

# NOBLEGEN

## Multi Year Accessibility Plan- Noblegen Inc.

### STATEMENT OF COMMITMENT:

Noblegen is committed to meeting the accessibility needs of persons with disabilities in an effective and timely manner by preventing and removing barriers for persons with disabilities in accordance with the *Integrated Accessibility Standards Regulation (IASR)*. Noblegen’s goal is to foster an inclusive organizational culture that is guided by the principles and requirements of the *Accessibility for Ontarians with Disabilities Act (AODA), 2005*, the *IASR* and the *Ontario Human Rights Code (“Code”)*.

<u>ACTION</u>	<u>COMPLIANCE DATE</u>	<u>RESPONSIBILITY</u>	<u>STATUS</u>
<b>PART 1- GENERAL REQUIREMENTS</b>			
<p><b>Establishment of Accessibility Policies</b> Every obligated organization shall 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</p> <p><b>Action:</b> Noblegen has developed all policies and procedures necessary to comply with the requirements set forth by AODA due Jan 1, 2014.</p>	Jan 1, 2014	Human Resources	Complete
<p><b>Accessibility Plans</b> Large organizations shall,</p> <ul style="list-style-type: none"> <li>a) 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;</li> <li>b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and</li> <li>c) review and update the accessibility plan at least once every five years.</li> </ul> <p><b>Action:</b> Accessibility plan completed. HR and management to identify barriers in the workplace on an ongoing basis. HR will review the plan periodically and make changes as needed.</p>	Jan 1, 2014	Human Resources	Complete

# NOBLEGEN

<p><b>Self Service Kiosks</b> Large organizations and small organizations shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.</p> <p><b>Action:</b> N/A</p>	<p>January 1, 2014</p>	<p>Senior Management</p>	<p>Not Applicable</p>
<p><b>Training</b> Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to:</p> <ul style="list-style-type: none"> <li>(a) all employees, and volunteers;</li> <li>(b) all persons who participate in developing the organization’s policies; and</li> <li>(c) all other persons who provide goods, services or facilities on behalf of the organization.</li> </ul> <p><b>Action:</b> Existing employees trained, new employees to be trained during onboarding.</p>	<p>Jan 1, 2015 &amp; Ongoing</p>	<p>Human Resources</p>	<p>Ongoing</p>
<p><b>PART 2- INFORMATION AND COMMUNICATION STANDARDS</b></p>			
<p><b>Feedback Processes</b> Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request.</p> <p><b>Action:</b> Noblegen will review all feedback processes across the company and ensure all staff are aware of the need to accommodate upon request and how to handle said requests. This will be integrated into the scheduled training on the Integrated Accessibility Standard.</p>	<p>Jan 1, 2015 &amp; Ongoing</p>	<p>Human Resources</p>	<p>Ongoing</p>
<p><b>Accessible Formats and Communication Supports</b> Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities</p> <ul style="list-style-type: none"> <li>a) in a timely manner that takes into account the person’s accessibility needs due to disability; and</li> <li>b) at a cost that is no more than the regular cost charged to other</li> </ul>	<p>Jan 1, 2016 &amp; Ongoing</p>	<p>Human Resources &amp; Marketing</p>	<p>Ongoing</p>

# NOBLEGEN

<p>persons.</p> <p>The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support. Every obligated organization shall notify the public about the availability of accessible formats and communication supports.</p> <p><b>Action:</b> Noblegen will determine what accessible formats and communication supports will be provided to persons with disabilities upon requests, to the extent practicable and will provide for provision of accessible formats and communication supports for persons with disabilities. Alternative communication methods will be available at our reception area and on our website.</p>			
<p><b>Emergency Procedures, Plans or Public Safety Information</b></p> <p>In addition to its obligations under section 12, if an obligated organization prepares emergency procedures, plans or public safety information and makes the information available to the public, the obligated organization shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.</p> <p><b>Action:</b> Noblegen will post emergency procedures, plans or safety information in an area where it is visible to the public and shall be provided in an accessible format or with appropriate communication supports, upon request as soon as practicable.</p>	<p>Jan 1, 2012</p>	<p>Human Resources &amp; JHSC Team</p>	<p>Complete</p>
<p><b>Accessible Websites and Web content</b></p> <p>Designated public sector organizations and large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out in this section.</p> <p><b>Action:</b> Any new content or changes made to the Noblegen’s website in 2014 conforms to the WCAG 2.0 Level A Standards. Moving forward, all content in the years to come will meet the Level A standards. By 2021, using our web developer’s assistance, we will ensure that the website conforms to the WCAG 2.0 Level AA Standards, to the extent practicable other than criteria 1.2.4 (captions) and 1.2.5 (pre-recorded audio descriptions) that are not a requirement.</p>	<p>Beginning Jan 1, 2014 &amp; ongoing through to Jan 1, 2021.</p>	<p>Marketing</p>	<p>Ongoing</p>

