



WOLF STEEL LTD MULTI-YEAR ACCESSIBILITY PLAN (Ontario Locations) 2021 - 2026

STATEMENT OF COMMITMENT

In 2005, the government of Ontario passed the Accessibility for Ontarians with Disabilities Act (the "AODA"). It is the goal of the Ontario government to make Ontario accessible by 2025. The Integrated Accessibility Standards Regulations ("IASR") under the AODA require that effective January 1, 2014, Wolf Steel Ltd. establish, implement, maintain and document a multi-year accessibility plan which outlines the organization's strategy to prevent and remove barriers for persons with disabilities to meet its requirements under the IASR. The multi-year accessibility plan is to be reviewed and updated, where necessary, every five (5) years.

Under the AODA, the following accessibility standards set certain requirements that are applicable to the Company

- Customer Service,
- Information and Communications,
- Employment,
- Transportation; *and*,
- Proposed Accessibility Standards for the Built Environment

This multi-year plan outlines the Company's strategy to prevent and remove barriers to address the current and future requirements of the AODA, and to fulfill the Company's commitment as outlined in the Wolf Steel Ltd. Accessibility Policy. Unless otherwise noted, this Accessibility Plan applied to Wolf Steel Ltd.'s Ontario locations.

In accordance with the requirements set out in the IASR, Wolf Steel Ltd. will:

- Establish, review and update this plan in consultation with persons with disabilities,
- Post this plan on its website (<https://www.napoleon.com/en/ca/accessibility>)
- Report, as required, on the company website (<https://www.napoleon.com>) the progress of the implementation of this plan;
- Provide this plan in an accessible format, upon request; and
- Review and update this plan at least once every five (5) years.

In accordance with our organizational obligations under the IASR, the Company's multi-year plan addresses the deliverables and activities that will be worked on over the next three to five years. The Company is committed to making accessibility throughout the organization a reality. We seek input from all Associates and management is committed to ensuring that our goals are met. This plan has been updated to include Wolf Steel Ltd.'s planned Accessibility strategies for the review period 2021 to 2026.

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ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE

Commitment

The Customer Service Standard was created to establish accessibility standards for customer service in Ontario. In keeping with this regulation, since 2012, the Company has been in compliance with the Accessible Customer Service Regulation under the AODA and will continue to comply with those regulations from June 2021 until January 2026.

The Company is committed to excellence in serving all customers, including persons with disabilities, and it will carry out its functions in a manner which delivers and accessible customer service experience by focusing on the unique needs of the individual.

The Company is committed to providing its goods and services in a way that respects the dignity and independence of persons with disabilities. This commitment will be integrated wherever possible and will ensure that persons with disabilities will benefit from the same services, in the same place and in a similar way as other customers.

Action Taken

The following measures have been implemented by the Company:

- Ensuring all persons who, on behalf of the Company, deal with the public or other third parties, and all those who are involved in the development and approvals of customer service policies, practices and procedures, as well as

all others providing services to our customers, are trained to communicate and provide the best possible service to all customers, including persons with disabilities;

- Ensuring that goods and services of the Company are provided in a manner that respects the dignity and independence of persons with disabilities,
- Ensuring completion of accessibility training is tracked and recorded,
- Providing customers with notice in the event of a planned or unexpected disruption of service or inaccessibility of facilities used by persons with disabilities, by placing such notices at all public entrances and service counters on the Company's premises,
- Continuing to welcome and appreciate feedback from persons with disabilities through multiple communications channels,
- An "Accessibility" tab has been added to the footer of the websites www.napoleon.com to communicate Wolf Steel Ltd. Accessible customer service policies including related procedures and guidelines; and,
- Reporting compliance with the Customer Service Standard on the Accessibility Compliance Reporting tool at Service Ontario's One-Source for Business Website,
- Ensuring, that as a provider of goods and services, an established process for receiving and responding to feedback about the manner in which the Company provides good or services to persons with disabilities is readily available and accessible,
- Ensuring that all documents required by the IASR are readily available in multiple formats upon request.

INTEGRATED ACCESSIBILITY STANDARDS REGULATIONS

EMERGENCY PROCEDURE, PLANS OR PUBLIC SAFETY INFORMATION

Commitment

The Company is committed to providing and maintaining premises that respect the dignity and independence of all persons, including those with disabilities.

