# Accessibility

## **Statement of Commitment**

J.P. BOWMAN LIMTED is committed to ensuring equal access and participation for all people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and by meeting our accessibility requirements under Ontario's accessibility laws.

# **Policy**

The purpose of the Accessibility Policy builds on J.P. Bowman Limited's code of conduct to promote and maintain an environment that enables the participation of persons with disabilities either as employees or customers of the company and to also educate our employees about the importance of facilitating access for persons with disabilities and the provisions of J.P. Bowman Limited's policy. This policy applies to all hourly, salary, apprentices, customers, clients and contract workers and is in line with Ontario's Accessibility for Ontarians with Disabilities Act (AODA). This commitment involves enabling accessibility for persons with disabilities in a way that respects the dignity and independence of all people. Everyone, whether a person's disability is apparent or not, will be treated with courtesy and have their need for accommodation respected whenever they interact at J.P. BOWMAN LIMITED. The company is also committed to compliance with applicable legislation, regulations, and standards in relation to persons with disabilities. The following definitions apply to this policy: "Accessible" is defined as something that can be easily accessed or used by a person with a disability. "Accommodation" is a means, through reasonable efforts, of preventing and removing barriers that impede individuals with disabilities from participating fully in services provided by J.P. BOWMAN LIMITED "Assistive device" is any device used by people with disabilities to help their daily living such as wheelchairs, walkers, canes, electronic communication devices, etc. "Barriers to accessibility" means anything that prevents a person with a disability from fully participating. This includes, but is not limited to, a physical barrier, architectural barrier, communication barrier, attitudinal barrier or a technology barrier. "Customer" is any person who visits or uses the services of J.P. BOWMAN LIMITED "Disability" defined, means:

- 1. Any degree of physical disability, infirmity, malformation, or disfigurement that is caused by bodily injury, birth defect or illness
- 2. A condition of mental impairment or developmental disability;
- 3. A learning disability or a dysfunction on one or more of the processes involved in understanding or using symbols or spoken language
- 4. A mental health issue or
- 5. An injury or disability for which benefits are being claimed or received

"Employee" includes persons who are permanent or temporary employees of J.P. BOWMAN LIMTED, and/or independent contractors. "Service animal" is an animal that is being used because of a person's disability. This is either readily apparent or is supported by a letter from a medical practitioner. "Support person" accompanied a person with a disability to help them with communication, mobility, personal care, or medical needs or to access the services of J.P. BOWMAN LIMITED "Third-party contractors" is any person or organization acting on behalf of J.P. BOWMAN LIMITED. In dealing with all persons J.P. BOWMAN LIMITED and its employees will respect the following principles:

- 1. J.P. BOWMAN LIMITED will strive to ensure that persons with disabilities have equal opportunity to access the company's goods and services in an integrated manner, where possible, without the need for accommodation, unless alternative measures are necessary.
- 2. J.P. BOWMAN LIMITED will support its employees with disabilities, including, but not limited to, policies on the provision of job accommodation that take into account an employee's accessibility needs due to a disability. J.P. BOWMAN LIMITED will provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that consider an employee's accessibility needs due to disability.
- 3. J.P. BOWMAN LIMITED will permit people with disabilities to use assistive devices to access our building and will allow people with disabilities along with their required support person or animal, to access all areas of our premises that are open to customers.

## **Training**

- J.P. BOWMAN LIMITED will make reasonable efforts to ensure that this policy and any practices and procedures arising from this policy are adhered to by its employees. Training will also be provided to new staff members or those employees who commence new duties that involve direct interaction with customers and will receive training or updates when changes are made to the policy, practices or procedures. Training will include a review of the purposes and requirements of the Act and instructions about the following:
- 1. How to interact and communicate with persons with various types of disability
- 2. How to interact with persons with disabilities that use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a person.
- 3. What to do if a person with a particular type of disability is having difficulty accessing the company.

#### Recruitment

J.P. BOWMAN LIMITED will inform applicants of the availability of accommodations for applicants with disabilities in its recruitment process.

- 1. If a selected applicant requests an accommodation, J.P. BOWMAN LIMITED will consult with the applicant and provide suitable accommodation in a manner that takes into account the applicant's accessibility need due to a disability.
- 2. When making offers of employment, J.P. BOWMAN LIMITED will notify the successful applicant of its policies for accommodating employees with disabilities.

# **Communication & Notification of Temporary Disruption**

J.P. BOWMAN LIMITED will take reasonable efforts to communicate with persons with disabilities in ways that take into account their disability. Where it is possible or reasonable J.P. BOWMAN LIMITED will provide technology to support accessible and effective communications with persons with disabilities, including through its website and telephone services. Upon request J.P. BOWMAN LIMITED consult to arrange for the provision of accessible formats and communication supports for information.

When services that are normally provided to a person with a disability are temporarily unavailable, a notice of the disruption will be posted on the company Website that includes an anticipated time of the disruption and alternate methods of service to accommodate.

J.P. BOWMAN LIMITED will develop, maintain and document an Accessibility Plan outlining the company's strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities. The Accessibility Plan will be reviewed and updated at least once every 5 years and will be included in the updated Employee Policy Information found on the QMS.

