
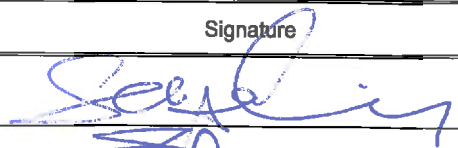
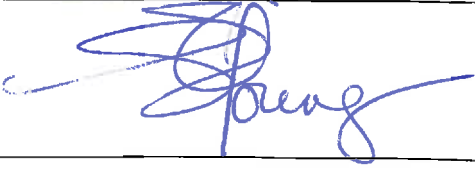



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|  125 Fleming Drive Cambridge, ON Canada, N1T 2B8 | Title: AODA – Integrated Accessibility Standards Regulation (IARS) Policy | | | | Status: Pending |
| | | | | | Approval: |
| | HR No.: HR-PLC014 | Rev. No.: 00 | Effective Date: July 8, 2020 | Print Date: 14-Dec-20 | Author: Anne Tucker |

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AODA – Integrated Accessibility Standards Regulation (IASR) Policy

| Approval | | | |
|----------|------------|------------------------------------|--|
| Date | Revision # | Approved by: | Signature |
| | 00 | Samson Ling, President |  |
| | 00 | Sandi Young, VP of Human Resources |  |
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1.0 Purpose

This policy is intended to meet the requirements of the [Integrated Accessibility Standards, Ontario Regulation 191/11](#) for the Information and Communications Standard and the employment standard set forth under the [Accessibility for Ontarians with Disabilities Act, 2005](#). This policy applies to the provision of information and communications services and materials as well as accessible employment services for people with disabilities.

All information and communications materials and services, including employment services, provided by Clarion Medical Technologies shall follow the principles of dignity, independence, integration and equal opportunity.


2.0 Scope

This policy applies to:

- a) The provision of services at Clarion Medical Technologies and at premises frequented by Clarion Medical Technologies such as job sites and client meeting places.
- b) Employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of Clarion Medical Technologies, including when the provision of services occurs off the premises of Clarion Medical Technologies.

3.0 Definitions

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|-------------------------------|--|
| Assessible format | Include but are not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities. |
| Communication Support | 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. |
| Performance Management | Activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success. |

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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 by the organization.

4.0 Reference

Accessibility Standards for Customer Service, Ontario Regulation 429/07

Integrated Accessibility Standards, Ontario Regulation 191/11

Ontario Human Rights Code

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

The process of accommodating individuals is a shared obligation of Clarion Medical Technologies and the customer. Together, they will work to determine the most appropriate form(s) of accommodation to meet the needs of the individual.


6.0 Procedural Details

General Principles

In accordance with the Integrated Accessibility Standards, Ontario Regulation 191/11, this policy addresses the following:

A. General Requirements

B. Information and Communication Standards

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C. Employment Standards

A. General Requirement

General requirements that apply across all of the three (3) standards (information and communication, employment, and customer service) are outlined as follows.

This policy does not include the *Integrated Accessibility Standards, Ontario Regulation 191/11* regarding transportation or design of public spaces standards as Clarion Medical Technologies does not provide any method of public transportation to employees or customers and does not have public spaces.

Establishment of Accessibility Policies and Plans

Clarion Medical Technologies will develop, implement and maintain policies governing how it will achieve accessibility through these requirements.


Clarion Medical Technologies has included a statement of its commitment to meeting the accessibility needs of persons with disabilities in a timely manner in its policies. This has been achieved through documentation in Clarion Medical Technologies' policies and by making these documents publicly available in an accessible format, upon request.

Clarion Medical Technologies has established, implemented, maintained and documented a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR. The accessibility plan will be reviewed and updated once every five (5) years. It is posted on our website and if requested, the plan will be created in an accessible format.

Training Requirements

Clarion Medical Technologies 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 Clarion Medical Technologies' policies, and all other persons who provide goods or services on behalf of Clarion Medical Technologies.

Training will be provided during orientation and as changes to Clarion Medical Technologies' accessibility policies occur.

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Records

Clarion Medical Technologies will maintain records on the training content and when it was provided.

B. Information and Communication Standards

Accessible Formats and Communication Supports

Clarion Medical Technologies will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, upon request. Accessible formats and communication supports will be provided in a timely manner and at no additional cost to the individual.

Clarion Medical Technologies 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.

Accessible Websites and Web Content

Clarion Medical Technologies will ensure that our website, and where applicable web content, conforms to the Web Content Accessibility Guidelines (WCAG) as outlined in the IASR, and will refer to the legislation for specific compliance deadlines and requirements.


Feedback Process

Clarion Medical Technologies has processes in place for receiving and responding to feedback which are accessible to persons with disabilities through providing or arranging for the provision of accessible formats and communication supports, upon request. Clarion has notified the public about the availability of these accessible formats.

Exception

The Information and Communication Standard does not apply to products and product labels; unconvertible information or communications; or information that the organization does not control directly or indirectly through a contractual relationship. If the organization determines that information or communications are unconvertible, the organization should provide the person requesting information or communication with the following:

- An explanation as to why the information or communication are unconvertible;
- A summary of the unconvertible information or communications;

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- Information is regarding as unconvertible if it is not technically feasible to convert the information or communications; or if the technology to convert the information is not readily available.

C. **Employment Standards**

Employment of Persons with Disabilities

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

Recruitment, Assessment and Selection

Clarion Medical Technologies 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, Clarion Medical Technologies will consult with the applicant and provide or arrange for suitable accommodation.

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 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, 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.

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Workplace Emergency Response Information

Where required, Clarion Medical Technologies 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 organization;
- The employee's overall accommodation needs or plans are reviewed; and/or
- Clarion Medical Technologies reviews general emergency response policies.

Documented Individual Accommodation Plans

The process for the development of documented individual accommodation plans will include the following elements:

- The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan;
- The means by which the employee is assessed on an individual basis;
- The ways that an employer can request an evaluation by an outside medical expert, or other experts (at the employer's expense) to determine if accommodation can be achieved, or how it can be achieved;
- The ways that an employee can request the participation of a representative from the workplace for the creation of the accommodation plan;
- The steps taken to protect the privacy of the employee's personal information;
- The frequency with which the individual accommodation plan should be reviewed or updated and how it should be done;
- The way in which the reasons for the denial of an individual accommodation plan will be provided to the employee; and
- The means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs.


Performance Management and Career Development and Advancement

Clarion Medical Technologies 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

Clarion Medical Technologies will maintain a return to work process for employees who are absent from work due to a disability and require disability-related accommodation(s) in order to

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return to work. The return to work process will use documented individual accommodation plans (as described in section 28 of the regulation).

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.

7.0 Revision History

| Date | Revision # | Description |
|---------------------|------------|-------------|
| October 26, 2020 | 00 | New Policy |
| | | |