

NUCAP INDUSTRIES INC.
AODA Multi-Year Accessibility Plan
(Accessibility Plan)

1. BACKGROUND & PURPOSE

The purpose of the goal of the *Accessibility for Ontarians with Disabilities Act, 2005* (the “Act”) is to create a more accessible Ontario, by identifying, and to the extent possible, preventing, and eliminating barriers experienced by persons with disabilities.

The Integrated Accessibility Standards (the “IAS”) is a regulation under the Act the purpose of which is to ensure accessibility for persons with disabilities in the areas of (i) Information and Communication, (ii) Employment, (iii) Transportation and (iv) Design of Public Spaces.

NUCAP Industries Inc. (“NUCAP” or the “Company”), inclusive of all our groups, divisions and affiliates, has developed a policy that identifies how NUCAP currently achieves and will continue to achieve accessibility by meeting the requirements of the IAS and by preventing and eliminating barriers faced by persons with disabilities (the “Policy”).

The purpose of this multi-year accessibility plan (“Accessibility Plan”) is to create a roadmap that describes in more detail, the steps NUCAP will take to meet the accessibility objectives set out in the Policy and the timeline in which these steps will be taken. The Accessibility Plan will help NUCAP ensure accessibility is incorporated into its regular business operations and its future development plans. This document will be made available in alternative formats upon request.

2. STATEMENT OF COMMITMENT

NUCAP is committed to treating all people in a way that allows them to maintain their dignity and independence. NUCAP believes in integration and equal opportunity and is committed to developing, implementing, and maintaining policies, practices and procedures aimed at meeting the accessibility needs of persons with disabilities in a timely manner.

3. COMPLIANCE WITH EXISTING LAW

Nothing in the Accessibility Plan or Policy is intended to replace or negate existing laws regarding accessibility for persons with disabilities including but not limited to the *Human Rights Code* and the *Workplace Safety and Insurance Act* (“Accessibility Legislation”).

The compliance deadlines established in this Accessibility Plan correspond with the deadlines set out in the IAS. NUCAP is working towards compliance in accordance with those deadlines. However, in advance of the compliance deadlines established by the IAS and this Accessibility Plan, NUCAP will continue to comply with its legal obligations under all applicable Accessibility Legislation.

4. REVIEW

The Accessibility Plan must be reviewed and updated at least once every five (5) years but may be reviewed more frequently depending on need.

5. TRANSPARENCY

As of January 1, 2014, the AODA Multi-Year Accessibility Plan was posted on NUCAP's website. The Accessibility Plan will be provided upon request to any member of the public in a hard, electronic, or other Accessible Format.

6. APPLICATION

Except as otherwise limited herein, this Accessibility Plan applies to NUCAP's operations in Ontario including but not limited to:

- i. All employees and volunteers in Ontario.
- ii. Any person who participates in the development of NUCAP's policies, practices and procedures respecting NUCAP's Ontario operations.

7. IMPLEMENTATION & REVIEW

Responsibility for the implementation, review and update of the Accessibility Plan is shared between departments as follows:

- The **Human Resources Department** is responsible for:
 - Oversight of the implementation of the IAS Accessibility Policy & Plan;
 - Compliance with the Employment Standards;
 - Reporting required under the IAS; and
 - The implementation of required training programs.
- The **Sales and Marketing Department** is responsible for compliance with the Information and Communications Standards and for the implementation and maintenance of policies, practices and procedures required under the Accessibility Standards for Customer Service ("Customer Service Standards").
- The **Property Manager** is responsible for compliance with the Design of Public Spaces Standards.
- The **Information Technology Department** is responsible for compliance with the accessibility requirements for the Company's website(s), specifically s. 14 (4) 1. Accessible Websites and Web Content that conforms with WCAG 2.0 Level A 7 Level aa, subject to exceptions.

8. DEFINITIONS

- i. **Accessible Formats** - may include, but are not limited to, large print, recorded audio and electronic formats, braille, and other formats usable by persons with disabilities.
- ii. **Communication Supports** - may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.
- iii. **Disability** – means:
 - a) 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,
 - b) a condition of mental impairment or a developmental disability,
 - c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
 - d) a mental disorder, or
 - e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997
- iv. **New Internet Website** - means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.
- v. **Performance Management** - means activities related to assessing and improving employee performance, productivity, and effectiveness, with the goal of facilitating employee success.
- vi. **Redeployment** - means the reassignment of employees to other departments or jobs as an alternative to layoff when a particular job or department has been eliminated.
- vii. **Staff** – means employees and volunteers of NUCAP.
- viii. **Unconvertible Information or Communication** – means information or communication that it is not technically feasible to convert, or if it is technically feasible to convert, the technology required to do so is not readily available.
- ix. **Web Content Accessibility Guidelines (“WCAG”)** – means the international standard for making websites and web content accessible to people with a wide-range of disabilities. The WCAG contain two levels of compliance, Level A and Level AA.