Action Taken

The following measures have been implemented by the Company:

- Emergency procedures and plans, including public safety information, prepared by the Company are available to the public, and are available to the public in accessible formats or with appropriate communication supports, as soon as practicable, upon request,
- An *Accessible Format Request Form* has been developed and is available on the Company's internal website, for completion by Company staff upon receipt of a request from the public for such documentation in an accessible format. In addition, an internal referral process is in place for fulfilling the accessible format request.

COMPLETION DATE: OCTOBER 2014

WORKPLACE EMERGENCY RESPONSE INFORMATION

Commitment

Where the Company is aware that an Associate has a disability and that there is a need for accommodation, individualized workplace emergency response information is provided to the Associate as soon as practicable if such information is necessary given the nature of the Associate's disability.

Action Taken

The following measures have been implemented by the Company:

- Individualized "Workplace Emergency Response Information" procedures have been developed for Associates with disabilities, as required,
- Workplace Emergency Response Information forms have been prepared for Associates who have disclosed a disability and who are being accommodated according to their disabilities,
- Where required, the Company provides assistance to specific disabled Associates, with the disabled Associate's written consent received prior to, in order to assist them with evacuation of the workplace in case of emergency or disaster, based on the plans provided to the Associate as set out in their individualized emergency plan;
- Individualized Emergency Plans are communicated to the Associates respective Managers and safety personnel, on an "as needed" basis,
- On an ongoing and regular basis, as per the applicable terms of the IASR, the Company reviews and assesses general Workplace Emergency Response Procedures and individualized emergency plans to ensure accessibility issues are addressed.

COMPLETION DATE: JANUARY 2012

PROCURING OR ACQUIRING GOODS, SERVICES OR FACILITIES

Commitment

The Company is committed to incorporating accessibility criteria and features when procuring or acquiring goods, services, or facilities, except where it is not practicable to do so.

Action Taken

In accordance with the IASR, The Company has implemented the following measures:

- Use of accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not practicable to do so,
- Where The Company has decided that it is not practicable to incorporate accessibility criteria and features, The Company will provide an explanation upon request,

- Provide educational awareness and tools to internal stakeholders and communication to external stakeholders, informing on changes to procurement procedures and purchasing criteria.

COMPLETION DATE: JANUARY 1, 2013

TRAINING

Commitment

The Company is committed to ensuring that all Associates, volunteers, third-party contractors who provide goods, services and facilities on the Company's behalf, and persons participating in the development and approval of the Company's policies, are provided with appropriate training on the requirements of the AODA, IASR and on the Ontario Human Rights Code as it pertains to persons with disabilities, and are provided with such training as soon as practicable.

Action Taken:

- Determine and ensure that appropriate training on the requirements of the IASR and the Ontario Human Rights Code as it pertains to persons with disabilities, is provided to all Associates, volunteers, third-party contractors who provide goods, services and facilities on the Company's behalf, and persons participating in the development and approval of The Company's policies;
- Ensure that training is provided to persons referenced above as soon as practicable,
- Keep and maintain records of training provided, including the dates the training was provided and the number of individuals to whom it was provided,
- Ensure that training is provided on any changes to the prescribed policies on an ongoing basis.

COMPLETION DATE: JANUARY 2015

INFORMATION AND COMMUNICATIONS

Commitment

The Company is committed to making company information and communications accessible to persons with disabilities. The Company incorporates all accessibility requirements under the Information and Communication Standard to ensure that its information and communications systems and platforms are accessible and provided in formats that meet the needs of persons with disabilities.

1. Feedback, Accessible Formats and Communication Supports

In accordance with the IASR, the Company has implemented the following measures:

- Ensure existing and new processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request and in a timely manner,
- More broadly, as a general principle, where accessible formats and communication supports for persons with disabilities are requested:
 - Provides or arranges for the provision of such accessible formats and communication supports,
 - Consults with the person making the request to determine the suitability of the accessible format or communication support,
 - Provides or arranges for the provision of accessible formats and communication supports in a timely manner that takes into account the person's accessibility needs, and at a cost no more than the regular cost charged to other persons,
 - Notifies the public about the availability of accessible formats and communication supports.

COMPLETION DATE: JANUARY 1, 2014

2. Accessible Websites and Web Content

In accordance with the IASR, the Company has implemented the following measures:

- Visitors to the Company's public website www.napoleon.com access a suite of products, at no cost, via an alliance with the eSSENTIAL Accessibility service. This service offers The Company's customers downloadable tools to enhance navigation of its websites, if the customers have dexterity challenges or reading challenges related to a variety of disabilities.
- New website content is coded in a compliance fashion to empower both the eSSENTIAL Accessibility software and third-party consumer tools, for example, readers with the inclusion of descriptive alt tags on all links and images directed through the site-map page.
- Adoption of standards in Internet Technology to ensure the public websites are compatible with the above-mentioned tools and have moved away from non-W3C formats (World Wide Web Compliant) to more flexible internet rich media to the website implementations.
- AODA compliance is included as one of the criteria in selecting technology vendors for new website development initiatives.

