and Organizational Commitment

Signature Aluminum Canada Inc. 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. 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 and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act (AODA).

4. Definitions

Below is a list of definitions in alphabetical order used in this policy:

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.

Accommodation means the special arrangement 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.

Assistive Devices are defined as technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that employees or visitors bring with them such as a wheelchair, walker or a personal oxygen tank, that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

Barriers to accessibility are obstacles that make it difficult-or sometimes impossible- for people with disabilities to fully participate in life.

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.

Conventional Transportation Service Provider means a designated public sector transportation organized that provides conventional transportation services that operates solely within the Province of Ontario.

Disability covers a range of visible and invisible conditions that may have been present from birth, caused by an accident, or developed over time.

IAP means Individualized Accommodation Plan.

IASR means Integrated Accessibility Standards Regulation

Internet Website means a collection of related web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier (URI) and is accessible to the public.

Maintenance of Public Spaces means activities that are intended to keep existing public spaces and elements in existing public spaces in good working order or to restore the spaces or elements to their original condition, examples of which include painting and minor repairs.

Medical Aid means an assistive device including respirators, and portable oxygen supplies.

Mobility Aid means a device used to facilitate the transport, in a seated posture, of a person

with a disability.

Mobility Assistive Device means a cane, walker, wheelchair, scooter or similar aid.

New Internet Website means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.

Ready Format means an electronic or digital format that facilitates conversion into an accessible format.

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

Specialized Transportation Services means public passenger transportation services that operate solely with the Province of Ontario, are provided by a designated public sector transportation organization and are designed to transport persons with disabilities.

Unconvertible means if it is not technically feasible to convert the information or communications. It also means if the technology to convert the information or communications is not readily available.

Web Content Accessibility Guidelines means the World Wide Web consortium recommendation, dated December 2008, entitled “Web Content Accessibility Guidelines” (WCAG) 2.0.

5. General Provisions of Customer Service Standard

This section covers the general requirements of the Customer Service Standard

Assistive Devices

Signature Aluminum Canada Inc. allows people with disabilities to use their personal assistive devices when accessing our goods, services, or facilities. In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with a disability can access our goods, services, or facilities. Employees and staff are trained during their new hire orientation on the various assistive devices that people who have a disability may use.

Communication

Signature Aluminum Canada Inc. will communicate with people with disabilities in ways that take into account their disability. When asked, we will provide information about our organization and its services, including public safety information, in accessible formats or with communication supports.

Service Animals

Signature Aluminum Canada Inc. will welcome people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public. When we cannot easily identify that an animal is a service animal, our staff may ask a person to provide documentation from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability. If service animals are prohibited by another law, we will explain why the animal is excluded, and discuss with the customer another way of providing goods, services or facilities.

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, Signature Aluminum Canada Inc. 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.

Training

Signature Aluminum Canada Inc. will provide accessible customer service training to all employees and volunteers, anyone involved in developing our policies, and anyone who provides goods, services, or facilities to customers on our behalf. All new hires will be trained during their orientation. Staff will also be trained when changes are made to our accessible customer service policies. Signature Aluminum Canada Inc. shall maintain a record of the dates when training was provided and the number of individuals to whom it was provided.

Feedback Process

Signature Aluminum Canada Inc. welcomes feedback on how we provide accessible customer service. Customer feedback will help us identify barriers and respond to concerns. We will make sure our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, upon request.

Notice of Availability of Documents

Signature Aluminum Canada Inc. will notify the public that documents related to accessible customer service, are always available upon request.

6. General Provisions of Integrated Accessibility Standard

This section covers the general requirements of the Integrated Accessibility Standards Regulation.

Multi-Year Accessibility Plan

Signature Aluminum Canada Inc.'s Multi-Year Accessibility Plan outlines a phased-in strategy to prevent and remove barriers and addresses the current and future requirements of the *Accessibility for Ontarians with Disabilities Act (AODA), 2005*. Signature Aluminum Canada Inc. will report annually on the progress and implementation of the plan, post the information to Signature Aluminum Canada Inc.'s website and will provide it in alternative formats upon request. The plan will be reviewed and updated at least once every five years, or when applicable laws are updated.

Procuring or Acquiring Goods, Services or Facilities

Although not required under this legislation, Signature Aluminum Canada Inc. will take into consideration, accessibility criteria and features when procuring or acquiring goods, services, or facilities as much as possible to show our commitment to accessibility.

