

INTEGRATED ACCESSIBILITY POLICY

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1. Introduction

Concours Technologies Inc. supports the full inclusion of persons with disabilities as set out in the Canadian Human Rights Act; Ontario Human Rights Code; the Accessibility for Ontarians with Disabilities Act (AODA) 2005; Ontario Regulation 429/07 – Accessibility Standards for Customer Service; and, the Integrated Accessibility Standards – Ontario Regulation 191/11.

Concours Technologies Inc. supports the goal of the Ontario government to make Ontario barrier-free by 2025. As we move closer to that date, it is expected that Concours Technologies Inc.'s services and facilities will become progressively more accessible and responsive to the needs of persons with disabilities.

The Accessibility Standards for Customer Service, Ontario Regulation 429/07 – Accessible Standards for Customer Service, came into force on January 1, 2008. It is the first accessibility standard created under the authority of the AODA and is a significant step toward the greater goal of a barrier-free Ontario. Concours Technologies Inc. is compliant with Ontario Regulation 429/07.

Concours Technologies Inc. *Accessible Customer Service Policy* and *Integrated Accessibility Standards* will affect requirements in a number of other key areas of our organization and will be reviewed at least on an annual basis. Enhancements or improvements to our policies, practices, or procedures, will be considered on an ongoing basis. Whenever new or revised standards or regulations are published under the AODA, this procedure will be reviewed and updated as necessary to ensure consistency and compliance. Updated information about the *Accessibility for Ontarians with Disabilities Act (AODA) 2005*, and *Ontario Regulation 429/07 – Accessibility Standards for Customer Service* is available at: <http://www.accesson.ca/> or by calling the AODA Contact Centre at 1-866-515-2025 (TTY 416-325-3408) or 1-800-268-7095 (toll-free).

This procedure has been prepared to outline what Concours Technologies Inc. will do to comply with *Ontario Regulation 429/07 – Accessible Standards for Customer Service*, and *Integrated Accessibility Standards Ontario Regulation 191/11*, and to explain to our employees and the public what they may expect from us.

This procedure is intended to benefit all persons with “disabilities”, as defined in the *Ontario Human Rights Code – Section 10 (1)*, or any other applicable laws and legislation. Whether a person’s disability is apparent or not, everyone should be treated with courtesy, made to feel welcome, and have their need for accommodation respected whenever they interact with Concours Technologies Inc. This policy is available in alternate formats upon request.

2. Definitions

AS DEFINED IN THE HUMAN RIGHTS CODE SECTION 10(1):

2.1 DISABILITY

“DISABILITY” MEANS

- 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 co-ordination, blindness or visual impediment, 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*; (“handicap”)

AS DEFINED ONTARIO REGULATION 429/07 – ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE:

2.2 Guide Dog

“Guide Dog” means a guide dog as defined in section 1 of the *Blind Persons’ Rights Act*; (“chien-guide”)

- an animal is a service animal for a person with a disability O. Reg. 429/07, s. 4 (9);
- if it is readily apparent that the animal is used by the person for reasons relating to his or her disability; O. Reg. 429/07, s. 4 (9); 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. O. Reg. 429/07, s. 4 (9).
- “provider of goods or services” means a person or organization to whom this Regulation applies. (“fournisseur de biens ou de services”) O. Reg. 429/07, s. 1 (2).

2.3 Service Animal

“Service Animal” means an animal described in subsection 4 (9) of; (“animal d’assistance”) O. Reg. 429/07, s. 4 (9).

2.5 Support Person

“Support person” means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care or medical needs or with access to goods or services. (“personne de soutien”) O. Reg. 429/07, s. 4 (8).

2.6 Accessible Formats and Communications Supports

“Accessible Formats and Communications Supports” means, policies, practices or procedures used to support new hires, employees, or the public with disabilities. (“personne de soutien”) O. Reg. 191/11.

3 Establishment of Policies, Practices, and Procedures

Concours Technologies Inc. is a manufacturer of products (goods) and services and we are committed to providing high-quality products, services, and facilities, to our employees and our customers.

Concours Technologies Inc. strives at all times to provide goods, services, and a working environment for our employees in a way that respects the dignity and independence of persons with disabilities. Concours Technologies Inc. is also committed to ensuring that our employees and the public with disabilities receive accessible services with the same quality, level of expected service, and timeliness as all other employees. It is with these objectives in mind Concours Technologies Inc. has established this Policy; Service Delivery Practices; Service Delivery Procedures for Accessible Customer Service and, Integrated Accessibility for employees in the workplace.