COMPLETION DATE: JANUARY 2012

- Development of its next generation digital platform for public websites, mobile applications, in-store media, and information technology infrastructure meet AODA Information and Communication Standards and that partnering vendors have necessary expertise with such technology.
- Use of guiding principles in the development of new corporate intranet applications as outlined by the Ontario Government's new Online Design Program Standard, which specifies compliance with international accessibility guidelines, W3C 2.0.

- Updated System Development Life Cycle (SDLC) documents and processes to outline role and responsibilities regarding content compliance for new intranet sites.
- Following the mandated Accessibility Directorate of Ontario (ADO) guidelines and Province of Ontario I&IT solutions that support obligated Private Sector organization in compliance initiatives.
- Partner with Corporate Communications and, in collaboration with operating divisions, provide guidelines to all Associates to ensure public documents and media are readily available in alternate accessible formats.
- Develop and communicate corporate e-mail best practices; and,
- Expand corporate awareness of requirements for compliance with Information and Communication Standards of AODA.

COMPLETION DATE: JANUARY 1, 2014

- Use of guiding principles in the development of new corporate intranet applications as outlined by the Ontario Government's new Online Design Program Standard, which specifies compliance with international accessibility guidelines, WCAG 2.0 Level AA

COMPLETION DATE: NOVEMBER 31, 2020

EMPLOYMENT STANDARDS

1. Recruitment Commitment

The Company is committed to fair and accessible employment practices that attract and retain Associates with disabilities. This includes providing accessibility across all stages of the employment cycle.

In accordance with the IASR, the Company has implemented that following measures throughout recruitment processes and procedures:

Recruitment General

The Company notifies Associates and the public of the availability of accommodation for applicants with disabilities in the recruitment process. This includes:

- A review and, as necessary, modification of existing recruitment policies, procedures and processes,
- Specifying that accommodation is available for applicants with disabilities on the Company's website and on job postings,
- Working with suppliers to ensure external web pages are compliance with the information and Communication Standards under the IASR requirements.

Recruitment, Assessment and Selection

The Company notifies 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 in the assessment and selection process. This includes:

- A review and, as necessary, modification of existing recruitment policies, procedures and processes.
- Inclusion of availability of accommodation notice as part of the script in the scheduling of an interview and/or assessment.
- If a selected applicant requests an accommodation, consultation with the applicant and arrangement for provision of suitable accommodation in a manner that considers the applicant's accessibility needs.

Notice to Successful Applicants

When making offers of employment, the Company will notify the successful applicants of its policies for accommodation Associates with disabilities. This will include:

- A review and, as necessary, modification of existing recruitment policies, procedures, and processes.
- Inclusion of notification of the Company's policies on accommodating Associates with disabilities in the offer of employment letters.

COMPLETION DATE: DECEMBER 1, 2015

2. Informing Associates of Supports Commitment

In Accordance with the IASR, the Company informs all Associates of policies that support Associates with disabilities, including but not limited to, policies on the provision of job accommodations that consider an Associates accessibility needs due to a disability. This includes:

- Informing current Associates and new hires of the Company's policies and procedures supporting Associates with disabilities, including but not limited to, policies on the provision of job accommodations that consider an Associates needs due to disability.
- Providing new information under this section as soon as practicable after the new Associate begins employment, specifically in the orientation process.
- Keeping Associates up to date on changes to existing policies on job accommodations with respect to disability.
- Where an Associate with a disability so requests it, the Company will provide or arrange for provision of suitable accessible formats and communications supports for information that is required or need in order to perform an Associate's job and/or information that is generally available to Associates in the workplace.
- In meeting the obligations to provide the information that is set out in the above, the Company will consult with the request Associate to determine the suitability of an accessible format or communication support.

COMPLETION DATE: DECEMBER 1, 2013

3. Documented Individual Accommodation Plans/Return to Work Process Commitment

The Company is dedicated to ensuring that barriers in accommodation and return to work processes are eliminated and corporate policies surrounding accommodation

and return to work are followed as detailed in the accessibility requirements set out in the IASR.

The Company's policies include steps that the Company takes to accommodate an Associate with a disability and to facilitate an Associate's return to work after absenteeism due to disability.

