

# POLICY

## Integrated Accessibility Standards AODA - Canada

### DOCUMENT CHANGE RECORD

REV.	PAGE	PARA.	NATURE OF CHANGE	DATE
A	ALL		New Policy	Dec 2013
B	ALL	1.0-9.0	Update to Company logo. Clarification of wording, update to contacts and approvers. Added Scope, Public Spaces	Jun 2021

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Approved	
	
<b>Stacey Dow</b> Associate Director, Human Resources	<b>Scott Nanson</b> Director, Oakville Operations

## **POLICY**

### **Integrated Accessibility Standards AODA - Canada**

#### **1.0 AODA VISION STATEMENT**

The following policy has been established by Collins Aerospace (corporate name is Goodrich Aerospace Canada Ltd.) (the “Company”) to govern the provision of services with Regulation 191/11, “Integrated Accessibility Standards” (the “Regulation”) under the *Accessibility of Ontarians with Disabilities Act, 2005* (the “AODA”).

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

The Company is governed by this policy as well as the Accessibility Standards for Customer Service Policy, the Multi-Year Accessibility Plan, and the AODA in meeting the accessibility needs of persons with disabilities.

#### **2.0 COMMITMENT**

The Company is committed to treating all people in a way that allows them to maintain their dignity and independence.

The Company believes in integration and equal opportunity and is committed to meeting the needs of persons with disabilities.

The Company aims at providing support to individuals with disability in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting its obligations under the AODA. To the extent possible, requests for accommodation will be addressed within 5 business days.

This policy will be implemented in accordance with the time frames established by the Regulation and set out in the Company’s Integrated Accessibility Standards Multi-Year Plan.

#### **3.0 SCOPE**

This Policy applies to all of the Company’s Representatives in the Province of Ontario.

For the purposes of this Policy, “Representative” means employees, volunteers, others that provide goods or services on the Company’s behalf and all those who are involved in the development of the Company’s policies, practices and procedures.

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#### 4.0 DEFINITIONS

As used in this Policy, the following terms have the meanings identified below:

**“Accessible Formats”** means any form of large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

**“Communication Supports”** means captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

**“Disability”** as defined in the Ontario *Human Rights Code* 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*.

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

**“Website”** means a collection of related webpages, images, videos, or other digital assets that are addressed relative to a common Uniform Resources Identifier (URI) and is accessible to the public.

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 1400 South Service Road, West  
 Oakville, Ontario, L6L 5Y7

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#### 5.0 TRAINING

The Company will ensure that training is provided on the Regulation and on the *Human Rights Code* as it pertains to persons with disabilities, to all Representatives.

The training provided by the Company will be appropriate to the duties of the Representatives.

Additional training will be provided when changes are made to the accessibility policy. New employees will be trained within 90 days of their date of hire.

Human Resources will maintain records of all employees trained on accessibility laws and the *Human Rights Code*, including the name of the employee, date of training and details of the training provided.

#### 6.0 COMMITMENT TO ACCESSIBLE INFORMATION AND COMMUNICATIONS

##### Accessible Formats and Communication Supports


The Company will endeavor to create, provide and receive information and communications in ways that are accessible to people with disabilities. The Company will notify the public about the availability of accessible formats and communication supports. When asked, the Company will provide information about the Company and its services, communications made available to the Company's customers and the public (including this policy), and any publicly available emergency procedures, plans or public safety information in accessible formats or with communication supports.

The Company will provide or arrange for accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs and at a cost that is no more than the regular cost charged to other persons. The Company will consult with the person making the request to determine the suitability of any accessible format or communication support provided.

If the Company determines that it is not technically feasible to convert the information or communications or that the technology to convert the information or communications is not readily available, the Company shall, upon request, 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 Websites and Web Content

Except where not practicable, the Company ensures that its current internet website(s), web content (backdated to 2012) and web-based applications conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level AA (other than success criteria 1.2.4 and 1.2.5).

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#### Feedback

The Company 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 communication supports.

Feedback may be delivered to the Company in person, by telephone, mail, email, facsimile or other means available to the person.

Customers may use any of the following feedback channels:

- In person at the Company's office:  

**1400 South Service Road West, Oakville, ON, L6L 5Y7 Canada**
- By telephone or facsimile:  

**Phone: 905-827-7777 Fax: 905-825-1583**
- By mail: in writing or through electronic or audio recording.  

**1400 South Service Road West, Oakville, ON, L6L 5Y7 Canada**

All feedback will be reviewed for possible improvement in the Company's services and accessibility to its services. Feedback will be directed to the most appropriate employee for resolution, and any complaints will be addressed as soon as possible. Persons providing feedback can expect an acknowledgment of their feedback to be issued within **15** business days. The acknowledgment will indicate when the matter will be addressed, and when the individual will be notified further with respect to the matter. Correspondence with the individual will take into account their accessibility needs and will be provided in accordance with the Company's commitment to accessible information and communication supports, described above.

