

INTRODUCTION

The *Accessibility for Ontarians with Disabilities Act, 2005, (AODA)* was passed in June 2005, with the purpose of developing, implementing and enforcing accessibility standards for Ontarians. The goal of the AODA is for Ontario to be fully accessible by January 1, 2025, by implementing a series of accessibility standards. These standards focus on identifying, removing and preventing barriers for persons with disabilities.

STATEMENT OF COMMITMENT

Bolton Railings Inc. (“Bolton Railings” or “the Company”) is committed to providing goods and services in a way that respects the dignity and independence of persons with disabilities. This will be achieved by identifying and removing barriers that impede a person’s ability to access goods and services, ensuring everyone is provided with equal opportunities whenever they interact with us.

Approximately 1.8 million Ontarians have a disability, and this number is growing as the population ages. Bolton Railings has an important responsibility for ensuring a safe, respectful and welcoming environment for our employees, customers and third parties that do business with the Company.

Bolton Railings will strive to ensure that our policies, practices and procedures are consistent with the following core principles as outlined in the AODA:

Dignity – Goods and services are provided in a manner that is respectful to persons with disabilities and do not diminish the person’s importance.

Independence – Accommodating a person’s disability means respecting their right to do for themselves and to choose the way they wish to receive goods and services.

Integration – Wherever possible, services will be provided in a manner that enables people with disabilities to fully benefit from the same services, in the same place and in the same or similar way as other customers or third parties. This may require alternative formats and flexible approaches. It means inclusiveness and full participation. This is a fundamental human right.

Equal Opportunity – Service is provided to persons with disabilities in a way that their opportunity to access goods and services is equal to that given to others.

Under the AODA, the following accessibility standard requirements are applicable to Bolton Railings:

- Customer Service Standard
- General Requirements
- Information and Communications Standards
- Employment Standards

PART 1 – CUSTOMER SERVICE STANDARD					
<p>This section of the Regulation requires that Bolton Railings:</p> <ul style="list-style-type: none"> • Establish policies, practices and procedures on providing goods and/or services to people with disabilities • Reasonably ensure that policies, practices and procedures are consistent with core principles of independence, dignity, integration and equality of opportunity • Set a policy on allowing people to use their own assistive devices to access our goods and/or services • Communicate with persons with disabilities in a manner that takes into account their disability • Allow persons with disabilities to be accompanied by their service animal • Permit persons with disabilities who use a support person to bring that person with them while accessing our goods and/or services • Provide notice when facilities and services that people with disabilities rely on, are temporarily disrupted • Train employees and third parties who act on our behalf about the customer service standard • Establish a process for providing feedback on how we provide goods and/or services to people with disabilities 					
Regulatory Requirement	Compliance Deadline	Deliverables	Actions/Progress	Due Date	Status
Establish policies, practices and procedures on providing goods and/or services to people with disabilities	January 1, 2012	Complete	Complete	December 2011 Complete	<input type="checkbox"/> Incomplete <input type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete
Ensure policies are consistent with core principles of independence, dignity, integration and equality of opportunity	January 1, 2012	Complete	Complete	December 2011 Complete	<input type="checkbox"/> Incomplete <input type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete
Set a policy on allowing people to use their own assistive devices to access our goods and/or services	January 1, 2012	Complete	Complete as part of accessibility policy	December 2011 Complete	<input type="checkbox"/> Incomplete <input type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete



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Policy on communicating with persons with disabilities in a manner that takes into account their disability	January 1, 2012	Complete	Complete as part of accessibility policy	December 2011 Complete	<input type="checkbox"/> Incomplete <input type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete
Policy and procedure on allowing persons with disabilities to be accompanied by their service animal <ul style="list-style-type: none"> • In those areas of premises Bolton Railings operates that are open to the public • Unless the animal is excluded by another law • If animal cannot access parts of our premises, use other measures to provide services to the person with the disability 	January 1, 2012	Complete	Complete as part of accessibility policy	December 2011 Complete	<input type="checkbox"/> Incomplete <input type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete
Policy and procedure on permitting persons with disabilities to use a Support Person	January 1, 2012	Complete	Complete as part of accessibility policy	December 2011 Complete	<input type="checkbox"/> Incomplete <input type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete
Policy and procedure on temporary disruptions	January 1, 2012	Complete	Complete as part of accessibility policy	December 2011 Complete	<input type="checkbox"/> Incomplete <input type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete
Train employees and third parties who act on our behalf about the customer service standard	January 1, 2012	Complete	Completed.	January 2012 Complete	<input type="checkbox"/> Incomplete <input type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete
Establish a process for receiving and responding to feedback on how we provide goods and/or services to people with disabilities, and how we respond to complaints	January 1, 2012	Complete	Completed as part of the overall accessibility policy	December 2011 Complete	<input type="checkbox"/> Incomplete <input type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete

