
Multi-Year Accessibility Plan and Policies for Company

This 2014-2021 accessibility plan outlines the policies and actions that Nahanni Steel Products Inc. (NSPi) will put in place to improve opportunities for people with disabilities.

PURPOSE

The purpose of this policy is to create a multi-year accessibility plan that lays out a roadmap for meeting the accessibility obligations under the Integrated Regulations of the Accessibility for Ontarians with Disabilities Act (AODA).

APPLICATION

This policy applies to all NSPi employees, volunteers, people who participate in developing the organization's policies, and all other people who provide goods, services, or facilities on behalf of the organization.

POLICY

Statement of Commitment

NSPi is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act (the "Act").

PROCEDURE

Accessible Emergency Information

NSPi is committed to providing the customers and clients with publicly available emergency information in an accessible way upon request. We will also provide employees with disabilities with individualized emergency response information when necessary.

Training

NSPi will provide training to employees, volunteers, and other staff members on Ontario's accessibility laws and on the Human Rights Code as it relates to people with disabilities. Training will be provided in a way that best suits the duties of employees, volunteers, and other staff members.

NSPi will take the following steps to ensure employees are provided with the training needed to meet Ontario's accessible laws by January 1, 2015: (Status: Complete)

- During the first quarter of 2015, we will develop training materials and conduct training sessions for all employees to which the training relates.
- NSPi will maintain a record of when the training was provided and to which individuals.

Information and Communications

NSPi is committed to meeting the communication needs of people with disabilities. We will consult with people with disabilities to determine their information and communication needs.

NSPi will take the following steps to make all websites and content conform with WCAG 2.0, Level AA by January 1, 2021.

- NSPi and its affiliated websites will be accessed for compliance requirements.
- Web developers and content providers will be trained on AODA requirements.
- Based on the results of the assessments, NSPi will work to ensure that, by January 1, 2021, all of its sites, and any content published on those sites, will be established to achieve website accessibility and compliance with the guidelines.
- IT staff and web developers will explore tools and resources to make newly created pages and content accessible and will consult with external web developers if needed to meet the requirements.

By January 1, 2019, Company will establish a committee to review its websites to identify any issues of non-compliance with WCAG 2.0, Level AA.

NSPi currently accepts feedback from members of the public in writing, by fax at 905-791-2147 and over the phone at 905-791-2100 ext 101. We also accept feedback from employees through email at r.neave@nahannisteel.com, or in person through the local Human Resources representative.

NSPi will enhance these feedback processes by taking the following steps by January 1, 2015. (Status: Complete)

- NSPi will communicate to all employees the methods for accepting feedback by the end of the second quarter in 2015. We will also communicate that we are committed to developing individualized methods of communication upon request

NSPi will take the following steps to ensure that all publicly available information is made accessible upon request by January 1, 2016: (Status: In Progress)

- NSPi will post a notice on our website that communicates that we will make information accessible to the public upon request.

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- NSPi will develop a system for accepting and processing such requests, and we will include in our website notice the manner in which members of the public can submit requests for accessible information.

Employment

NSPi is committed to fair and accessible employment practices.

We will take the following steps to notify the public and staff that, when requested, we will accommodate people with disabilities during the recruitment and assessment processes and when people are hired. By January 1, 2016: (Status: Complete). NSPi will:

- Include a statement in all job postings conveying our commitment to accessible recruitment and hiring processes, and inviting individuals with accessibility concerns to communicate those concerns to us.
- Include a similar statement in our written correspondence with job candidates during the recruitment and assessment process.
- At the time of hire, if applicable, we will communicate resources available for employees with disabilities.

NSPi will take the following steps to develop and put in place a process for developing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability:

- Conduct a comprehensive review of our current practices, including a review of our Modified Work Arrangement Form and related processes.
- New and existing employees will be informed of the policies used to support 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.
- An individual accommodation plan will be completed and documented during the on-boarding stage for any new employees with disabilities.
- For employees returning to work who have been absent due to a disability, a return-to-work plan will be discussed and documented and an individual accommodation plan will be completed and documented.
- Consider all requests for modified work on a case-by-case basis, and together with the impacted employee, develop individualized plans pursuant to which tasks are adapted or reassigned as needed.
- Provide training to managers, as needed, so that they understand how best to support employees who have disabilities.

NSPi will take the following steps to ensure the accessibility needs of employees with disabilities are taken into account in connection with performance management, career development and redeployment processes:

- Accommodate individual requests for accessible formats of performance and career development processes.
- Communicate and promote the importance of focusing on achievement rather than ability or disability, and the retention and promotion of employees based on consistent, objective criteria.
- Determine whether additional training resources are necessary for employees with disabilities to ensure that they have the same development opportunities as others.
- Ensure that opportunities for transfer and promotion are provided in accessible formats.
- Through the redeployment process, the accessibility needs of employees with disabilities as well as individual accommodation plans will be taken into account.

NSPi will take the following steps to prevent and remove other accessibility barriers identified:

- As policies are reviewed, NSPi will consider how the policies can be modified to include concepts of accessibility.
- To the extent that policy and operational changes are warranted following the above review, we will put these changes into effect, and communicate any material changes to all employees.
- Monthly workplace inspections by the Joint Health & Safety Committee (JHSC) will include the noting of any accessibility barriers within the workplace.
- Any accessibility barriers identified by the JHSC will be brought to the attention of senior management and a solution will be made within a reasonable time period.

For More Information

For more information on this accessibility plan or to request accessible formats of this document, please contact the Human Resources Department at:

Phone: 905-791-2100 ext. 101

Email: r.neave@nahannisteel.com