

**EFFECTIVE DATE: November 25, 2024**

## OBJECTIVE

Drive Products Inc. (“DPI” or the “Company”) is committed to taking every precaution reasonable in the circumstances for the protection of the health and safety of workers, as required by the *Occupational Health and Safety Act*.

DPI is committed to ensuring equal access and participation for people with disabilities. We are committed to treating all people in a way that allows them to maintain their dignity and independence. We are committed to meeting the needs of people with disabilities in a timely manner.

## DEFINITION

The *Accessibility for Ontarians with Disability Act, 2005* (the “AODA”) is a provincial statute that outlines the requirements for developing, implementing and mandating accessibility standards to achieve accessibility for persons with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures, and premises.

A detailed compliance framework for designated public sector organizations, including the Office of the Worker Adviser (DPI) is included in the Integrated Accessibility Standards Regulation (IASR) (O. Reg. 191/11) that defines the standards for accessibility in areas including:

- customer service
- information and communications
- employment
- design of public spaces
- transportation

The Accessibility Policy is developed to ensure that DPI meets its compliance obligations for accessibility set out in the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) and Ontario Regulation 191/11 - Integrated Accessibility Standards Regulation (IASR) (collectively, “AODA”) and in consideration of the related provisions of the Ontario *Human Rights Code*, the *Workplace Safety Insurance Act, 1997* and the *Occupational Health and Safety Act*.

## FOR THE PURPOSE OF THIS POLICY:

- **AODA** means, the *Accessibility for Ontarians with Disability Act, 2005* and its Regulations.
- **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.

- **Accessible formats** may include, but are not limited to, large print, recorded audio and electronic formats, braille and other formats usable by people with disabilities.
- **Assistive devices** mean an auxiliary aid such as communication aids, cognition aids, personal mobility aids, mobility assistive devices and medical aids (canes, wheelchairs, crutches, or hearing aids).
- **Barrier** means anything that keeps someone with a disability from participating in all aspects of society.
  - Physical and architectural barriers: occur in the environment and prevent access for people with disabilities.
  - Information or communications barriers: arise when a person with a disability cannot easily receive and/or understand information that is available to others (e.g. publications that are not available in large print, digitally, Braille or other accessible formats)
  - Technological barriers: occur when technology or the way it is used does not meet the needs of people with disabilities (e.g. a website that does not support screen reading software)
  - Attitudinal barriers: may result in people with disabilities being treated differently than people without disabilities (e.g. a receptionist who talks to an individual's support person rather than the individual with a disability); or
  - Systemic barriers in policies, practices and procedures result in people with disabilities being treated differently than others or sometimes excluded altogether.
- **Customers** means general public to who DPI provides goods, services and facilities, in the ordinary course of business, including, but not limited to, injured workers, employers, and other representatives of the public.
- **Communication supports** may include, but are not limited to, captioning, alternative and augmentative communication supports (i.e. methods used to supplement or replace speech or writing for those with impairments in the production or comprehension of spoken or written language), plain language, sign language, and other supports that facilitate effective communication.
- **Guide Dog** means a highly trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons' Rights Act*, to provide mobility, safety and increased independence for people who are blind.
- **Service Animal** means a service animal for a person with a disability if:  
the animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the vest or harness worn by the animal; or

the person provides documentation from one of the following regulated health professionals confirming that the person requires the animal for reasons relating to the disability:

- **Information** means data, facts, and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.
- **Person Requiring Assistance (PRA)** means a person identified as requiring assistance at the time of an evacuation. This can be due to medical conditions or some other reason.
- **Person with Disabilities** means an individual who has a disability. “Disability” is defined in the Ontario *Human Rights Code* as:
  - 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 in 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; and an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.
- **Support Persons** means any person whether a paid professional, volunteer, family member, or friend who accompanies a person with a disability to help with communication, mobility, personal care or medical needs or with access to goods, services or facilities.

## POLICY

### ***Accessibility in the Workplace***

DPI is committed to establishing a barrier-free environment and meeting the requirements of the AODA and the organizational policies that address employees’ human rights and privacy.

In fulfilling its mandate, DPI strives to provide its services in a way that respects the dignity and independence of people with disabilities. DPI is also committed to ensuring people with disabilities have the same opportunity and access to services and benefits as others.

## ACCESSIBILITY POLICY

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DPI is also committed to ensuring its employment practices are accessible to meet the needs of employees and job applicants with disabilities.

To deliver on these commitments, DPI shall identify, prevent, and remove barriers to accessibility that might interfere with the ability of the people with disabilities to interact with DPI, or obtain goods and/or services in a timely manner, or work productively in the DPI's workplace.

