

Easy Plastic Containers Corporation

Accessibility Policies

Purpose:

This policy establishes the Accessibility Policies for the Accessible Customer Service Standard and the Integrated Accessibility Standards Regulation; Employment, Information and Communications, Transportation and Public Spaces developed under the *Accessibility for Ontarians with Disabilities Act, 2005*, (AODA) for Easy Plastic Containers Corporation

These standards are in accordance with Ontario Regulation 429/07 and Ontario Regulation 191/12 and the Ministry of Economic Development, Trade and Employment's, intent to "streamline, align and phase-in accessibility requirements and allow for progress on accessibility".

Scope and Responsibilities

This policy has been written in accordance with the regulation and addresses how Easy Plastic Containers Corporation achieves accessibility through meeting the regulatory requirements. It provides the overall strategic direction that we will follow to provide accessibility supports to Ontarians with disabilities.

This policy applies to all employees, volunteers, and to any individual or organization that provides goods, services or facilities to the public or other third parties on behalf of Easy Plastic Containers Corporation, in accordance with the legislation. This policy is available in accessible formats or with communication supports, upon request.

Policy Statement and Organizational Commitment

Easy Plastic Containers Corporation is committed to providing exceptional and accessible service to its customers. Goods and services will be provided in a manner that respects the **dignity and independence** of all customers. The provision of services to persons with disabilities will be **integrated** wherever possible. Persons with disabilities will be given an opportunity **equal** to that given to others, to obtain, use or benefit from the goods and services provided by and on behalf of Easy Plastic Containers Corporation.

We support the full inclusion of persons as set out in *Canadian Charter of Rights and Freedoms Act*, and the *Accessibility for Ontarians with Disabilities Act, 2005*.

Easy Plastic Containers Corporation shall use every effort to ensure that we meet the needs of people with disabilities, in a timely manner, through the implementation of this policy.

Definitions:

Below is a list of twenty (20) definitions used in this policy, listed in alphabetical order:

Accessible:

Accessible means customer service is provided in a manner that is capable of being easily understood or appreciated; easy to get at; capable of being reached, or entered; obtainable.

Accessible Formats:

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:

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:

Assistive devices are defined as any piece of equipment or product that is used to increase, maintain or improve functional capabilities of persons with disabilities.

Barrier:

Barrier means anything that prevents a person with a disability from fully participating in all aspects of society because of a disability. Barriers may include physical, architectural and attitudinal barriers as well as any information.

Communication Supports:

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.

Communications:

Communications means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received.

Conversion Ready:

Conversion ready means an electronic or digital format that facilitates conversion into an accessible format.

Disability

Disability means:

- a) Any degree of physical 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

impairment, 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*.

Guide Dog:

Guide dog means a dog trained as a guide for a blind person and having the qualifications prescribed by the Blind Persons' Rights Act R.S.O. 1990, c. B.7, s. 1 (1).

IAP

An Individual Accommodation Plan outlining process for accommodating employees with disabilities that work for Easy Plastic Containers Corporation.

Information:

Information includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.

Maintenance of Public Spaces:

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.

Mobility Aid:

Mobility aid means a device used to facilitate the transport, in a seated posture, of a person with a disability.

Mobility Assistive Device:

Mobility assistive device means a cane, walker, wheelchair, scooter or similar aid.

Redeployment:

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.

Service Animal:

Service animal is an animal for a person with a disability, if it is readily apparent that the animal is used by the person for reasons relating to his/her disability; or if the person provides a letter from a health practitioner confirming that the person requires the animal for reasons relating to the disability.

Service Disruption:

Service disruption is defined as planned or unplanned unavailability of facilities or services operated by an organization.

Support Person:

Support person is a person who accompanies a person with a disability in order to help with communications, mobility, personal care, medical needs or with access to goods and services.

Unconvertible:

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.

General

Easy Plastic Containers Corporation is a private sector organization and are committed to providing goods and services to the public in an accessible manner in accordance with the legislation.

Policies and Procedures

We have developed policies and procedures which will govern how Easy Plastic Containers Corporation will meet its obligations under the *Accessibility for Ontarians with Disabilities Act*

Procurement of Goods and Services

When procuring goods and services, self-service kiosks or facilities, we shall keep accessibility in mind.

