

ACCESSIBILITY POLICY

PROVIDING GOODS, SERVICES AND OPPORTUNITY TO PEOPLE WITH DISABILITIES

PURPOSE

Bolton Railings Inc. (“Bolton Railings” or “the Company”) is committed to excellence in serving all of our customers, clients and visitors, and we strive at all times to meet the accessibility needs of persons with disabilities in a timely manner, and to provide our goods and services in a way that respects the dignity and independence of people with disabilities.

In addition, Bolton Railings is committed to equal treatment with respect to employment.

It is the responsibility of all employees of Bolton Railings to comply with this Accessibility Policy, to treat all people with dignity and respect, and to provide additional assistance where and when necessary in order to assist those requiring accommodation.

Upon request, this policy will be made available in accessible formats.

DEFINITION

As outlined in the Ontario Human Rights Code, a disability is:

- 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 a 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

About 15.5 % of Ontario’s population or 1.8 million people are reported as having a disability (Stats Canada, 2006) and that number is expected to grow significantly.

ACCESSIBILITY PLAN

Bolton Railings has developed and will maintain and documented Accessibility Plan outlining our strategy to prevent and remove barriers and to improve opportunities for persons with disabilities.

The Accessibility Plan will be reviewed and updated at least once every five (5) years, and will be posted on the company's website. Upon request, Bolton Railings will provide a copy of the Accessibility Plan in an accessible format.

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PROVIDING GOODS AND SERVICES TO CUSTOMERS, CLIENTS AND VISITORS WITH DISABILITIES

Bolton Railings will 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:

- Ensuring that all customers, clients and visitors receive the same value and quality;
- Allowing customers, clients and visitors with disabilities to do things in their own way, at their own pace when accessing Bolton Railings' goods and/or services as long as this does not present a safety risk;
- Using alternative methods when necessary to ensure that customers, clients and visitors with disabilities have access to the same services, in the same place and in a similar manner;
- Ensuring the provision of goods or services to persons with disabilities and others are integrated unless an alternate measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the goods or services.
- Taking into account individual needs when providing goods and/or services; and
- Communicating in a manner that takes into account a person's disability.

INFORMATION AND COMMUNICATION STANDARD

Bolton Railings will communicate to those with disabilities in ways that takes into account their disability. We train our employees on how to effectively interact and communicate with our diverse community and people with various types of disabilities.

FEEDBACK

Bolton Railings has established a process to ensure customers, clients and visitors with disabilities are able to provide us with feedback on our products/services and how we deliver them to those with disabilities.

Feedback is always welcome and appreciated and can be submitted in the following formats:

- in person - 3 Browning Court, Bolton Ontario
- by telephone - (905) 857-3266
- by mail - 3 Browning Court, Bolton Ontario L7E 5S6
- by facsimile - (905) 857-7723
- by email – guyv@boltonrailings.com

The Bolton Railings address, telephone number, and facsimile number are listed on the Bolton Railings website at www.boltonrailings.com -> click on Location/Contact Us on the left side of the screen.

Bolton Railings will continue to ensure that all customers, clients and visitors are able to provide feedback and if the stated methods of feedback do not for some reason accommodate a person who would like to provide feedback, we are willing to arrange for other methods based on request (i.e. accessible formats, communication supports etc.)

If a complaint is received, we will work with the person making the complaint to determine a way that we can improve our procedures to better accommodate them in the future. We will welcome their

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suggestions, and take them into consideration when updating our policies and procedures as related to disability accommodation.

ACCESSIBLE FORMATS AND COMMUNICATION SUPPORTS

Upon request, Bolton Railings will provide, or will arrange to provide information in an accessible format and with communication supports in a timely manner that takes into account a person's accessibility needs due to his or her disability.

Bolton Railings will consult with the person making the request in determining the suitability of an accessible format or communication support. Some examples of accessible formats and communication supports that Bolton Railings is willing to provide in order to best accommodate a person with a disability, include:

- accessible electronic formats such as HTML and MS Word
- Braille
- large print
- reading the written information aloud to the person directly
- exchanging hand-written notes
- drawing pictures and showing photographs
- repeating, clarifying, or restating information

Bolton Railings will provide formats and supports in a timely manner, and will notify the public of the availability of this accommodation.

