

Human Resources Policy
 Integrated Accessibility Standards Policy
 Effective January 1, 2014

Purpose

This policy outlines Wolf Steel Ltd., commitment to and process by which the Company will achieve accessibility by meeting the phased in requirements of the *Integrated Accessibility Standards Regulation, Ontario Regulation 191/11* under the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*.

Scope

This policy applies to:

1. Associates who deal with the public or other third parties on behalf of Wolf Steel Ltd.
2. All persons who participate in the development of the Company policies, practices and procedures governing accessibility
3. Customers, Contractors/Subcontractors, Visitors, Applicants for employment that may require accommodation and any other third party providing good or services on the Companies behalf.

Responsibility

The President and the Director of Human Resources must create an environment that provides accessibility and ensure that the company achieves compliance with the AODA legislation. All Associates must adhere to the established company policies.

Definitions

Accommodation – means the special arrangements made or assistance provided so persons with disabilities can participate in the experience available to persons without disabilities.

Disability – the term disability as defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*, refers to:

- 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;

- a condition of mental impairment or a developmental disability;
- a learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- a mental disorder; or
- an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

General Principles

In accordance with the *Integrated Accessibility Standards, Ontario Regulation 191/11*, this policy outlines the commitment of Wolf Steel Ltd., to progress toward improved accessibility by meeting the phased in requirements of the *Integrated Accessibility Standards Regulation, Ontario Regulation 191/11* under the *Accessibility for Ontarians with Disabilities Act, 2005*. Wolf Steel Ltd., herein details procedures to ensure we maintain compliance with all the standards under the AODA as they become law.

A. Commitment of Wolf Steel Ltd., to achieve accessibility

- Wolf Steel Ltd. 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 people 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.
- Wolf Steel Ltd. will make every reasonable effort to develop and maintain policies, practices and procedures that are consistent with the principles of dignity, independence, integration and equal opportunity. Wolf Steel Ltd. will progress toward improved accessibility by meeting the phased in requirements of the *Integrated Accessibility Standards Regulation, Ontario Regulation 191/11* under the *Accessibility for Ontarians with Disabilities Act, 2005*.
- Wolf Steel Ltd. is committed to providing information to or communicating with a person with a disability and will endeavor

to do so in a manner that takes into account the persons disability

B. Multi-year Accessibility Plan

- By January 1, 2014, Wolf Steel Ltd. will develop a multi-year Accessibility Plan outlining the strategy to prevent and remove barriers and address the current & future requirements of OADA and the Integrated Regulation Standards.
- Action Plan:
 - a. Assess current policies, practices, procedures, premises, access to goods & services and information & communication systems to identify barriers to persons with disabilities.
 - b. Address the identified barriers and develop a five year plan for the removal and prevention of these barriers.
 - c. Update the plan every five years
 - d. Post on the company's website the availability of the Accessibility Plan
 - e. Upon request provide the plan in an appropriate alternative accessible format in a timely manner and at a cost no more than the regular cost to other people.
 - f. Submit required information to the government as required.

C. Policies and Procedures to maintain compliance with the Integrated Standards under the AODA

- The Company will develop procedures to address "Information & Communication" and "Employment" as prescribed by the Integrated Accessibility Standards.

Information & Communication Jan 1, 2016

- Wolf Steel Ltd. is committed to meeting the communication needs of people with disabilities. We will consult with people with disabilities to determine their information and communication needs.
- By January 1, 2016, Wolf Steel Ltd. will provide accessible information and communications that take into account a person's disability and post on the company's website the availability of accessible formats and communication supports

and provide them in a timely manner and at a cost no more than the regular cost to other people.

- New websites and web content will conform to WCAG 2.0 Level A (mandatory Jan 1, 2014)
- By January 1, 2021, all current websites & web content will conform to WCAG 2.0 Level AA.

Information – refers to knowledge, data and facts that convey meaning and that exist in any format such as text, audio, digital or images.

Exceptions - the Information and Communications Standard does not apply to the following:

1. Products and product labels, except as specifically provided by this Part.
2. Unconvertible information or communications.
3. Information that the obligated organization does not control directly or indirectly through a contractual relationship.

