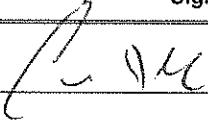


	Title: AODA – Integrated Accessibility Standards Regulation (IARS) Policy		
	Form No.: HR-PLC014	Rev. No.:01	Effective Date: 2026-07-24

AODA – Integrated Accessibility Standards Regulation (IASR) Policy

Approval			
Date	Revision #	Approved by:	Signature
	00	Cameron Dell, President	
	00	Anne Tucker, Senior Director of Human Resources	

	Title: AODA – Integrated Accessibility Standards Regulation (IARS) Policy		
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1.0 Purpose

The purpose of this policy is to confirm Clarion Medical Technologies' commitment to meeting its obligations under the Accessibility for Ontarians with Disabilities Act, 2005 and the Integrated Accessibility Standards, Ontario Regulation 191/11, as amended. Clarion Medical Technologies is committed to identifying, preventing and removing barriers for persons with disabilities and to providing goods, services, facilities, information, communications and employment practices in a manner that respects dignity, independence, integration and equal opportunity.

2.0 Scope

This policy applies to Clarion Medical Technologies' operations in Ontario and to all employees, volunteers, contractors, agents and other individuals who provide goods, services or facilities on behalf of Clarion Medical Technologies, or who participate in developing policies, practices or procedures relating to accessibility.

3.0 Definitions

Term	Definition
Accessible format	Formats that may include, but are not limited to, large print, recorded audio, electronic formats, braille and other formats usable by persons with disabilities.
Communication support	Supports that may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communication.
Conversion ready	An electronic or digital format that facilitates conversion into an accessible format.
Disability	Has the same meaning as set out in the Accessibility for Ontarians with Disabilities Act, 2005 and the Ontario Human Rights Code.
Performance management	Activities related to assessing and improving employee performance, productivity and effectiveness to facilitate employee success.
Redeployment	The reassignment of employees to other departments or jobs within the organization as an alternative to layoff when a particular job or department has been eliminated.

4.0 Reference

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Accessibility for Ontarians with Disabilities Act, 2005

Integrated Accessibility Standards, Ontario Regulation 191/11, as amended

Ontario Human Rights Code

AODA Accessibility Standards for Customer Service Policy

AODA Emergency Information Form (HR-FRM0004)

AODA Individualized Emergency Response Information Form (HR-FRM0005)

AODA Request for Accessible Information or Communication Form (HR-FRM006)

AODA Customer Service Feedback Form (HR-FRM0007)

AODA Customer Service Feedback Follow Up Form (HR-FRM008)

AODA Request for Recruitment Accommodation Form (HR-FRM009)

5.0 Responsibility

Accessibility is a shared responsibility. Clarion Medical Technologies is responsible for establishing, implementing and maintaining accessibility policies, plans, processes and training. Employees, volunteers, contractors and agents are responsible for following this policy, participating in required training, identifying accessibility barriers and supporting accommodation processes in good faith. Human Resources will coordinate policy administration, recordkeeping and accessibility-related employment processes.

6.0 Procedural Details

General Principles

This policy addresses the applicable requirements of Ontario Regulation 191/11, including general requirements, information and communications standards, employment standards and customer service standards. Transportation requirements are excluded because Clarion Medical Technologies does not provide conventional or specialized public transportation services. Design of public spaces requirements will be addressed where Clarion Medical Technologies constructs or redevelops public spaces covered by the regulation.

A. General Requirements

Accessibility Policies and Statement of Commitment

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Clarion Medical Technologies will develop, implement and maintain accessibility policies that describe how it will meet the requirements of the IASR. The organization will include a statement of commitment to meeting the accessibility needs of persons with disabilities in a timely manner and will make this policy publicly available in an accessible format upon request.

Multi-Year Accessibility Plan

Clarion Medical Technologies will establish, implement, maintain and document a multi-year accessibility plan that outlines its strategy to prevent and remove barriers and meet its requirements under the IASR. The plan will be reviewed and updated at least once every five years, posted on the company website where applicable, and provided in an accessible format upon request.

Procurement and Self-Service Kiosks

Where practicable, Clarion Medical Technologies will incorporate accessibility design, criteria and features when procuring or acquiring goods, services or facilities. Where it is not practicable to do so, Clarion Medical Technologies will provide an explanation upon request. If Clarion Medical Technologies designs, procures or acquires self-service kiosks, it will have regard to accessibility for persons with disabilities.