ACCESSIBLE WEBSITES AND WEB CONTENT

Bolton Railings is working to ensure that its website, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA except where this is impracticable. As a new website is launched, AODA will be addressed.

TELEPHONE SERVICES

Bolton Railings is committed to providing fully accessible telephone service to all persons. Bolton Railings trains employees to communicate with persons over the telephone in plain language while speaking clearly and slowly. Bolton Railings will offer to communicate with customers, clients and visitors by email or letter if telephone communication is not suitable to their communication needs or is unavailable.

The Company will communicate with customers, clients and visitors by TTY (the special device that allows people who are deaf, hard of hearing, or speech-impaired to use the telephone to communicate, by allowing them to type messages back and forth) if telephone communication is not suitable to their communication needs or is not available.

USE OF ASSISTIVE DEVICES

An assistive device is one or more devices used by a person with a disability to help him/her independently complete everyday tasks. Accessibility devices include mobility aids (e.g. wheelchairs and

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walkers), portable communication devices, head-wands, hearing aids, white canes used by people who are blind or who have low vision, note-taking devices and personal oxygen tanks to assist breathing, etc.

Bolton Railings welcomes the use of assistive devices by our customers, clients and visitors and third parties to access our goods and/or services. Our employees are trained on how to interact with individuals using various assistive devices and how employees can provide alternative or supplemental service methods to those requesting them, such as pushing or directing wheelchairs, reading documents aloud, etc.

BILLING/INVOICES

Bolton Railings is committed to providing accessible billing/invoices to all our customers, clients and visitors and third party business partners. Bolton Railings will answer any questions customers, clients and visitors may have about the content of the billing and will be responsible for ensuring that the alternative formats are available upon request.

USE OF SERVICE ANIMALS AND SUPPORT PERSONS

SERVICE ANIMALS

An animal is a service animal for a person with a disability if, (a) it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or (b) the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

Bolton Railings welcomes service dogs to our office, and Bolton Railings employees have been made aware that service dogs are permitted. For the purpose of this policy, service dogs will include service dogs-in-training.

In the rare situation where another person's health and safety could be seriously impacted by the presence of a service dog, the Company will review all options for safely allowing the service animal, by working with both affected parties to meet their individual needs.

No service animal may enter the plant area/areas without first working with senior management of Bolton Railings to ensure the safety of everyone present, including the animal. The nature of the work conducted in the plant areas can be dangerous, thus a plan needs to be put into place prior to entrance. If the person requiring assistance has other suggestions on the best way to assist them without their service animal, Bolton Railings will work with the person one-on-one.

SUPPORT PERSONS

A support person is an individual who accompanies a customer, client or visitor (or other third party doing business with Bolton Railings) with a disability to help them meet his or her communication, mobility, personal care or medical needs or to assist them in accessing goods and/or services. A customer, client, visitor or third party with a disability who is accompanied by a support person will be allowed to enter Bolton Railings' premises together with the support person, and will not be prevented from having access to the support person while on the premises.

All support persons are welcome at Bolton Railings Inc.

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NOTICE OF DISRUPTION OF SERVICES

In the event of a planned or unexpected temporary disruption to accessing our goods and services, Bolton Railings is committed to providing timely notice to our customers, clients and visitors. Temporary service disruptions may result due to many different situations. The following is a list of some common circumstances that may result in a temporary service disruption. This list is not exhaustive:

- Power Failure
- Phone Lines Down
- Internet Down

Notice of a temporary service disruption shall be posted at a conspicuous place on the premises as soon as practicable. The notice will include:

- Reason for the disruption
- Which goods/services are disrupted
- Expected duration

Every effort will be made to provide customers, clients and visitors information as quickly as possible.

In the event of a snow storm or community-wide power outages, it is also encouraged that prior to visiting our location, customers, clients and visitors requiring assistance call to ensure Bolton Railings is best prepared to accommodate them.

The following is the Bolton Railings Inc. address and telephone number:

3 Browning Court
Bolton, ON
L7E 1G8
(905) 857-3266



EMPLOYMENT STANDARDS

RECRUITMENT

Bolton Railings notifies our employees and the public about the availability of accommodation for applicants with disabilities in our recruitment process. This policy serves as one method of notification.

RECRUITMENT, ASSESSMENT OR SELECTION PROCESS

The Company is an equal opportunity employer committed to hiring a diverse workforce and sustaining an inclusive culture. As part of our accessibility commitment, there are alternative ways to interview with us in order that we may accommodate people of all abilities.

