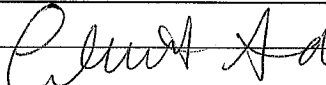
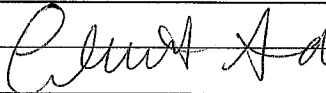
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## 1 POLICY

- 1.1 *Eco-Tec Inc. is committed to creating an inclusive culture across the organization by preventing and removing barriers for persons with disabilities. Where it is not possible to remove barriers, Eco-Tec will make efforts to accommodate persons with disabilities in a timely, effective and suitable manner. Eco-Tec is committed to promoting independence, dignity, integration and equality of opportunity for persons with disabilities.*

Additionally, Eco-Tec Inc. is committed to providing exceptional and accessible service to its customers. Goods and services will be provided in a manner which respects the dignity and independence of all customers. The provision of services to persons with disabilities will be integrated wherever possible. Persons with disabilities, including those who need use of assistive devices and/or support persons, will be given the same opportunity as given to others, to obtain, use or benefit from the goods and services provided by and on behalf of Eco-Tec.

*The purpose of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) is to develop, implement and enforce accessibility standards in key areas of daily living to address barriers for people living with disabilities.*

Eco-Tec supports the principles of the AODA and the Customer Service Standard and Integrated Accessibility Standards Regulations.

## 2 PURPOSE

- 2.1 This policy is intended to specifically address the requirements of the AODA and describes how Eco-Tec will comply with those requirements. Additionally, this policy outlines what employees and the public may expect from Eco-Tec.

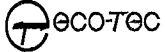
## 3 SCOPE

- 3.1 This policy applies to all Eco-Tec employees, students and volunteers, where applicable.

## 4 RESPONSIBILITY AND AUTHORITY

- 4.1 The Company shall:

- Ensure compliance with the *AODA*;
- Include accessibility in annual planning processes;
- Budget for accessibility requirements;
- Support staff attendance at required training;
- Notify Human Resources of additional training requirements;
- Communicate, coordinate and/or provide service to a person with a disability regarding the use of, or who may use, a service animal, support person or assistive device;
- Provide notification of service disruptions; and
- Provide all documentation in appropriate formats upon request by a person with a disability.

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#### 4.2 Human Resources shall:

- Coordinate and provide Accessibility training in order to comply with the *AODA*;
- Coordinate and maintain training records;
- Establish and maintain an ongoing training program to ensure all staff are trained in providing Accessible Customer Service as part of the corporate orientation process;
- Communicate to all departments regarding all requirements under the regulations;
- Monitor the progress of legislative requirements under the *AODA*;
- Report to the Ministry of Community and Social Services on compliance requirements;
- Attend professional development activities to keep current on regulations and best practices; and
- Ensure compliance with the *AODA*.

### 5 DEFINITIONS

5.1 **Accessible:** Customer service is provided in a manner that is capable of being easily understood or appreciated and obtainable.

5.2 **Accessible Formats:** *May include, but not limited to, large print, recorded audio and electronic formats.*

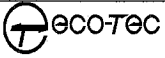
5.3 **Assistive Device:** A device used to assist persons with disabilities in carrying out activities or in accessing the services of persons or organizations covered by the *AODA*.

5.4 **Barrier:** Anything which prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy, procedure or practice.

5.5 **Communication Supports:** *May include, but not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports which facilitate effective communications.*

#### 5.6 Disability:

- Any degree of physical 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 coordination, blindness or visual impairment, 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*.

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- 5.7 **Guide Dog:** A guide dog as defined in Section 1 of the *Blind Persons' Rights Act* is a dog trained as a guide for a blind person and having qualifications prescribed by the regulations under the *Blind Persons' Rights Act*.
- 5.8 **New Internet Website:** Means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.
- 5.9 **Service Animals:** As defined by the *Accessibility for Ontarians with Disabilities Act, 2005* an animal is a service animal for a person with a disability if it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.
- 5.10 **Standard:** According to the *Accessibility for Ontarians with Disabilities Act, 2005*, sets out what a person or organization must do to achieve accessibility for persons with disabilities to whom the standard applies.
- 5.11 **Support Persons:** As defined by the *Accessibility for Ontarians with Disabilities Act, 2005* shall mean any person, whether a paid professional, volunteer, family member or friend who accompanies a person with a disability in order to help with communication, mobility, personal care or medical needs or with access to goods or services.

## 6 GENERAL PROVISIONS

### 6.1 Multi-Year Accessibility Plan

Eco-Tec's Multi-Year Accessibility Plan outlines a phased-in strategy to prevent and remove barriers and addresses the current and future requirements of the AODA. This plan will be posted on our website and on the Forms drive [Human Resources → AODA] and updated annually.

