



ACCESSIBILITY PLAN AND POLICIES

LAST REVIEW
MARCH 1, 2019



Accessibility Plan and Policies

William Knell and Company Limited referred to as "Knell's" or the "Company"

This Plan and Policy is included in the Employee Policies Handbook (March 1, 2019) as Appendix B and posted on our website

ACCESSIBILITY

Knell's is committed to diversity and social inclusion and to meeting its obligation under Ontario's Accessibility for Ontarians with Disabilities Act, 2005 (AODA), by providing accessible environments that respect the rights of every individual.

Our Purpose

We are a century old Company providing products and services to the non-residential openings industry, including the safety and security of property, as well as being a distributor of industrial supplies to manufacturing and maintenance professionals in Southwestern Ontario.

Our Statement of Commitment to Accessibility

Knell's is committed to providing a barrier-free environment for all stakeholders including our clients/customers, employees, job applicants, suppliers, and any visitors who may enter our premises, access our information, or use our services. As a Company, we respect and uphold the requirements set forth under the Accessibility for Ontarians with Disabilities Act (2005), and its associated standards and regulations.

We understand that we have a responsibility for ensuring a safe, dignified, and welcoming environment for everyone. We are committed to ensuring our Company's compliance by incorporating accessibility legislation into our policies, procedures, equipment requirements, training, and best practices. We will review these policies and practices annually, as Company changes occur, or in anticipation of compliance deadlines. In addition, we will strive to meet the needs of individuals with disabilities in a timely and effective manner.

Providing an accessible and barrier-free environment is a shared effort, and as a Company, Knell's is committed to working with the necessary parties to make accessibility for all a reality.

Feedback Process

Customers, contractors, vendors or other members of the public are encouraged to bring forward complaints, concerns or compliments, and to make suggestions on ways we can improve our services and interactions with respect to the Ontario's Accessibility for Ontarians with Disabilities Act, 2005. You may provide feedback in person to an employee, by email, by telephone or by regular post mail to:

Knell's

Attn: Shawna Frede, Human Resources

2090 Shirley Drive, Kitchener, ON N2B 0A3

Email: sfrede@knells.ca | 519-578-1001 (ext. 294)

Review and Modifications to our Accessibility Plan and Policies

Our Accessibility Plan and Policies will be reviewed regularly to ensure that it's reflective of current practices as well as legislative requirements. We are committed to developing policies that respect and promote the dignity and independence of people with disabilities. Any policy of the Company that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

Questions

If anyone has a question about this Accessibility Plan and Policies, or if the purpose of a policy is not understood, an explanation should be provided by, or referred to Human Resources.

Accessibility for Ontarians with Disabilities: (AODA) Integrated Accessibility Standards Regulation (IASR) Policy

Intent

The Integrated Accessibility Standards Regulation or the IASR (Ontario Regulation 191/11) establishes the accessibility standards and compliance timeframes for each of the five (5) standards: Information & Communication, Employment, Customer Service and where applicable, Transportation and Design of Public Spaces. The purpose of this Policy is to outline how Knell's achieves, and continues to achieve, the requirements of the IASR, encompassing the 5 standards into one Policy.

Policy Statement

Knell's recognizes the dignity and worth of every individual and seeks to follow the principles of dignity, independence, integration and equal opportunity in all of its provisions of goods and services, and accessible employment.

Statement of Commitment

Knell's is committed to fulfilling its obligations under the Accessibility Standards for Customer Service (Ontario Regulation 429/07) as well as the Accessibility Standard for Information & Communications and Employment issued under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA). Our goal is to encourage an inclusive environment and provide goods and services in a way that respects the dignity and independence of people with disabilities. We are committed to the accessibility of our goods and services for all who use them or wish to use them.

The Integrated Accessibility Standard Regulation (IASR) under the Accessibility for Ontarians with Disability Act (AODA) requires Knell's to develop a multi-year plan. This plan will be reviewed and updated regularly to prevent and remove barriers for people with disabilities. This plan and any status reports will be posted on our website. If requested, the plan and any reports shall be created in an accessible format.