The Company notifies potential job applicants of the ability to accommodate in writing, through posting this policy on our website, and as part of all job postings on external websites.

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In addition, job applicants selected to participate in an assessment or selection process (interview) are advised verbally over the telephone that accommodations are available upon request relating to the materials or processes to be used.

If a successful candidate requires accommodation and they advise Bolton Railings, we will consult with them one-on-one in order to best assist them in taking into account their accessibility needs as related to their disability.

NOTICE TO SUCCESSFUL APPLICANTS

When making offers of employment, Bolton Railings notifies successful applicants of our policies for accommodating employees with disabilities.

TRAINING AND JOB INFORMATION

Bolton Railings provides training for all employees and third parties that engage with Bolton Railings' customers, clients and visitors on behalf of the Company, on how to effectively interact with persons with disabilities. In addition, everyone who is involved with and/or influences customer service policies and procedures will receive this training. Training records will be logged, and training will be provided on an ongoing basis as changes to the policies, practices, or procedures surrounding accessibility for persons with disabilities are made. Training includes:

- Purposes of the Accessibility for Ontarians with Disabilities Act and requirements of the customer service standard
- All information outlined in this policy
- How to interact and communicate with persons with disabilities in a manner that takes into account his or her disability
- How to interact with persons with disabilities who use an assistive device or require the assistance of a service animal or a support person
- How to use equipment or devices available that may help with the provisions of goods and/or services
- What to do if a person with a particular type of disability is having difficulty accessing goods and/or services
- Workplace emergency response information
- Return to work process
- Recruitment, including how to accommodate the candidates and employees with disabilities during the hiring process and employment
- Other important accessibility related information

Bolton Railings will provide accessible workplace information when an employee with a disability asks for it. This includes:

- any information that employees need to perform their jobs
- performance management related information
- training materials

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- general information that is available to all employees at work (e.g., company newsletters, bulletins about company policies and health and safety information)
- information about emergency procedures

INFORMING EMPLOYEES OF SUPPORT

Bolton Railings will work to support employees with disabilities who notify the Company of the need for that support. Support can be provided in several different ways, and will be addressed on a case-by-case basis.

Bolton Railings will continue to inform its employees of its policies (and any updates to those policies) written to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information is provided to new employees as soon as practicable after commencing employment. It is also provided through AODA employee training.

WORKPLACE EMERGENCY RESPONSE

Bolton Railings will provide individualized workplace emergency response information to any employee who has a disability, if the disability is such that the individualized information is necessary, and if Bolton Railings is aware of the need for accommodation due to the employee's disability. Bolton Railings will provide this information as soon as practicable after becoming aware of the need for accommodation.

Bolton Railings recognizes how an individual's disability, as well as the physical nature of the workplace, may create unique challenges in emergency situations.

For example:

An employee who has a hearing disability may not hear an alarm and may need to be notified by other means, such as flashing lights or another employee physically notifying them. Or,

An employee with a visual disability may be unable to identify the escape routes, or obstructions to the escape routes.

Bolton Railings will consult with employees who have disabilities so that the individualized workplace emergency response information meets the employee's specific needs.

A wide range of potential emergencies will be considered, including but not limited to, the following:

- fire
- power outages
- severe weather
- natural disasters
- security incidents

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Where the employee requires assistance, Bolton Railings will, with the consent of the employee, provide the workplace emergency response information to the person designated by Bolton Railings to provide assistance to the employee.

Bolton Railings will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when the employees overall accommodations needs or plans are reviewed, or when Bolton Railings reviews its general emergency response policies.

DOCUMENTED INDIVIDUAL ACCOMODATION PLANS

Bolton Railings has a program in place for the creation of individual custom accommodation plans for employees who may need accommodation due to a disability.

