



Company Policy

Accessibility for Ontarians with Disabilities Act (AODA) Integrated
Accessibility Standards Policy

SAP DOCUMENT 833310 (REV 1)

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1.0 PURPOSE

This policy is drafted in accordance with the Integrated Accessibility Standards (Ontario Regulation 191/11) which forms part of the *Accessibility for Ontarians with Disabilities Act, 2005* and addresses how Curtiss Wright (CW) achieves or will achieve accessibility by meeting the requirements of the regulation.

The standards were developed to identify, remove and prevent barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment.

2.0 SCOPE

This policy applies to all those working at CW including regular and term Employees, contract staff and students , as well as persons involved in developing policies, procedures, and practices pertaining to the provision of goods and services to the public or third parties. Hereafter referred to as Employees.

3.0 PROCEDURE OWNER

Manager, Human Resources

4.0 RELATED DOCUMENTS

Accessibility for Ontarians with Disabilities Act, 2005 - Regulation 429/07

Policy - Customer Service Accessibility, SAP Document 822840

5.0 DEFINITIONS

AODA – Accessibility for Ontarians with Disabilities Act 2005

Barrier – As defined by the AODA, means anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability. This includes physical barrier, an architectural barrier, information or communications barrier, an attitudinal barrier, a technological barrier, a policy or practice.

Disability – As defined by the AODA and the *Ontario Human Rights Code*, means:

1. And degree of physical disability, infirmity, malformation or disfigurements that is caused by bodily injury, birth defect or illness,
2. A condition of mental impairment or a developmental disability,
3. A learning disability or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
4. A mental disorder, or
5. An injury or disability for which benefits were claimed or received under the insurance plan established under the *Ontario Workplace Safety & Insurance Act, 1997*.

6.0 POLICY STATEMENT & INSTRUCTION

We are committed to eliminating barriers and improving accessibility for persons with disabilities in a manner that respects dignity, independence, integration, and equality of opportunity.

CW is committed to making every reasonable effort to accommodate people with disabilities, provided such accommodation does not cause CW undue hardship.

7.0 General Standards

7.1 Accessibility Plan

CW will establish, implement, maintain and document a Multi-year Accessibility Plan outlining CW's strategy to identify, remove and prevent barriers and increase accessibility for persons with disabilities, in accordance with the AODA.

The plan will be reviewed and updated a least once every five years and will be posted on CW's website. Upon request CW will provide a copy of the Multi-Year Accessibility Plan in an accessible format.

7.2 Training:

By 2015, CW will ensure that training is provided on the requirements of the accessibility standards referred to in the Regulation on the Human Rights Code as it pertains to people with disabilities to:

- All its Employees;
- All persons who participate in developing CW's policies; and,
- All other persons who provide goods, services or facilities on behalf of CW

The training provided will be appropriate to the duties of the Employees and other such persons.

Employees and such other persons will be trained when changes are made to CW's Integrated Accessibility Standards Policy. New Employees and such other persons will be trained as soon as practicable.

CW will keep records of the training it provides, including dates on which the training is provided and the number of individuals to whom it was provided.

8.0 Information and Communications Standards

8.1 Accessible Websites & Web Content:

Beginning January 1, 2014 CW will ensure that all new CW Internet websites, including web content, conform to the World Wide Web Consortium Web content Accessibility Guidelines (WCAG) 2.0, at Level A.

As of January 1, 2021 all CW internet and web content will conform with the WCAG 2.0 Level A, other than: success criteria 1.2.4 Captions (Live) and success criteria 1.2.5 Audio Descriptions (Pre-recorded).

8.2 Feedback:

By January 2015, CW will ensure that the process for receiving and responding to feedback, is accessible to persons with disabilities by providing, or arranging for the provisions of, accessible formats and communications supports, upon request. CW will notify the public about the availability of accessible formats and communication supports.

8.3 Accessible Formats and Communication Supports:

By January 2016, upon request, CW will provide, or will arrange for the provision of accessible formats and communication supports for persons with disabilities. CW will do so in a timely manner that takes into account the person's accessibility needs due to disability and at a cost that is no more than the regular cost charged to other persons.

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

9.0 Employment Standards

9.1 Workplace Emergency Response Information

CW will provide individualized workplace emergency response information to Employees who have a disability, if the disability is such that the individualized information is necessary, and if CW is aware of the need or accommodation due to the Employee's disability. CW will provide this information as soon as practicable after becoming aware of the need for accommodation.

Where the Employee requires assistance, CW will, with the consent of the Employee, provide the workplace emergency response information to the person designated by CW to provide assistance to the Employee.

CW will review the individualized workplace emergency response information when/ if the employee moves to a different location in the office or organization, when the Employee's overall accommodation needs or plans are reviewed and when CW reviews its general emergency response practices.

9.2 Recruitment:

By January 2016, CW will notify it Employees and the public about the availability of accommodation for applicants with disabilities in the recruitment process.

By January 2016, CW will notify job applicants in Ontario, when they are individually selected to participate further 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, CW will consult with the applicant and provide, or arrange for the provision of, suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

By January 2016, when making an offer of employment, CW will notify the successful applicant of its policies for accommodating Employees with disabilities.

9.3 Informing Employees of Supports:

By January 2016, CW will inform its Employees of its policies (and changes to those policies) used to support 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 disability. This information will be provided to new Employees as soon as practicable after commencing employment.

9.4 Accessible Formats and Communication Supports for Employees:

By January 2016, upon the request of an Employee with a disability, CW will consult with the Employee to provide, or arrange for the provision of, accessible formats and communication supports for the information that is needed to perform the Employee's job, and information that is generally available to other Employees.

CW will consult with the Employee making the request in order to determine the suitability of an accessible format or communication support.

9.5 Documented Individual Accommodation Plans:

CW will maintain a written process for the development of documented individual accommodation plans for Employees with disabilities.

If requested, information regarding accessible formats and communications supports provided will also be included in individual accommodation plans.

In addition, the plans will include individualized workplace emergency response information (where required), and will identify any other accommodation that is to be provided.

9.6 Return to Work Process

By January 2016, CW will develop and have in place a documented return to work process for its Employees who have been absent from work due to disability and who require disability-related accommodations in order to return to work.

The return to work process will outline the steps CW will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

This return to work process does not replace or override any other return to work process created by or under any other statute.

9.7 Performance Management, Career Development and Advancement & Redeployment

By January 2016, CW will take into account the accessibility needs of Employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to Employees or when redeploying Employees.

10.0 RESPONSIBILITIES

10.1 Manager, Human Resources

Responsible for reviewing the policy to ensure it continues to meet Ontario legislative requirements and respects and promoted the dignity and independence of people with disabilities.

10.2 Employees

Must comply with the requirements of this policy and complete required training with respect to the policy.