### 6.2 Training


*Eco-Tec will ensure that training is provided to all employees on the requirements of the Accessibility Standards and on the Human Rights Code as it pertains to persons with disabilities.*

#### **Timeline for Training**

Training will be provided as soon as practicable upon an individual being assigned the applicable duties as well as on an ongoing basis as changes occur to Eco-Tec's policies, procedures and practices governing the provision of goods and services to persons with disabilities and as new standards come into effect under the AODA.

#### **Records of Training**

Eco-Tec will keep records of the training, including the date on which training is provided and the number of individuals to whom it is provided. Detailed records will be kept for reporting purposes.

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## 7 CUSTOMER SERVICE STANDARD (EFFECTIVE JANUARY 1, 2012)

The Customer Service Standard applies to all persons who deal with members of the public or third parties on behalf of Eco-Tec, whether the person does so as an employee, volunteer, student or otherwise and all persons who participate in developing Eco-Tec's policies, practices and procedures governing the provision of goods and services to members of the public or other third party members.

### 7.1 The Provision of Goods and Services to Persons with Disabilities (January 1, 2012)

Eco-Tec will use reasonable efforts to ensure that its policies, practices and procedures are consistent with the following principles:

- Eco-Tec's goods and services are provided in a manner which respects the dignity and independence of persons with disabilities;
- The provision of Eco-Tec's goods and services to persons with disabilities are integrated with those provided to persons who do not have disabilities unless alternative measure is necessary to enable a person with a disability to obtain, use or benefit from Eco-Tec's goods or services; and
- Persons with disabilities are given an opportunity equal to that of persons without disabilities to obtain, use or benefit from Eco-Tec's goods or services.

### 7.2 Assistive Devices and other Measures that Assist with Accessibility (January 1, 2012)

The use of assistive devices by persons with disabilities to obtain, use or benefit from Eco-Tec's goods or services is recognized unless Eco-Tec has determined that the assistive device may pose a risk to the health and safety of the person with a disability or the health and safety of others on the premises.

In these situations and others, Eco-Tec may offer a person with a disability other reasonable measures to assist him or her in obtaining, using and benefiting from Eco-Tec's goods or services where Eco-Tec has such other measures available.

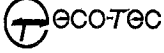
It is the responsibility of the person with a disability to ensure that his or her assistive device is operated in a safe and controlled manner at all times.

### 7.3 Guide Dogs, Service Animals (January 1, 2012)

Persons with disabilities are permitted to be accompanied by their guide dog or other service animal and keep that animal with them in areas/premises that are open to the public, when accessing goods or services provided by Eco-Tec, unless the animal is otherwise excluded by law.

If the service animal or guide dog is excluded by law, Eco-Tec will look to other available measures to enable the person with a disability to obtain, use or benefit from Eco-Tec's goods or services.

It is the responsibility of the person with a disability to ensure that his or her service animal is kept in control at all times.

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7.4 Communication (January 1, 2012)

When communicating with a person with a disability, Eco-Tec will do so in a manner which takes into account the person's disability.

7.5 Support Persons (January 1, 2012)

Persons with disabilities are permitted to be accompanied by their support person in areas/premises that are open to the public, when accessing goods or services provided by Eco-Tec.

If a person with a disability is accompanied by a support person, Eco-Tec will ensure that both persons are permitted to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the premises. If there is confidential information to be disclosed, written consent must be received from the person with the disability, as well as from the support person.

Eco-Tec may deem it necessary to require a support person for a person with a disability in order to protect the health and safety of that person or others on the premises. This will only occur after consultation with the person with a disability and when it is the only means to allow the person with a disability to access Eco-Tec's goods or services.

7.6 Notice of Temporary Disruptions in Services and Facilities (January 1, 2012)

In the event of a planned service disruption to facilities, services or systems which are relied upon by persons with disabilities to access Eco-Tec's goods or services, notice of the disruption shall be provided in advance.

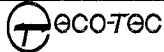
Notice of the disruption will include information about the nature of the disruption, its anticipated duration and a description of alternative facilities, services or systems, if any, that may be available.

Eco-Tec will make reasonable efforts to provide prior notice of planned disruptions if possible, recognizing that in some circumstances, such as in the situation of unplanned temporary disruptions, advance notice will not be possible. In such cases, Eco-Tec will provide notice as soon as possible.

Notice may be given by posting the information in a conspicuous place on the premises, or by posting it on Eco-Tec's website or by such other method as is reasonable under the circumstance.