9. ACCESSIBLE CUSTOMER SERVICE

NUCAP strives to deliver its products and services in a manner that respects the dignity and independence of persons with disabilities. NUCAP is also committed to ensuring that everyone has access to the same quality of goods and service and where possible, persons with disabilities can access goods and services in the same place and in the same or similar way as persons who do not have a disability.

To this end NUCAP has developed a policy that addresses the accessibility requirements contained in the Customer Service Standards. This policy is available to any client or member of the public upon request. To request a copy of this policy please contact:

Human Resources Department

Mailing Address/In-person Request

3370 Pharmacy Avenue, Toronto ON
Toronto, ON M1W 3K4

Telephone

416-494-1444

Fax

416 494 4565

Email

accessibility@nucap.com or hr@nucap.com

10. GENERAL ACCESSIBILITY STANDARDS UNDER IAS

I. Training

Compliance Deadline: January 1, 2015

Policy Statement:

By January 1, 2015 (the “Compliance Deadline for Training”), NUCAP will provide training to all existing employees, volunteers and all persons who participate in the development of AODA Policies.

Training will be provided on:

- the requirements of the IAS;
- the *Human Rights Code* as it pertains to persons with disabilities; and
- the AODA Policies as required by the IAS.

The content of the training will be applicable to the individual’s duties.

Employees hired and volunteers accepted after the Compliance Deadline for Training will receive the required training as soon as practicable.

NUCAP will keep a record of the training provided, including the dates on which the training is provided and the number of individuals to whom it is provided.

Accessibility Plan:

i. Content of Training

NUCAP provides training programs for all employees and volunteers. The training program will address the *Human Rights Code* as it pertains to persons with disabilities and the requirements of the IAS applicable to employees’ duties.

Additional specialized training will be provided to individual employees as required. For example, the Property Manager will receive training on the Design of Public Spaces Standards.

ii. Format of Training

Training will be provided through a combination of in-person, online and written training programs.

11. INFORMATION AND COMMUNICATION STANDARDS

I. Feedback Procedures

Compliance Deadline: January 1, 2015

Policy Statement:

By January 1, 2015 NUCAP will ensure that its processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of Accessible Formats and Communications Supports, upon request.

NUCAP will notify the public that Accessible Formats and Communications Supports are available in respect of its feedback procedures.

Accessibility Plan:

NUCAP currently accepts feedback from clients, the public, and employees in a variety of different ways. NUCAP will attempt to accommodate requests to provide or to receive responses to feedback in an Accessible Format or with Communication Supports.

II. Accessible Formats & Communication Supports

Compliance Deadline: January 1, 2016

Policy Statement:

By January 1, 2016 NUCAP will, upon request, provide or arrange for the provision of Accessible Formats and Communication Supports in order to make its communications or information about the goods, services and/or facilities it offers accessible to persons with disabilities.

Accessibility Plan:

i. Exempt Information

The Information and Communication Standards do not apply to (i) products and product labels; (ii) Unconvertible information or communications; and (iii) information that NUCAP does not control directly or indirectly through a contractual relationship.

Should NUCAP determine that information or a communication is Unconvertible it will explain why this is the case and provide the person making the request with a summary of the requested information or communication.

ii. Consultation

A Staff member who receives a request from a client or the public for information in an Accessible Format or with Communication Supports will consult with the requesting individual to determine how the information may best be made accessible.

iii. Providing Accessible Formats at No Additional Cost

NUCAP may not have Accessible Formats immediately available upon request. If a customer makes a request for a document in an Accessible Format NUCAP will contact an appropriate provider to arrange for same.

Accessible Formats and Communication Supports will be provided in a timely manner and at a cost that is no more than the regular cost charged to other persons.

III. Accessible Websites and Web Content

Initial Website Compliance Deadline: January 1, 2014

Final Website Compliance Deadline: January 1, 2021

Policy Statement:

By the Initial Website Compliance Deadline NUCAP will ensure that, where practicable, a New Internet Website and web content on such site(s) conforms with WCAG 2.0 Level A.

By the Final Website Compliance Deadline NUCAP will ensure that, where practicable, any website or content on that site(s) published after January 1, 2012 conforms with WCAG 2.0 Level AA to the extent required by the IAS.

When determining whether meeting the requirements of this section is practicable NUCAP will consider i. the availability of commercial software or tools required to achieve web accessibility; and ii. the impact meeting the requirements of this section will have on projects planned before January 1, 2012.

The commitment to provide accessible websites and web content only applies to websites and web content that NUCAP controls directly or indirectly through a contractual relationship that allows for modification of the website or web content in question.