In accordance with the provisions of the IASR, the Company as implemented the following measures:

- A review and, as necessary, assessment of the existing policies to ensure documented individual accommodation plans for Associates with disabilities, if such plans are required.
- A process for the development of documented individual accommodation plans that include the following elements, in accordance with the provisions of IASR:
 - The manner in which the Associate requesting accommodation can participate in the development of the plan,
 - The means by which the Associate is assessed on an individual basis,
 - The manner in which the Company can request an evaluation by an outside medical or other expert, at the Company's expense, to assist the Company in determining if and how accommodation can be achieved,
 - The manner in which the Associate can request participation of a representative from his or her bargaining agent (DOES NOT APPLY), or the participation of another representative from the workplace, in the case of Wolf Steel Ltd., the Associate Relations Committee (ARC), where an Associate is not part of the bargaining unit,
 - Protection of the privacy of the Associate's personal information,
 - Outlines of the frequency in which individual accommodation plan are reviewed and updated and the manner in which this will be done,
 - The manner in which the Company will provide the Associate a denial, and reasons thereof, in the event an individual accommodation plan is denied,
 - The means of providing the individual accommodation plan in a form that takes into account the Associate's accessibility needs,
 - Where individual accommodation plans are established, they must include:
 - Individualized workplace emergency response information, if any, as required,
 - Any information regarding accessible formats and communication supports that have been provided for or arranged, in order to provide the Associate with information required to perform the Associate's job and/or information that is generally available to Associate's in the workplace.
 - Identify any other accommodation that is to be provided to the Associate.

The Company has ensured that the return to work process as set out in its policies includes the steps the Company will take to facilitate the Associates safe return to work after a disability- related absence, outlines the development of a written individualized return to work plan for such Associates, and requires the use of individual accommodation plans, as discussed above, in the return to work process.

COMPLETION DATE: DECEMBER 24, 2014

4. Performance Management, Career Development and Redeployment Commitment

The Company takes into account the accessibility needs of Associates with disabilities, as well as individual accommodation plans:

- When using its performance management process in respect of Associate's with disabilities,
- When providing career development and advancement to its Associates with disabilities; and,
- When redeploying Associates with disabilities.

Action Taken

In accordance with the IASR, the Company has implemented the following measures:

- Review, assess, and as necessary, modifying existing policies, procedures and practices to ensure compliance,
- Consider the accessibility needs of Associates with disabilities and, as applicable, their individualized accommodation plans when:
 - Assessing performance
 - Managing career development and advancement
 - Redeployment is required.
- Review, assess, and as necessary, include in Performance Management workshops, accessibility criteria,
- Take into account the accessibility needs of Associates with disabilities when providing career development and advancement to its Associates with disabilities, including notification of the ability to provide accommodations on internal job postings,
- Take into account the accessibility needs of Associates with disabilities when redeploying Associates, including review and, as necessary, modification of Associate transfer checklist.

COMPLETION DATE: NOVEMBER 15, 2013

DESIGN OF PUBLIC SPACES

Commitment

The Company is committed to meeting the Accessibility Standards for the Design of Public Spaces when building or undertaking major renovations/modifications to public spaces. The nature of business of The Company determines that public



spaces would typically involve service-related elements such as service counters, waiting areas and reception areas.

Action Taken

- Consider all aspects of Accessibility Standards for the Design of Public Spaces when building or undertaking major renovations/modifications
- Renovation occurred of such as service counters, waiting areas or receptions in the sales facilities (Napoleon Home Comfort).
- Put in place procedures to prevent service disruptions to its accessible parts of public spaces. In the event of service disruption, The Company will notify the public of disruption and alternatives available.

COMPLETED: JANUARY 1, 2017 – ONGOING

CONTACT US

Accessible formats of this document are available free of charge, upon request. For more information on Wolf Steel Ltd. Accessibility Policies and Multi-Year Plan please contact us. Should we need to contact you to provide further information, please include:

- Your name
- Your affiliation (customers, visitor, Associate, candidate, etc...)
- Your contact information (address, telephone and/or email)
- Preferred method of contact (email, phone, text, video, etc...)
- A summary of your feedback

By email: generalhris@napoleon.com

If you are in Canada, you can also call us toll free at: **1-705-721-1212 ext. 0** and request to speak to the **Human Resources department**.

Approved by	Approved by
Shannon Beelik	Tina Hitch
Date: May 25, 2021	Date: May 25, 2021
Reviewed:	Reviewed: