



1.0 PURPOSE:

This policy outlines Theta TTS commitment to the process by which the company will achieve accessibility by meeting the phased in requirements of the *Integrated Accessibility Standard*. This policy is intended to meet the requirements of the *Integrated Accessibility Standards, Ontario Regulation 191/11*, set forth under the *Accessibility for Ontarians with Disabilities Act 2005 (AODA)*. 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*.

2.0 SCOPE:

This policy shall apply to:

1. Employees who deal with the public or other third parties on behalf of Theta TTS.
2. All persons who participate in the development of 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.

3.0 RELATED DOCUMENTS:

Accessibility for Ontarians with Disabilities Act, 2005
Integrated Accessibility Standards Ontario Regulation 191/11
Ontario Human Rights Code, 1990
Theta TTS Accessible Customer Service Plan
Theta TTS AODA Feedback Form

4.0 CONSULTATION:

General Manager
Health & Safety Representative

5.0 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 by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*, refer 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
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- hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other medical 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.

Accessible Formats – include but not limited to large print, and electronic formats, and other formats usable by persons with disabilities.

Communication Supports – include but not limited plain language, sign language and other supports that facilitate effective communications.

Conversion Ready – an electronic or digital format that facilitates conversion into an acceptable format.

Information – includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and conveys meaning.

Redeployment – the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated in the organization.

6.0 GENERAL PRINCIPLES

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

A. Commitment of Theta TTS to achieve accessibility

Theta TTS 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 requirement under the AODA.

Theta TTS 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. We will progress toward improved accessibility by meeting the phased in



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requirements of the Act. Theta is committed to providing information to or communicating with a person with a disability and will endeavour to do so in a manner that takes into account the persons disability.

B. Multi-year Accessibility Plan

- By January 1, 2014, Theta will develop a multi-year Accessibility Plan outlining the strategy to prevent and remove barriers and address the current and future requirements under the AODA.
- Action Plan
 - a. Assess current policies, practices, procedures, premises, access to goods and services and information and communication systems to identify barriers to persons with disabilities.
 - b. Address the indentified barriers and develop a five year plan for the removal and prevention of these barriers.
 - c. Update the plan every 5 years.
 - d. Post on the company 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

Theta TTS will develop procedures to address “Information and Communication” and “Employment” as proscribed by the Integrated Accessibility Standard.

Information and Communication

January 1, 2016

- Theta 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, Theta will provide accessible information and communication 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 and web content will conform to WCAG 2.0 Level AA.



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If an employee with a disability request it, Theta TTS must provide or arrange for the provision of accessible formats and communication supports for the following:

1. Information needed in order to perform their job: and
2. Information that is generally available to all employees in the workplace.

Theta TTS should consult with the employee making the request to determine the best way to provide the accessible format or communication support.

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

- Unconvertible information or communications such as brochures, sales pamphlets, etc.
- Information the Theta does not control directly or indirectly through a contractual relationship.

Feedback – Under the Customer Service Standard, Theta has established a customer 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 January 1, 2016

Emergency Response

- Theta will provide individualized workplace emergency response information to employees who have disclosed a disability and with their consent, provide the workplace emergency information to the person designated to provide them assistance.
- The individual workplace emergency response information will be reviewed/revise,
 1. When the employee moves to a different location in the company;
 2. When the employee's accommodation needs change or plans
 3. When the employer reviews its general emergency response policies

Recruitment

Theta TTS is committed to fair and accessible employment practices. Theta TTS will notify employees and the public about the availability of accommodation for job applicants who have disabilities. Applicants will be informed that these accommodations are available, upon request, for the interview process and other candidate selection methods. Theta TTS will notify the successful applicant of their policies and supports for accommodating people with disabilities.

Individualized Plans

Theta will develop individual accommodation plans for employees with disabilities. Theta has a Return to Work process for employees absent due to disabilities who require accommodation. The return to work process will include an outline of the steps Theta TTS will take to facilitate the employee's return to work and use documented individual accommodation plans (as described in section 28 of the regulation). If redeployment is used, the accessibility needs of the employee will



be taken into account. Redeployment may mean reassignment of employees to other departments within the organization as an alternative to a “layoff”, when a particular job or department has been eliminated. We will also ensure that accessibility needs and individual accommodation plans of the employee are taken into account when assessing their performance, managing their career development, advancement and redeployment.

D. Training January 1, 2015

Theta will train employees dealing with customers and the public on behalf of Theta or those 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 employees as appropriate to the duties of the employee.

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 Standard, Ontario Regulation 191/11
- Applicable portions of the Human Rights Code, 1990 (disability related obligations)
- Theta’s policies, procedures and practices pertaining to the AODA

Training Schedule:

Initial training will be completed by January 1, 2015. Training will be provided to new employees or contract employees who deal with the public, during orientation or within 3 months of date of hire. Revised training will be provided in the event of changes to the legislation, procedures and/or practices.

Record of Training:

HR will keep a record of training that includes dates training was provided and who attended.