

## ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

### INTEGRATED ACCESSIBILITY STANDARDS – Multi Year Plan – January 1, 2015

#### Part I – GENERAL REQUIREMENTS

Section	Initiative	Description	Action Taken	Status	Compliance Date
3	Establishment of Accessibility Policies	3.(1) Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this Regulation.	Developed, implemented and maintained Integrated Accessibility Standards Policy	Completed and posted on company websites by December 31 <sup>st</sup> , 2014	January 1, 2014
4	Accessibility Plans	<p>4.(1) Large organizations shall,</p> <p>a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under this Regulation;</p> <p>b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and</p> <p>c) review and update the accessibility plan at least once every five years.</p>	<p>Developed current Multi Year Accessibility Plan</p> <p>MYAP has been posted on website and available in accessible format upon request</p>	Completed and posted on company website by Dec 31 <sup>st</sup> , 2014; and available upon request in accessible format	January 1, 2014

Section	Initiative	Description	Action Taken	Status	Compliance Date
6	Self-Serve Kiosks	6.(2) Large organizations and small organizations shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.	<p>Establish consideration when designing, procuring or acquiring self-serve kiosks to better serve persons with disabilities except where is not practicable to do so;</p> <p>where not practicable to incorporate accessibility criteria and features, it will provide an explanation and alternatives upon request;</p> <p>provide educational awareness and tools to internal stakeholders and communication to external stakeholders, informing of changes to procurement procedures and purchasing criteria</p>	Communicated with personnel that are in charge of procurement and considerations that must be taken effective Jan 1 <sup>st</sup> , 2014	January 1, 2014
7	Training	<p>7.(1) Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to,</p> <p>(a) all employees, and volunteers;</p> <p>(b) all persons who participate in developing the organization's policies; and</p> <p>(c) all other persons who provide goods, services or facilities on behalf of the organization.</p>	<p><b>Planned Action</b></p> <p>In accordance with the IASR and Ontario Human Rights Code as it pertains to persons with disabilities, Fengate will provide training before Jan 1<sup>st</sup>, 2015 to;</p> <p>a) all employees and volunteers;</p> <p>b) all persons who participate in developing the organization's policies; and</p> <p>c) all other persons who provide goods, services or facilities on behalf of the organization</p>	Completed – All employees have performed IASR training	January 1, 2015

**PART II – Information and Communications Standards**

Section	Initiative	Description	Action Taken	Status	Compliance Date
11	Feedback	11.(1) Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request.	Established feedback process already in place. Fengate will continue to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities.	Complete	January 1, 2015
12	Accessible Formats & Communication Supports	12.(1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, a) in a timely manner that takes into account the person's accessibility needs due to disability; and b) at a cost that is no more than the regular cost charged to other persons.	Fengate will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in timely cost effective manner upon request.	Upon request will follow established procedure	January 1, 2016
12		12.(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	Fengate will consult with the person making request.	Upon request will follow established procedure	January 1, 2016
12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Fengate will notify the public about availability of accessible formats and communication supports.	Upon request will follow established procedure	January 1, 2016

Section	Initiative	Description	Action Taken	Status	Compliance Date
14	Accessible Websites & Web Content	14.(2) Designated public sector organizations and large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG)2.0, initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out in this section.	Fengate has updated their internet websites, including web content, to conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA except where this is impractical.	Complete	<p><b>January 1, 2014</b> New internet websites and web content on those sites must conform with WCAG 2.0 Level AA.</p> <p><b>January 1, 2021</b> All internet websites and web content must conform with WCAG 2.0 Level AA, other than,</p> <ul style="list-style-type: none"> <li>• success criteria 1.2.4 Captions (Live)</li> <li>• success criteria 1.2.5 Audio Descriptions (Pre-recorded).</li> </ul>

**PART III – Employment Standard**

Section	Initiative	Description	ActionTaken	Status	Compliance Date
22	Recruitment – General	22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	<p>Fengate confirms that it along with third party recruiters will notify job applicants and public of availability of accommodation for applicants with disabilities across all stages of recruitment cycle.</p> <ul style="list-style-type: none"> <li>a) A review and, as necessary, modification of existing recruitment policies, procedures and processes;</li> <li>b) Specifying that accommodation is available for applicants with disabilities, on the Fengate websites and on job postings;</li> <li>c) Working with third party suppliers to ensure external Web pages are compliant with Information Communication Standards under the IASR’s requirements.</li> </ul>	Complete	January 1, 2016
23	Recruitment, Assessment or Selection Process	23.(1) During a recruitment process, an employer shall notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used.	Fengate or third party recruiter will notify job applicants, when they are individually selected to participate in assessment or selection process, that accommodation are available upon request in relation to the materials or processes to be used in the assessment/selection process.	Complete	January 1, 2016