4 Use of Service Animals and Support Persons

Persons with disabilities may bring their service animal on the parts of our premises that are open to our employees or the public. Health and Safety is our greatest concern for our employees, our customers, and members of the public, therefore Concours Technologies Inc. will limit or prohibit access to some areas of our facilities if there is a known health or safety risk for our employees or the public who have disabilities. Concours Technologies Inc. will ensure all employees dealing with our customers or the public are trained in how to interact with persons with disabilities and accompanied by a service animal when applicable.

Concours Technologies Inc. defines a support person as one who is required by our customers or the public with a disability to assist them in any way while on our premises. This includes but is not limited to: primary caregiver, sign language interpreter, real-time captioner, attendant, etc.). Any person with a disability who is accompanied by a support person will be allowed to enter Concours Technologies Inc.'s facilities in areas that are safe with his or her support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises.

4.1 Exceptions to the Use of Service Animals and Support Persons

On rare occasions, but only if a support person is necessary to protect the health or safety of the person with a disability or the health or safety of others on the premises, Concours Technologies Inc. may suggest to a customer or a member of the public that a support person is required, or that a service animal cannot enter an area of the premises that is unsafe or not permitted consistent with other laws. In these instances, Management Staff of Concours Technologies Inc. will suggest appropriate alternatives and provide assistance.

5 Assistive Devices

Concours Technologies Inc. is committed to serving persons with disabilities who use assistive devices to obtain, use or benefit from our products and services. Concours Technologies Inc. will ensure employees know how to use assistive devices available in our

facilities for our employees, and to inform our employees or the public of assistive devices that are available for their use.

6 Notice of Temporary Disruptions

Concours Technologies Inc. will provide our employees and the public with notice in the event of a planned or unexpected disruption in the facilities or services used by persons with disabilities. This notice will include information about the reason for the disruption, how long the disruption is expected to last, and a description of any alternative services available (if any). The notice will be placed at the public entrance to our premises. Depending on the nature of the disruption, notice will also be provided as outgoing telephone messages and on our website.

This notice will be provided in accessible formats when requested.

Training for Board of Directors, Executive Leadership and Employees

7 Our Training Policy

Concours Technologies Inc. is committed to ensuring that our employees, our customers, and the public with disabilities receive accessible services with the same quality, level of expected service, and timeliness as all other employees. To achieve this commitment Concours Technologies Inc. Board of Directors and Employees will receive training on our Accessibility Policy, practices, and procedures to ensure a high level of accessible services are provided to persons with disabilities. Employees will also be trained on an ongoing basis when enhancements or improvements are made to our Policy, practices and procedures, as the result of legislative requirements and/or customer or public feedback.

8 Training for Board of Directors and Executive Leadership

Concours Technologies Inc. will provide *Accessibility Legislation Training* to all of our Board Employees and Executive Leadership. Board employees and Executive Leadership will receive update training on *Accessibility Legislation* on an annual basis or as updates to this legislation occur.

8.1 Training for New Employees, Agents, and Volunteers or Others

Concours Technologies Inc. will provide *Accessible Customer Service and Integrated Accessibility Standards Training* to new employees, agents, volunteers, or others acting on behalf of Concours Technologies Inc. as part of their orientation.

8.2 Training for Current Employees

Concours Technologies Inc. will provide *Accessible Customer Service and Integrated Accessibility Standards Training* to all employees. Employees will receive refresher training on an annual basis to ensure compliance to existing standards and regulations, and as a means to ensure a consistent level of high-quality delivery of services to our employees and customers.

Employees will receive update training, as appropriate, on policies, practices and procedures to ensure a high level of accessible services are provided to persons with disabilities. Employees will also be trained on an ongoing basis when enhancements or improvements are made to these policies, practices and procedures, as the result of legislative requirements and/or member or public feedback.

