

WOLF STEEL LTD MULTI-YEAR ACCESSIBILITY PLAN

INTRODUCTION AND STATEMENT OF COMMITMENT

In 2005, the government of Ontario passed the Accessibility for Ontarians with Disabilities Act (the "AODA"). It is the goal of the Ontario government to make Ontario accessible by 2025. The Integrated Accessibility Standards Regulations ("IASR") under the AODA require that effective January 1, 2014, Wolf Steel Ltd. establish, implement, maintain and document a multi-year accessibility plan which outlines the organization's strategy to prevent and remove barriers for persons with disabilities and to meet its requirements under the IASR.

Under the AODA, the following accessibility standards set certain requirements that are applicable to the Company

- Customer Service;
- Information and Communications;
- Employment;
- Transportation, and
- Proposed Accessibility Standards for the Built Environment

This multi-year plan outlines The Company's strategy to prevent and remove barriers to address the current and future requirements of the AODA, and in order to fulfill The Company's commitment as outlined in the **WOLF STEEL LTD- Accessibility Policy**.

In accordance with the requirements set out in the IASR, The Company will:

- Establish, review and update this plan in consultation with persons with disabilities;
- Post this plan on its website (www.napoleonproducts.com);
- Report as required on its website (www.napoleonproducts.com) on the progress of the implementation of this plan;
- Provide this plan in an accessible format, upon request; and
- Review and update the accessibility plan at least once every five years.

In Accordance with our organizational obligations under the IAS,

The Company's multi-year plan addresses the deliverables and activities that will be worked on over the next three to five years. The Company is committed to making accessibility throughout the organization a reality. We seek input from all Associates and management is committed to ensuring that our goals are met.

OVERVIEW

- **Accessibility Standards for Customer Service**
- **Integrated Accessibility Standards Regulations**
- **Emergency Procedure, Plans or Public Safety Information**
- **Workplace Emergency Response Information**
- **Procuring or Acquiring Goods, Services or Facilities**
- **Training**
- **Information and Communication Standards**
 1. **Feedback, Accessible Formats and Communication Supports**
 2. **Accessible Websites and Web Content**
- **Employment Standards**
 1. **Recruitment**
 2. **Informing Employees of Supports**
 3. **Documented Individual Accommodation Plans/Return to Work Process**
 4. **Performance Management, Career Development and Redeployment**
- **Proposed Accessibility Standards for the Built Environment**

ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE

Commitment:

Since 2012, The Company has been in compliance with the Accessible Customer Service Regulation under the AODA, and will continue to comply with that regulation from January 1, 2013 to December 31, 2017.

The Company is committed to excellence in serving all customers, including persons with disabilities, and it will carry out its functions in a manner which delivers an accessible customer service

experience.

The Company is committed to providing its goods and services in a way that respects the dignity and independence of persons with disabilities. This commitment will be integrated wherever possible and will ensure that persons with disabilities will benefit from the same services, in the same place and in a similar way as other customers.

Action Taken:

The following measures have been implemented by The Company:

- Ensuring all persons who, on behalf of The Company, deal with the public or other third parties, and all those who are involved in the development and approvals of customer service policies, practices and procedures, as well as all others providing services to our customers, are trained to communicate and provide the best possible customer service to all customers, including persons with disabilities;
- Ensuring completion of accessibility training is tracked and recorded;
- Providing customers with notice in the event of a planned or unexpected disruption of service or inaccessibility of facilities used by persons with disabilities, by placing such notices at all public entrances and service counters on The Company's premises.
- Continuing to welcome and appreciate feedback from persons with disabilities through multiple communication channels;
- An "Accessibility" tab has been added to the footer of the websites www.napoleonproducts.com to communicate Wolf Steel Ltd accessible customer service policy including related procedures and guidelines; and
- Reporting compliance with the customer service standard on the Accessibility Compliance Reporting tool at Service Ontario's One-Source for Business website.

INTEGRATED ACCESSIBILITY STANDARDS REGULATIONS EMERGENCY PROCEDURE, PLANS OR PUBLIC SAFETY INFORMATION

Commitment:

The Company is committed to providing and maintaining premises that respect the dignity and independence of persons with disabilities.