This Policy applies to all DPI employees and contractors and pertains to all services provided by the DPI.

In scope are the accessibility needs of people with disabilities including Customers and DPI employees.

## REQUIREMENTS

### Accessible Customer Service

- DPI shall make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:
  - A. ensuring that all Customers receive the same value and quality.
  - B. allowing Customers with disabilities to do things in their own way and at their own pace when accessing goods and services provided this does not pose a safety risk.
  - C. using alternative methods, when possible, to ensure that Customers with disabilities have access to the same services and in a similar manner.
  - D. taking into account individual needs when providing goods and services; and communicating in a manner that takes into account the Customer's disability.
- DPI employees are encouraged to be proactive in seeking solutions and removing barriers, as well as alerting all Customers to the range of available accommodation.
- It is recommended that DPI employees use the term “persons with disabilities” or “people with disabilities” and if a specific condition must be referenced, the condition be referenced last (e.g., person with low vision). To guide communication and interaction with or about people with all types of disabilities:
- It is important to put people first. It is more appropriate to say “person with a disability”, rather than “disabled person” or “the disabled”.
- It is best not to make assumptions. Wait until an individual describes their disability to you. Disabilities can be complex, and our assumptions may be inaccurate.

### Guide Dogs and Service Animals

- If a person with a disability is accompanied by a guide dog, a service dog, or another service animal, DPI will allow the person to enter any DPI facility with the animal and to keep the animal with them.
- If it is not readily apparent that the animal is being used by the Customer for reasons related to their disability, DPI may request verification from the Customer. Verification may include:
  - A confirmation that the person requires the animal for reasons related to the disability (see Service Animal definition); or
  - A certificate of training from a recognized guide dog or service animal training school.

- It is the responsibility of the person with a disability to ensure that their service animal is under their control at all times.

### Use of Support Persons

- If a person with a disability is accompanied by a support person, DPI shall ensure that both people are allowed to enter its premises together, and that the person with a disability is not prevented from having access to the support person.
- DPI may require a person with a disability to be accompanied by a support person when on DPI's premises if a support person is necessary to protect the health and safety of a person with a disability or the health and safety of others on the premises. This may only occur after consulting with the person with a disability.

### Use of Assistive Devices

- People with disabilities may use their own assistive devices as required when accessing DPI's goods and/or services. In cases where the assistive device presents a safety concern or where a barrier may exist, other reasonable measures may be used to ensure the access of goods and/or services.
- Service or facilities related disruptions may occur due to reasons that may or may not be within the control or knowledge of DPI. Where possible, when a temporary disruption occurs, the DPI will take reasonable steps to continue assisting people with disabilities.
- DPI shall provide Customers with notice in the event of a planned disruption in the facilities or services usually used by people with disabilities.
- In the event of an unexpected disruption, DPI shall make reasonable efforts to contact Customers with disabilities that may be impacted by the disruption prior to their scheduled meetings.
- Notice(s) will be placed at visible place(s) on the premises (e.g., public entrances, service counters) and posted on the DPI website. When posted notices are used, there must also be a plan to convey the information to people who may not see or cannot understand the signage.
- The goal of DPI is to meet Customer expectations while serving Customers with disabilities.
- Availability of Accessibility Documents
- All documents required by the Accessibility Standards for Customer Service and employees including the DPI accessibility policy, notices of temporary disruptions, process shall be available upon request, subject to the DPI Freedom of Information Policy.

- When providing these documents to a person with a disability, DPI shall provide the document, or the information contained in the document, in a format that takes the person's disability into account.
- Where DPI determines that these documents cannot be converted into an accessible format, DPI shall provide the person requesting the information or communication with:
  - A. A summary of the inconvertible information or communication.

### AODA Training

- DPI shall ensure that training, using appropriate methodologies, is provided to the following person(s):
  - A. all employees.
  - B. every person engaged to deliver goods and/or services and/or facilities on DPI behalf; and
  - C. any person involved in developing DPI policies, as required by the AODA.
- Training shall be provided to each person according to their duties as soon as reasonably practicable. Ongoing training shall be provided in connection with changes to DPI's policies, practices and procedures governing the provision of goods and/or services and/or facilities to people with disabilities.
- DPI shall maintain a training plan that integrates the requirements of the AODA.
- DPI shall ensure that the amount and format of training shall be in relation to the person's level of interaction with DPI Customers.
- DPI shall maintain a record of the dates on which the training is provided and the individuals to whom it is provided.
- Regardless of the format, training shall cover the following:
  - A review of the purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Accessibility Standards for Customer Service
  - Instructions on how to interact and communicate with people with various types of disabilities
    - A. use an assistive device(s); or
    - B. require the assistance of a guide dog, service dog or other service animal; or
    - C. require the use of a support person

- Instructions on how to use equipment available on the DPI premises or that DPI provides that may help people with disabilities.

