



OVERVIEW

Under the Accessibility for Ontarians with Disabilities Act (AODA), 2005, all public and private sector organizations must meet the requirements of accessibility standards. This document sets out the policies and procedures that CuBE Packaging Solutions Inc. ("CuBE") has put in place to provide accessibility supports to Ontarians with disabilities.

The requirements of the Regulation include:

- 1.1 Establishment, implementation, maintenance, and documentation of a multi-year accessibility plan, which outlines the strategies to prevent and remove barriers and meet its requirement under the Regulation for all companies.
- 1.2 Incorporation of accessibility criteria and features when procuring or acquiring goods, services, or facilities.
- 1.3 Training.
- 1.4 Other specific requirements under the Information and Communication, Employment, Public Spaces and Customer Service Standards.

POLICY

CuBE is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of persons with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act.

APPLICATION

This policy applies to the following: all employees, irrespective of part-time, full-time, contract or permanent status; individuals completing a practicum, articling, co-op or placement as part of an academic program; vendors, contractors and all other persons who provide goods, services or facilities on behalf of CuBE.

GENERAL REQUIREMENTS

Multi-Year Accessibility Plan: Our Multi-Year Accessibility Plan outlines a phased-in strategy to prevent and remove barriers and addresses the current and future requirements of the AODA. We will review the progress of the plan and update its implementation every three years. The plan will be reviewed and updated in consultation with persons with disabilities.

Training: CuBE will provide training of Accessible Customer Service, Integrated Accessibility Standards (Ontario Regulation 191/11), and CuBE's Accessibility Policy to:

- all employees
- anyone involved in developing our policies
- anyone who provides goods and services to customers/visitors on our behalf.

Staff will be trained on accessible customer service during their orientation within the first two weeks of employment.

Employees will also be trained when changes are made to any of the policies noted above.

Feedback: CuBE welcomes feedback on how we provide accessible customer service. Customer/visitor feedback will help us identify barriers and respond to concerns.

Customers/visitors who wish to provide feedback on the way CuBE provides goods or services to people with disabilities can provide it in the following way(s):

- Verbally, at the front Reception desk,
- Written, addressed to:
HR Department
CuBE Packaging Solutions Inc.
200 Industrial Parkway North,
Aurora ON, L4G 4C3, or
- By email, to the HR Department: careers@cubep.com

All feedback, including complaints, will be directed to the HR Department. Customers/visitors can expect a response within 21 business days.

CuBE will make sure its feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request.

Emergency Information: All emergency procedures, plans or public safety information that are made available to the public, will be provided in accessible formats or with appropriate communication supports, upon request.

Accessible Formats and Communication Supports: We will provide persons with disabilities the accessible formats and communication supports that are available upon request in a timely and reasonable manner.

ACCESSIBLE CUSTOMER SERVICE PROCEDURES

Our accessible customer service policies will be consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

A) Communication

We will communicate with people with disabilities in ways that consider their disability.

We will train staff who communicate with customers/visitors on how to interact and communicate with people with various types of disabilities.

We will consider a person's disability when communicating with them, with the end goal being to communicate in an effective way. Where possible and helpful, Staff will ask persons with disabilities directly how best to communicate with them. Some examples include:

- ♦ Large print for those who have limited vision
- ♦ Easy-to-read, simplified summaries of materials for those with developmental or intellectual disabilities
- ♦ Alternate services or channels of communication, such as offering phone service rather than in-person service, or providing email rather than mail notices

B) Telephone Services

We are committed to providing fully accessible telephone service to our customers. We will train staff to communicate with customers over the telephone in clear and plain language and to speak clearly and slowly. We will offer to communicate with customers/visitors by e-mail, in print, or other formats if telephone communication is not suitable to their communication needs or is not available.

C) Assistive Devices

We are committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our goods and services. We will ensure that our employees are trained and familiar with various assistive devices that may be used by customers with disabilities while accessing our goods or services.

Support persons and Service animals: We welcome people with disabilities and their support persons or service animals in areas of our premises that are not restricted. Customer/visitors and the Support persons and/or Service animals must be escorted by CuBE personnel while in the facility.

Provisions of Services: CuBE will make every reasonable effort to accommodate persons with disabilities following this Policy's guiding principles.

Procedure: Where barriers are reported or identified, staff will:

1. Engage the person experiencing the barrier in a discussion to understand the barrier and the impact on the person's ability to access services.
2. Once the specific impact of the barrier on the person's ability to access services is understood, the staff member will assess what is required to resolve the barrier and when necessary, consult with their immediate manager, and where appropriate, the manager will seek advice from the Joint Health and Safety Committee and develop proposed steps for addressing the identified barrier.
3. The Staff member or the manager will communicate to the person experiencing the barrier the proposed steps to accommodate or resolve the accessibility issue.
4. If the person experiencing the barrier is satisfied that the proposed measures resolve the issue, implementation may proceed.
5. Where the person experiencing the barrier does not agree that the proposed measures will resolve the barrier, further consultation with the manager and the Joint Health and Safety Committee should occur prior to confirming a final decision to the individual.
6. The manager and the employee involved will keep a record of the above, making notes as appropriate for future reference.

