

Integrated Accessibility Standards Policy



The following policy has been established by Espar Products, Inc., a subsidiary of J. Eberspächer, to govern the provision of services with Regulation 191/11, "Integrated Accessibility Standards" ("Regulation") under the *Accessibility for Ontarians with Disabilities Act, 2005*

These standards are developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment.

Espar Products, Inc. is governed by this policy, as well as the Accessibility Standards for Customer Service Policy and the *Accessibility for Ontarians with Disabilities Act, 2005* in meeting the accessibility needs of persons with disabilities.

Commitment

Espar Products, Inc. has historically striven to ensure a fully accessible environment for all persons with disabilities, and will continue to build upon and improve its practices in addition to ensuring that it meets the accessibility needs of persons with disabilities in a timely manner, consistent with the specific requirements of the Act and its regulations.

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

Accessibility Plan

Espar Products, Inc. will develop, maintain and document an Accessibility Plan outlining the company's strategy to prevent and remove barriers from its workplace and to meet its requirements under the Regulation.

The Accessibility Plan will be reviewed and updated at least once every five years, and will be posted on the company's website. Upon request, Espar Products, Inc. will provide a copy of the Accessibility Plan in an accessible format.

Procuring or Acquiring Goods, Services or Facilities

Espar Products, Inc. will have regard for accessibility criteria and features when it procures or acquires goods, services or facilities, except where it is not practicable to do so.

Training Employees and Volunteers

Espar Products, Inc. will ensure that training is provided on the requirements of the accessibility standards referred to in the Regulation and continue to provide 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 Espar Products, Inc.'s policies; and,
- all other persons who provide goods, services or facilities on behalf of the company.

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

Staff will be trained when changes are made to the accessibility policy. New staff will be trained as part of the onboarding process.

Espar Products, Inc. will keep a record of the training it provides.

INFORMATION AND COMMUNICATIONS STANDARDS

Feedback

Espar Products, Inc. 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.

Accessible Formats and Communication Supports

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

Espar Products, Inc. will consult with the person making the request in determining the suitability of an accessible format or communication support.

Espar Products, Inc. will also notify the public about the availability of accessible formats and communication supports.

Accessible Websites and Web Content

Espar Products, Inc. will ensure that its Internet and Intranet websites, including web content, conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA except where this is impracticable.

EMPLOYMENT STANDARDS

Recruitment

Espar Products, Inc. will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

Recruitment, Assessment or Selection Process

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

If a selected applicant requests an accommodation, Espar Products, 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 due to disability.

Notice to Successful Applicants

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

Informing Employees of Supports

Espar Products, Inc. will continue to inform its employees of its policies (and any updates to those policies) used to support 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.

Accessible Formats and Communication Supports for Employees

Upon the request of an employee with a disability, Espar Products, Inc. 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, Espar Products, Inc. will consult with the employee making the request.

Workplace Emergency Response Information

Espar Products, Inc. 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 Espar Products, Inc. is aware of the need for accommodation due to the employee's disability. Espar Products, Inc. will provide this information as soon as practicable after becoming aware of the need for accommodation.

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

Espar Products, Inc. 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.

Documented Individual Accommodation Plans

Espar Products, Inc. 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.

Return to Work Process

Espar Products, Inc. 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 Espar Products, Inc. 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*).

Performance Management, Career Development and Advancement & Redeployment

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

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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. If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation will be provided by:

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