

	<b>POLICY &amp; SYSTEM PROCEDURES</b>		
	<small>Title:</small> <b>Accessibility Policy</b>	<b>SP 6.4.2</b>	<small>Rev:</small> July 9, 2024 <small>Page:</small> 1 of 5
	<small>Review:</small> W. Krulicki	<small>Approval:</small> S. Gater	

## STATEMENT OF POLICY

Disability affects all social, economic, and educational classes. Various types of disability include vision, hearing, physical, intellectual, developmental, learning, mental health, speech, or language and deaf-blind. Cedarlane is committed to making every effort to provide a barrier-free environment for all stakeholders including our employees, job applicants, clients/customers, suppliers, and any visitors who may enter our premises, access our information, or use our services to individuals with physical, mental, learning disability or condition of mental impairment or developmental disabilities in a timely manner, consistent with the accessibility legislation requirements, including the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*, *The Accessibility for Manitobans Act (AMA)* and any associated standards and regulations.

## ADMINISTRATION

Cedarlane is committed to developing policies that respect and promote the dignity and independence of individuals with disabilities. Therefore, no changes will be made to this policy before considering the impact on individuals with disabilities. Any policy of the Company that does not respect and promote the dignity of individuals with disabilities will be modified or terminated. Any exceptions to this policy must be approved in advance by Human Resources. This policy may be amended or terminated at any time.

## APPLICATION

This policy applies to all employees that are required to comply with accessibility legislation, who provide goods, services, and employment opportunities on behalf of Cedarlane to ensure that all individuals including those with disabilities have equal opportunities. Supervisors, Managers and Human Resources are responsible for applying this policy.

## POLICY

### General Requirements

Accessibility standards have been developed to remove, reduce, and prevent barriers to access goods, services, and employment opportunities to individuals with disabilities in various areas, including Customer Service, Information and Communications, and Employment and Design of Public Spaces. General requirements that apply across all areas are outlined as follows:

#### 1. Establishment of Accessibility Policies and Plans

- Cedarlane will make reasonable efforts to be consistent with developing, implementing, and maintaining policies governing how it will achieve accessibility to ensure individuals who self-identify as disabled have the same opportunity to access products, services, and employment opportunities.
- Cedarlane will establish, implement, maintain, and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements. Accessibility plans will be made available in an accessible format, upon request.

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- Cedarlane will review and update its accessibility plan once every five (5) years and will establish, review, and update our accessibility plans in consultation with individuals with disabilities or an advisory committee. Annual status reports will be prepared that will report on the progress of the steps taken to implement accessibility plans. This status report will be available upon request. If requested, the report shall be created in an accessible format.

## 2. **Procuring or Acquiring Goods and Services, or Facilities**

Cedarlane will incorporate accessibility criteria and features when procuring or acquiring goods, services, or facilities. The only exception is in cases where it is impracticable to do so.

## 3. **Training**

- Cedarlane will provide training to all employees who provide goods, services, or facilities, recruit, select, train, promote, redeploy, terminate, manage, supervise, as well as ensure that those who are involved in the development and approvals of policies, practices and procedures are trained in the following areas:
  - How to interact and communicate with individuals with various types of disabilities;
  - How to interact with individuals with disabilities who use an assistive device or require the assistance of a service animal or a support person;
  - How to use the equipment or assistive devices that may help with the provision of products or services to individuals with disabilities;
  - What to do if a person with a disability is having difficulty in accessing Cedarlane's products or services;
  - Cedarlane's policies, practices and procedures relating to the Customer Service Standard.
- Training will be provided as soon as reasonably practical, but no later than the compliance deadline.
- Training will be provided on an ongoing basis to new employees and further training will be provided to all employees as changes to Cedarlane's accessibility policies occur.
- Cedarlane will maintain records on the training provided, when it was provided and the number of employees that were trained.
- Cedarlane will ensure that employees are trained to communicate with customers over the telephone in clear and plain language and to speak clearly and slowly.

## **Accessibility Standards**

### 1. **Customer Service Standard:**

Cedarlane is committed to excellence in serving all customers, including individuals with disabilities, in a manner that is accessible and respects the dignity and independence of each individual. The Customer Service Standard applies to the provision of goods and services to the public or other third parties, not to the goods themselves. Cedarlane will carry out our functions and responsibilities in the following areas:

#### a) **Communication:**

- communicate with individuals with disabilities in ways that take into account their disability and their accessibility needs when customizing individual requests and shall consult with the individual making the request to ensure suitability.