Accessibility Training for Staff

Easy Plastic Containers Corporation will ensure that training is provided to all employees and regular fee-for-service staff 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 as soon as practicable. If any changes are made to this policy or the requirements training will be provided.

Every person who works for the organization or who participates in developing Easy Plastic Containers Corporation's policies, practices and procedures governing the provision of goods and services to the public; including company staff, volunteers, agents, contractors and others will receive training regarding the provision of goods and services to persons with disabilities and on the requirements of the Customer Service Regulation, the Integrated Accessibility Standards Regulation and the Ontario Human Rights Code as applicable.

A record of the dates on which training is provided and the number of individuals to whom it is provided will be kept.

Multi-Year Accessibility Plan

Easy Plastic Containers Corporation'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*. Easy Plastic Containers Corporation will monitor the progress and implementation of the plan, post the information to our website and will provide it in alternative formats upon request. The plan will be reviewed and updated at least every five (5) years.

Customer Service Standard

Easy Plastic Containers Corporation is committed to providing exceptional and accessible service to its customers. Goods and services will be provided in a manner that reflects the four principles of accessible customer service:

- Independence;
- Integration;
- Dignity; and
- Equal opportunity.

Use of Service Animals, Support Persons and Assistive Devices

If a person with a disability is accompanied by a guide dog or other service animal, Easy Plastic Containers Corporation will ensure that the person is permitted to enter our facility with the animal and to keep the animal with him or her unless the animal is otherwise excluded by law. Where a service animal is excluded by law, Easy Plastic Containers Corporation will ensure that other measures are available to enable the person with a disability to obtain, use and benefit from the company's goods and services.

The service animal must be under the care and control of the individual at all times. If the service animal is not easily identifiable, the employee can request the individual to provide documentation from a regulated health professional verifying it is a service animal.

If a person with a disability is accompanied by a support person, Easy Plastic Containers Corporation will ensure that both persons are permitted to enter a Company facility, and that the person with a disability is not prevented from having access to the support person. If an amount is payable by a support person for admission, or otherwise, to a premise, Easy Plastic Containers Corporation will ensure notice is given in advance about the amount.

Easy Plastic Containers Corporation may require a person with a disability to be accompanied by a support person when in a company facility, but only if a support person is necessary to protect the health or safety of the person with a disability or the health or safety of others in the facility. Before making that decision, we as an organization shall consider the four points below:

- Consult with the person with the disabilities to understand their needs;
- Consider the health or safety reasons based on available evidence;

- Determine if there is no other reasonable way to protect the health and safety of the person or others on the premises;
- Waive the admission fee or fare for the support person if one exists.

A person with a disability is permitted to use their own personal assistive devices to access and benefit from our goods and services. If we provide any assistive devices, we will ensure a staff person knows how to operate that assistive device.

Notice of Disruptions

Easy Plastic Containers Corporation shall provide notice of service disruption to the public.

Any Notice of Disruption will contain the following three pieces of information:

- Reason for the disruption;
- Anticipated duration; and
- Alternative facilities or services.

Company staff will provide such notice in at least one of the following three methods:

- Notice physically posted at the site of the disruption;
- Notice on Company website; and
- Any other method that may be reasonable under the circumstances.

Communications

Easy Plastic Containers Corporation will provide communication to people with disabilities in ways that take into account their disabilities.

Notice of Availability of Documents

Easy Plastic Containers Corporation will provide the public notice of the availability of documents upon request. Notice of availability will be provided on Easy Plastic Containers Corporation web site and through other printed methods.

Format of Documents

If Easy Plastic Containers Corporation is required, by the *Accessibility for Ontarians with Disabilities Act, 2005*, to give a copy of a document to a person with a disability, we will take into account the person's ability to access the information and will provide the document or information contained in the document in a format that meets those needs as agreed upon with the person.

Information and Communications Standard

Easy Plastic Containers Corporation will create, provide and receive information and communications in ways that are accessible to people with disabilities.

If Easy Plastic Containers Corporation 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, we 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.