Section	Initiative	Description	ActionTaken	Status	Compliance Date
		<p>(2) If a selected applicant requests an accommodation, the employer shall 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.</p>	<p>This will include:</p> <ul style="list-style-type: none"> <li>a) A review and, as necessary modification of existing recruitment policies, procedures and processes;</li> <li>b) Inclusion of availability of accommodation notice as part of the script in the scheduling of an interview and/or assessment;</li> <li>c) If a selected applicant requests an accommodation, consult with the applicant and arrange for provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to disability.</li> </ul>		
24	Notice to Successful Applicants	<p>24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.</p>	<p>Fengate when making offers of employment will notify the successful applicant and arrange for accommodating employees with disabilities. This will include;</p> <ul style="list-style-type: none"> <li>a) A review and, as necessary, modification of existing recruitment policies, procedures and processes;</li> <li>b) Inclusion of notification of Fengate's policies on accommodating employees with disabilities in offer of employment letters.</li> </ul>	Complete	January 1, 2016

Section	Initiative	Description	ActionTaken	Status	Compliance Date
25	Informing Employees of Supports	25.(1) Every employer 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 that take into account an employee's accessibility needs due to disability.	<p>Fengate in accordance with IASR, will inform all employees of policies that support employees with disabilities, including, but not limited to, policies on the provision of job accommodation that take into account an employee's accessibility needs due to a disability.</p> <p>This will include:</p> <ul style="list-style-type: none"> <li>a) Informing current employees and new hires of Fengate's policies supporting employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's needs due to disability;</li> </ul>	Complete by means of training all new and existing employees	
25		25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	<ul style="list-style-type: none"> <li>a) Providing information under this section as soon as practicable after the new employees begins employment, specifically in the orientation process;</li> </ul>	Complete	January 1, 2016
25		25.(3)Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.	<ul style="list-style-type: none"> <li>a) Keeping employees up to date by email HR Advisories;</li> </ul>	Complete	January 1, 2016

Section	Initiative	Description	ActionTaken	Status	Compliance Date
26	Accessible Formats & Communication Supports for Employees	<p>26.1 In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for,</p> <p>(a) information that is needed in order to perform the employee's job; and</p> <p>(b) information that is generally available to employees in the workplace.</p>	<p>a) Where an employee with a disability so requests it, Fengate will provide or arrange for provision of suitable accessible formats and communications supports for:</p> <p>a. Information that is needed in order to perform the employee's job;</p> <p>b. Information that is generally available to employees in the workplace.</p>	Complete	January 1, 2016
26		<p>26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>	<p>In meeting the obligations to provide the information that is set out in the paragraph above, Fengate will consult with the requesting employee in determining suitability of an accessible format or communication support.</p>	Complete	January 1, 2016



Section	Initiative	Description	ActionTaken	Status	Compliance Date
27	Workplace Emergency Response Information	27.(1) Every employer shall provide individualized workplace emergency response information to employees who have a disability, 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.	<p>Where Fengate is aware that an employee has a disability and that there is a need for accommodation, individualized workplace emergency response information will be provided to the employee as soon as practicable if such information is necessary given the nature of the employee's disability.</p> <p>The following measures were implemented by Fengate effective Jan 1, 2012:</p> <ul style="list-style-type: none"> <li>a) Individualized workplace emergency response information procedures have been developed for employees with disabilities, as required;</li> <li>b) Workplace Emergency Response Information forms have been prepared for employees who have disclosed a disability and who are being accommodated according to their disabilities</li> <li>c) Where required, Fengate provides assistance to specific disabled employees, with the disabled employees' prior consent, to help them evacuate the workplace in case of an emergency or disaster. These plans for providing assistance have been set out in individualized emergency plans for the employees;</li> </ul>	Complete by notifying all employees via HR Advisory	January 1, 2012

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27		(2) If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.	These individualized emergency plans have been communicated to the employees' respective managers and Safety personnel, on an "as needed" basis.	Complete	January 1, 2012
27		(3) Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.	Fengate will provide as soon as practicable upon becoming aware for the need for accommodation due to an employee's disability to individuals necessary on the Safety team and immediate manager.	Complete	January 1, 2012
27		(4) Every employer shall review the individualized workplace emergency response information, (a) when the employee moves to a different location in the organization; (b) when the employee's overall accommodations needs or plans are reviewed; and (c) when the employer reviews its general emergency response policies.	On an ongoing and regular basis Fengate will review individualized workplace emergency response information in compliance with IARS regulations.	Complete	January 1, 2012