NOTICE OF TEMPORARY DISRUPTION

In the event of a planned or unexpected disruption to services or facilities for customers/visitors with disabilities, CuBE will notify customers/visitors promptly. This clearly posted notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available.

The notice will be made publicly available at the Main Entrance of the facility.

INFORMATION AND COMMUNICATION SUPPORT STANDARDS

Communication: When communicating with a person with a disability, CuBE employees and third-party contractors shall do so in a manner that considers the person's disability and maintains their dignity and respect.

Terminology: When referring to people with disabilities, CuBE employees and third-party contractors shall use terminology that maintains a respectful and inclusive environment.

Accessible Websites and Web Content: Internet websites and web content controlled directly by CuBE or through a contractual relationship that allows for modification of the product, shall

conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level A and AA, where practical and in accordance with the schedule set out in the AODA Integrated Accessibility Standards.

EMPLOYMENT STANDARDS

CuBE aims to provide fair and accessible employment practices to all its prospective and current employees. Thus, CuBE is committed to working towards meeting the legislative requirements as it relates to preventing and removing barriers to accessibility in the workplace and providing everyone, including employees and representatives with disabilities access to the same opportunities.

CuBE will meet accessibility requirements by taking the following steps in three major areas of employment standards: Recruitment, Accommodations for Staff and Performance Management, Career Development and Redeployment.

Recruitment and Selection Process: CuBE shall post information about the availability of accommodations for applicants with disabilities in its recruitment process (job postings, job fairs, etc.). Job applicants selected for an interview and/or testing shall be notified that accommodations for material to be used in this process may be available, upon request. CuBE shall consult with any applicant who requests an accommodation in a manner that considers the applicant's disability. Successful applicants shall be notified about CuBE's policy for accommodating employees with disabilities as part of their offer of employment provided that the job requirements can be achieved with the accommodations made, and that the safety of the employee with the disability is not compromised.

Employee Support: As required, CuBE will implement policies to support employees with disabilities, including policies on the provision of job accommodations that consider an employee's accessibility needs due to disability. CuBE will provide this information to new employees as soon as practicable after they begin their employment and provide updated information to all employees whenever there is a new policy implemented or change to existing policies on the provision of job accommodations that consider an employee's accessibility needs due to disability.

Accessible Formats and Communication Supports for Employee: Upon an employee's request, CuBE shall consult with the employee to provide or arrange for the provision of accessible formats and communication support for information that is needed to perform the employee's job and for information that is generally available to employees in the workplace.

CuBE will consult with the employee making the request in determining the suitability of an accessible format or communication support.

Documented Individual Accommodation Plans: A written process for the development and maintenance of documented individual accommodation plans shall be developed for employees with disabilities, if requested. These plans shall include information regarding accessible formats and communication support. If requested, the plans shall include individualized workplace emergency response information.

Return to Work Process: CuBE has in place a documented Return to Work process for employees returning to work due to disability and requiring disability-related accommodations. This Return to Work process outlines the steps that CuBE shall take to facilitate the return to work and will include the following steps:

- Developing a written plan that outlines the steps required to help facilitate the return to work;
- Ensuring that any return to work plan takes into consideration an individual accommodation plan, where one exists; and
- Performance Management, Career Development and Redeployment

CuBE shall consider the accessibility needs of its employees with disabilities as well as any individual accommodation plans when providing career development, performance management and when considering redeployment.

Workplace Emergency Response Information: If an employee's disability is such that accommodation is required through the workplace Evacuation Plan, and CuBE is aware of the need for accommodation, this information shall be provided to the employee, and with the employee's consent, to the person designated to provide assistance. The information shall undergo review when;

- the employee moves to a different department or location
- the employee's overall accommodation needs, or plans are reviewed
- Management changes the Evacuation Plan, or
- during an evacuation drill it was noted that the current procedures were not sufficient

Performance Management, Career Development, Redeployment and Advancement: Managers will consider the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using performance management tools, providing career development and advancement, or when redeploying employees.

MODIFICATIONS TO THIS OR OTHER POLICIES

CuBE policies will be reviewed and updated as required to promote and respect the principles of dignity, independence, integration and equal opportunity for people with disabilities.

BUILDING STANDARDS

CuBE does not own or maintain any public spaces in the province of Ontario. CuBE leases their manufacturing facility and office in Ontario and to the best of our knowledge, is built in accordance with the Ontario Building code.

For more information on this Accessibility Plan, please contact:

HR Department
905-750 2823 / 275
careers@cubep.com

ACCOUNTABILITY

All staff members are responsible for ensuring that the AODA legislation is complied with by acting in accordance with this policy and the training they have been provided.