7.7 Feedback (January 1, 2012)

Eco-Tec will maintain a feedback process to enable members of the public to comment on the provision of goods and services to persons with disabilities. Feedback from the public is welcomed as it may identify areas that require change and encourage continuous service improvements.

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Feedback will be received in any form (i.e. in person, by telephone, in writing, fax, or by email) and all such feedback will be logged by Human Resources for reporting purposes. Eco-Tec will ensure that every process for receiving and responding to feedback is accessible to persons with disabilities. Eco-Tec will do this by providing and arranging for the provision of accessible formats and communication supports upon request.

All feedback will be kept in strict confidence and will be used to improve customer service. An answer to feedback is not mandatory, however depending on the situation, it may be appropriate to respond to the customer. Should an answer be deemed appropriate and should the customer have chosen to supply his or her contact information, the customer will be provided with a response.

Feedback forms including information about the feedback process will be readily available to the public and will be posted on Eco-Tec's website with hardcopy forms available at Reception by request.

#### 7.8 Notice of Availability and Format of Documents (January 1, 2012)

All documents required by the *Accessibility for Ontarians with Disabilities Act, 2005*, including Eco-Tec's Accessibility policies, procedures and practices, notice of temporary disruptions, training records, and written feedback process are available upon request, subject to the *Personal Information Protection and Electronic Documents Act (PIPEDA)*. All documents will also be available on the forms drive in the Human Resources folder.

When providing a document to a person with a disability, Eco-Tec will provide the document, or the information contained in the document, in a format that takes the person's disability into account.

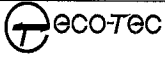
Notice of the availability of all documents required by the *Accessibility for Ontarians with Disabilities Act, 2005*, will be posted on the Eco-Tec website.

#### 7.9 Training (January 1, 2012)

Eco-Tec is committed to establishing, implementing and maintaining a program for training on the requirements of the *AODA* and, where appropriate, the *Ontario Human Rights Code, 1990* as it pertains to people with disabilities. Eco-Tec will ensure that all persons for whom this policy applies receive training as required by the *AODA*. The amount and format of training given will be tailored to suit each person's interactions with the public and his or her involvement in the development of policies, procedures and practices pertaining to the provision of goods or services.

The content of the training will include:

- A review of the purposes of the *Accessibility for Ontarians with Disabilities Act, 2005*;
- The requirements of the *Accessibility Standards for Customer Service (Ontario Regulation 429/07)* and the *Integrated Accessibility Standards, Ontario Regulation 191/11*;

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- Instruction on Eco-Tec’s policies, procedures and practices pertaining to the provision of goods and services to persons with disabilities;
- How to interact and communicate with persons with various types of disabilities;
- What to do if a person with a particular type of disability is having difficulty accessing Eco-Tec’s goods and services;
- How to interact with persons with disabilities who use assistive devices or who require the assistance of a support person or service animal;
- Information about the equipment or devices available on Eco-Tec’s premises that may help with the provision of goods and services to persons with disabilities;
- Applicable portions of the *Ontario Human Rights Code, 1990* (disability related obligations); and
- Other requirements set out under the *AODA*.

## 8 INTEGRATED ACCESSIBILITY STANDARDS (EFFECTIVE JANUARY 1, 2016)

The Integrated Accessibility Standards (Regulation 191/11) under the AODA came into force on January 1, 2016. The regulation establishes standards to address barriers which persons with disabilities face in the areas of information and communications, employment, transportation and the design of public spaces. These standards apply to Eco-Tec employees, students and volunteers. The requirements under these standards are not a replacement or substitution for the requirements of the Ontario Human Rights Code.

The Ontario Human Rights Code provides for equal rights and opportunities and freedom from discrimination. The Code protects people from discrimination because of past, present and perceived disabilities.

For further information on the Ontario Human Rights Code visit: [www.ohrc.on.ca](http://www.ohrc.on.ca).


### Employment Standard

The Employment Standard assists Eco-Tec in making its recruitment, hiring and retention of employees more accessible to potential and existing employees with disabilities. It requires employers to have processes in place to determine an employee’s accommodation needs. The Ontario Human Rights Code requires all employers to meet the accommodation needs of employees with disabilities to the point of undue hardship.

