

HUMAN RESOURCES POLICY

Policy #: HRA8 **Effective Date:** January 2014
Subject: Integrated Assessibility Standards **Supersedes:**
Policy

1.0 POLICY

This policy has been established by CCL Industries Inc. ("CCL") to govern the provision of services in compliance with Regulation 191/11, "Integrated Accessibility Standards" ("Regulation") under the Accessibility for Ontarians with Disabilities Act, 2005 (the "AODA").

The standards established by the Regulation have been developed to eliminate barriers and facilitate accessibility for persons with disabilities in the areas of information and communications and of employment.

2.0 SCOPE

This policy and CCL's companion policy on Accessibility Standards for Customer Service are applicable specifically to CCL's facilities in Ontario, which are governed by the AODA and the Regulation. The policies are intended to assist in meeting the accessibility needs of persons with disabilities.

3.0 COMMITMENT

CCL is committed to meeting the needs of persons with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the AODA and the Regulation. In this context, CCL is committed to treating all people in a way that allows them to maintain their dignity and independence. CCL believes in integration and equal opportunity.

This policy will be implemented in accordance with the time frames established by the Regulation.

4.0 ACCESSIBILITY PLAN

CCL will develop, maintain and document an accessibility plan outlining the company's strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities (the "Accessibility Plan").

The Accessibility Plan will be reviewed and updated at least once every five years. Upon request, CCL will provide a copy of the Accessibility Plan in an accessible format.

5.0 TRAINING EMPLOYEES AND VOLUNTEERS

CCL will ensure that training is provided on the requirements of the accessibility standards referred to in the Regulation and to provide additional training on the Human Rights Code as it pertains to persons with disabilities, to:

- all its employees and volunteers;
- all persons who participate in developing CCL's applicable policies and,
- all other persons who provide goods, services or facilities on behalf of CCL

The training will be appropriate to the duties of the employees, volunteers and other persons.

The training of employees will be updated when relevant changes are made to this policy or to the Accessibility Plan. New employees will be trained as part of their orientation process.

CCL will keep a record of the AODA training it provides.

6.0 INFORMATION AND COMMUNICATIONS STANDARDS

6.1 Feedback

CCL will continue to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communications supports, upon request.

6.2 Accessible Formats and Communication Supports

Upon request, CCL will provide, or will arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that take into account the person's accessibility needs due to disability.

CCL will consult with the person making the request in determining the suitability of an accessible format or communication support.

CCL will provide notification to the public about the availability of accessible formats and communication supports by appropriate and reasonable means.

6.3 Accessible Websites and Web Content

CCL will ensure that its Internet websites, 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.

7.0 EMPLOYMENT STANDARDS

7.1 Recruitment

CCL will provide notification to its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

7.2 Recruitment, Assessment or Selection Process

CCL will notify job applicants, when they are individually selected to participate further in an assessment or selection process that reasonable accommodations are available upon request in relation to the materials or processes to be used.

If a selected applicant requests an accommodation, CCL will consult with the applicant and provide, or arrange for the provision of, reasonable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

7.3 Notice to Successful Applicants

When making offers of employment, CCL will notify the successful applicant of its policies for accommodating employees with disabilities.

7.4 Informing Employees of Supports

CCL will continue to inform its employees of its policies (and any updates to those policies) concerning support for 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 will be provided to new employees as soon as practicable after commencing employment.

7.5 Accessible Formats and Communication Supports for Employees

Upon the request of an employee with a disability, CCL will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his/her job, and information that is generally available to other employees.

In determining the suitability of an accessible format or communication support, CCL will consult with the employee making the request.

7.6 Workplace Emergency Response Information

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

7.6 Workplace Emergency Response Information (Cont'd)

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

CCL will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodations needs or plans are reviewed.

7.7 Documented Individual Accommodation Plans

CCL will maintain a written process for the development of documented individual accommodation plans for employees with disabilities.

If requested, information regarding accessible formats and communications supports provided will also be included in individual accommodation plans.

In addition, the plans will include individualized workplace emergency response information (where required), and will identify any other accommodation that is to be provided.

7.8 Return to Work Process

CCL maintains a documented 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.

The return to work process outlines the steps CCL will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

This return to work process will not replace or override any other return to work process created by or under any other statute (ie., the Workplace Safety Insurance Act, 1997).

7.9 Performance Management, Career Development and Advancement & Redeployment

CCL will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans and overall job performance when conducting performance management, providing career development and advancement to employees, or when redeploying employees.

8.0 QUESTIONS ABOUT THIS POLICY

This policy has been developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment.

Any questions related to this document should be directed to the Human Resources Department.