8.3 Training Content

Concours Technologies Inc. will provide employees, agents, volunteers, or others with training that includes:

- A brief overview of the Legal Environment, including: The Canadian Human Rights Act, the Ontario Human Rights Code, and Prohibited Grounds of Discrimination;
- A review of the purposes of the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)* and regulations applicable to our workplace, and the requirements of the Accessibility Standards for Customer Service and Integrated Accessibility Standards for our Employees and our Customers;
- Our plans to provide accessible customer service, accessibility standards for employees and our customers;
- How to interact and communicate with persons with various types of disabilities;
- How to interact with persons with disabilities who use an assistive device or require the assistance of a service animal or a support person;
- How to use the equipment or devices available on our premises, or otherwise, that may assist with the provision of goods or services to persons with disabilities;
- What to do if a person with a disability is having difficulty in accessing Concours Technologies Inc.'s services;
- Concours Technologies Inc. policies, practices and procedures relating to the provision of services to persons with disabilities; and,
- How to solicit feedback from our employees and the public on: a) the effectiveness of our accessible service delivery, or; b) ways we can improve accessible service delivery to our employees and the public;
- Integrated Accessibility Standards Regulation as it relates to the following in the workplace:
 - Employment Standards in the areas of Recruitment, Assessment, or Selection processes.
 - Employment Standards as it pertains to Notice to Successful Job Applicants.
 - Employment Standards as it pertains to Informing Employees of Supports.
 - Employment Standards as it pertains to Accessible Formats and Communication Supports for Employees.
 - Employment Standards as it pertains to Workplace Emergency Response information.
 - Employment Standards as it pertains to Documented Individual Accommodation Plans.
 - Employment Standards as it pertains to Return to Work Process for employees with permanent or temporary disabilities.

9. Employment

9.1 Accommodation

Concours Technologies Inc. is committed to providing recruitment, selection, assessment processes that are in accordance with Accessibility for Ontarians with Disabilities Act (AODA), 2005 and the Ontario Human Rights Code, and Equal Opportunity Employment. Concours Technologies will provide accommodations during the recruitment, selection, and/or assessment process to applicants with disabilities. If selected to participate in the recruitment, selection and/or assessment processes, please inform Concours Technologies Inc.'s Human Resources Department of the nature of the accommodation(s) that you may require in relation to any materials or processes used. Concours will consult with any applicant to determine suitable provisions and provide accommodation or alternate methods that are acceptable to the applicant taking into consideration the applicant's accommodation needs.

9.2 Concours Recruitment, Assessment, and Selection Process

It is the policy of Concours to fill vacancies with the candidate who has the best qualifications and experience for the position and the needs of the organization. As an Equal Opportunity Employer, Concours encourages all individuals to apply regardless of their race or colour; religion and creed; physical or mental disability; dependence on alcohol or drugs; age; sex (incl. Pregnancy and childbirth); marital status; sexual orientation; national or ethnic origin; ancestry or place of origin; language; social condition or origin; source of income; assignment, attachment or seizure of pay; based on association; political belief; record of criminal conviction; pardoned conviction

Consideration for employment will be given to any person who applies for the position within the time period specified for applications. Every applicant must provide satisfactory evidence of their qualifications and experience for the vacancy. Only those individuals who are selected for an interview will be contacted.

Exception to this policy:

From time to time it may be necessary to fill vacancies on a short term or acting basis to ensure the immediate needs of the organization are met. Acting positions are assigned at the discretion of the President of Concours or his/her designate. Acting positions are temporary and the length of the acting period will be determined at the time of appointment. This period may be renewed at the discretion of the President of Concours or his/her designate.

9.3 Concours Notification to Successful Job Applicants

As a condition of employment, the successful candidate will be required to show proof of citizenship and provide documents to support that they are legally permitted to be employed in the Country where the vacancy exists. During the course of their employment Concours reserves the right to terminate for cause any employee who is found to have misrepresented their qualifications, their experience, their citizenship, or have failed to provide documents that support they are legally permitted to be employed in the Country where the vacancy exists.

When requested by the successful candidate, Concours will provide accommodations in relation to the materials or processes to be used when performing their job duties. Concours will consult with any applicant to determine suitable provisions and provide accommodation or alternate methods that are acceptable to the applicant taking into consideration the applicant's accommodation needs.

9.4 Onboarding for Successful Candidates

Orientation and Probation:

All new employees will receive orientation on the first day they report for work, which includes: orientation on the Concours organization; Concours policies and procedures, orientation training on multiple topics; a safety evacuation and orientation tour of the facility; and, an introduction to their job description.

New employees will serve a probationary period of three (3) months with the possibility of a probation extension of up to three (3) additional months, if necessary. During this time the employee will be assessed in multiple areas to determine their suitability for the employment position. The assessment will be previewed with the employee as part of their orientation.