#### 8.1 Workplace Emergency Evacuation Information (January 1, 2016)

*Eco-Tec shall provide individualized workplace emergency response information to employees who have a disability for the 4 points below:*

- i. *if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee’s disability;*

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- ii. *if the employee who receives individual workplace emergency response information requires assistance and with the employee's consent, Eco-Tec shall provide assistance to the employee;*
- iii. *as soon as practicable after becoming aware of the need for accommodation due to the employee's disability;*
- iv. *review the individualized workplace emergency response information when the employee moves to a different location in the organization, when overall accommodation needs or plans are reviewed and when the employer reviews its general emergency response policies.*

## 8.2 Recruitment and Selection (January 1, 2016)

*Eco-Tec shall notify employees and the public about the availability of accommodations for applicants with a disability for the 3 situations below by including statements in our job advertisements, interview confirmation emails and job offer emails.*

- i. *during the recruitment process when job applicants are individually selected to participate in an assessment or selection process;*
- ii. *shortlisted applicants must request accommodation and Eco-Tec shall provide or arrange for the provision of a suitable accommodation, which takes into account the applicant's disability;*
- iii. *notify successful applicants of the policies for accommodating employees with disabilities.*

## 8.3 Accessible Formats and Communication Supports (January 1, 2016) - Employment

*Where an employee requests it, Eco-Tec will consult with the employee or arrange for the provision of accessible formats and communication supports for the 3 points below:*


- i. *information which is generally available to employees in the workplace;*
- ii. *information which is needed to perform the employee's job;*
- iii. *consult with the employee making the request in determining the suitability of an accessible format or communication support*

## 8.4 Individual Accommodation Plan (IAP) (January 1, 2016)

*Eco-Tec shall have in place a written process for the development of a documented individual accommodation plan for employees with a disability. Process to include the 12 points below:*

- i. *the employee's participation in the development of the IAP;*
- ii. *assessment on an individual basis;*
- iii. *identification of accommodations to be provided;*
- iv. *timelines for the provision of accommodation;*
- v. *Eco-Tec may request an evaluation by outside medical or other expert, at our expense, to assist with determining accommodation and how to achieve accommodation;*



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- vi. *employee may request the participation of a representative from the workplace;*
- vii. *steps taken to protect the privacy of the employee's personal information;*
- viii. *frequency with which the IAP will be reviewed and updated and the manner in which it will be done;*
- ix. *if denied, the reasons for denial are to be provided to the employee;*
- x. *a format which takes into account the employee's disability needs;*
- xi. *if requested, any information regarding accessible formats and communication supports provided;*
- xii. *identification of any other accommodation which is to be provided.*

*Please refer to ETI-HR-6-053 – Individual Accommodation Plans for more information.*

#### 8.5 Employee Notification (January 1, 2016)

*Eco-Tec shall inform its employees of its policies used to support its employees with disabilities including, but not limited to, policies on the provision of job accommodations which take into account an employee's accessibility needs due to a disability for the two situations below:*

- i. *as required to new employees as soon as practicable after they begin their employment.*
- ii. *whenever there is a change to existing policies on the provision of job accommodations which take into account an employee's accessibility needs due to a disability.*


#### 8.6 Return to Work (January 1, 2016)

*Eco-Tec will have in a place a return to work process for employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work. Such processes must be documented and must outline the steps which Eco-Tec and the employee will take to facilitate the return to work and include an individual accommodation plan.*

#### 8.7 Performance Management, Career Development and Redeployment (January 1, 2016)

*Eco-Tec will take into account the accommodation needs and/or individual accommodation plans of employees for the 3 points below:*

- i. *using performance management process*
- ii. *providing career development and advancement information*
- iii. *using redeployment procedures*

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## Information and Communications Standard

### 8.8 Accessible Website and Web Content (January 1, 2014 – new websites/January 1, 2021 – existing websites)

Eco-Tec will, except where impracticable, ensure that its internet websites that are accessible to members of the public conform to the applicable requirements of the *World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0* by the dates specified in the AODA.

### 8.9 Accessible Formats and Communication Supports (January 1, 2016) – Information & Communications

*Eco-Tec shall be obligated to provide or arrange for accessible formats and communication supports for persons with disabilities for the situations listed below:*

- a) Upon request in a timely manner that takes into account the persons' accessibility needs due to a disability;*
- b) At a cost that is no more than the regular cost charged to other persons;*
- c) Consult with the person making the request and determine suitability of an accessible format or communication support;*
- d) Notify the public about the availability of accessible formats and communication supports.*

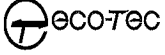
### 8.10 Emergency and Public Safety Information (January 1, 2012)

When communicating with a person with a disability, Eco-Tec will do so in a manner which takes into account the person's disability. Eco-Tec will endeavour to provide, or arrange to provide, communications in accessible formats and communication supports to a person with a disability in order to facilitate access to Eco-Tec's products and services. Eco-Tec will do this in a timely manner which takes into account the person's accessibility needs due to his or her disability and at a cost that is no more than the regular cost charged to other persons.