Accessibility Plan:

NUCAP does not have any current plans to update its existing website. However, any future updates that constitute a “significant refresh” within the meaning of the IAS will incorporate the applicable WCAG requirements. Moreover, NUCAP will ensure its website is compliant with the WCAG 2.0 Level AA save and except for the (a) success criteria 1.2.4 Captions (Live), and

(b) success criteria 1.2.5 Audio Descriptions (Pre-recorded) both of which are not required under the IAS by the Final Website Compliance Deadline.

12. EMPLOYMENT STANDARDS

The Employment Standards only apply to employees of NUCAP. They do not apply to volunteers, other unpaid individuals, or Contractors.

I. Recruitment/Selection/Assessment

Compliance Deadline: January 1, 2016

Policy Statement:

By January 1, 2016 NUCAP will notify its employees and the public of the availability of accommodation during the recruitment process. NUCAP will further notify all job applicants who are individually selected to participate in an assessment or selection process that accommodation is available upon request in relation to the assessment or selection process if the applicant requires accommodation due to a disability.

If an applicant requests accommodation, NUCAP will 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.

Accessibility Plan:

i. Notification to the Public & External Applicant: Accommodation During Recruitment

This Accessibility Plan posted on NUCAP's website will serve as notice to the public of the availability of accommodation during the recruitment process.

NUCAP occasionally posts open positions on job search/social media websites. Such postings will include a notification of the availability of accommodation during the recruitment process.

ii. Notification to Employees: Accommodation During Recruitment

NUCAP posts notifications of open positions on internal bulletin boards. By the applicable compliance deadline these posts will include a notice regarding the availability of accommodation during the recruitment process.

iii. Notification: Accommodation During Assessment & Selection

NUCAP employs different assessment and selection processes depending on the position for which it is hiring. Where an applicant is individually selected to participate in any assessment or selection process NUCAP will notify the applicant of the availability of accommodation in respect of same.

Where, by reason of a disability, an applicant requests accommodation in respect an assessment or selection process, NUCAP will consult with the applicant for the purposes of determining an

appropriate accommodation. NUCAP reserves the right to require the applicant to provide medical documentation in support of the need for accommodation.

Where NUCAP determines an applicant, due to a disability, does require accommodation during the assessment and selection process, NUCAP will provide accommodation up to the point of undue hardship.

iv. Use of External Recruitment Agencies

On rare occasions NUCAP may retain a recruit agency to fill an open position. Where NUCAP retains a recruitment agency it will ensure that an obligation to notify applicants about the availability of accommodation during the recruitment, assessment and selection process is included in its service contract.

II. Notice to Successful Applicants

Compliance Deadline: January 1, 2016

Policy Statement:

By January 1, 2016 NUCAP will ensure that when making offers of employment, it notifies the successful applicant of its policies on accommodating employees with disabilities.

Accessibility Plan:

NUCAP will notify successful candidates for employment of its policy regarding the accommodation of employees with disabilities in its offer letters and/or contracts of employment.

III. Informing Employees of Supports

Compliance Deadline: January 1, 2016

Policy Statement:

By January 1, 2016 NUCAP will inform its existing employees of its policies on supporting employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.

NUCAP will provide employees with updated information whenever there is a material change to its policies on the provision of job accommodations for employees with disabilities.

Accessibility Plan:

NUCAP will post a notification informing employees of the availability of accommodation during employment as well as its policies for the development of documented individual accommodation plans and return to work plans on its internal bulletin boards. NUCAP will update these postings, as necessary.

IV. Accessible Formats and Communication Supports for Employees

Compliance Deadline: January 1, 2016

Policy Statement:

By January 1, 2016 NUCAP will, upon the request of an employee with a disability, provide or arrange for the provision of Accessible Formats and Communication Supports in order to ensure that (i) information required by the employee to perform his/her job; and (ii) information generally available to employees in the workplace, is accessible to the employee with a disability.

NUCAP will consult with the employee making the request to determine the suitability of any Accessible Format or Communication Support. However, NUCAP reserves the right to determine the Accessible Format or Communication Support that will be provided in the circumstances.

Accessibility Plan:

A request for the provision of information in an Accessible Format and/or with a Communication Support may be made to the employee's immediate supervisor or the Human Resources Department. Such requests will be addressed in accordance with NUCAP's regular procedure for accommodating employees with disabilities which by January 1, 2016, will include the development of a documented individual accommodation plan in consultation with the employee.

v. Workplace Emergency Response Information

Compliance Deadline: January 1, 2012

Policy Statement:

"NUCAP is committed to ensuring the safety of all employees. Employees are required to notify NUCAP, if due to a disability, the employee would be unable to independently evacuate the premises or otherwise respond in an emergency situation.

Upon receiving such notification, NUCAP will provide the employee with individualized emergency response information that takes account of the employee's disability. The employee is not required to disclose the details of his/her medical condition or diagnosis, only the kind of assistance required. The information provided will be kept confidential and will only be shared with the employee's consent.

