

Accessibility for Ontarians with Disabilities Act

Integrated Accessibility Standards

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1. PURPOSE

- 1.1. The *Integrated Accessibility Standards* (the “IAS”) is a regulation under the Act, the purpose of which is to ensure accessibility for persons with disabilities in the areas of (i) Information and Communication, (ii) Employment, (iii) Transportation and (iv) Design of Public Spaces.
- 1.2. The purpose of this policy is to identify and document how Recochem Inc. achieves accessibility by meeting the requirements of the IAS and how it will continue to ensure accessibility for persons with disabilities.

2. STATEMENT OF COMMITMENT

- 2.1. Recochem Inc. is committed to developing, implementing and maintaining policies aimed at meeting the accessibility needs of persons with disabilities in a timely manner. An accessibility Plan has been developed and will be maintained in order to establish the steps required to prevent and remove barriers from its workplace for persons with disabilities

3. APPLICATION

- 3.1. This Policy applies to all Employees and Persons responsible for the development of Recochem Inc. policies in the Province of Ontario.
- 3.2. This Policy is subject to all applicable provincial legislation requirements and obligations.

4. DEFINITIONS

- 4.1. **Accessible Formats** - may include large print, electronic formats, and other formats usable by persons with disabilities.
- 4.2. **Communication Supports** - may include alternative and augmentative communication supports, plain language and other supports that facilitate effective communications.
- 4.3. **Disability** – means:
 - 4.3.1. any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness,
 - 4.3.2. a condition of mental impairment or a developmental disability,
 - 4.3.3. a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
 - 4.3.4. a mental disorder, or
 - 4.3.5. an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*

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- 4.4. **New Internet Website** - means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.
- 4.5. **Performance Management** - means activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.
- 4.6. **Redeployment** - means the reassignment of employees to other departments or jobs as an alternative to layoff, when a particular job or department has been eliminated.
- 4.7. **Unconvertible Information or Communication** – means information or communication that it is not technically feasible to convert, or if it is technically feasible to convert, the technology required to do so is not readily available.
- 4.8. **Web Content Accessibility Guidelines (“WCAG”)** – means the international standard for making websites and web content accessible to people with a wide-range of disabilities.

5. IMPLEMENTATION

- 5.1. All members of management will be responsible to ensure this policy is applied. The Human Resources department with the management executives will ensure review and update of this policy and its related Accessibility Plan.

6. GENERAL ACCESSIBILITY STANDARDS

6.1. Accessibility Plan

- 6.1.1. Recochem Inc. has established and implemented an Accessibility Plan, which outlines the Company’s strategy to prevent and remove barriers for persons with disabilities and meet the requirements of the IAS in accordance with the timelines set out therein.
- 6.1.2. Recochem Inc. will maintain the Accessibility Plan in accordance with the requirements of the IAS. The Accessibility Plan will be reviewed and updated at least once every five (5) years.
- 6.1.3. The Accessibility Plan will be made available in an Accessible Format upon request.

6.2. Training

- 6.2.1. Recochem Inc. will provide training to existing employees and persons who participate in the development of AODA Policies.
- 6.2.2. Training will include the requirements of the IAS; the *Human Rights Code* as it pertains to persons with disabilities; Information about achieving accessibility by 2025; requirements of the Communication, Employment and Information standards. The content of the training may be modified depending on the individual’s duties.
- 6.2.3. Employees hired after the Compliance Deadline for Training will receive the required training as soon as practicable.

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6.2.4. Recochem Inc. will keep a record of the training provided, including the dates on which the training is provided and the number of individuals to whom it is provided.

6.2.5. Recochem Inc. will ensure that contractors providing goods, services and/or facilities on the Company's behalf have received the training required under the IAS.

7. INFORMATION AND COMMUNICATION STANDARDS

7.1. The Information and Communication Standards do not apply to:

7.1.1. products and product labels;

7.1.2. Unconvertible information or communications; and

7.1.3. Information that Recochem Inc. does not control directly or indirectly through a contractual relationship.

7.2. Should Recochem Inc. determine that information or a communication is Unconvertible it will explain why and provide the person making the request with a summary of the said information or communication.

8. Feedback Procedures

8.1. Recochem does not solicit feedback from the general public. However, it will ensure that persons with disabilities seeking to communicate with Recochem can do so, by providing or arranging for the provision of Accessible Formats and Communications Supports, upon request.

8.2. Recochem Inc. will notify the public that Accessible Formats and Communications Supports are available.

9. Accessible Formats & Communication Supports

9.1. Recochem Inc. will, upon request, provide or arrange for the provision of Accessible Formats and Communication Supports to persons with disabilities, in a timely manner and at a cost that is no more than the regular cost charged to other persons.