## **Feedback**

J.P. BOWMAN LIMITED encourages feedback on the goods, services, facilities and accommodation provided to employees, customers and visitors with disabilities.

Feedback can be given:

Email: info@jpbowmantool.com

Telephone: 519-752-6533

Handwritten: 55 Sinclair Blvd. Brantford, Ontario N3S7X6

Accessible formats and other communication supports will be made available upon request. Where feedback involves a complaint, efforts will be made to address the matter immediately, however in all cases feedback and complaints will be responded to within 15 days. This policy will be available on our website, computer network and postings. Our feedback process and will be made available upon request.

# J.P. BOWMAN LIMITED Multi-Year Accessibility Plan

Accessibility Requirement	J.P. Bowman Limited's Action Plan	Status
Part I: General		
Establishment of Accessibility Policies		
Develop, implement, and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this regulation.	1. J.P. BOWMAN LIMITED has developed and implemented policies governing how it achieves accessibility and meet its legal requirements.	Completed
Accessibility Plans		
Create and make a public statement of commitment.	1. J.P. BOWMAN LIMITED has created and made public a statement of commitment. The statement of commitment is posted on the company's website.	Completed

Establish, implement, maintain, and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under this regulation	2. J.P. BOWMAN LIMITED has established, implemented, and will maintain this multi-year accessibility plan, which outlines our strategy to prevent and remove barriers and meet the requirements under this regulation.	Completed
Post accessibility plan on website and provide the plan in an accessible format upon request.	3. All applicable IASR requirements have been reviewed to develop this Accessibility Plan.	Completed
Review and update the accessibility plan every five (5) years	4. Revised accessibility plans will be posted on the company website and will be provided in an accessible format upon request.	Completed
	5. Requests for accessible formats of this document will be reviewed by J.P. BOWMAN LIMITED, who will work with the individual to determine the most suitable format.	Completed
	6. J.P. BOWMAN LIMITED's accessibility plan will be reviewed and updated every five (5) years.	Completed
Training		

Provide training on the requirements of the accessibility standards and on the Human Rights Code to all employees.	1. Training for new and current employees will be delivered online covering all applicable content as required under the IASR and will be required as part of their orientation with the company.	Completed/ Ongoing
Keep record of the training provided	2. Record of completed training will be retained via employee orientation.	Completed/ Ongoing
	3. Training will be made available via alternate formats as requested.	Completed/ Ongoing
Part II: Information and Communication Standard		
Accessible Websites and Web Content		
Ensure website and web content published after January 1, 2012, conforms to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, Level AA	1. J.P. BOWMAN LIMITED's public website and its content meets all requirements under the WCAG 2.0 Level AA.	Completed

	2. J.P. BOWMAN LIMITED is committed to continuously improving its website and online content to ensure it is accessible.	Completed/ Ongoing
Accessible Formats and Communication Supports		
Upon request, provide accessible formats and communication supports to individuals with disabilities	1. Upon request, J.P. BOWMAN LIMITED will provide accessible formats and communication supports to individuals with disabilities. Guidelines and processes for responding to various requests have been developed.	Completed/ Ongoing
Consult with the person making the request in determining the suitability of an accessible format or communication support	2. J.P. BOWMAN LIMTED will consult with the employee making the request in determining the suitability of an accessible format or communication support.	Completed/ Ongoing
Notify the public about the availability of accessible formats and communication supports	3. J.P. BOWMAN LIMITED's ability to provide accessible formats and communication supports upon request has been made public by posting a statement on our website and on the QMS in our Accessibility policy.	Completed/ Ongoing
Emergency Procedures, Plans for Public Safety Information		

If emergency procedures, plans or public safety information are prepared, the information will be provided in an accessible format or with appropriate communication supports, as soon as practicable, upon request	1. J.P. BOWMAN LIMITED provides emergency procedures, plans or public safety information in an accessible format or with appropriate communication supports, when requested.	Completed/ Ongoing
Part III: Employment Standard		
Recruitment General		
Notify employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process	1. An accessibility statement is posted on all internal and external job postings that notifies applicants that accommodation will be made upon request.	Completed/ Ongoing
Recruitment Assessment or Selection Process		
During a recruitment process, job applicants will be notified that accommodations are available upon request in relation to the material or processes to be used	1. An accessibility statement is posted on all job postings that will notify applicants that accommodation will be made upon request.	Completed/ Ongoing

If a selected applicant requests an accommodation, the employer shall consult with the applicant	2. Successful applicants will be informed of the availability of accommodations as it will be stated in all offers of employment.	Completed/ Ongoing
When making offers of employment, the employer must notify the successful applicant of its policies for accommodating employees with disabilities	3. Our internal Accommodation Policy will be explained to all new hires as part of their orientation. They will also be advised of where to locate the policy should they wish to see it.	
	4. Alternative formats of the policy will be made available upon request.	Completed/ Ongoing
	5. If a selected applicant requests an accommodation, J.P. BOWMAN LIMITED will consult with applicants and provide or arrange for the provision of a suitable accommodation in a manner that considers the applicant's accessibility needs due to disability.	Completed/ Ongoing
Notice to Successful Applicants		
When making offers of employment, successful applicants will be notified of our policies for accommodating employees with disabilities	1. J.P. BOWMAN LIMITED notifies successful applicants regarding its policies for accommodating employees with disabilities when making offers of employment, as it will be communicated in all offers of employment.	Completed/ Ongoing