### Information and Communication

- Accessible Formats Available Upon Request
- DPI shall provide, upon request, to the people with disabilities who are DPI Customers and employees, the information under DPI control, about DPI's goods and/or services. Where possible, appropriate accessible format or communication supports shall be used. Such information should be provided in a timely manner and take into account the accessibility needs of the person with a disability.
- DPI shall maintain and make public a Multi-Year Accessibility Plan to improve the accessibility of its goods, services and facilities and meet the compliance requirements of the AODA. The Plan shall be updated at least once every five years and then posted.
- DPI shall prepare an annual status report on the progress of measures taken to implement the Multi-Year Accessibility Plan.
- Available Emergency Procedures and Safety Information
- DPI prepares for emergency situations and develops protocols for the protection of, and assistance to, everyone on DPI's premises during an emergency. Publicly available emergency procedures and safety information will be made available in an accessible manner upon request.
- The DPI works with our building landlords to provide publicly available emergency procedures and safety information related to the building, upon request, to Customers and employees in an accessible format or with appropriate communication supports.

### Employment

- Notice of Accommodation Availability in Recruitment and Selection
- As part of the OPS, DPI is committed to sustaining an inclusive and accessible workplace that allows all employees to fully participate. OPS policies promote the recruitment, retention and development of talented employees through equitable and barrier-free practices. We uphold the rights of all employees to be treated with dignity, respect and equality. Every staff member is expected to contribute to creating and sustaining a workplace that is respectful and inclusive of individual needs and differences.
- 5.3. Accessible Formats and Communication Supports for Employees



- Upon request by an employee with a disability, DPI shall provide, or arrange for, accessible formats and communication supports for information that is needed to perform their job, and information that is available to other employees. In order to determine the suitability of an accessible format or communication support, DPI shall consult with the employee making the request.
- Accessible formats and communications support regarding general workplace information should also be provided to employees with disabilities.
- DPI shall ensure that a formalized process is in place for development of documented individual accommodation plans for employees with disabilities.
- Workplace Emergency Response Information and Individualized Plans
- Where we are aware that an employee has a disability and that there is a need for accommodation, individualized workplace emergency response information will be provided to the employee as soon as possible if such information is necessary given the nature of the employee's disability.
- Our emergency protocols include people requiring assistance and AODA requirements.
- Employee-wide communication was deployed throughout the region to identify employees with disabilities requiring workplace emergency response assistance as people requiring assistance.
- Individualized workplace emergency plans have been prepared for employees who have disclosed a disability and who require accommodation.
- A process for communicating individual emergency response plans to floor fire wardens has been implemented maintaining the privacy of any medical information that may be disclosed during the accommodation process.
- DPI will establish a written process for developing documented individual accommodation plans for employees with disabilities. If requested, the accommodation plan will include information regarding accessible format and communication supports provided, individualized emergency response information, if required, and any other accommodation that is to be provided.

### **Design of Office Layout and Public Spaces**

- When facilities management constructs or redevelops DPI public spaces such as, service counters and waiting areas we will do so in keeping with the requirements set out in the Integrated Accessibility Standards -The Design of Public Spaces Standards and Ontario's Building Code.

### Roles and Responsibilities

- **DPI Managers are responsible for:**
  - A. raising awareness to facilitate understanding of the policy.
  - B. demonstrating sensitivity to and respect confidentiality of information; and
  - C. Participating in and co-operating to facilitate workplace accommodation, including the development of contingency plans.
  - D. Ensuring reception areas and equipment in reception areas are accessible and reporting problems to appropriate areas for resolution.
  - E. formulating plans, in conjunction with local management and security, for advising Customers and delivering services if reception areas or DPI buildings are not accessible for people with disabilities.
- **All DPI employees are responsible for:**
  - A. Ensure they understand the intent of this policy;
  - B. Complying with the provisions of this policy; and completing required training.
- Employees with disabilities are responsible for:
  - A. participating and cooperating with all parties to facilitate workplace accommodation; and informing the management of their need for accommodation in an emergency by completing “Persons Requiring Assistance Form”.

### UPDATES TO THIS POLICY

This policy may be updated or amended based on direction from the Government of Ontario.

### RETENTION

DPI Will ensure that copies of this policy, including any subsequent revisions, are retained for a period of three years after the policy ceases to be in effect.