The accessibility plans will help to inform planning requirements of the Integrated Accessibility Standards Regulation enacted in July 2011 of the Accessibility for Ontarians with Disabilities Act (AODA). The AODA requires Knell's to develop, implement and enforce accessibility standards so that good, services, facilities, accommodation, employment, buildings, structures and premises are accessible to people with disabilities.

The multi-year accessibility plan outlines, the specific steps Knell's is taking to improve opportunities for persons with disabilities and comply with the phased in requirements of the Regulations. It serves to provide a framework within which accessibility plans and initiatives are to be created in order to move the Company towards the goal of improved accessibility for people with disabilities by 2025.

Definitions

- **Accessible Formats:** Include but are not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.
- **Assistive Device** – Is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that customers bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.
- **Communication Supports:** Include but are not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.
- **Conversion Ready:** an electronic or digital format that facilitates conversion into an acceptable format.
- **Disability:** The term disability as defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*, refers to:

- 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 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*.
- **Kiosk** – an interactive electronic terminal, including a point-of-sale device, for public use that allows users to access one (1) or more services or products.
- **Performance Management:** activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success.
- **Redeployment:** The reassignment of employees to other departments or jobs within the Company as an alternative to layoff, when a particular job or department has been eliminated by the Company.
- **Guide Dog** – Is a highly-trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons' Rights Act*, to provide mobility, safety and increased independence for people who are blind.
- **Service Animal** – an animal is a service animal for a person with a disability if:
 1. the animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the vest or harness worn by the animal; or
 2. the person provides documentation from one of the following regulated health professionals confirming that the person requires the animal for reasons relating to the disability is a member of:
 - College of Audiologists and Speech-Language Pathologists of Ontario;
 - College of Chiropractors of Ontario;
 - College of Nurses of Ontario;
 - College of Occupational Therapists of Ontario;
 - College of Optometrists of Ontario;
 - College of Physicians and Surgeons of Ontario;
 - College of Physiotherapists of Ontario;
 - College of Psychologists of Ontario; or
 - College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.
- **Service Dog** – As reflected in *Health Protection and Promotion Act, Ontario Regulation 562* a dog other than a guide dog for the blind is a service dog if:
 - It is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability; or
 - The person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.
- **Support Person** – a 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, medical needs or access to goods and services.

Training Requirements

Knell's will provide training for its employees and volunteers regarding the IASR and the Ontario Human Rights Code as they pertain to individuals with disabilities. Training will also be provided to individuals who are responsible for developing Company policies, and all other persons who provide goods, services or facilities on behalf of Knell's. Training will be provided in a way that best suits the duties of employees, and will cover:

- A review of the purpose of the Accessibility for Ontarians with Disabilities Act, 2005
- A review of the requirements of the Accessibility Standard for Customer Service, Ontario Regulation 429/07
- Instructions on how to interact and communicated with people with various disabilities.
- Instructions on how to interact with people with disabilities who:
 - Use assistive devices;
 - Require the assistance of a guide dog, service dog or other service animal; or
 - Require the use of a support person;
 - Assisting persons with disabilities; and
 - The polices covered in this document
- The Human Rights Code as it pertains to persons with Disabilities

The Company will provide training as soon as practicable. Training will be provided to new employees during orientation. Revised training will be provided in the event of changes to legislation, procedures, policies, and/or practices.

The Company will keep a record of training that includes the participants and dates of training provided.

Kiosks

We do not typically have kiosks in our buildings; however, we will assure employees through communication channels consider accessibility issues if purchasing kiosks.

Feedback Process
Review and Modifications to our Accessibility Plan and Polices
Questions



Please refer to Page 2

Standards

1. Information & Communications

Unless deemed unconvertible, Knell's will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, of public information, upon request, about our goods, services and buildings. Accessible formats and communication supports will be provided in a timely manner and at no additional cost to the individual.

We will take into account the person's accessibility needs when customizing individual requests and shall consult with the individual making the request to ensure suitability.

We will make the availability of accessible formats and communication supports publicly known.

Feedback Processes will communicate that any feedback processes are accessible to persons with disabilities upon request.

Knell's website content is compliant with the IASR regulations WCAG 2.0, level AA and will be compliant with level AA by January 1, 2021.

The Information and Communications Standard does not apply to:

- Products and product labels;
- Unconvertible information or communications; or
- Information that the Company does not control either directly or indirectly through a contractual relationship.