On request and where applicable, Eco-Tec will provide emergency procedures, plans and public safety information which is available to the public in an accessible format with appropriate communication supports as soon as practicable.

### 8.11 Feedback (January 1, 2015)

*Eco-Tec has a process in place for receiving and responding to feedback and will ensure that those processes are provided in accessible formats and with communication supports upon request. We will notify the public about the availability of accessible formats and communication supports.*

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### 8.12 Exceptions

*The Information and Communications Standard does not apply to products and product labels; unconvertible information or communications; or information which the organization does not control directly or indirectly through a contractual relationship. If the organization determines that information or communications are unconvertible, the organization should provide the person requesting information or communication with the following:*

- i. An explanation as to why the information or communications are unconvertible;*
- ii. A summary of the unconvertible information or communications;*
- iii. Information is regarded as unconvertible if it is not technically feasible to convert the information or communications; or if the technology to convert the information is not readily available.*

## 9 EXCLUSIONS

This Accessibility Policy shall not apply during any period where a “State of Emergency” has been declared as defined under the *Emergency Management Act*.

*Eco-Tec is excluded from the following standards:*

### **Transportation Standard**

*This standard covers public transit and taxis, and sets out requirements for transportation service providers to make it easier for people with disabilities to travel. This standard does not apply to Eco-Tec as we do not offer public transportation as a service.*


### **Design of Public Spaces Standard**

*This standard sets requirements for specific features of the physical environment that will make it easier for people with disabilities to move through, use and enjoy what communities have to offer.*

*This standard applies to new construction or major renovations being designed for elements such as recreational trails, outdoor public eating areas, outdoor play spaces, exterior paths of travel, off-street parking, service counters and wait areas.*

*Organizations are not required to retrofit public spaces to meet the requirements. This means that Eco-Tec is not required to alter its public spaces if we have no plans to do so. Therefore this standard does not apply to Eco-Tec at this time.*

*Accessibility for elements related to buildings, for example, building entrances, washrooms and barrier-free paths of travel are not addressed in this standard. They are addressed through Ontario’s Building Code.*

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## 10 HEALTH & SAFETY – HAZARDS ASSESSMENT

Level	Hazard–Energy Type	Level	Hazard–Energy Type	Level	Hazard–Energy Type
	Gravitational		Electrical		Mechanical
	Chemical		Pressure		Noise
	Heat/Light		Body Mechanics	X	Not Applicable

**Hazard Level: L-Low M-Medium H-High X-Not Applicable**

10.1 Completion of form ETI-AF169 – Job Safety Analysis is required when a High Hazard is present.

## 11 ATTACHMENTS

- The Customer Service Standard Learning Package for Eco-Tec Employees
- Customer Feedback on Accessibility for Ontarians with Disabilities Form
- Temporary Service Disruption in Services & Facilities Template Form
- Accessibility Plan

## 12 RELATED DOCUMENTS

Document	Identification No.
Ontario Regulation 429/07, Accessibility for Ontarians with Disabilities Act, 2005.	Visit: <a href="http://www.e-laws.gov.on.ca">www.e-laws.gov.on.ca</a>
Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0	<a href="http://www.w3.org/TR/WCAG20/">www.w3.org/TR/WCAG20/</a>
Workplace Safety & Insurance Act	<a href="http://www.e-laws.gov.on.ca">www.e-laws.gov.on.ca</a>
Blind Persons' Rights Act	<a href="http://www.e-laws.gov.on.ca">www.e-laws.gov.on.ca</a>
Personal Information Protection and Electronic Documents Act (PIPEDA)	<a href="http://www.priv.gc.ca/leg_c/leg_c_p_e.asp">www.priv.gc.ca/leg_c/leg_c_p_e.asp</a>
Emergency Management Act	<a href="http://www.e-laws.gov.on.ca">www.e-laws.gov.on.ca</a>
Ontario Human Rights Code	<a href="http://www.ohrc.on.ca">www.ohrc.on.ca</a>
Customer Feedback on Accessibility for Ontarians with Disabilities Form	AF 510
Emergency Building Evacuation Plan	ETI-CR-3-007
Individual Accommodation Plan – AODA	ETI-HR-6-053

## 13 REVISION CONTROL

Date	No.	Revision Description	Effective
16/01/14	1	<i>Added the Integrated Accessibility Standards to policy – Information and Communications and Employment</i>	16/01/01