Training

Signature Aluminum Canada Inc. is committed to training all employees, staff, volunteers, and those that develop the organizations policies, on the requirements of the accessibility standards referred to in the regulation and on the *Human Rights Code* as it pertains to

persons with disabilities.

Training will be provided to all new hires during their new hire orientation. Existing employees take part in a mandatory refresher training on a yearly basis. If any changes are made to this policy or the requirements, training will be provided to include those changes. Signature Aluminum Canada Inc. shall maintain a record of the dates when training was provided and the number of individuals to whom it was provided. Signature Aluminum Canada Inc. shall ensure that others that provide goods, services, or facilities on behalf of the organization have had training.

Information and Communications Standard

Signature Aluminum Canada Inc. will create, provide, and receive information and communications in ways that are accessible to people with disabilities.

If Signature Aluminum Canada Inc. determines that it is not technically feasible to convert the information or communications or the technology to convert the information or communications is not readily available, Signature Aluminum Canada Inc. will be obligated to provide the person that requires the information with an explanation as to why the information or communications are unconvertible; and a summary of the unconvertible information or communications.

Emergency Information

If Signature Aluminum Canada Inc. prepares emergency procedures, plans or public safety information and makes the information available to the public, Signature Aluminum Canada Inc. shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

Feedback

Signature Aluminum Canada Inc. has a process in place for receiving and responding to feedback and will ensure that those processes are provided in accessible formats and with communication supports upon request. Signature Aluminum Canada Inc. will notify the public about the availability of accessible formats and communication supports.

Signature Aluminum Canada Inc. has a feedback/suggestion box for any employees, management, and visitors to make suggestions on making the workplace/building accessible. Feedback can also be submitted to the Director of Human Resources at 905-427-2210 or via email at recruitment@signaturealum.com or reception@signaturealum.com.

Accessible Formats and Communication Supports

Signature Aluminum Canada Inc. shall be obligated to provide or arrange for accessible formats and communication supports for persons with disabilities by following the four bullets listed below:

- i. Upon request in a timely manner that takes into account the persons' accessibility needs due to a disability;
- ii. At a cost that is no more than the regular cost charged to other persons;
- iii. Consult with the person making the request and determine suitability of an accessible format or communication support;
- iv. Notify the public about the availability of accessible formats and communication supports.

Website Accessibility

As of January 1st, 2021, Signature Aluminum Canada Inc's internet website and web content were assessed using AODA WCAG Compliance checker- no known issues were found, and the website meets WCAG2.0, Level AA standards.

Employment Standard

The Employment Standard builds upon the existing requirements under the *Ontario Human Rights Code* in relation to how Signature Aluminum Canada Inc. will provide accessibility throughout the entire employment cycle. It applies in respect to employees and does not apply to volunteers and other non-paid individuals.

The requirements of the Employment Standard shall be met by Signature Aluminum Canada Inc. For further clarification and specific details you can also refer to Signature Aluminum Canada Inc.'s 2019-2024 Multi-Year Accessibility Plan.

Recruitment

Signature Aluminum Canada Inc. shall notify employees and the public about the availability of accommodations for applicants with disabilities as per three (3) bullets below:

- i. During the recruitment process when job applicants are individually selected to participate in an assessment or selection process;
- ii. If a selected applicant requests an accommodation, Signature Aluminum Canada Inc. shall consult with the applicant and provide or arrange for the provision of a suitable accommodation that takes into account the applicant's disability;
- iii. Notify successful applicants of the policies for accommodating employees with disabilities.

Employee Notification

Signature Aluminum Canada Inc. shall 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 for the two (2) situations below:

- i. As required to new employees as soon as practicable after they begin their employment;
- ii. Whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility need due to a disability.

Accessible Formats and Communication Supports

In addition and where an employee with a disability requests it, Signature Aluminum Canada Inc. will consult with the employee to provide or arrange for the provision of accessible formats and communication supports as per the following three (3) bullets below:

- i. Information that is needed in order to perform the employee's job;
- ii. Information that is generally available to employees in the workplace; and
- iii. Consult with the employee making the request in determining the suitability of an accessible format or communication support.