Unconvertible Information or Communications

If it is determined, in consultation with the requesting party, that information or communications are unconvertible, Knell's will ensure that the individual who made the request is provided with an explanation and a summary of the information. We will classify information or communications as unconvertible where:

- It is not technically practicable to convert; or
- The technology required to make the conversion is not readily available.

2. Employment

Recruitment, Assessment and Selection

The Company will notify employees and the public about the availability of accommodation for job applicants who have disabilities. Applicants will be informed that these accommodations are available, upon request, for the interview process and for other candidate selection methods. Where an accommodation is requested, the Company will consult with the applicant and provide or arrange for suitable accommodation. Successful applicants will be made aware of Company policies and supports for accommodating people with disabilities.

Accessible Formats and Communication Supports for Employees

The Company will ensure that employees are aware of our policies for employees with disabilities and any changes to these policies as they occur.

If an employee with a disability requests it, the Company will provide or arrange for the provision of accessible formats and communication supports for the following:

- Information needed in order to perform their job; and
- Information that is generally available to all employees in the workplace.

The Company will consult with the employee making the request to determine the best way to provide the accessible format or communication support.

Workplace Emergency Response Information

Where required, the Company will create individual workplace emergency response information for employees with disabilities. This information will take into account the unique challenges created by the individual's disability and the physical nature of the workplace and will be created in consultation with the employee.

This information will be reviewed when:

- The employee moves to a different physical location in the Company;
- The employee's overall accommodation needs or plans are reviewed; and/or
- The Company reviews general emergency response policies.

Documented Individual Accommodation Plan

The Company has developed and has in place written processes for documenting individual accommodation plans for employees with disabilities. (References: *Human Rights Policy and Return to Work/Accommodation Policy*).

Note: Accommodation Request & Plan Form is available from Human Resources

Performance Management and Career Development and Advancement

The Company will consider the accessibility needs of employees with disabilities when implementing performance management processes, or when offering career development or advancement opportunities.

Individual accommodation plans will be consulted, as required.

Return to Work

The Company will facilitate 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 illness, injury or disability:

- We will require up to date medical documentation indicating the employee's work limitations and restrictions (if any);
- We will in consultation with the employee, develop a return to work plan with an individualized accommodation plan; and
- We will implement an individualized accommodation plan to facilitate the employee's return to work.

Human Resources will work with the returning employee and other relevant stakeholders to develop an individual Return to Work plan to ensure a successful reintegration into the workplace. (References: *Return to Work/Accommodation Policy*).

Redeployment

The accessibility needs of employees with disabilities will be taken into account in the event of redeployment.

Individual accommodation plans will be consulted, as required.

3. Design of Public Spaces

The Company will meet the requirements of the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces which include, but not limited to:

- Outdoor paths of travel like ramps, stairs, etc.
- Accessible off-street parking, ensuring:
 - The required number of accessible parking spaces based on the size of the lot.
 - Proper signage is provided for each accessible parking space.

- Service-related elements such as a reception counter and waiting area, ensuring:
 - At least one (1) counter is made accessible including a accessible seat

In the event of a disruption to accessible parts of our public spaces, the public will be notified and alternatives will be provided.

4. Transportation

This standard is not applicable to the Company, as Knell's does not provide transportation services.

5. Customer Service

Customer Service applies to the provision of goods and services to the public or other third parties, not to the goods themselves.

All goods and services provided by Knell's shall follow the principles of dignity, independence, integration and equal opportunity.

The Provision of Goods and Services to Persons with Disabilities

The Company will make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- Ensuring that all customers receive the same value and quality;
- Allowing customers with disabilities to do things in their own ways, at their own pace when accessing goods and services as long as this does not present a safety risk;
- Using alternative methods when possible to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner;
- Taking into account individual needs when providing goods and services; and
- Communicating in a manner that takes into account the customer's disability.

The Use of Assistive Devices

Customer's Own Assistive Device(s)

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by the Company.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services. For example, open flames and oxygen tanks cannot be near one another. Therefore, the accommodation of a customer with an oxygen tank may involve ensuring the customer is in a location that would be considered safe for both the customer and business. Or, where elevators are not present and where an individual requires assistive devices for the purposes of mobility, service will be provided in a location that meets the needs of the customer.