Accessible Formats and Communication Supports

Easy Plastic Containers Corporation shall provide or arrange for accessible formats and communication supports for persons with disabilities as per four bullets below:

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

Emergency Information

If Easy Plastic Containers Corporation prepares any emergency procedures, plans or public safety information and makes the information available to the public, we shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

Feedback

Easy Plastic Containers Corporation 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.

Easy Plastic Containers Corporation accepts feedback from the public in following four methods including:

- Telephone: 905-669-4466
- Fax: 905-669-5635
- In writing: Easy Plastic Containers Corporation Ltd., 101 Jardin Drive, Concord, Ontario, L4K 1X6
- Email: inquiry@easyplastics.com

All feedback is reviewed by Upper Management Human Resources. Complaints are investigated and follow up is provided to the customer if requested within 5 days of receiving the complaint.

Employment Standard

The Employment Standard builds upon the existing requirements under the *Ontario Human Rights Code* in relation to how we provide accessibility. It applies in respect to employees and does not apply to volunteers and other non-paid individuals. It includes accommodating employees with disabilities during the Recruitment, Assessment and Selection process, and throughout the life cycle of an employee's employment as per the *Accessibility for Ontarians with Disabilities Act*.

The requirements of the Employment Standard shall be met by Easy Plastic Containers Corporation by January 1, 2017 unless otherwise specified.

Recruitment

Easy Plastic Containers Corporation shall post information about the availability of accommodations for applicants with disabilities during the recruitment process. We will consult with any applicants who request an accommodation and provide them in a manner that takes into account the applicant's disability.

Assessment

Job applicants who are individually selected for an interview and/or testing shall be notified that accommodations are available, upon request.

Retention

Easy Plastic Containers Corporation shall notify the successful applicants of the policies for accommodating employees with disabilities as part of their offer of employment.

Employee Notification

Easy Plastic Containers Corporation shall inform all 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.

Easy Plastic Containers Corporation shall provide information required under this section to new employees as soon as practicable after they begin their employment and 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 a disability.

Accessible Formats

In addition, and where an employee with a disability requests it, Easy Plastic Containers Corporation will consult with the employee to provide or arrange for the provision of accessible formats and communication supports as per the three points below:

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

Individual Accommodation Plan (IAP)

Easy Plastic Containers Corporation will have in place a written process for developing a documented individual accommodation plan for employees with disabilities. The following twelve points will form the development of the Individual Accommodation Plan.

- The employee's participation in the development of the IAP;
- Assessment on an individual basis;
- Identification of accommodations to be provided;
- Timelines for the provision of accommodations;

- Easy Plastic Containers Corporation may request an evaluation by outside medical or other expert, at the expense of the company, to assist with determining accommodation and how to achieve accommodation;
- Employee may request the participation of a representative from the workplace;
- Steps taken to protect the privacy of the employee's personal information;
- Frequency with which the IAP will be reviewed or updated and the manner in which it will be done;
- If denied, the reasons for denial are to be provided to the employee;
- A format that takes the employee's disability needs into account;
- If requested, any information regarding accessible formats and communication supports provided;
- Identification of any other accommodation that is to be provided.

Performance Management, Career Development & Advancement, and Redeployment

Easy Plastic Containers Corporation will take into account the accommodation needs and/or individual accommodation plans of employees for the three points below when:

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

Workplace Emergency Response Information

Easy Plastic Containers Corporation shall provide individualized workplace emergency response information to employees who have a disability as per the four points below:

- 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;
- If the employee who receives individual workplace emergency response information requires assistance and with the employee's consent, Easy Plastic Containers Corporation shall provide the workplace emergency information to the person designated and provide assistance to the employee;
- As soon as practicable after becoming aware of the need for accommodation due to the employee's disability; and
- 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. The Transportation Standard does not apply to us an organization, but we will inform staff through staff training on the upcoming changes and its impact and benefits to the community for people with disabilities.

Public Spaces

Easy Plastic Containers Corporation shall incorporate accessibility into public spaces that are newly constructed or redeveloped on and after January 1, 2018. Easy Plastic Containers Corporation does not have any public spaces however, if we do create new or renovated spaces, we will ensure that we follow the existing requirements stated under the Design of Public Spaces Standards as per six applicable areas 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.

We shall provide maintenance and restoration of newly created or renovated public spaces as applicable.

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