# NOBLEGEN

<p><b>Please note:</b> All WCAG2.0 requirements only apply to websites, web content and web based applications that an organization can control either directly or through a contractual relationship and where meeting the requirements are technically feasible.</p>			
<b>PART 3- EMPLOYMENT STANDARDS</b>			
<p><b>Recruitment – General</b> Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.</p> <p><b>Action:</b> Noblegen will include a statement in job advertisements and identify different options for where job advertisements may be posted.</p>	January 1, 2016	Human Resources	Ongoing
<p><b>Recruitment, Assessment, Selection</b> During a recruitment process, an employer shall notify job applicants when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used. If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant’s accessibility needs due to disability.</p> <p><b>Action:</b> Noblegen will receive and update existing recruitment policies, procedures, and processes. Noblegen will determine how to notify applicants – telephone, email, letter, or alternative means that takes into account their need for accommodation. Noblegen will identify barriers in the recruitment process including location of interview room, format of tests (if applicable), room set up for interviewee, interviewing timelines, supports and paperwork. Noblegen will develop interview guidelines that takes into account accommodation for persons with disabilities.</p>	January 1, 2016 & Ongoing	Human Resources	Ongoing
<p><b>Notice to Successful Applicants</b> Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.</p> <p><b>Action:</b> Noblegen will include a statement in future employment agreements confirming that Noblegen will support the accessibility needs of its employees.</p>	January 1, 2016	Human Resources	Ongoing
<p><b>Informing Employees of Supports</b> Every employer shall inform its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on the provision</p>	January 1, 2016	Human Resources	Ongoing

# NOBLEGEN

<p>of job accommodations that take into account an employee’s accessibility needs due to disability.</p> <p>Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment. Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee’s accessibility needs due to disability.</p> <p><b>Action:</b> Noblegen will inform current employees and new hires as soon as practicable after they begin employment of policies supporting employees with disabilities. New employees will be provided with accessibility policies and training as a part of onboarding process. Noblegen will keep employees up to date on changes to policies/procedures relating to accommodation.</p>			
<p><b>Accessible Formats and Communication Supports for Employees</b>          In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for</p> <ul style="list-style-type: none"> <li>(a) information that is needed in order to perform the employee’s job; and</li> <li>(b) information that is generally available to employees in the workplace.</li> </ul> <p>The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</p> <p><b>Action:</b> Noblegen will conduct an audit of regular communications. Noblegen will make a list of what employees will require, and ensure that their accessibility needs are met through an individualized accessibility plan.</p>	<p>January 1, 2016</p>	<p>Human Resources</p>	<p>Ongoing</p>
<p><b>Workplace Emergency Response Information</b>          Every employer shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee’s disability.</p> <p>If an employee who receives individualized workplace emergency response information requires assistance and with the employee’s consent, the employer</p>	<p>January 1, 2012</p>	<p>Human Resources</p>	<p>Complete</p>

# NOBLEGEN

<p>shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.</p> <p>Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.</p> <p>Every employer shall review the individualized workplace emergency response information</p> <ul style="list-style-type: none"> <li>(a) when the employee moves to a different location in the organization;</li> <li>(b) when the employee's overall accommodations needs or plans are reviewed; and</li> <li>(c) when the employer reviews its general emergency response policies.</li> </ul> <p><b>Action:</b> In the event that Noblegen becomes aware of an employee's disability, the Company will ensure that the employee is provided with information on emergency response protocols that will take into account their individualized requirements. We will review individualized workplace emergency response information every year, or as changes occur (i.e. legislation updates, job transfers, etc.). We will ensure the individualized emergency response information is updated and communicated to affected employees.</p>			
<p><b>Documented Individual Accommodation Plans</b></p> <p>Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.</p> <p>The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none"> <li>1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</li> <li>2. The means by which the employee is assessed on an individual basis.</li> <li>3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if and how accommodation can be achieved.</li> <li>4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the</li> </ol>	<p>January 1, 2016</p>	<p>Human Resources</p>	<p>Ongoing</p>