Guide Dogs, Service Animals and Service Dogs

A customer with a disability that is accompanied by guide dog, service animal or service dog will be allowed access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to guide dogs, service animals and/or service dogs.

If a guide dog, service animal or service dog is excluded by law the Company will offer alternative methods to enable the person with a disability to access goods and services, when possible (for example, securing the animal in a safe location and offering the guidance of an employee).

If it is not readily apparent that the animal is being used by the customer for reasons relating to their disability, the Company may request verification from the customer.

The customer who is accompanied by a guide dog, service dog and/or service animal is responsible for maintaining care and control of the animal at all time.

If a health and safety concern presents itself for example in the form of a severe allergy to the animal, the Company will make all reasonable efforts to meet the needs of all individuals.

The Use of Support Persons

If a customer with a disability is accompanied by a support person, the Company will ensure that both persons are allowed to enter the premises together and that the customer is not prevented from having access to the support person.

There may be times where seating and availability prevent the customer and support person from sitting beside each other. In these situations the Company will make every reasonable attempt to resolve the issue.

In situations where confidential information might be discussed, consent will be obtained from the customer, prior to any conversation where confidential information might be discussed.

Where the Company requires a support person to accompany a person with a disability, and where the person with a disability has agreed to the accompaniment, the Company will not charge the support persons any fees or fares.

Notice of Disruptions in Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of the Company. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use the Company goods or services, reasonable efforts will be made to provide advance notice. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

Notifications will include:

In the event that a notification needs to be posted the following information will be included unless it is not readily available or known:

- Goods or services that are disrupted or unavailable;
- Reason for the disruption;
- Anticipated duration; and
- A description of alternative services or options.

Notification Options:

When disruptions occur the Company will provide notice by:

- posting notices in conspicuous places including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption and/or on the Company website;
- contacting customers with appointments;
- verbally notifying customers when they are making a reservation or appointment; or
- by any other method that may be reasonable under the circumstances.

Notice of Availability and Format of Documents

The Company shall notify customers that the documents related to the Customer Service Standards are available upon request and in a format that takes into account the customer's disability. Notification will be given by posting the information in a conspicuous place owned and operated by the Company, the Company website and/or any other reasonable method.

Feedback Process



Please refer to Page 2

Accountabilities of the Accessibility Plan and Policies

The Company will:

- Ensure all management and employees are aware of the Accessibility for persons with Disabilities Policies and its applications.
- Hold all supervisors, management and employees accountable for their responsibilities in related service elements.
- Consider accessibility of people with disabilities as part of the regular development and ongoing review of existing policies and practices.
- Amend existing policies as needed to comply with the Accessibility Standards once relevant regulation is developed and proclaimed as law in Ontario.

Management and Supervisors will:

- Ensure that their division and departments facilitate the use by persons with disabilities of their personal assistive devices, service animals, allowing access for their support person moving through our building
- Ensure relevant training in accessibility standards by their staff is completed.
- Ensure notice of temporary disruption is provided as outlined in the policy.
- Respond to feedback including any accessibility related concerns as outlined in the policy.
- Inform employees of their obligations and accountabilities to adhere to the requirements of Accessibility Standards as they apply in their respective divisions and departments.
- Ensure employees are responding to requests for accommodation in a timely manner.
- Ensure all complaints, or identified risks; about accessibility are dealt with in a timely manner.

Employee will:

- Participate in training related to Accessibility Standards for Customer Service,
- Support the implementation of Accessibility Standards by providing service in a manner that respects dignity and independence with disabilities, including permitting the use of assistive devices, service animals and support persons as outlined below.
- Forward any feedback regarding accessibility to their immediate Supervisor or Manager.

Human Resources and Company Executive will:

- Identify training needs for the Company.
- Ensure that mechanisms are put into place to support Supervisors/Managers implementing Accessibility Standards for Customer Service or responding to accessibility-related concerns.
- Ensure that AODA reporting requirements are completed and submitted to the Ontario Government.
- Ensure that the Company policies practices and procedures related to AODA are available to any person upon request.
- Ensure that communications with persons with disabilities are done in a manner that takes into account their individual circumstances.



Rob Dippell, President

March 1, 2019

Date