9.2. Recochem Inc. will consult with the person making the request when determining the suitability of an Accessible Format or Communication Support

10. Emergency Plans, Procedures or Public Safety Information

10.1. Recochem Inc. will provide safety information that it makes available to the public in an Accessible Format or with appropriate Communication Supports, upon request.

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11. Accessible Websites and Web Content

- 11.1. Recochem Inc. will ensure that, where practicable, any website or content on their site conforms with WCAG 2.0 Level AA to the extent required by the IAS.
- 11.2. The commitment to provide accessible websites and web content only applies to websites and web content that Recochem inc. controls directly or indirectly through a contractual relationship that allows for modification of the website or web content in question.

12. EMPLOYMENT STANDARDS

- 12.1. The Employment Standards only apply to employees of Recochem Inc. They do not apply to other unpaid individuals or contractors.

12.2. Recruitment/Selection/Assessment

- 12.2.1. Recochem Inc. will notify the public and employees of the availability of accommodation for job applicants during the recruitment process.
- 12.2.2. Recochem Inc. will notify all job applicants who are individually selected to participate in an assessment or selection process that accommodation is available upon request if the applicant requires accommodation due to a disability.
- 12.2.3. If an applicant requests accommodation, Recochem Inc. will consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs.

12.3. Notice to Successful Applicants

- 12.3.1. Recochem Inc. will ensure that when making offers of employment, it notifies the successful applicant of its policies on accommodating employees with disabilities.

12.4. Informing Employees of Supports

- 12.4.1. Recochem Inc. will inform its existing employees of its policies on supporting employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.
- 12.4.2. Recochem Inc. will provide employees with updated information whenever there is a material change to its policies on the provision of job accommodations for employees with disabilities.

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12.4.3. All employees hired after the Informing Employees of AODA Policies Compliance Deadline will be notified of Recochem Inc. policies on supporting employees with disabilities as soon as practicable after commencing employment.

12.5. Accessible Formats and Communication Supports for Employees

12.5.1. Recochem Inc. will, upon the request of an employee with a disability, provide or arrange for the provision of Accessible Formats and Communication Supports in order to ensure that (i) information required by the employee to perform his/her job; and (ii) information generally available to employees in the workplace, is accessible to the employee with a disability.

12.5.2. Recochem Inc. will consult with the employee making the request to determine the suitability of any Accessible Format or Communication Support. However, Recochem Inc. reserves the right to determine the Accessible Format or Communication Support that will be provided in the circumstances.

12.6. Workplace Emergency Response Information

12.6.1. If an employee has a disability and Recochem Inc. is aware that, due to that disability, the employee requires an individualized workplace emergency response, information addressing such response will be provided to the employee as soon as practicable after Recochem Inc. becomes aware of such requirement.

12.6.2. In such a case, with the employee's consent, Recochem Inc. will designate a colleague(s) to provide such individualized assistance and will ensure that this colleague is provided with a copy of employee's individualized emergency response information.

12.6.3. Recochem Inc. will review the individualized workplace emergency response information when (i) the employee moves to a different work location; (ii) the employee's overall accommodations needs or plans are reviewed; and (iii) when Recochem Inc. reviews its general emergency response policies.

12.7. Documented Individual Accommodation Plans

12.7.1. Recochem Inc. will have in place a written process for the development of documented individual accommodation plans for employees with disabilities. The process will include the following elements:

12.7.2. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.

12.7.3. The means by which the employee is assessed on an individual basis.

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12.7.4. The manner in which Recochem Inc. can request an evaluation by an outside medical or other expert, at its own expense, to assist in determining if accommodation can be achieved and, if so, how accommodation can be achieved.

12.7.5. The manner in which the employee can request the participation of a representative from the workplace, in the development of the accommodation plan.

12.7.6. The steps Recochem Inc. will take to protect the privacy of the employee's personal information.

12.7.7. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.

12.7.8. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.

12.7.9. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

12.7.10. Where requested, an employee's individual accommodation plan will include any information regarding the provision of Accessible Formats and Communications Supports and individualized workplace emergency response information.

12.8. Return to Work Process

12.8.1. Recochem Inc. has a documented a return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

12.8.2. The return to work process will outline the steps Recochem Inc. will take to facilitate the employee's return to work and will use the documented individual accommodation plans.

12.8.3. The return to work process will not replace or override any other return to work process created under any other statute.

12.9. Performance Management, Career Development, Advancement and Redeployment

12.9.1. Recochem Inc. will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance appraisals, providing career development and advancement plans or when redeploying employees.

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13. DESIGN OF PUBLIC SPACES STANDARDS

- 13.1. Recochem Inc. will comply with the accessibility requirements of the Design of Public Spaces Standards when redeveloping or constructing new public spaces on or after January 1, 2017.

14. QUESTIONS ABOUT THIS POLICY

- 14.1. Any questions about this policy should be directed to the Corporate Human Resources Department