The following is the outline of the process for creating accommodation plans:

1. An employee requiring an accommodation plan must advise his or her manager of the need for a plan as soon as possible.
2. The employee will provide an Abilities and Restrictions Form as completed by their medical practitioner, outlining where there are restrictions, and what their capabilities for work are.
3. The employee and their manager meet to go through the A&F Form to ensure they both understand the nature of the accommodation required.
4. The employee advises their manager verbally if they would like assistance of another employee, or a Joint Health and Safety Committee member in the creation of the plan.
5. The manager advises the employee verbally if they believe they need assistance from an outside person to assist with creating the plan. (E.g. if a specialist paid for by the Company or a Human Resources representative will need to be involved.)
6. The parties work together to put together a draft accommodation plan.
7. The manager will ask the employee whether or not they would like to keep the details of their accommodation plan confidential and private, or whether they would like other employees to be made aware.
8. The manager will explain where other employees may be required to have some information (e.g. in the case where the employee needing the accommodation plan has difficulty hearing, and they may need assistance in knowing when an emergency alarm is sounding. Or, if the cost associated with implementing the plan exceeds the allowable department budget or will change the nature of how the business must operate, and must be reviewed at the Senior Management level.)
9. The manager will respect the privacy of the employee, and comply with their request for a particular level of privacy. Only those parties who absolutely must, for the safety of the employee, their own safety, or due to company benefit program, policy, budget or operational reasons be made aware, will be advised of the accommodation plan, but only in as much detail as is absolutely necessary.
10. The plan will be finalized by the manager, and presented to the employee no later than one (1) week after it was first drafted by the participating parties.
11. In addition to providing the finalized plan to the employee, the manager will provide a schedule for when and how the plan will be reviewed and updated. This will be determined based on the nature of the disability and the necessity for updated abilities and restriction information.

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12. If an employee requests an accommodation plan and there is no medical evidence (via an A&F Form) to support the need, or if a plan has been rejected by the senior team because of undue hardship to the Company or for other reasons deemed serious enough, the manager will immediately advise the employee. They will meet and come to a mutually agreeable alternative plan.
13. If the employee requires the plan to be available in an accessible format, the manager will work with the employee to determine the most appropriate format, and ensure the employee receives a copy in that format.
14. All individual accommodation plans will include:
 - a. A section that outlines how workplace information will be made available in an accessible format if requested
 - b. A section that outlines how emergency information will be provided in an accessible format if needed
 - c. Any additional accommodation that is to be provided to the employee.

RETURN TO WORK PROCESS

Bolton Railings has an Early and Safe Return to Work Process for employees who have been absent from work due to a disability and who require disability related accommodations to return to work.

The return to work process outlines the steps Bolton Railings will take to facilitate the return to work and will include documented individual accommodation plans/modified duties schedule as part of that process.

This return to work process is consistent with the process followed for employees who have experience workplace injuries or illnesses, as outlined in the Workplace Safety Insurance Act, 1997.

PERFORMANCE MANAGEMENT

When the Company has been made aware of an employee's disability, each individual's needs will be considered when determining how to best accommodate them in any performance management related process.

Bolton Railings will provide performance management related documentation in accessible formats to employees who request them due to a disability.

Managers will also provide informal and formal coaching and feedback in a manner that takes into account their disability, such as using plain language for an individual with a learning disability.

CAREER DEVELOPMENT AND ADVANCEMENT

When providing career development and advancement opportunities, Bolton Railings will take into account what accommodations employees with disabilities may need to succeed elsewhere in the organizations or to take on new responsibilities in their current position.

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For example, an employee may receive a promotion which includes new responsibilities. In this case, Bolton Railings and the employee may review the individual accommodation plan to learn what adjustments may be needed for the new responsibilities.

REDEPLOYMENT

Should Bolton Railings decide to use redeployment processes, the Company will consider the accessibility needs of employees with disabilities when moving them to other positions so that those employees can continue to have their accommodation needs met.

MODIFICATIONS TO THIS AND OTHER POLICIES

Bolton Railings is committed to developing accessibility policies that respect and promote the dignity and independence of persons with disabilities. Therefore, no changes will be made to this policy before considering the impact on persons with disabilities. Any policy of Bolton Railings that does not respect and promote the dignity and independence of persons with disabilities will be modified or removed. This policy and its related procedures will be reviewed as required in the event of legislative changes.

QUESTIONS ABOUT THIS POLICY

If you have a question about the policy, please contact us using any of the following methods:

In Person or by Mail:
Bolton Railings Inc.
Attn: General Manager
3 Browning Court
Bolton, ON
L7E 1G8

By Telephone:
(905) 857-3266

By E-mail:
guyv@boltonrailings.com

REVISION CONTROL

DATE	COMMENTS
February 2016	Policy Issued
May 2016	Policy Revised