Feedback - The regulation only applies to organizations that have processes for receiving and responding to feedback. Organizations that do not have a feedback processes are not required to create such processes. Under the **Customer Service Standard**, Wolf Steel Ltd. has establish a customer service feedback process for receiving and responding to feedback specifically about the manner in which they provide accessible goods or services to people with disabilities.

Employment Jan 1, 2016

Emergency Response

- The company will provide individualized workplace emergency response information to Associates who have disclosed a disability and with their consent, provide the workplace emergency response information to the person designated to provide them assistance.
- The individualized workplace emergency response information will be reviewed/revise,
 1. when the Associates moves to a different location in the organization;
 2. when the Associate’s accommodations needs change or plans are reviewed; and

3. When the employer reviews its general emergency response policies.

Recruitment

- The Human Resources Manager(The Human Resources Recruiter) will specify that accommodation is available for job applicants with disabilities on the Company website and job advertisements
- The Human Resources Manager (Recruiter) will inform candidates, when called for an interview, during the selection process and in the job offer, that accommodations are available upon request in relation to the materials or processes to be used.
- If a selected applicant requests an accommodation, the Human Resources Manager will consult with the applicant and provide or arrange for the provision of suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.
- When making an offer of employment, the Human Resources Manager will notify the successful applicant of its policies for accommodating employees with disabilities.
- The Human Resources Manager will inform all Associate's of Wolf Steel Ltd. policies used to support its Associate's with disabilities, including policies on the provision of job accommodations that take into account an Associate's accessibility needs due to disability and will provide updated information to all Associates whenever there is a change to existing policies on the provision of job accommodations. This information will be included in the employee orientation training.
- Individualized Plans

The Human Resources Manager & Associates (H&S Coordinator)

Manager/Supervisor will:

- Develop individual accommodation plan for Associates with disabilities
- Develop a return to work process for Associates absent due to disabilities who require accommodation to return to work
- Ensure the accessibility needs and individual accommodation plan of the Associate are taken into account when assessing their performance, managing their career development, advancement and redeployment.

D. Training

January 1, 2015

Wolf Steel Ltd. will train Associates dealing with customers and the public on behalf of Wolf Steel Ltd. or involved in development of related policies on the requirements of the Integrated Regulation Standards and the Ontario Human Rights Code as it relates to persons with disabilities.

The Company will provide training to other Associates as appropriate to the duties of the Associate.

Training Components;

- Purpose of the Accessibility for Ontarians with Disabilities Act, 2005.
- Requirements of Accessibility Standards for Customer Service, Ontario Regulation 429/07.
- Requirements of the Integrated Accessibility Standards, Ontario Regulation 191/11.
- Applicable portions of the Ontario Human Rights Code, 1990 (disability related obligations)

Training Schedule:

Initial training will be completed by January 1, 2015. Training will be provided to new Associates or contract Associates who deal with the public, during orientation. Revised training will be provided in the event of changes to legislation, procedures and/or practices.

Record of Training:

The Human Resources Manager will keep a record of training that includes the dates training was provided and the number of employees who attended the training.

Accessible Formats of Documents & Communication Supports

- Upon request Wolf Steel Ltd. will provide or arrange for the provision of information in an accessible format that takes into account the individual's disability, in a timely manner and at a cost no more than the regular cost to other people.
- If the information is unconvertible, upon request, the Company will provide an explanation as to why it is unconvertible and provide a summary of the unconvertible information or communications

Requesting Information or Providing Feedback:

Wolf Steel Ltd. provides the public with the opportunity to provide feedback on our Accessibility program. Information about the feedback process is available at the entrance to main offices. Individuals may request an "AODA Feedback" form or may provide feedback verbally (in person or by telephone) or written (hand written or email). Individuals that provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

If you have any questions, concerns or feedback regarding this policy or its related procedures please contact:

- Human Resources Assistant/Support
- 705-721-1212 ext# 430
- 24 Napoleon Road, Barrie, ON L4M 0G8
- Cmilne@napoleonproducts.com

This policy and its related procedures will be reviewed as required in the event of legislative changes.

REFERENCES:

- Accessibility for Ontarians with Disabilities Act, 2005
- Integrated Accessibility Standards Ontario Regulation 191/11
- Ontario Human Rights Code, 1990