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Training

Clarion Medical Technologies will provide training on the requirements of the IASR and the Ontario Human Rights Code as they relate to persons with disabilities. Training will be provided to employees, volunteers, persons who participate in developing the organization's policies, and other persons who provide goods, services or facilities on behalf of the organization. Training will be appropriate to each person's duties and will be provided as soon as practicable and when changes are made to accessibility policies.

Clarion Medical Technologies will maintain records of training provided, including the dates training on which the training was provided and the number of individuals trained.

B. Information and Communications Standards

Accessible Formats and Communication Supports

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Upon request, Clarion Medical Technologies will provide or arrange for accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability. Accessible formats and communication supports will be provided at a, and a cost that is no more than the regular cost charged to other persons.

Clarion Medical Technologies will consult with the person making the request to determine the suitability of an accessible format or communication support and will notify the public about the availability of accessible formats and communication supports.

Emergency Procedures, Plans and Public Safety Information

Where Clarion Medical Technologies prepares emergency procedures, plans or public safety information and makes that information available to the public, it will provide the information in an accessible format or with appropriate communication supports as soon as practicable, upon request.

Accessible Websites and Web Content

Clarion Medical Technologies will ensure that its internet websites and web content conform with Web Content Accessibility Guidelines (WCAG) 2.0 Level AA, except where meeting a requirement is not practicable or where an exception under the IASR applies.

Feedback Process

Clarion Medical Technologies will ensure that its processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for accessible formats and communication supports upon request. Clarion Medical Technologies will notify the public about the availability of accessible formats and communication supports for feedback processes.

Exception

The Information and Communications Standard does not apply to products and product labels, unconvertible information or communications, or information that Clarion Medical Technologies does not control directly or indirectly through a contractual relationship. If Clarion Medical Technologies information or communications are determined to be unconvertible, Clarion Medical Technologies will provide the person requesting the information or communication with an explanation and a summary of the unconvertible information or communications.

C. C. Employment Standards

Employment of Persons with Disabilities

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Clarion Medical Technologies will make employment practices accessible and will take accessibility needs due to disability into account throughout the employment relationship, including recruitment, selection, onboarding, accommodation, performance management, career development, advancement, return to work and redeployment.

Recruitment, Assessment and Selection

Clarion Medical Technologies will notify employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes. Applicants selected to participate in an assessment or selection process will be informed that accommodations are available, upon request, in relation to the materials or processes to be used. Where an accommodation is requested, Clarion Medical Technologies will consult with the applicant and provide or arrange for a suitable accommodation that takes the applicant's accessibility needs due to disability into account.

Successful applicants will be made aware of Clarion Medical Technologies' policies and supports for accommodating people with disabilities.

Accessible Formats and Communication Supports for Employees

Clarion Medical Technologies will inform employees of its policies used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practicable after they begin employment and whenever there is a change to existing policies.

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

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

Clarion Medical Technologies 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 Clarion Medical Technologies is aware that an employee has a disability and that there is a need for accommodation, it will provide individualized workplace emergency response information as soon as practicable if the disability makes such information necessary. With the employee's consent, Clarion Medical Technologies will provide this information to the person designated to provide assistance to employee.

This information will be reviewed when:

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

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Documented Individual Accommodation Plans

Clarion Medical Technologies will maintain a written process for developing documented individual accommodation plans for employees with disabilities. The process will address employee participation, individual assessment, requests for medical or other expert evaluation at the organization's expense where required, employee representation, privacy protection, review and update frequency, reasons for denial, and provision of the plan in an accessible format.

Performance Management and Career Development and Advancement

Clarion Medical Technologies will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using performance management processes, providing career development and advancement, or redeploying employees.

Return to Work

Clarion Medical Technologies will maintain a documented return-to-work process for employees who are absent from work due to a disability and require disability-related accommodation to return to work. The process will outline the steps the organizationClarion Medical Technologies will take to facilitate the employee's return andand will use documented individual accommodation plans as partpart of the process. This return to work process does not replace or override any other return- to- work process created by or under another statute.

Customer Service Standards

Clarion Medical Technologies will provide goods, services and facilities to persons with disabilities in a manner that is consistent with the principles of dignity, independence, integration and equal opportunity. The organizationClarion Medical Technologies will permitaddress the use of assistive devices, service animals and support persons in accordance with the IASR and applicable law;; provide notice of temporary disruptions where required;; maintain an accessible feedback process;; and ensure required customer service training is provided and recorded in accordance with the IASR.

7.0 Revision History

Date	Revision #	Description
October 26, 2020	00	New Policy
July 24, 2026	01	Rewritten for clarity and alignment with current Ontario Regulation 191/11 requirements.