

## **Accessibility - Statement of Commitment**

Navacord is committed to excellence in serving all customers, employees, job applicants, suppliers, and any visitors, including people with disabilities, and will carry out its functions and responsibilities in an appropriate manner to accommodate such individuals.

Navacord is also dedicated to giving people with disabilities the same opportunity to access our goods and services, and allowing them to benefit from the same services, in the same place, and in a similar way as other customers.

Navacord will strive to ensure that its policies, practices and procedures are consistent with the following core principles as outlined in the AODA.

**Dignity** – Goods and services are provided in a manner that is respectful to persons with a disability and does not diminish the person’s importance.

**Independence** – Accommodating a person’s disability means respecting their right to do for themselves and to choose the way they wish to receive goods and services.

**Integration** – Wherever possible, services will be provided in a manner that enables people with disabilities to fully benefit from the same services, in the same place and in the same or similar way as other customers. This may require alternative formats and flexible approaches. It means inclusiveness and full participation. This is a fundamental human right.

**Equal Opportunity** – Service is provided to persons with disabilities in a way that their opportunity to access goods and services is equal to that given to others.

### **More Information**

Please contact your Human Resources Department.

## **INTEGRATED ACCESSIBILITY STANDARDS POLICY**

The following policy has been established by Navacord to govern the provision of services with Regulation 191/11, “Integrated Accessibility Standards” (“Regulation”) under the *Accessibility for Ontarians with Disabilities Act, 2005*.

These standards are developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment.

Navacord is governed by this policy as well as the Accessibility Standards for Customer Service Policy and the *Accessibility for Ontarians with Disabilities Act, 2005* in meeting the accessibility needs of persons with disabilities.

### **Commitment**

Navacord 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 persons 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.

This policy will be implemented in accordance with the time frames established by the Regulation.

### **Accessibility Plan**

Navacord will develop, maintain and document an Accessibility Plan outlining the company’s strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities.

The Accessibility Plan will be reviewed and updated at least once every five years, and will be posted on the company’s website. Upon request, Navacord will provide a copy of the Accessibility Plan in an accessible format.

### **Training Employees and Volunteers**

Navacord will ensure that training is provided on the requirements of the accessibility standards referred to in the Regulation and continue to provide training on the Human Rights Code as it pertains to persons with disabilities, to:

- all its employees and volunteers;
- all persons who participate in developing Navacord’s policies; and,
- all other persons who provide goods, services or facilities on behalf of the company

The training will be appropriate to the duties of the employees, volunteers and other persons.

Employees will be trained when changes are made to the accessibility policy. New employees will be trained within 60 days of the start of their employment.

Navacord will keep a record of the training it provides.

## **INFORMATION AND COMMUNICATIONS STANDARDS**

### **Feedback**

Navacord will continue to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communications supports, upon request.

### **Accessible Formats and Communication Supports**

Upon request, Navacord will provide, or will 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.

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

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

### **Accessible Websites and Web Content**

Navacord will ensure that our Internet websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA except where this is impracticable.

## **EMPLOYMENT STANDARDS**

### **Recruitment**

Navacord will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

### **Recruitment, Assessment or Selection Process**



Navacord will notify job applicants, 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, Navacord 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, Navacord will notify the successful applicant of its policies for accommodating employees with disabilities.

### **Informing Employees of Supports**

Navacord will continue to inform its employees of its policies (and any updates to those policies) used to support employees with disabilities, including 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.

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

Upon the request of an employee with a disability, Navacord will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his/her job, and information that is generally available to other employees.

In determining the suitability of an accessible format or communication support, Navacord will consult with the employee making the request.

### **Workplace Emergency Response Information**

Navacord 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 Navacord is aware of the need for accommodation due to the employee's disability. Navacord will provide this information as soon as practicable after becoming aware of the need for accommodation.

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



Navacord will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodations needs or plans are reviewed.

## **Documented Individual Accommodation Plans**

Navacord 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.

## **Return to Work Process**

Navacord maintains a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

The return to work process outlines the steps Navacord 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 will not replace or override any other return to work process created by or under any other statute (i.e. the *Workplace Safety Insurance Act, 1997*).

## **Performance Management, Career Development and Advancement & Redeployment**

Navacord 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.



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### **Questions about this policy**

This policy has been developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment. If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation will be provided by:

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