PART 2 – GENERAL REQUIREMENTS					
<p>This section of the Regulation requires that Bolton Railings:</p> <ul style="list-style-type: none"> • Develop accessibility policies and a multi-year accessibility plan • Report on the progress of the multi-year plan • Ensure employees have been trained on the Integrated Accessibility Standards Regulation (“IASR”) and the Ontario Human Rights Code 					
Regulatory Requirement	Compliance Deadline	Deliverables	Actions/Progress	Due Date	Status
<p>Develop accessibility policies</p> <ul style="list-style-type: none"> • Develop, implement and maintain policies about what the organization will do to meet the IASR requirements and become more accessible • Statement of commitment • Make policies available to the public 	January 1, 2014	<ul style="list-style-type: none"> • Update current AODA Customer Service Standard Policy to incorporate our statement of commitment and how we will meet the IASR requirements 	<ul style="list-style-type: none"> • Customer Service Standard Policy updated and posted on company website • Statement of Commitment posted on company website via the accessibility policy 	<p>December 2013 Complete</p>	<input type="checkbox"/> Incomplete <input type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete
<p>Develop a multi- year accessibility plan</p> <ul style="list-style-type: none"> • Establish, implement, maintain and document a multi-year accessibility plan • Post multi-year accessibility plan on website and provide in an accessible format, upon request 	January 1, 2014	<ul style="list-style-type: none"> • A multi-year accessibility plan that sets out how Bolton Railings will comply with requirements of IASR will be developed and posted on the website 	Multi-year accessibility plan developed and posted on company website	<p>December 2013 Complete</p> <p>To be updated in 5 years.</p>	<input type="checkbox"/> Incomplete <input type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete

<p>Self-service kiosks</p> <ul style="list-style-type: none"> • Incorporate accessibility features when designing, procuring or acquiring self-service kiosks. • Large organizations and small organizations shall have regard to the accessibility for persons with disability when designing, procuring or acquiring self-service kiosks. 	<p>January 1, 2014</p>	<ul style="list-style-type: none"> • If we do purchase self-serve kiosks, we will develop a plan on the procuring/acquiring of accessible self-serve kiosks 	<p>Currently N/A</p>	<p>Currently N/A</p>	<p>Currently N/A</p>
<p>Training</p> <ul style="list-style-type: none"> • Ensure that training on the IASR and the Human Rights Code as it pertains to persons with disabilities is provided to employees, third parties acting on behalf of the Company; and persons who participate in developing our policies and others who provide goods, services or facilities on behalf of the Company. 	<p>January 1, 2015</p>	<ul style="list-style-type: none"> • Modify current Employee Training Workbooks to include IASR and Human Rights Code training • Include an AODA section in the employee handbook for all new employees to read and sign their acknowledgement of. 	<ul style="list-style-type: none"> • Training program will continue to be updated as policies are revised or new policies are added. • Training tracked and placed in HR files. • New employees will go through the training as they start work. • All current employees complete. 	<p>December 2014 Complete</p>	<p><input type="checkbox"/> Incomplete <input type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete</p>

PART 3 – INFORMATION AND COMMUNICATION STANDARD

This section of the Regulation includes requirements related to:

- Accessible websites and web content using the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level A and AA
- Accessible feedback processes
- Accessible formats and communication