Individual Accommodation Plan (IAP)

Signature Aluminum Canada Inc. has in place a documented individual accommodation plan for employees with a disability. The policy includes the points below:

- i. The employee's participation in the development of the IAP;
- ii. Assessment on an individual basis;
- iii. Identification of accommodations to be provided;
- iv. Timelines for the provision of accommodations;
- v. Signature Aluminum Canada Inc. may request an evaluation by outside medical or other expert, at Signature Aluminum Canada Inc.' expense, to assist with determining accommodation and how to achieve accommodation;
- vi. Employee may request the participation of a representative from the workplace;
- vii. Steps taken to protect the privacy of the employee's personal information;
- viii. Frequency with which the IAP will be reviewed and updated and the manner in which it will be done;
- ix. If denied, the reasons for denial are to be provided to the employee;
- x. A format that takes into account the employee's disability needs;
- xi. If requested, any information regarding accessible formats and communication supports provided;
- xii. Identification of any other accommodation that is to be provided.

Return to Work

Signature Aluminum Canada Inc. has in place a 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. Such processes shall be documented and must outline the steps that Signature Aluminum Canada Inc. will take to facilitate the return to work and include an individual accommodation plan.

Performance Management, Career Development and Advancement and Redeployment

Signature Aluminum Canada Inc. takes into account the accommodation needs and/or individual accommodation plans of employees for the three points below when:

- i. Using performance management processes;
- ii. Providing career development and advancement information;
- iii. Using redeployment procedures.

Workplace Emergency Response Information

Signature Aluminum Canada Inc. shall provide individualized workplace emergency response information to employees who have a disability as per the following four (4) points below:

- i. If the disability is such that the individualized information is necessary, and the employer is aware of the need for accommodation due to the employee's disability;
- ii. If the employee who receives an individual workplace emergency response information requires assistance and with the employee's consent, Signature Aluminum Canada Inc. shall provide the workplace emergency information to the person designated by Signature Aluminum Canada Inc. to provide assistance to the employee;
- iii. As soon as practicable after becoming aware of the need for accommodation due to the employee's disability;
- iv. Review the individualized workplace emergency response information when the employee moves to a different location in the organization, when overall accommodations needs or plans are reviewed and when the employer reviews its general emergency response policies.

Transportation Standard

The Transportation Standard will make it easier for people to travel in Ontario, including persons with disabilities, older Ontarians and families traveling with children in strollers. Signature Aluminum Canada Inc. is not affected by the Transportation Standard but will inform staff, during their staff training, of the positive steps being made towards better accessible transit.

Public Spaces

Signature Aluminum Canada Inc. shall incorporate accessibility into public spaces that are newly constructed or redeveloped on and after January 1, 2017. Signature Aluminum Canada Inc. will ensure that we follow the existing requirements stated under the Design of Public Spaces Standards (Accessibility Standards for the Built Environment maintenance) for recreational trails and beach access routes, outdoor public use eating areas, outdoor play spaces, exterior paths of travel, accessible parking, and service related elements. Signature Aluminum Canada Inc. shall also provide maintenance and restoration of public spaces by ensuring Signature Aluminum Canada Inc.'s multi-year accessibility plan includes procedures for preventative and emergency of accessible elements in public spaces and procedures for dealing with temporary disruptions when accessible elements required under this section are not in working order. For further clarification and specific details, you can also refer to Signature Aluminum Canada Inc.'s 2019-2024 Multi-Year Accessibility Plan and the copy of the Design of Public Spaces Standard.

7. Regulatory Requirements

An Administrative Monetary Penalties scheme is being established under the Accessibility for Ontarians with Disabilities Act (AODA). The scheme will allow a director or a designate to issue an order against a person, organization or corporation to pay a penalty amount as a result of non-compliance with the AODA or the accessibility standards. The largest penalty amount that can be issued to an individual or an organization that is not a corporation is \$50,000.

Use of administrative monetary penalties will be considered an avenue of last resort when all other compliance assistance and improvement options have been exhausted

The License Appeal Tribunal (LAT) will hear appeals from organizations of director's orders, but not individual complaints. Individuals who feel their human rights have not been met would continue to complain to the Ontario Human Rights Commission.

I have read and understand the 'Integrated Accessibility and Accessible Customer Service Policy' and have been provided with a copy of the policy. I understand that it is my responsibility to abide by the policy at Signature Aluminum Canada Inc.

Name: _____

Signature: _____

Date: _____