



STATEMENT of POLICY and PROCEDURE

Company	Wolf Steel	Number	AR-02-02
Section	Human Resources	Effective	January 1, 2014
Issued to	All Manual Holders	Revised	May 10, 2021
Subject	<i>INTEGRATED ACCESSIBILITY STANDARDS POLICY</i>		
Issued by	Human Resources		
Approved by	Approved by	Approved by	
Shannon Beelik – Director, HR	Tina Hitch – Vice President, HR	Not required.	
Date: May 26, 2021	Date: May 26, 2021		

1. Policy

- 1.01 For the purposes of this policy, The Company, and Napoleon Home Comfort will be referred to as “The Company”. The Company strives to provide a barrier free work environment for its Associates and visitors. The Company is committed to provide accessible customer service to people with disabilities in a manner that is consistent with the principles of independence, dignity, integration and equality. The guidelines outlined in this document represent acceptable service practices for The Company.

2. Purpose

- 2.01 This policy outlines The Company’s commitment to and process by which The Company will achieve accessibility by meeting the phased in requirements of the *Integrated Accessibility Standards Regulations, Ontario Regulation 191/11 under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*.

3. Scope

- 3.01 This policy applies to:
- Associates who deal with the public or other third parties on behalf of The Company.
 - All persons who participate in the development of The Company’s policies, practices, and procedures governing accessibility.
 - Customers, Contractors/Subcontractors, Visitors, Applicants for employment that may require accommodations and any other third-party providing goods or services on the Company’s behalf.

4. Responsibility

- 4.01 The President and the Vice President of Human Resources must create an environment that provide accessibility and ensures that The Company achieves compliance with the AODA legislation.
- 4.02 All Associates must adhere to the established Company Policies.

5. Definitions

- 5.01 “Accommodation”:
Accommodation refers to the special arrangements made, or assistance provided so persons with disabilities can participate in the experience available to persons without disabilities.
- 5.02 “Barrier”:
Anything that prevents a person with a disability from fully participating in all aspects of society because of their disability, including a physical barrier, architectural barrier, an information’s or communications barrier, an attitudinal barrier, a technological barrier, and/or a policy or practice.
- 5.03 “Disability”:
The AODA Defines disability as:
- 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,



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- 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; (“handicap”)

5.04 “Information”

Information refers to the knowledge, data and facts that convey meaning and that exist in any format such as text, audio, digital and/or images.

6. References and Related Statements of Policy and Procedure

6.01 The Company Accessibility Policy: Statement of Organizational Commitment

7. General Principles

In accordance with the Integrated Accessibility Standards, Ontario Regulation 191/11, this policy outlined the commitment of The Company to progress toward improved accessibility by meeting the phased in requirements of the Integrated Accessibility Standards Regulation, Ontario Regulation 191/11 under the Accessibility for Ontarians with Disabilities Act, 2005. The Company herein details procedures to ensure we maintain compliance with all standards set forth under the AODA as they become law.

7.01 Commitment of The Company to Achieve Accessibility

- 7.04.01 The Company is committed to treating all people in a way that allows them to maintain their dignity and independence. The Company believes in integration and equal opportunity. The Company is committed to meeting the needs of people 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, 2005*.
- 7.04.02 The Company will make every reasonable effort to develop and maintain policies, practices and procedures that are consistent with the principles of dignity, independence, integration and equal opportunity. The Company will progress toward improve accessibility by meeting the phased in requirements of the Integrated Accessibility Standards, Ontario Regulation 191/11 under the *Accessibility for Ontarians with Disabilities Act, 2005*.
- 7.04.03 The Company is committed to providing information to, or communicating with a person with a disability, and will endeavor to do so in a manner that takes into account the persons disability while respecting their dignity and independence.