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#### **7.0 EMPLOYMENT STANDARDS**

The Company has implemented the following practices and procedures to promote the inclusion of applicants for employment and existing employees with disabilities in its workplace.

##### **Recruitment**

The Company 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**

The Company will notify job applicants, when they are individually selected to participate further in an assessment or selection process that accommodations in relation to the materials or processes to be used, are available upon request.

If a selected applicant requests an accommodation, the Company 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, the Company will notify the successful applicant of its policies for accommodating employees with disabilities.

##### **Informing Employees of Supports**

The Company 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, the Company 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 or her job, or information that is generally available to other employees.

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

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#### Workplace Emergency Response Information

The Company will provide individualized workplace emergency response information to individual employees:

- who have a disability,
- who the Company is aware have a need for accommodation due to the employee's disability, and
- who need individualized emergency response information.

The Company will provide this information as soon as practicable after becoming aware of the need for accommodation.

Where the employee requires additional support, the Company, with the consent of the employee, will provide the workplace emergency response information to the person designated by the Company to provide emergency support to the employee with a disability. The Company will not share the details of the employee's disability, just the information required to provide the support.

The Company will review the individualized workplace emergency response information when: reviewing the general emergency response policies; reviewing an individual employee's overall accommodation needs or plans; or when the employee requesting accommodation moves to a different location.

If you are a person with a disability and require assistance in the event of an emergency, please contact Human Resources and Environmental Health & Safety so that the Company can provide you with a personalized workplace emergency response plan.

The Company will review and update, if necessary, the response plan when:

- a) you change locations;
- b) your overall accommodation needs and/or accommodation plan are reviewed; and
- c) when the Company's general emergency policies are reviewed.

#### Documented Individual Accommodation Plans

If an employee requires reasonable accommodation in the workplace due to a disability, the Company will work with the employee to prepare an individual accommodation plan ("IAP") outlining, among other things, any accommodation measures that will be implemented. The IAP will be provided to the employee in a format which takes into account his or her disability.

The IAP process will be kept as confidential as possible. No information will be released to other team members without the permission of the employee, except as where required for reasonable operational purposes: those who are informed will be advised on a "need to know" basis only (e.g., direct supervisor of the employee).

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The IAP Process is as follows:

- Employee advises their Manager that they require an accommodation due to a disability. If the employee advises his or her Manager, the Manager is responsible for contacting Human Resources and Environmental Health & Safety to engage this IAP Process.
- Employee participates in the development of the IAP with Human Resources and Environmental Health & Safety. The employee may request to Human Resources the participation of one (1) representative from the workplace to participate in this process with the employee.
- Employee provides Human Resources and Environmental Health & Safety with information and documentation regarding the employee's functional limitations and advises how the Company may be able to accommodate the disability. The Company will consider the employee's proposals however, ultimately it is up to the Company to determine what, if any, reasonable accommodations will be provided, based on the documentation submitted by the employee and the Company's operational needs.
- The Company can, at its discretion, request an evaluation by an outside medical or other expert, at the Company's expense, to assist in assessing potential options to accommodate the employee.
- Human Resources and Environmental Health & Safety documents the accommodation requirements in the IAP, including any workplace emergency response information that may be required.
- Within two (2) weeks of finalizing the IAP, the Company will provide the employee with a copy of the IAP in a format which takes into account the individual's disability. A copy is placed in the employee's file and a copy will be provided to the employee's direct supervisor.
- Human Resources takes responsibility for ensuring the plan of action outlined in the IAP is in place.
- Each IAP is reviewed annually or when the Company receives information suggesting that the employee's disability-related needs have changed.

If the Company determines that accommodation is not required or if the Company cannot accommodate the employee without undue hardship, the employee will be provided with the reasons for this decision.

<b>Approved</b>	
	
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#### Return to Work Process

The Company will maintain a 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 will outline the steps the Company will take to facilitate the individual's return to work and will include documented individual accommodation plans as part of the process, where required.

The Company's return to work/accommodation process does not replace or override any other return to work process created by or under any other statute (e.g., the *Workplace Safety Insurance Act, 1997*).

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

The Company will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management reviews, providing career development and advancement opportunities to employees, or when redeploying employees.

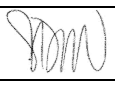
#### 8.0 PUBLIC SPACES

The Company shall incorporate accessibility into the Company's public spaces that are newly constructed or redeveloped on and after January 1, 2017. We will ensure that we follow the requirements stated under the Design of Public Spaces Standards (Accessibility Standards for the Built Environment). We shall also provide, within our contractual obligations and capabilities, restoration and maintenance of the Company's public spaces by ensuring our Multi-Year Accessibility Plan includes procedures for preventative and emergency maintenance of accessible elements in the Company's public spaces and procedures for dealing with temporary disruptions when accessible elements required under this section are not in working order.

#### 9.0 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:

**Stacey Dow**  
 Associate Director, Human Resources  
 Email: [Stacey.Dow@collins.com](mailto:Stacey.Dow@collins.com)  
 Phone: (416) 771-7057

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