Action to be Taken:

The following measures will be implemented by Wolf Steel Ltd effective 2014:

- Emergency procedures, plans and public safety information that are prepared by The Company and made available to the public, will be made available in an accessible format or with appropriate communication supports, as soon as practicable, upon request;
- An Accessible Format Request Form will be developed and will be available on-line on The Company's internal website, for completion by The Company staff upon receipt of a request from the public for such documentation in an accessible format. In addition, an internal referral process will be in place for fulfilling the accessible format request.

Required legislative compliance: January 1, 2014

**Implementation timeframe: October 2012 to December, 2014
(In Progress)**

Completion date: Start now-October 2014

WORKPLACE EMERGENCY RESPONSE INFORMATION

Commitment:

Where The Company is aware that an Associate has a disability and that there is a need for accommodation, individualized workplace

emergency response information will be provided to the Associate as soon as practicable if such information is necessary given the nature of the Associates disability.

Action Taken:

The following measures will be implemented by The Company effective October 2014(In Progress):

- Individualized workplace emergency response information procedures have been developed for Associates with disabilities, as required;
- Workplace Emergency Response Information forms have been prepared for Associates who have disclosed a disability and who are being accommodated according to their disabilities;
- Where required, The Company provides assistance to specific disabled Associates, with the disabled Associate's prior consent, to help them evacuate the workplace in case of an emergency or disaster. These plans for providing assistance have been set out in individualized emergency plans for the Associates;
- These individualized emergency plans have been communicated to the Associates respective managers and Safety personnel, on an 'as needed' basis;
- On an ongoing and regular basis, and as per the applicable terms of the IASR, The Company will review and assess general workplace emergency response procedures and individualized emergency plans to ensure accessibility issues are addressed.

Required legislative compliance: January 1, 2012

Implementation timeframe: September 2011 to January 1, 2012

Completion date: January 1, 2012

PROCURING OR ACQUIRING GOODS, SERVICES OR FACILITIES

Commitment:

The Company is committed to incorporating accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not practicable to do so, commencing January 1, 2013.

Planned Action:

In accordance with the IASR, The Company will implement procurement processes that:

- Use accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not practicable to do so;
- Where The Company has decided that it is not practicable to incorporate accessibility criteria and features, it will provide an explanation upon request;
- Provide educational awareness and tools to internal stakeholders and communication to external stakeholders, informing on changes to procurement procedures and purchasing criteria.

Required legislative compliance: January 1, 2013

Implementation timeframe: September 2012 to January 1, 2013

Completion date: January 1, 2013

TRAINING

Commitment:

The Company is committed to implementing a process to ensure that all Associates, volunteers, third-party contractors who provide goods, services and facilities on The Company's behalf, and persons participating in the development and approval of The Company's policies, are provided with appropriate training on the requirements of the IASR and on the Ontario Human Rights Code as it pertains to

persons with disabilities, and are provided with such training as soon as practicable.

Planned Action:

In accordance with the IASR, The Company will:

- Establish an internal committee with the responsibility for developing appropriate training;
- Determine and ensure that appropriate training on the requirements of the IASR and on the Ontario Human Rights Code as it pertains to persons with disabilities, is provided to all Associates, volunteers, third-party contractors who provide goods, services and facilities on The Company's behalf, and persons participating in the development and approval of The Company's policies;
- Ensure that the training is provided to persons referenced above as soon as practicable;
- Keep and maintain a record of the training provided, including the dates that the training was provided and the number of individuals to whom it was provided;
- Ensure that training is provided on any changes to the prescribed policies on an ongoing basis.

Required legislative compliance: January 1, 2015

Implementation timeframe: January 1, 2014 to January 1, 2015

Completion date: N/A

INFORMATION AND COMMUNICATION STANDARDS

Commitment:

The Company is committed to making company information and communications accessible to persons with disabilities. The Company will incorporate new accessibility requirements under the information and communication standard to ensure that its information and communications systems and platforms are accessible and are provided in accessible formats that meet the needs of persons with disabilities.

1. Feedback, Accessible Formats and Communication Supports

Planned Action:

In accordance with the IASR, The Company will:

- Ensure that existing and new processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request and in a timely manner;
- More broadly, as a general principle where accessible formats and communication supports for persons with disabilities are requested:
 - Provide or arrange for the provision of such accessible formats and communication supports;
 - Consult with the person making the request to determine the suitability of the accessible format or communication support;
 - Provide or arrange for the provision of accessible formats and communication supports in a timely manner that takes into account the person's accessibility needs due to disability, and at a cost no more than the regular cost charged to other persons;
 - Notify the public about the availability of accessible formats and communication supports.