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28	Documented Individual Accommodation Plans	28.(1) Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.	Process has been developed. (LINK to Fengate Accommodation Process)	Complete	January 1, 2016
28		<p>28 (2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none"> <li>1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</li> <li>2. The means by which the employee is assessed on an individual basis.</li> <li>3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if and how accommodation can be achieved.</li> <li>4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.</li> <li>5. The steps taken to protect the privacy of the employee's personal.</li> </ol>	<p>Fengate will ensure that the process for the development of documented individual accommodation plans include the following elements, in accordance with the provisions of the IASR;</p> <ol style="list-style-type: none"> <li>1. Include in the process the manner in which the employee requesting accommodation can participate in the development of the plan;</li> <li>2. Include the means in the process by which the employee is assessed on an individual basis;</li> <li>3. Include in the process the manner in which Fengate can request an evaluation an outside medical or other expert, at Fengate's expense, to assist Fengate in determining if and how accommodation can be achieved;</li> <li>4. Include in the process the manner in which the employee can request participation of a representative from the workplace where an</li> </ol>	Complete	January 1, 2016

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		<p>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> <p>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</p>	<p>employee is not in the bargaining unit;</p> <p>5. Steps are in place to protect the privacy of the employee's personal information which is stored in secure location</p> <p>6. Outline the frequency in which individual accommodation plans will be reviewed and updated and the manner in which this will be done;</p> <p>7. Provide the employee with the reasons for the denial if an individual accommodation plan is denied;</p> <p>8. Include in the process the means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs.</p> <p>9. If individual accommodation plans are established, ensure that they include:</p> <ul style="list-style-type: none"> <li>a. Individualized workplace emergency response information that is required;</li> <li>b. Any information regarding accessible formats and communication supports that have been provided for or arranged, in order to provide the</li> </ul>		

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			<p>employee with;</p> <p>c. Information that is needed in order to perform the employee's job;</p> <p>d. Information that is generally available to employees in the workplace</p> <p>10. Identify any other accommodation that is to be provided to the employee.</p>		
29	Return to Work Process	<p>29.(1) Every employer, other than an employer that is a small organization,</p> <p>(a) shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and</p> <p>(b) shall document the process.</p>	Fengate will update the Return to Work policy which will include steps that Fengate will take to accommodate an employee with a disability and to facilitate an employee's return to work after absenteeism due to disability.	Complete	January 1, 2016
29		<p>29. (2) The return to work process shall,</p> <p>(a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and</p> <p>(b) use individual documented accommodation plans, as described in section 28, as part of the process.</p>	Fengate will ensure that the process for return to work and the development of documented individual accommodation plans includes the following elements in accordance with the provisions of the IASR;	Complete	January 1, 2016

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29		29. (3) The return to work process referenced in this section does not replace or override any other return to work process created by or under any other statute.	The return to work process referenced in this section does not override any other return to work process created by or under any other statute.	Complete	January 1, 2016
30	Performance Management	30.(1) An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.	<p>Fengate will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plan;</p> <ul style="list-style-type: none"> <li>• When using its performance management process in respect of employees with disabilities;</li> </ul> <p>In accordance with IASR, Fengate will;</p> <ul style="list-style-type: none"> <li>• Review, assess and, as necessary, modify existing policies, procedures and practices to ensure compliance with IASR;</li> <li>• Take the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account when; <ul style="list-style-type: none"> <li>○ Assessing performance</li> </ul> </li> </ul>	Complete	January 1, 2016

Section	Initiative	Description	ActionTaken	Status	Compliance Date
31	Career Development & Advancement	31.(1) An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.	<ul style="list-style-type: none"> <li>• When providing career development and advancement to its employees with disabilities;</li> </ul> <p>In accordance with IASR, Fengate will;</p> <ul style="list-style-type: none"> <li>• Review, assess and, as necessary, modify existing policies, procedures and practices to ensure compliance with IASR;</li> <li>• Take the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account when; <ul style="list-style-type: none"> <li>○ Managing career development and advancement</li> </ul> </li> <li>• Take into account the accessibility needs of employees with disabilities when providing career development and advancement to its employees, including notification of the ability to provide accommodations on internal job postings;</li> </ul>	Complete	January 1, 2016

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32	Redeployment	32.(1) An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.	<ul style="list-style-type: none"> <li>• When redeploying employee with disabilities</li> </ul> <p>In accordance with IASR, Fengate will;</p> <ul style="list-style-type: none"> <li>• Review, assess and, as necessary, modify existing policies, procedures and practices to ensure compliance with IASR;</li> <li>• Take the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account when; <ul style="list-style-type: none"> <li>○ Redeployment is required</li> </ul> </li> <li>• Take into account the accessibility needs of employees with disabilities when redeploying employees, including review and, as necessary, modification of employee transfer checklist.</li> </ul>	Complete	January 1, 2016
33	Built Environment	33. Fengate will ensure that any applicable requirements set out in the standard will be implemented in accordance with the timeframes set out in Section 4 of IASR.		In progress	January 1, 2017