9 Employee Return to Work Process (for Disability-Related Accommodation)

Concours Technologies Inc. has a documented 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. This policy outlines the steps Concours will take to facilitate the return to work of employees who were absent because their disability required them to be away from work.

“Fit to Work” Assessments are used to determine if employees who have been absent from work due to a disability require disability-related accommodations in order to return to work. The Employee is not required to reveal the nature of their illness or disability (privacy). If accommodation is required, the employee is provided with a letter from Concours which outlines the steps the employee is required to take with their Primary Care Physician (medical practitioner) to determine if suitable accommodation can be achieved. A *Functional Abilities Form* (FAF) may be required and is completed by a medical practitioner.

The FAF must specify any restrictions requiring accommodation in the workplace. If accommodation is required, a meeting is scheduled prior to the employee's return to work to create an individual return to work accommodation plan.

The Return to Work Process includes documented individual accommodation plans and a meeting with the following participants:

- The employee requiring accommodation;
- The employee's supervisor(s);
- Human Resources;
- A support person from the workplace (if requested by the employee); and,
- Any other individual(s) with expertise that may be required.

10 Communication

Concours Technologies Inc. will communicate with persons with disabilities in ways that take into account their disability. Employees will communicate in a means that enables persons with disabilities to communicate effectively for purposes of using, receiving and requesting Concours Technologies Inc. products, services, and access to our facilities.

Concours Technologies Inc. will train employees who communicate with our employees and the public on how to interact and communicate with persons with various types of disabilities.

11 Feedback Process for Our Employees, Our Customers, and the Public

The ultimate goal of this policy is to meet service delivery expectations in the workplace for our employees and when offering products and services to our customers and the public who have disabilities. Comments on our services regarding how well those expectations are being met are welcome, encouraged, and appreciated.

If you would like to give your feedback to Concours Technologies Inc. on the effectiveness of our accessible service delivery, or ways we can improve accessible service delivery to you, please make your request known to the employee serving you, their Manager, or you can contact the Corporate Human Resources Manager of Concours Technologies Inc. in any of the following ways (or other means requested by you):

In Writing or In Person	By Phone or Fascimile	By Email:
Concours Technologies Inc. 465 Jutras Drive South Lakeshore, Ontario. Canada N8N 5C4 1T7 Attention: Human Resources Department	Human Resources Department PH: 519.727.9949 Ext. 124 CELL:519.816.0852 FAX: 519.790.0279	CTI.HRDept@concourstechnologies.com

Your privacy will be respected and all feedback will be reviewed for actions or changes that can be implemented in our policies, procedures, and practices to improve Concours Technologies Inc.'s accessibility service delivery for you, our employees, and the public.

Whenever possible, suggestions, concerns, or complaints will be addressed immediately. However, some suggestions, concerns, or complaints may require more effort and time to address, and must be reviewed for resolution, possibly at a higher level in our organization. Employees and the public can expect acknowledgement of verbal, telephone, written, and electronic feedback within two business days. We will provide direct feedback of our resolution to employees, our customers, and the public in the same format the original suggestion, concern, or complaint was received detailing our resolution and timing for corrective action implementation (if applicable).

12 Modifications to this or other Policies

Concours Technologies Inc. is committed to ensuring that our policies, practices and procedures respect and promote the dignity and independence of all persons with disabilities. Therefore, changes will not be made to this or any other policy before considering the impact on persons with disabilities.

13 Questions about this Policy and Availability of Documents

The purpose of this policy is to achieve accessible service delivery excellence for our employees, our customers, and the public who have disabilities. If anyone has a question about this policy; or if the purpose of this policy is not understood; or to receive a copy of this policy or our procedures; please contact Concours Technologies Inc. Human Resources Department in any of the following ways (or other means when requested by you):

In Writing or In Person	By Phone or Facsimile	By Email:
Concours Technologies Inc. 465 Jutras Drive South Lakeshore, Ontario. Canada N8N 5C4 1T7 Attention: Human Resources Department	Human Resources Department PH: 519.727.9949 Ext. 124 CELL:519.816.0852 FAX: 519.790.0279	CTL.HRDept@concourstechnologies.com

Revision Control Chart

<i>Date</i>	<i>Rev.</i>	<i>Description of Change</i>
April 2, 2020		Brand change