# NOBLEGEN

<p>workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.</p> <p>5. The steps taken to protect the privacy of the employee’s personal information.</p> <p>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> <p>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>8. The means of providing the individual accommodation plan in a format that takes into account the employee’s accessibility needs due to disability.</p> <p><b>Action:</b> Noblegen will develop a written process for implementing accommodation plans for persons with disabilities which includes the above prescribed elements. Noblegen will create a template to document individual accommodation plans when the need arises.</p>			
<p><b>Return to Work Process</b></p> <p>Every employer, other than an employer that is a small organization</p> <p>(a) shall 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 in order to return to work; and</p> <p>(b) shall document the process.</p> <p>The return to work process shall</p> <p>(a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and</p> <p>(b) use individual documented accommodation plans, as described in section 28, as part of the process.</p> <p>The return to work process referenced in this section does not replace or override any other return to work process created by or under any other statute.</p> <p><b>Action:</b> Noblegen will develop a written process for implementing a return to work plan for persons with a disability which incorporates the above prescribed elements. Noblegen will create a template to document the return to work</p>	<p>January 1, 2016</p>	<p>Human Resources</p>	<p>Ongoing</p>

# NOBLEGEN

process.			
<p><b>Performance Management</b> An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.</p> <p><b>Action:</b> Noblegen will review the current Performance Management process. Noblegen will evaluate different options for administering the performance management process to take into account the individual needs of persons with a disability and consider the different methods to provide feedback to employees – on paper, verbally, on-line, etc. If a person with a disability has an Individual Accommodation Plan (IAP), take into account how information needs to be communicated to these individuals.</p>	January 1, 2016	Human Resources	Ongoing
<p><b>Career Development and Advancement</b> An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.</p> <p><b>Action:</b> Noblegen will review current Succession Plan and Career Development processes.</p> <p>We will keep IAP's in mind when making career development and advancement decisions.</p>	January 1, 2016	Human Resources	Ongoing
<p><b>Redeployment</b> An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.</p> <p><b>Action:</b> Noblegen will review current Re-deployment processes to take into account the individual needs of persons with a disability as well as any IAP's.</p>	January 1, 2016	Human Resources	Ongoing
<b>Part 4- DESIGN OF PUBLIC SPACE STANDARDS</b>			
<p><b>Obtaining Service – Make Service counters, Queuing Guide and Waiting Areas Accessible.</b> <b>Action:</b> Where practicable, all indoor or outdoor newly constructed service</p>	January 1, 2017	Human Resources, Executive Team	Complete

# NOBLEGEN

counters and fixed queuing guides and all newly constructed or redeveloped waiting areas will conform to all of the required elements in accordance with the provisions of the IASR.			
<b>Maintain the Accessible Parts of Our Public Spaces.</b> <b>Action:</b> Identify preventative and emergency maintenance procedures & alternatives & procedures for handling disruptions and alternatives in accordance with the provisions of the IASR.	January 1, 2017	Human Resources, Executive Team	Complete
<b>Make Parking Accessible</b> <b>Action:</b> Where practicable, new and redeveloped parking areas meet certain technical requirements in accordance with the provisions of the IASR.	January 1, 2017	Human Resources, Executive Team	Complete
<b>Make Exterior Paths of Travel Accessible.</b> <b>Action:</b> Where practicable, new and redeveloped exterior paths of travel that are outdoor sidewalks or walkways designed and constructed for pedestrian travel and are intended to serve a functional purpose (includes stairs, ramps, curb ramps, depressed curbs, pedestrian signals, rest areas) and not to provide a recreational experience meet certain technical requirements in accordance with the provisions of the IASR.	January 1, 2017	Human Resources, Executive Team	Complete

NobleGen’s accessibility policies (The Customer Service Standard Policy & the Integrated Accessibility Standards Regulation Policy) are available upon request. The policies and the multi-year accessibility plan are available in accessible format, upon request.

**FOR MORE INFORMATION, PLEASE CONTACT:**

**Eliana Masse**

**Phone Number:** (705) 748-1108

**Email:** [eliana.masse@noblegen.com](mailto:eliana.masse@noblegen.com)

**In Writing:**

14 Hunter Street East, Second Floor

Peterborough, ON

K9J 7B2