Required legislative compliance: January 1, 2014 – Feedback, January 1, 2016 – Accessible formats & Communication Supports (or other applicable compliance date as set out in the IASR)

**Implementation timeframe: January 1, 2012 to January 1, 2014 (as applicable)
Completion date: N/A**

2. Accessible Websites and Web Content

Accomplishments to Date:

- Visitors to The Company's public website www.napoleonproducts.com access a suite of products, at no cost, via an alliance with the eSSENTIAL Accessibility service. This service offers The Company's customers downloadable tools to enhance navigation of its websites, if the customers have dexterity challenges or reading challenges related to a variety of disabilities;
- New website content is coded in a compliant fashion to empower both the eSSENTIAL Accessibility software and third-party consumer tools, for example, readers with the inclusion of descriptive alt tags on all links and images directed through the site-map page;
- Adoption of standards in Internet technology to ensure the public websites are compatible with the above-mentioned tools and have moved away from non-W3C formats (World Wide Web Compliant) to more flexible Internet rich media in the website implementations;
- AODA compliance is included as one of the criteria in selecting technology vendors for new website development initiatives.

Planned Action:

In accordance with the IASR, The Company will:

- Ensure development of its next generation digital platform for public websites, mobile applications, in-store media and information technology infrastructure meet AODA Information and Communication Standards and that partnering vendors have necessary expertise with such technology;
- Use guiding principles in the development of new corporate intranet applications as outlined by the Ontario Government's new Online Design Program standard, which specifies compliance with international accessibility guidelines, W3C WCAG 2.0;
- Update System Development Life Cycle (SDLC) documents and processes to outline roles and responsibilities regarding

content compliance for new intranet sites;

- Follow the mandated Accessibility Directorate of Ontario (ADO) guidelines and Province of Ontario I&IT solutions that support obligated Private Sector organizations in compliance initiatives;
- Partner with Corporate Communications and, in collaboration with operating divisions, provide guidelines to all staff to ensure public documents and media are readily available in alternate accessible formats;
- Develop and communicate corporate e-mail best practices; and
- Expand corporate awareness of requirements for compliance with Information and Communication Standards of AODA.

Required Legislative Compliance: January 1, 2014 – WCAG 2.0 Level A – new Internet websites and web content, January 1, 2021 – WCG 2.0 Level AA – all Internet websites and web content, except for exclusions set out in the IASR Implementation timeframe: January 1, 2012 to December 31, 2017

Completion date: (Complete/In Progress)

EMPLOYMENT STANDARDS

1. Recruitment

Commitment:

The Company is committed to fair and accessible employment practices that attract and retain Associates with disabilities. This includes providing accessibility across all stages of the employment cycle.

Planned Action:

In accordance with the IASR, The Company will do the following:

Recruitment General

The Company will notify Associates and the public of the availability of accommodation for applicants with disabilities in the recruitment process. This will include:

- A review and, as necessary, modification of existing recruitment policies, procedures and processes;
- Specifying that accommodation is available for applicants with disabilities, on The Company's website and on job postings;
- Working with suppliers to ensure external Web pages are compliant with the Information and Communication Standards under the IASR's requirements.

Recruitment, assessment and selection

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

- A review and, as necessary, modification of existing recruitment policies, procedures and processes;
- Inclusion of availability of accommodation notice as part of the script in the scheduling of an interview and/or assessment;
- If a selected applicant requests an accommodation, consult with the applicant and arrange for provision of suitable accommodations 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 Associates with disabilities. This will include:

- A review and, as necessary, modification of existing recruitment policies, procedures and processes;
- Inclusion of notification of The Company's policies on accommodating Associates with disabilities in offer of employment letters.

Required legislative compliance: January 1, 2016

Implementation timeframe: To be determined

Completion date: N/A

2. Informing Associates of Supports

In accordance with the IASR, The Company will inform all Associates of policies that support Associates with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an Associates accessibility needs due to a disability. This will include:

- Informing current Associates and new hires of The Company’s policies supporting Associates with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an Associates needs due to disability;
- Providing information under this section as soon as practicable after the new Associate begins employment, specifically in the orientation process;
- Keeping Associates up to date on changes to existing policies on job accommodations with respect to disability;
- Where an Associate with a disability so requests it, The Company will provide or arrange for provision of suitable accessible formats and communications supports for:
 - Information that is needed in order to perform the Associate’s job;
 - Information that is generally available to Associate’s in the workplace.
- In meeting the obligations to provide the information that is set out in the paragraph above, The Company will consult with the requesting Associate in determining the suitability of an accessible format or communication support.

Required legislative compliance: January 1, 2014

Implementation timeframe: September 2012 to January 1, 2014

Completion date: N/A

3. Documented Individual Accommodation Plans/Return to Work Process

Commitment:

The Company will incorporate new accessibility requirements under the IASR to ensure that barriers in accommodation and return to work processes are eliminated and corporate policies surrounding accommodation and return to work are followed, where applicable.

Planned Action:

The Company's existing policies include steps that The Company will take to accommodate an Associate with a disability and to facilitate an Associate's return to work after absenteeism due to disability.

The Company will review and assess the existing policies to ensure that they include a process for the development of documented individual accommodation plans for Associate's with a disability, if such plans are required.

The Company will ensure that the process for the development of documented individual accommodation plans includes the following elements, in accordance with the provisions of the IASR:

- Include in the process the manner in which the Associate requesting accommodation can participate in the development of the plan;
- Include in the process the means by which the Associate is assessed on an individual basis;
- Include in the process the manner in which The Company can request an evaluation by an outside medical or other expert, at The Company's expense, to assist The Company in determining if and how accommodation can be achieved;
- Include in the process the manner in which the Associate can request participation of a representative from his or her bargaining agent where an Associate is in the bargaining unit, or the participation of another representative from the workplace where an Associate is not in the bargaining unit;

- Steps are in place to protect the privacy of the Associate's personal information;
- Outline the frequency in which individual accommodation plans will be reviewed and updated and the manner in which this will be done;
- Provide the Associate with the reasons for the denial if an individual accommodation plan is denied;
- Include in the process the means of providing the individual accommodation plan in a format that takes into account the Associate's accessibility needs;
- If individual accommodation plans are established, ensure that they include:
 - Individualized workplace emergency response information that is required;
 - Any information regarding accessible formats and communication supports that have been provided for or arranged, in order to provide the Associate with:
 - Information that is needed in order to perform the Associate's job;
 - Information that is generally available to Associate's in the workplace.
- Identify any other accommodation that is to be provided to the Associate.

The Company will ensure that the return to work process as set out in its existing policies outlines the steps The Company will take to facilitate the Associates return to work after a disability-related absence, outlines the development of a written individualized return to work plan for such Associate's, and requires the use of individual accommodation plans, as discussed above, in the return to work process.

Required Legislative compliance: January 1, 2014
Implementation timeframe: September 2012 to January 1, 2014
Completion date: (In Progress)

4. Performance Management, Career Development and Redeployment

Commitment:

The Company will take into account the accessibility needs of Associates with disabilities, as well as individual accommodation plans:

- When using its performance management process in respect of Associate's with disabilities;
- When providing career development and advancement to its Associates with disabilities;
- When redeploying Associates with disabilities.

Planned Action:

In accordance with the IASR, The Company will:

- Review, assess and, as necessary, modify existing policies, procedures and practices to ensure compliance with the IASR;
- Take the accessibility needs of Associates with disabilities and, as applicable, their individualized accommodation plans, into account when:
 - Assessing performance
 - Managing career development and advancement
 - Redeployment is required
- Review, assess and, as necessary, include in Performance Management workshops, accessibility criteria;
- Take into account the accessibility needs of Associates with disabilities when providing career development and advancement to its Associate with disabilities, including notification of the ability to provide accommodations on internal job postings;
- Take into account the accessibility needs of Associates with disabilities when redeploying Associates, including review and, as necessary, modification of Associate transfer checklist.

Required legislative compliance: January 1, 2014

Implementation timeframe: September 2012 to January 1, 2014

Completion date: N/A

PROPOSED ACCESSIBILITY STANDARDS FOR THE BUILT ENVIRONMENT

The 45-day public comment period on the government's proposal for the Accessibility Standards for the Built Environment closed on October 1, 2012. The goal of the proposed standard is to remove barriers in public spaces and buildings. When the standard is finalized and comes into force, The Company will ensure that any applicable requirements set out in the standard are followed.