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|  | TITLE: AODA-Integrated Accessibility Standard Regulation |                             |
|   | EFFECTIVE DATE: Nov. 10, 2017                            | RE-ISSUE DATE: Dec. 7, 2020 |
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## Applicable Legislation:

*Accessibility for Ontarians with Disabilities Act (AODA), Ontario Regulation 191/11, Integrated Accessibility Standards Regulation (IASR)*  
*Web Content Accessibility Guidelines (WCAG) 2.0 Level AA*

### 1.0 PURPOSE

(1) To establish the principles of *Integrated Accessibility Standards Regulation (IASR)* in the areas of *Information and Communications, Employment, Transportation and Design of Public Spaces and Customer Service*, with a process to structure, align and phase-in accessibility requirements under the regulation.


(2) The requirements in the standards set out in this Regulation are not a replacement or a substitution for the requirements established under the Human Rights Code nor do the standards limit any obligations owed to persons with disabilities under any other legislation (*O. Reg. 191/11, s. 1 (2)*).

### 2.0 SCOPE

The policy applies to all employees of Alumicor, including visitors, third party contractors and customers.

### 3.0 DEFINITIONS


- 3.1 Accessibility** means giving people of all abilities opportunities to participate fully in everyday life. It is used to describe how widely a service, product, device, or environment is available to as many people as possible. Accessibility can be seen as the ability to access and benefit from a system, service, product or environment.
- 3.2 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.
- 3.3 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.
- 3.4 Assistive Device** may include a 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 persons with disabilities 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.
- 3.5 Barrier** means anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice.

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- 3.6 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.
- 3.7 Communications** means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received.
- 3.8 Disability** means:
- (a) any degree of physical disability, 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 impediment, 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*; (“handicap”).
- 3.9 IAP** means Individualized Accommodation Plan.


## 4.0 RESPONSIBILITIES

- 4.1 President** has overall responsibility for this program.
- 4.2 Manager/Supervisors** are responsible to ensure that employees follow this procedure, arrange for special assistance for persons with disabilities who have communicated such requirements, incorporate accessibility requirements during employment process and implement all other requirements of this procedure.
- 4.3 Marketing** is responsible for updating and maintaining Alumicor’s Website to meet the *Web Content Accessibility Guidelines (WCAG) 2.0 Level AA*.
- 4.4 Health and Safety** is responsible to update this procedure, train employees requiring training on this procedure, receive feedback, and coordinate with Managers/Supervisor any special assistance required for persons with disabilities and support any other accessibility requirements as required by this procedure.
- 4.5 JHSC** is responsible to assist individuals in case of *Emergency Response Plan* as needed and review the changes in this procedure.
- 4.6 Human Resources** will incorporate accessibility requirements during employment process and retain training records including employees’ names and dates of training and receive feedback.
- 4.7 Employees** are responsible to follow this procedure and employees with disabilities who may require assistance to inform Alumicor to be adequately accommodated and in the event of an emergency shall communicate their requirement to their Manager/Health and Safety Specialist and give consent to receive specific help.

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## 5.0 POLICY

- 5.1 STATEMENT OF COMMITMENT:** Alumicor is committed to ensuring equal access and participation for people with disabilities. Alumicor is committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. Alumicor believes in integration, and is committed to meeting the needs of people with disabilities in a timely manner. Alumicor will do so by removing and preventing barriers to accessibility and by meeting accessibility requirements under Ontario’s accessibility laws.
- 5.2 INFORMATION AND COMMUNICATION:** Alumicor will communicate with people with disabilities in ways that take into account their disability. When inquired, ALUMICOR will provide information about our organization and its services in accessible formats or with communication supports. Alumicor will also meet internationally-recognized **Web Content Accessibility Guidelines (WCAG) 2.0 Level AA** website requirements in accordance with Ontario’s accessibility laws as applicable.
- 5.3 ASSISTIVE DEVICES:** Alumicor welcomes people with 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.
- 5.4 SERVICE ANIMALS:** Alumicor welcomes persons with disabilities and their service animals. If a service animal is not easily identifiable, Alumicor will request the person to provide documentation from a regulated health professional. The documentation must confirm that the person needs the service animal for relating to their disability. However, service animals have to comply with Health and Safety regulations and can be excluded from the plant. Alumicor will use other measures to ensure the person with a disability can access our goods, services or facilities.
- 5.5 SUPPORT PERSONS:** Alumicor welcomes support persons to accompany a person with the disability. In certain cases, Alumicor might require a person with a disability to be accompanied by a support person or the health or safety reasons of the person with a disability and others on the premises.  
Support person will be determined only with the consultation with the person with a disability to understand their needs, evidence of health and safety concerns; and if there is no other reasonable way to protect the health or safety of the person with a disability and the health or safety of others on the premises. *NOTE: An Admission fee is not required to access Alumicor goods and services.*
- 5.6 EMPLOYMENT:** Alumicor will notify employees, potential hires and the public that accommodations can be made during recruitment and hiring and provide support as needed. Alumicor will put in place a process to develop individual accommodation plans for employees. Alumicor performance management, career development and redeployment processes will take into account the accessibility needs of all employees.

