



INNPOWER CORPORATION CORPORATE POLICY

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Title: Integrated Accessibility Standard Regulation	Rev. Number:
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1. PURPOSE

InnPower is committed to making its programs, services, facilities, print and electronic materials accessible in a manner that provides the best service to customers with a range of abilities, including those with disabilities.

The Integrated Accessibility Standards Regulation Policy outlines the overall strategic direction that InnPower will follow in the identification, removal and prevention of barriers to persons with disabilities to ensure access to InnPower's goods, services and facilities. This policy is intended to meet the requirements of the Accessibility for Ontarians with Disabilities Act, 2005 and all related standards and regulations introduced under this legislation, ensuring that persons with disabilities are provided equal opportunities and standards of service.

InnPower's regulatory compliance with the Integrated Accessibility Standards Regulation (O. Reg. 191/11) of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and all policy requirements under the Regulation.

2. SCOPE/APPLICATION

This Policy applies to all InnPower employees, including full-time, part-time, student, co-op, or contract service employees who work in InnPower Corporation's owned or controlled offices, facilities and work sites.

3. DEFINITIONS

"Accessible" means capable of being entered or reached; approachable; easy to get at; capable of being influenced; obtainable; easy to understand or appreciate.

"Barrier" means anything that 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 or practice; "obstacle". (AODA 2005)

"Customer" means a person who buys, receives or uses goods or services.

"Disability" means:

- (a) any degree of physical disability, 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 impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or service animal or on a wheelchair or other remedial appliance or device.

- (b) a condition of mental impairment or a developmental disability,
- (c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- (d) a mental disorder, or
- (e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997; (“handicap”).
(AODA, 2005)

“Guide Dog” means a dog trained as a guide for a blind person and having the qualifications prescribed by the regulations in the Blind Persons’ Rights Act.

“Planned Service Disruption” means a scheduled interruption of service which may result in a reduction or change to a service level.

“Readily Apparent” means that an animal is a service animal when it is obvious by its appearance (examples: identification card, certificate, logo, harness) or by what it is doing (examples: opening doors, retrieving items, guiding).

“Service Animal” means an animal is a service animal for a person with a disability:

- (a) if it is readily apparent that the animal is used by the person for reasons relating to his or her disability, or
- (b) if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability O. Reg. 429/07, s. 4 (9).
- (c) a dog is trained as a guide dog for a blind person and having the qualifications prescribed by the regulations under the Blind Persons’ Rights Act.

“Support Person” means a person who accompanies a person with a disability in order to assist him or her with communication, mobility, personal care or medical need or with access to goods or services.

“Temporary Service Disruption” means a shutdown or closure of a service in response to an unexpected event which results in a reduction or change to a service level.

4. RESPONSIBILITY

It is the responsibility of all InnPower employees to ensure that this policy is adhered to and that the practices at InnPower demonstrate a commitment to accessibility as outlined in this policy and accessibility legislation.

5. POLICY STATEMENT

InnPower is committed to providing persons with disabilities consistent opportunity and access to InnPower goods, services and facilities. InnPower will ensure that policies, procedures and practices are provided in a manner that is timely and addresses integration, independence, dignity and equal opportunity. When communicating with a person with a disability, InnPower employees will do so in a manner that takes into account the person's disability. InnPower will endeavour to follow the compliance schedule of the legislation when implementing each of the requirements addressed in this policy.

6. APPLICATION

a) Accessibility Plan

InnPower will establish, implement, maintain and document a Multi-Year Accessibility Plan that will outline InnPower's strategy to prevent and remove barriers to persons with disabilities and meet the requirements under accessibility legislation. The Board of Directors will be presented with the plan for review and approval.

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

b) Notice of Power Interruption/Outage

In the event of a planned power interruption/outage, InnPower will endeavor to provide notice of the interruption in advance.

The notice will include information about the reason for the interruption and its anticipated duration.

In the event of an unexpected interruption, InnPower shall provide service restitution as soon as possible.

c) Accessible Formats and Communication Supports

When communicating with a person with a disability, InnPower will do so in a timely manner that takes into account the person's disability. InnPower and the person with the disability will agree on what format will be used.

InnPower will notify the public about the availability of accessible formats or communication supports. If a document, or portion of a document, cannot be converted into an accessible format, InnPower will provide an explanation or summary of such information in an accessible format.

d) Assistive Devices

Persons with disabilities may provide their own assistive device(s) for the purpose of obtaining, using and benefitting from InnPower's goods and services unless otherwise prohibited due to health and safety or privacy issues (see examples of such legislation under the References and

Related Documents section of this policy). Where applicable, assistive devices owned and operated by InnPower will be available for use by persons with disabilities.

e) **Support Persons**

Persons with disabilities are permitted to be accompanied by their support person in areas/premises that are open to the public when accessing goods and services provided by InnPower. If a person with a disability is accompanied by a support person, the provider of goods or services shall 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.

f) **Service Animals**

Persons with disabilities may enter premises owned and operated, or operated by InnPower, accompanied by their service animal and keep that animal with them in areas/premises that are open to the public when accessing goods and services provided by InnPower, unless the animal is otherwise excluded by legislation (see non-exhaustive list of such legislation under References and Related Documents).

In the event that a service animal is otherwise prohibited by law from the premises, InnPower will ensure that alternate means are available to enable the person with a disability to obtain, use or benefit from InnPower's goods and services.

Where it is not readily apparent that an animal is a Service Animal, InnPower staff may ask for verification as per legislated guidelines.