- ensure that employees who communicate with customers with disabilities are trained on how to interact and communicate over the telephone in clear and plain language and to speak clearly and slowly.
- provide accessible documents upon request and answer any questions individuals may have about the content of the document.

**b) Telephone Services**

- provide fully accessible telephone service to employees, job applicants, clients/customers, suppliers, and any visitors.

**c) Assistive Devices**

- serve individuals with disabilities who use assistive devices to obtain, use or benefit from our goods and services.
- If an assistance device could potentially impose a security, health, or safety risk to the individual or others, Cedarlane will make other reasonable measures available to assist the individual with a disability when accessing premises, obtaining goods, services, or employment opportunities from Cedarlane.

**d) Use of Service Animals and Support Persons**

- welcoming individuals with disabilities who are accompanied by a service animal or support person on the parts of our premises that are open to the public
- ensure that employees are properly trained in how to interact with individuals with disabilities who are accompanied by a service animal.

**e) Notice of Temporary Disruption**

- provide notice in the event of a planned or unexpected disruption in the facilities or services usually used by an individual with disabilities.

**2. Information and Communication Standard:**

The Information and Communication Standard applies to the provision of information and communication services and materials for individuals with disabilities. This standard addresses the following areas:

**a) Feedback Process**

- make effort to ensure that all feedback processes are made accessible to employees, job applicants, clients/customers, suppliers, and visitors.
- HR Department will field all feedback inquiries and the appropriate department will respond.
- Individuals can expect to hear back within five (5) business days.
- Feedback, concerns, questions about the policy, or if the purpose of a policy is not understood, will be addressed by the Cedarlane Human Resources Department:

**Toll free:** 1-800-268-5058 ext. 230  
**Fax:** 289-288-0020  
**Email:** [HR@Cedarlanelabs.com](mailto:HR@Cedarlanelabs.com)  
**Mail:** Cedarlane Corporation  
 Attn: Human Resources - Accessibilities  
 Feedback  
 4410 Paletta Court  
 Burlington, Ontario  
 L7L 5R2

**b) Emergency Procedures, Plans and Public Safety**

- ensure all publicly available emergency procedures, plans or public safety information is available in an accessible format or with appropriate communication supports, upon request.
- where required, create individual workplace emergency response information for employees with disabilities in consultation with the employee.

**c) Accessible Formats and Communication Supports**

- provide communication in accessible formats and communication support to a person that self- identifies as having a disability. Documents will be provided in the following formats upon request:
  - Accessible Formats –large print, recorded audio, electronic format, braille, etc.
  - Communication Supports – captioning, alternative and augmentative communication supports, plain language, sign language, etc.
  - Conversion Ready –electronic or digital format that facilitates conversion into an acceptable format
- make availability of accessible formats and communication supports publicly known

**d) Accessible Websites and Web Content**

- ensure our website and web content published conforms to the Web Content Accessibility Guidelines (WCAG) 2.0, except where this is impractical.

**e) Exceptions**

- products and product labels; unconvertible information or communications; or information that is not controlled by the organization.
- If information or communications are unconvertible, Cedarlane will ensure that individuals are provided with an explanation and a summary of the information.
- Cedarlane will classify information or communications as unconvertible where it is not technically practicable to convert, or the technology required to make the conversion is not readily available.

**3. Employment Standard**

The Employment Standard applies to the provision of accessible employment services for persons with disabilities. These standard addresses:

**a) Recruitment, Assessment and Selection**

- notify employees and the public about the availability of accommodation for job applicants with disabilities. Where an accommodation is requested, Cedarlane will consult with the applicant and provide or arrange for suitable accommodations.

**b) Performance Management and Career Development and Advancement**

- consider accessibility needs when assessing, performance, productivity, and effectiveness or when offering career development or advancement opportunities.

**c) Return to Work**

- develop and implement return-to-work processes for employees who are absent from work due to a disability and require disability-related accommodation(s) .

**d) Redeployment**

- take accessibility needs into account in the event of redeployment.

e) **Documented Individual Accommodation Plans**

- document individual accommodation plans for employees with disabilities.

4. **Design of Public Spaces**

- ensure our premises and related services are accessible and if applicable, provide alterations.
- If unavailable, provide explanation and notice