Regulatory Requirement	Compliance Deadline	Deliverables	Actions/Progress	Due Date	Status
<p>Accessible websites and web content</p> <ul style="list-style-type: none"> Websites and web content to conform to WCAG 2.0 Level A and AA if/when our website undergoes a significant refresh or web content changes. 	January 1, 2014- January 1, 2021	<ul style="list-style-type: none"> Train all key employees on WCAG 2.0 guidelines as part of the IASR Training Run website through an AODA reader Identify website content to be updated Provide information to web developer for updating 	<ul style="list-style-type: none"> In progress until site is refreshed Will work with web builder to meet the requirements Training component complete 	As web content changes, and final deadline of January 1, 2021	<input type="checkbox"/> Incomplete <input checked="" type="checkbox"/> In progress <input type="checkbox"/> Complete
<p>Feedback processes</p> <ul style="list-style-type: none"> Ensure that processes for receiving and responding to feedback are accessible to persons with disabilities by providing/arranging for accessible formats and communication supports, upon request Notify the public about the availability of accessible formats and communication supports 	January 1, 2015	<ul style="list-style-type: none"> Document processes Ensure Bolton Railings website incorporates an on-line feedback process and that it is available in other formats, upon request 	<ul style="list-style-type: none"> Website has feedback policy posted as part of overall Accessibility Policy, and provides various ways to contact the Company. 	December 2014 Complete	<input type="checkbox"/> Incomplete <input type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete

<p>Accessible formats and communication supports</p> <ul style="list-style-type: none"> • Upon request, provide for provision of accessible formats and communication supports for persons with disabilities • Notify the public about the availability of accessible formats and communication supports 	<p>January 1, 2016</p>	<ul style="list-style-type: none"> • Bolton Railings to provide accessible formats and communication supports in a timely manner upon request 	<ul style="list-style-type: none"> • Prepared to provide accessible formats as requested 	<p>December 2015 Complete</p>	<p><input type="checkbox"/> Incomplete <input type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete</p>
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<p>PART 3 – EMPLOYMENT STANDARDS</p>					
<p>This section of the Regulation includes requirements related to:</p> <ul style="list-style-type: none"> • Recruitment, assessment and selection • Accessible formats and communication supports for employees • Workplace emergency response information • Return to work process • Performance management, career development/advancement and redeployment 					
<p>Regulatory Requirement</p>	<p>Compliance Deadline</p>	<p>Deliverables</p>	<p>Actions/Progress</p>	<p>Due Date</p>	<p>Status</p>

<p>Recruitment</p> <ul style="list-style-type: none"> Notify employees and the public about the availability of accommodation for applicants with disabilities in the recruitment process 	<p>January 1, 2016</p>	<ul style="list-style-type: none"> Notify employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process Existing recruitment policies, procedures and processes be reviewed/revised Update job posting templates to include accessibility statement 	<ul style="list-style-type: none"> Employees notified of accommodation availability through new employee handbook sessions. Policies and procedures updated Job posting templates are being updated to include the statement Interview packages include a statement about accessibility and providing accommodation 	<p>Some elements of the process still being updated</p>	<p><input type="checkbox"/> Incomplete <input checked="" type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete</p>
<p>Recruitment, assessment, or selection process</p> <ul style="list-style-type: none"> Notify job applicants when they are individually selected to participate in an assessment/selection process that accommodations are available upon request in relation to the materials or processes used during the recruitment process. 	<p>January 1, 2016</p>	<ul style="list-style-type: none"> Review existing recruitment policies, procedures and processes Update recruitment process to ensure applicants are notified if selected for an interview or assessment that accommodations are available, upon request 	<ul style="list-style-type: none"> Added to the overall Accessibility Policy Recruitment process is being updated to ensure applicants are notified of ability to accommodate at all levels of the recruitment and selection process Interview packages include a statement about accessibility and providing accommodation 	<p>Recruitment process in progress</p>	<p><input type="checkbox"/> Incomplete <input checked="" type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete</p>