Informing Employees of Supports		
Inform employees of our policies used to support our employees with disabilities, including policies on the provision of job accommodation that considers an employee's accessibility due to disability	1. J.P. BOWMAN LIMITED's Accommodation Policy has been developed and will be communicated to employees during orientation, in addition to it being posted on our website, computer network and posted	Completed/ Ongoing
The information required under this section will be provided to new employees as soon as practicable after they begin their employment	2. All new hires will be provided with the Accommodation Policy, as it will be communicated through job postings, employee orientation and offers of employment.	Completed/ Ongoing
If there is a change to the existing policy on the provision of job accommodations that considers an employee's accessibility needs due to disability, employees will be provided with updated information	3. All employees are informed of changes to the Accommodation Policy as they occur. These changes will be posted and communicated via email.	Completed/ Ongoing
	4. Upon a change to an existing policy, J.P. BOWMAN LIMITED will consider an employee's accessibility needs.	Completed/ Ongoing
Accessible Formats and Communication Supports for Employees		

When an employee with a disability requests it, HR will work with that individual to provide or arrange for the provision of accessible formats and communication supports for:  • Information that is needed to perform the job • Information that is generally available to employees in the workplace	1. When a request is received, the J.P. BOWMAN LIMTED will work with the employee to ensure a suitable accessible format or communication is provided.	Completed/ Ongoing
When a request is made, HR will work with the individual to determine the suitability of the proposed accessible format/communication support.		Completed/ Ongoing
Workplace Emergency Response Information		
Individualized workplace emergency response information will be provided to employees who have a disability, if a disability is such that the individualized information is necessary	1. Individualized response plans have and will be created for employees with disabilities.	Completed/ Ongoing
If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the workplace emergency response information will be provided to the person designated to provide assistance to the employee	2. J.P. BOWMAN LIMITED provides the information required as soon as it becomes aware of the need for accommodation due to the employee's disability.	Completed/ Ongoing
Provide the information under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability	3. J.P. BOWMAN LIMITED reviews the individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodation needs, or plans are reviewed and when we review our general emergency response policies.	Completed/ Ongoing

Review individualized workplace emergency response information when:  • When the employee moves to a different location in the organization • When the employee's overall accommodations needs or plans are reviewed, and • When the employer reviews its general emergency response policies		
Documented Individual Accommodation Plans		
Develop and have in place a written process of the development of documents individual accommodation plan for employees with disabilities	1. J.P. BOWMAN LIMITED has developed and implemented a written process for the development of documented individual accommodation plans for employees with disabilities. As per IASR requirements, the plan includes the following:	Completed/ Ongoing
	a) The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan	Completed/ Ongoing
	b) The means by which the employee is assessed on an individual basis	Completed/ Ongoing
	c) The steps taken to protect the privacy of the employee's personal information	Completed/ Ongoing
	d) The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done	Completed/ Ongoing
	e) If an individual accommodation plan is denied, the manner in which the reason for the denial will be provided	Completed/ Ongoing

	f) The means of providing the individual accommodation plan in a format that considers the employee's needs due to disability	Completed/ Ongoing
Return to Work Process		
Develop and have in place a return-to-work process for its employees who have been absent from work due to a disability and require disability related accommodations to return to work	1. J.P. BOWMAN LIMITED has developed and documented a return-to-work process which details specific plans for employees who have been absent from work due to disability related accommodations.	Completed/ Ongoing
This process will be documented	2. J.P. BOWMAN LIMITED's return to work process outlines the steps it will take to facilitate the return to work of employees absent due to disability and will use individual accommodation plans as part of the process.	Completed/ Ongoing
Customer Service		
Establish policies and procedures on how we will provide goods and services to people with disabilities	1.J.P. BOWMAN LIMITED will make reasonable efforts to ensure the policies and procedures will provide goods and services to people with disabilities.	Completed/ Ongoing
Training for Employees		
Every provider of goods or services must ensure that the following persons receive training about the provision of its goods or services to persons with disabilities	1. Every employee who deals with members of the public or other third parties on behalf of the provider will receive training.	Completed/ Ongoing

Prepare a document describing its training policy and the comment must include a summary of the contents of the training and details of when the training is to be provided	2. Every employee who participates in developing J.P. BOWMAN LIMITED's policies and procedures governing the provision of goods or services to members of the public or third parties will also receive training.	Completed/ Ongoing
Keep records of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided	3. Training includes a review of the purposes of the Act and the requirements of this regulation and instruction about the following matters: a. How to interact and communicate a with persons which various tropes of disabilities b. How to interact with person with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person c. What to do if a person with a particular type of disability is having difficulty accessing the provider's goods or services.	Completed/ Ongoing
	4. Record of the training completed will be kept in training file.	Completed/ Ongoing
	5. Training will be administered online.	