The employee is required to notify NUCAP if, during employment, the employee develops a medical condition or there is a change in an existing medical condition that would necessitate the creation of or an amendment to individual emergency response information."

Accessibility Plan:

i. Existing Employees

A notification regarding NUCAP's emergency response procedures as well as the availability of individual emergency response information is posted on NUCAP's internal bulletin board. Individual emergency response information for employees has been developed as required. NUCAP will continue to update individual workplace emergency response information, as necessary.

ii. New Employees

Information regarding the availability of individual emergency response information as well as a copy of NUCAP's emergency response procedures is included in NUCAP's onboarding package and/or discussed during the employee's orientation.

VI. Documented Individual Accommodation Plans

Compliance Deadline: January 1, 2016

Policy Statement:

By January 1, 2016, NUCAP will have in place a written process for the development of documented individual accommodation plans for employees with disabilities. The process 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 manner in which NUCAP can request an evaluation by an outside medical or other expert, at its own expense, to assist in determining if accommodation can be achieved and, if so, how accommodation can be achieved.
- The manner in which the employee can request the participation of a representative from his or her bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.
- The steps NUCAP will take to protect the privacy of the employee's personal information.
- The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
- If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
- The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

Where requested, an employee's individual accommodation plan will include any information regarding the provision of Accessible Formats and Communications Supports.

Where required, an employee's individual accommodation plan will include individualized workplace emergency response information.

An employee's individual accommodation plan will include any additional accommodation that is to be provided.

Accessibility Plan:

The Human Resources Department has a policy on the development of Individual Accommodation Plans .

VII. Return to Work Process

Compliance Deadline: January 1, 2016

Policy Statement:

By January 1, 2016, NUCAP will have a documented a return-to-work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

The return-to-work process will outline the steps NUCAP will take to facilitate the employee's return to work and will consider any documented individual accommodation plan that may exist.

Accessibility Plan:

The Human Resources Department will create a documented return to work process for employees absent from work due to disability and will have completed this process by the applicable Compliance Deadline.

VIII. Performance Management

Compliance Deadline: January 1, 2016

Policy Statement:

By January 1, 2016, NUCAP will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when applying its performance management process.

Accessibility Plan:

Managers are responsible for evaluating employee performance and currently comply with their obligations under applicable Accessibility Legislation in respect of same.

As of the Compliance Deadline for Training, Managers will have received training on the *Human Rights Code* as it pertains to employees with disabilities and specifically, on how to accommodate accessibility needs of employees with disabilities during the performance management process. This training will include a discussion of the need to consider individual accommodation plans when applying the performance management process.

IX. Career Development and Advancement

Compliance Deadline: January 1, 2016

Policy Statement:

By January 1, 2016, NUCAP will take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing opportunities for career development and advancement to its employees with disabilities.

Accessibility Plan:

Managers are responsible for evaluating employee performance and when opportunities arise, identifying candidates deserving of consideration for career advancement. Managers currently comply with their obligations under applicable Accessibility Legislation when performing these tasks.

As of the Compliance Deadline for Training, Managers will have received training on the *Human Rights Code* as it pertains to employees with disabilities and specifically, on how to take accessibility needs into account when providing opportunities for career development and advancement. Managers will also have received training on the need to consider any individual accommodation plan that may exist.

X. Redeployment

Compliance Deadline: January 1, 2016

Policy Statement:

By January 1, 2016, NUCAP will take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.

Accessibility Plan:

NUCAP is currently aware of and in compliance with its obligations under applicable Accessibility Legislation when redeploying employees.

As of the Compliance Deadline for Training NUCAP personnel responsible for Redeployment will have received training on how to take accessibility needs into account as well as individual accommodation plans, if any, when redeploying employees with disabilities.

13. DESIGN OF PUBLIC SPACES STANDARDS

Compliance Deadline: January 1, 2017

Policy Statement:

NUCAP will comply with the accessibility requirements of the Design of Public Spaces Standards when redeveloping or constructing new public spaces on or after January 1, 2017.

Accessibility Plan:

NUCAP does not have any current plans to construct or redevelop any of the public spaces covered by the Design of Public Spaces Standards. However, should such plans be considered or advanced in the future, NUCAP will ensure compliance with the requirements of the Design of Public Spaces Standards.

14. QUESTIONS ABOUT THE POLICY OR ACCESSIBILITY PLAN

For more information about the Policy or NUCAP's Accessibility Plan please contact:

Human Resources Department

Mailing Address/In-person Request

3370 Pharmacy Avenue, Toronto ON
Toronto, ON M1W 3K4

Telephone

416 494 1444

Fax

416 494 4565

Email

accessibility@nucap.com or hr@nucap.com