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<p>Notice to successful applicants</p> <ul style="list-style-type: none"> When making an offer of employment, notify successful applicants of policies for accommodating employees with disabilities 	<p>January 1, 2016</p>	<ul style="list-style-type: none"> Create an accommodation procedure to include delivering the message when making the verbal offer of employment 	<ul style="list-style-type: none"> Managers advised of new procedure to include the message when making the verbal offer 	<p>December 2015 Complete</p>	<p><input type="checkbox"/> Incomplete <input type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete</p>
<p>Informing employees of support</p> <ul style="list-style-type: none"> Inform employees of policies used to support employees with disabilities (ex. Provisions of job accommodations that take into account employee's accessibility needs) as soon as practicable Information shall be provided to new employees as soon as practicable after they begin their employment Employers shall provide updated information whenever there is a change to existing policies on the provision of job accommodation that take into account an employee's accessibility needs due to disability 	<p>January 1, 2016</p>	<ul style="list-style-type: none"> Create accommodation procedure Inform employees of policies to support employees with disabilities Providing information regarding accommodation as the new employee begins employment (during the orientation training) Keeping employees up to date on changes to existing policies re: job accommodations with respect to disabilities 	<ul style="list-style-type: none"> Accommodation procedure created as part of the Accessibility Policy Employees have been informed via the employee handbook roll-out sessions and full employee AODA training Policies and programs are communicated to employees as they are updated 	<p>Complete</p>	<p><input type="checkbox"/> Incomplete <input type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete</p>



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<p>Accessible formats and communication supports for employees</p> <ul style="list-style-type: none"> When requested by an employee with a disability, employers shall provide or arrange for the provision of accessible formats and communication supports for information needed to perform the employee’s job, and information generally available to employees in workplace 	<p>January 1, 2016</p>	<ul style="list-style-type: none"> Bolton Railings to provide accessible formats and communication supports in a timely manner to requested employees 	<ul style="list-style-type: none"> Company is prepared to provide accessible formats and communication supports to employees who make the request 	<p>December 2015 Complete</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Incomplete <input type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete
<p>Documented individual accommodation plans</p> <ul style="list-style-type: none"> Develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities 	<p>January 1, 2016</p>	<ul style="list-style-type: none"> Expand on current accommodation policy Add applicable components to existing forms Document individual procedures 	<ul style="list-style-type: none"> Accommodation policy has been created and added as part of the overall Accessibility Policy. 	<p>December 2015 Complete</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Incomplete <input type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete

<p>Workplace emergency response information</p> <ul style="list-style-type: none"> • Provide individualized workplace emergency response information to employees who have a disability as required • If an employee requires assistance, with their consent, provide the response information to a person who will provide that assistance • Provide the information as soon as practicable upon finding out about the accommodation requirement • The emergency response information will be reviewed: <ol style="list-style-type: none"> (1) When the employee transfers (2) When their needs or plans are reviewed (3) When all emergency response policies are reviewed 	<p>January 1, 2012</p>	<ul style="list-style-type: none"> • Review Bolton Railings emergency information • Upon request or when it is determined that employees require accommodation, provide individualized emergency response information • Develop individualized workplace emergency response information procedures for employees with disabilities 	<ul style="list-style-type: none"> • To ask new employees when hired as part of orientation. • A statement has been added to the employee handbook. 	<p>Initial phase: December 2011 Complete</p> <p>In progress: To be adjusted on an ongoing basis as new employees start, or as part of any change to policies and procedures</p>	<p><input type="checkbox"/> Incomplete <input checked="" type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete</p>
<p>Return to work process</p> <ul style="list-style-type: none"> • Develop and have in place a return to work process for employees who have been absent from work due to a disability and require disability related accommodations to return to work 	<p>January 1, 2016</p>	<ul style="list-style-type: none"> • Review, update and document existing return to work process 	<ul style="list-style-type: none"> • Return to Work process has been updated in the employee handbook and the Accessibility Policy • Process in compliance 	<p>December 2015 Complete</p>	<p><input type="checkbox"/> Incomplete <input type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete</p>



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<p>Performance management, career development and redeployment</p> <ul style="list-style-type: none"> Take into account accessibility needs of employees with disabilities and individual accommodation plans as part of performance management processes, when providing career development opportunities and considering redeployment 	<p>January 1, 2016</p>	<ul style="list-style-type: none"> Create accessible employment procedure 	<ul style="list-style-type: none"> Employment procedure has been created and added to the Accessibility Policy As needed, Managers will work one-on-one with applicable employees 	<p>December 2015 Complete</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Incomplete <input type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete
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