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**5.7 WORKPLACE EMERGENCY RESPONSE PLAN:** Alumicor shall provide individualized workplace emergency response information to Alumicor employees who have a disability, if the disability is such that the individualized information is necessary, and if the Alumicor employee makes Alumicor aware of the need for accommodation due to the employee's disability. Alumicor shall provide this information as soon as practicable after becoming aware of the need for accommodation. **Employees Requiring Assistance** who may require assistance in the event of an emergency shall communicate their requirement to their Manager/Health and Safety Specialist and give consent to receive specific help.

**5.8 NOTICE OF TEMPORARY DISRUPTION:** In the event of a planned or unexpected disruption to facilities for customers with disabilities, Alumicor will notify Customers through postings the reason for the disruption, its anticipated duration and a description of alternative facilities or services as soon as reasonably possible.


**5.9 TRAINING:** Alumicor will ensure that training is provided to all employees, and those that develop policies; on the requirements of the accessibility standards referred to in the regulation and on the *Human Rights Code* as it pertain to persons with disabilities. Training shall be appropriate to the duties of Alumicor employees and will also be incorporated in the *Orientation* training for all new employees. If any changes are made to this policy or the requirements, training will be provided to include those changes. Alumicor shall maintain a record of the dates when training was provided along with the training document and the list of individuals to whom it was provided.

## 6.0 PROCEDURE

**6.1** Alumicor will accommodate customers and employees wherever possible. To request accommodation or assistance for any program, good or service, contact the **Health and Safety Specialist by phone, email or in person.**

**6.2** Alumicor has created a **MULTI-YEAR ACCESSIBILITY PLAN** that outlines a phased-in strategy to prevent and remove barriers and addresses the current and future requirements of the Accessibility at Alumicor. Alumicor will provide the plan in alternative formats upon request. The plan will be reviewed and updated at least once every year.

**6.3 FEEDBACK:** Alumicor shall 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, upon request. Any individual can submit feedback to our Human Resources/Health and Safety Specialist in person, email, phone or submitting an online "*Customer Service Feedback Form*" available on Alumicor's website at [www.alumicor.com](http://www.alumicor.com). Alumicor will investigate and respond to all complaints relating to its services in a timely, thorough and objective manner. Alumicor will investigate and respond to all complaints relating to its services in a timely, thorough and objective manner.

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**6.4 MODIFICATIONS TO THIS POLICY AND OTHERS:** Alumicor is committed to developing accessible policies that respect and promote the dignity and independence of people with disabilities. Alumicor retains the right to amend or change this policy at any time; however, any such change will only be made after considering the impact on people with disabilities.

## 7.0 REFERENCES

- 7.1 Alumicor Multiyear Accessibility Plan  
<P:\Health and Safety\Corporate\Corporate Policies and Programs\AODA>
- 7.2 Our Commitment To Accessibility Policy Statement  
<P:\Health and Safety\Corporate\Corporate Policies and Programs\AODA>
- 7.3 A Guide to the Integrated Accessibility Standards Regulation  
<https://dr6j45jk9xcmk.cloudfront.net/documents/4845/guidelines-to-iasr-english.pdf>
- 7.4 How to make websites accessible  
<https://www.ontario.ca/page/how-make-websites-accessible>
- 7.5 Accessibility Features of Alumicor Website  
<P:\Health and Safety\Corporate\Corporate Policies and Programs\AODA>

| REVISION DATE | REVISION DATE | SECTIONS REVISED/EDITED  | APPROVED BY:    |
|---------------|---------------|--|-----------------|
| Nov. 10, 2017 | 1             | ALL  | Hitendra Rathod |
| Oct. 21, 2019 | 2             | Sec. 4.1, 4.3, Job Titles Changes; Sec. 6.1, 6.3 Customer Service Feedback Form; Added 7.1 |                 |
| Dec. 7, 2020  | 3             | Added Legislation on WCAG, Sections 4.3, 7.1, 7.4, 7.5                                     |                 |



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