

AGC Flat Glass North America Ltd.

Accessibility Policy and Multi-Year Accessibility Plan

This accessibility policy and multi-year accessibility plan outlines the current, ongoing and planned actions of AGC Flat Glass North America Ltd. (“AGC”) as it strives to ensure equality of opportunity for people with disabilities.

This policy and plan will be reviewed once every five years. A review will be conducted more frequently in the event of legislative changes or any changes to the work or the workplace that necessitates an earlier review.

Individuals can request a copy of this policy and plan at any time in a format or with communication supports that meet the needs of the individual.

Unless otherwise stated in this policy and plan or in accordance with applicable law, the commitments set out in the plan are being achieved and/or implemented and/or planned as of the effective date of this policy.

Statement of Commitment

AGC 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* (“AODA”).

In order to meet this commitment, AGC is currently complying with those provisions of the AODA that are in effect. Equally importantly, AGC has created a multi-year accessibility plan for the purpose of continuing to meet its commitments under the AODA.

Please also see AGC’s Accessible Customer Service Policy for information about how AGC meets the requirements of the Customer Service Standard under the AODA.

Accessible Emergency Information

AGC is committed to providing the customers and clients with publicly available emergency information in an accessible format and/or with appropriate communication supports, upon request.

We also provide individualized emergency response information to employees who, for reasons related to their disability, require such information.

Training

AGC will provide training to employees, volunteers, persons participating in the development and approval of AGC's policies, and others who provide goods, services or facilities on behalf of AGC on:

- a. the Integrated Accessibility Standards of the *AODA*; and
- b. the *Human Rights Code* as it relates to people with disabilities.

Training will be appropriate to the duties performed by the individual. Training will be provided as soon as practicable after an individual begins working, volunteering or otherwise providing services necessitating training.

AGC will take the following steps to ensure employees are provided with the training needed to meet Ontario's accessibility laws:

- AGC will assign one or more members of its Human Resources Department to develop appropriate training programs on the Integrated Accessibility Standards of the *AODA* or assess the appropriateness of existing training modules provided by the Ontario Government. Similarly, such individual(s) will review and update existing training programs on the *Human Rights Code* as it relates to people with disabilities.
- AGC will provide the above-noted training in order to ensure that any individual requiring it will have received the necessary training.
- AGC will keep and maintain a record of the training provided, including the dates that the training was provided and the number of individuals to whom it was provided.
- AGC will ensure that training is provided on any changes to relevant policies on an ongoing basis.

Information and Communications

Websites

AGC 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 as requested or required.

AGC is aware that effective January 1, 2014 it has obligations to ensure that new websites meet the accessibility standards required by the *AODA*. For the purpose of this policy, a "new website" is defined as:

- (a) a website with a new domain name; and

- (b) a website with an existing domain name that undergoes a significant refresh (e.g. more than 50% of its content is updated, whether by content or technological support).

AGC will work to ensure that where it has new websites, they conform to WCAG 2.0, Level A. It will work to ensure that existing websites and web content will conform with the requirement of WCAG 2.0, Level AA by **January 1, 2021**. It will develop timelines to assist in any necessary conversion of existing websites and web content.

Feedback Processes

AGC will take the following steps to ensure existing feedback processes are accessible to people with disabilities upon request:

- AGC will review its existing processes for receiving feedback, to ensure that disabled individuals can provide feedback in a manner that meets their particular needs.
- Upon request and in a timely manner, AGC will provide an accessible format and/or communication support to enable an individual with a disability to provide feedback. For example, feedback forms, along with alternate methods of providing feedback, such as verbally, in person, or by telephone, or written and delivered (or written and sent via email), will be available upon request.
- Upon request and in a timely manner, AGC will arrange for its responses to feedback to be provided in an accessible format and/or with necessary communication supports.
- AGC will follow up in a timely fashion with any person who makes a complaint about how goods and services are provided to persons with disabilities. Along with providing acknowledge of such feedback, AGC will communicate any resulting actions based on concerns or complaints that were submitted.

Publicly Available Information

AGC will take the following steps to make sure all publicly available information is made accessible to persons with disabilities upon request:

- AGC will review its existing processes for providing the public with information, to ensure that disabled individuals can also receive such information in a manner that meets their particular needs.
- Upon request and in a timely manner, AGC will provide an accessible format and/or communication support to enable an individual with a disability to receive publicly available information.
- Requested information will be provided in a timely manner that takes into account the person's accessibility needs due to disability, and at a cost no more than the regular cost

charged to other persons.

- AGC will consult with the person making the request to determine the suitability of the accessible format or communication support that is requested.

Employment

Hiring Practices

AGC is committed to fair and accessible employment practices and understand commits to introduce all of the practices set out below.