Service animals must be supervised by their owners and be kept in control at all times.

g) **Training**

InnPower will ensure that all persons to whom this policy applies receive training as required by the Accessibility Standards for Customer Service Regulation 429/07. The amount and format of training provided will be tailored to suit each person's interactions with the public and their involvement in the development of policies, procedures and practices pertaining to the provision of goods and services.

At a minimum, the training will include:

- Review of the AODA and the requirements of the Accessibility Standards for Customer Service (Ontario Regulation 429/07).
- How to interact with persons with disabilities who use an assistive device or require assistance of a service animal or the assistance of a support person.
- How to use equipment or devices provided by InnPower that may help with the provision of goods or services to a person with a disability.
- How to assist a person with a particular type of disability who is having difficulty in accessing InnPower's goods or services.
- Instruction on InnPower's Policies and Procedures pertaining to the provision of goods and services to persons with disabilities.

The specified training and information must be provided to each person to whom this policy applies as soon as practical after they are assigned the applicable duties as well as on an ongoing basis as changes occur to InnPower's policies, procedures and practices governing the provision of goods or services to persons with disabilities.

A record of the training provided, the date of the training and the recipients will be maintained.

h) **Procuring or Acquiring Goods or Services**

InnPower will incorporate accessibility criteria and features when procuring or acquiring goods or services, except when it is not practical to do so. InnPower will provide an explanation, upon request, when it has not been practical to incorporate feasibility features.

i) **Self-Service Kiosks**

InnPower shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.

j) **Accessible Websites and Web Content**

InnPower will ensure that its external website and web content conforms with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 initially at Level AA effective January 1, 2021.

k) **Feedback**

In an effort to improve on the provision of InnPower goods and services to persons with disabilities, feedback from the public is welcomed. To assist with the collection of feedback, InnPower will accept comments in any form (in person, electronic format, written, etc.). Response time to the feedback will depend on the issue, but will not exceed 5 business days unless there are extenuating circumstances.

l) **Recruitment, Assessment and Selection**

InnPower is committed to equal consideration of candidates during the recruitment, assessment and selection process. Job applicants, including the public and current InnPower employees, will be notified of the availability of accommodations for persons with disabilities in its application process.

Individuals selected to participate in assessment or selection processes, such as an interview or testing, will be notified of the availability of accommodations, upon request, during such an assessment or selection process. In cases where accommodations due to disability are requested, InnPower will consult with the individual and provide or arrange for suitable accommodations in a manner that takes into consideration the applicant's disability needs. Accommodations will be provided with respect to the materials or processes used in recruitment.

When making offers of employment, InnPower will notify the successful applicant of its policies for accommodating employees with disabilities. This notification will be provided in the Offer of Employment letter.

m) **Informing Employees of Supports**

InnPower will inform employees of its policies, and any updates to such policies, used to support employees with disabilities. InnPower will provide this information to new employees as soon as practical after commencing employment. This includes policies on providing job accommodations that take into account the employee's accessibility needs due to disability.

n) **Accessible Formats and Communication Supports for Employees**

InnPower will, when requested by an employee with a disability, consult with the employee to provide or arrange for the provision of accessible formats and communication supports for information that is required in order to perform the job, as well as information that is generally available to employees in the workplace. InnPower will consult with the employee making the request in determining the suitability of an accessible format or communication support.

o) **Workplace Emergency Response Information**

InnPower is committed to ensuring the safety of its employees. Individualized workplace emergency response information will be provided to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the employee's need. This information will be provided as soon as practical after InnPower becomes aware of the accommodation.

When an employee requires assistance in an emergency, InnPower will, with the employee's consent, provide such information to the person designated by InnPower to provide assistance. InnPower will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodation needs and plans are reviewed, and when InnPower reviews its general emergency policies.

p) **Documented Individual Accommodation Plans**

InnPower will develop a written process for the development of documented individual accommodation plans for employees with disabilities. The individual accommodation plan will include:

- If requested, any information regarding accessible formats and communication supports provided to the employee;
- If required, individualized workplace emergency response information; and
- Any other accommodations that are to be provided.

q) **Return to Work Process**

InnPower will maintain its documented return to work process for employees with a disability and who require disability-related accommodation in order to return to work.

InnPower's return to work process will outline the steps InnPower 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 statutes (i.e. the Workplace Safety Insurance Act, 1997).

r) **Performance Management, Career Development and Advancement**

InnPower will take into account the accessibility needs of employees with disabilities and any individual accommodation plans when providing any performance management, career development and advancement.

s) **Emergency Procedure, Plan or Public Safety Information**

InnPower will, upon request, provide emergency procedure, plan and public safety information in an accessible format or with communication support, as soon as practical.

t) **Format of Documents**

InnPower shall notify the public that the documents required by the Integrated Accessibility Standards (Ontario Regulation 191/11) and InnPower's Integrated Accessibility Standard Regulation Policy, procedures, notices of temporary disruptions, training records are available upon request, subject to the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA).

Notice of the availability of documents may be given by posting the information in conspicuous places owned by InnPower, InnPower's website and/or any other reasonable method.

7. REFERENCES AND RELATED DOCUMENTS

- Ontarians with Disabilities Act, 2001
- Accessibility for Ontarians with Disabilities Act, 2005
- Ontario Regulation 191/11 – Integrated Accessibility Standards Regulation
- Ontario Human Rights Code
- Town of Innisfil Animal Control By-law No. 068-06
- Dog Owner's Liability Act
- Other Accessibility Standards as approved into Regulation