AGC commits to undertake reviews of existing policies, to create new policies if required, and to revise document templates as required (e.g. for job postings, offer letters, etc.). Further to its objective of creating an inclusive workplace, AGC will take the following steps in respect of its recruitment processes:

- AGC will ensure that job postings will specify that accommodation is available for applicants with disabilities during the recruitment and interview/assessment processes.
- AGC will train its staff involved in recruitment and hiring to advise applicants verbally, at the time that they are offered interviews or other assessment processes, that accommodation is available for applicants with disabilities during the interview/assessment processes.
- If an applicant requests accommodation, AGC will consult with the applicant to determine the appropriate means of accommodation.
- AGC will include, in offer letters made to successful job candidates, notice of its policies concerning accommodation of employees with disabilities as well as information on where and how to obtain copies of such policies, including in accessible formats.

Accommodation Information

AGC will ensure that any employee with a disability, who makes a request to human resources, will receive information (whether or not in writing, verbally communicated or in electronic form) in a format that is accessible or that provides communication supports to the employee. Information for the purpose of this policy includes (a) information that is required for an employee to do the job for which they were hired and (b) any other information that is generally available to employees in the workplace.

Individual Accommodation Plans

AGC will develop and put in place a process for developing individual accommodation plans and

return-to-work plans for employees that have been absent from the workplace due to a disability. In furtherance of this objective, AGC will undertake the following:

- AGC will modify its existing policies to ensure that they provide for the creation and use of individualized accommodation plans in both the accommodation and return-to-work processes.
- On an ongoing basis:
 - o AGC will ensure that an employee requesting accommodation can participate in the development of the individualized accommodation plan. Employees will be able to participate in the development of the individualized accommodation plan by (a) advising AGC of the limitations brought about by the nature of the disability; (b) suggesting methods of accommodating those limitations; (c) providing medical support for any accommodations requested. Employees will be able to participate in the development of the individual accommodation plan by meeting with human resources in person at a mutually convenient time or by providing written comments to human resources. Please note that human resources may require an employee to provide medical support for accommodations requested and/or a meeting in person in order to canvass options for accommodation.
 - o AGC will support the ongoing assessment of employees for the purpose of individualized accommodations with reference to any medical information provided by the employee and any medical information requested based upon objective observations and criteria that may necessitate an initial or ongoing physical or mental assessment.
 - o AGC may request an independent medical examination to assist in the accommodation process. Any request for an independent medical examination will be made in writing and the cost of the examination will be borne by AGC or its insurer, as the case may be.
 - o Any unionized worker will be permitted to request the participation of a representative from his or her bargaining agent in any meeting regarding an individualized accommodation plan or the obligations arising as a result of the existence of that plan. Non-unionized employees can request the participation of another representative from the workplace in any such meetings.
 - o An employee's privacy, as it relates to any personal information disclosed as a result of the need for an individualized accommodation plan will be safeguarded. Human resources will keep any information disclosed in the offices of human resources and will not share that information (except as required to implement the individual accommodation plan, including with medical consultants retained by AGC) with any third party without the consent of the employee.

- o Individualized accommodation plans will be reviewed once every two years or upon the provision of new, objective medical information that necessitates an earlier review. Human resources will undertake the review and will consult with the employee if it is determined that amendments to the plan are required. An employee can request a review of the individualized accommodation plan at any time, understanding that such requests must be objectively necessary and based upon a change in the employee's accommodation needs, the workplace duties being assigned and/or the physical layout of the workplace.
- o In the event that a request for an individualized accommodation plan is denied (in whole or in part, including requests to amend the plan), AGC will (a) notify the employee in writing and, with reference to the employee's disability, provide the employee with alternate notification in a manner that takes into account the employee's disability.
- o Individualized accommodation plans will be provided to an employee in writing and, with reference to the employee's disability, in an alternate format that takes into account the employee's disability.
- o Individualized accommodation plans can include any information regarding accessible formats and communication supports that are required and that have been provided, upon the request of the employee; can include individualised workplace emergency response information, if that information exists; and may identify other accommodations that have been provided to an employee.

Accessibility Needs Considered

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

- AGC will review and, if necessary, modify existing policies, procedures and practices relating to performance management, career development and redeployment.
- AGC will take the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account in assessments of performance.
- AGC will take into account the accessibility needs of employees with disabilities when providing career development and advancement to its employees with disabilities, including notification of the ability to provide accommodations on internal job postings.
- AGC will take into account the accessibility needs of employees with disabilities when redeploying employees, as that term is understood in the *AODA*.

Return to Work

AGC is committed to returning employees who have been absent from the workplace to work, with or without accommodation, at the earliest opportunity. To do so, AGC has developed the following return to work process:

- An employee who makes a request to return to the workplace after a period of disability, will be return to work (with or without accommodations) at the earliest opportunity;
- AGC reserves the right to require an employee to provide objective medical information confirming his or her ability to return to work;
- AGC will implement its individualized accommodation plan policy for any employee who requires accommodations upon his or her return to work; and
- AGC will allow the employee to provide input into his or her return to work plan, subject at al times to the right of AGC to request objective medical information in support of a particular request.

For more information:

For more information on this accessibility plan, or to obtain this document in accessible formats, please contact:

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