7.02 Multi-Year Accessibility Plan

The Company has developed a multi-year Accessibility Plan outlining the strategy to prevent and remove barriers and address the current & future requirements of OADA and the Integrated Regulation Standards. The Company will continue its commitment to:



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- 7.02.01 Assess current policies, practices, procedures, premises, access to goods & services and information & communication systems to identify barriers to persons with disabilities.
- 7.02.02 Address the identified barriers and develop a five-year plan for the removal and prevention of these barriers.
- 7.02.03 Update the plan on an on-going basis, as required.
- 7.02.04 Post on The Company’s website the availability of the Accessibility Multi-Year plan and all related documents, policies and procedures.
- 7.02.05 Upon request provide, the Multi-Year Plan in an appropriate alternative accessible format in a timely manner and at a cost no more than the regular cost.
- 7.02.06 Submit Compliance Reports, information and documents as required to the Government.

7.03 Policies and Procedure to maintain compliance with the Integrated Standards under the AODA

The company has developed procedures to address “Information & Communication” and “Employment” as prescribed by the Integrated Accessibility Standards.

Information & Communication

- 7.03.01 The Company is committed to meeting the communication needs of people with disabilities. The Company will has consulted with and will continue to consult with people with disabilities to determine their information and communication needs.
- 7.03.02 By January 1, 2016 The Company provided accessible information and communications that take into account a person’s disability and post on The Company’s website, www.napoleon.com, the availability of accessible formats and communication supports. The Company is committed to providing the supports required by a person in a timely manner, and at no cost more than the regular cost.
- 7.03.03 Effective January 1, 2021, all current Company websites and & web content meets the requirements of WCAG 2.0 Level AA.
- 7.03.04 Exceptions: The information and communication Standard does not apply to the following:
 - a) Products and product labels, except as specifically provided by the AODA or Integrated Accessibility Standards Regulation, Ontario Regulation 191/11 under the Accessibility for Ontarian with Disabilities Act, 2005, or unless otherwise required or legislated.
 - b) Unconvertible information or communications.
 - c) Information that the obligated organization, in this case, The Company, does not control directly or indirectly through a contractual relationship.
- 7.03.05 Feedback: Under the Customer Service Standard, Wolf Steel Ltd., The Company, has established a Customer Service Feedback Process for receiving and responding to feedback specifically about the manner in which The Company provides accessible goods or services to people with disabilities.

Employment

- 7.03.06 Emergency Response: The Company will provide individualized workplace emergency response information to Associates who have disclosed a disability, and with their consent, provide the



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workplace emergency response information to the person designated to provide them assistance, i.e. a member of Leadership, a Health and Safety representative, or a Human Resources Associate.

- 7.03.07 The individualized workplace emergency response information will be reviewed and revised in the following circumstances:
- If or when the Associate moves to a different location within The Company;
 - When the Associate’s accommodation needs change or plans require review (at least once per year); and/or,
 - When the Employer reviews its general emergency response policies and related procedures.

Recruitment

- 7.03.08 The Company specifies that accommodation is available for job applicants with disabilities on the Company website, www.napoleon.com, and through all related job advertisements via external third-party websites (i.e. LinkedIn, Indeed, etc...).
- 7.03.09 The Talent Management Team will inform candidates, when called for an interview, during the selection process and in the job offer, that accommodations are available upon request in relation to the materials or processes to be utilized.
- 7.03.10 If a select applicant requests an accommodation, the Talent Management Manager in partnership with the Associate relations team, will consult with the applicant and provide or arrange for the provision of suitable accommodation in a manner that takes into account the applicant’s accessibility needs.
- 7.03.11 When making an offer of employment, the Talent Management Manager or Specialist will notify the successful applicant of The Company’s policies for accommodations Associates with disabilities.
- 7.03.12 The Company, via the Human Resources department, will inform all Associate’s of The Company of policies used to support Associates with disabilities, including policies on the provision of job accommodations that take into account an Associate’s accessibility needs and The Company will provide updated information to all Associates whenever there is a change to existing policies on the provision of job accommodations. This information will be included in the Associate Orientation Training.
- 7.03.13 Where an individualized accommodation plan is required, the Human Resources Director and Human Resources Associates, in partnership with the Environmental Health and Safety department will:
- Develop individual accommodation plans for Associates with disabilities
 - Develop a return to work process for Associates absent due to disabilities who require accommodation to return to work
 - Ensure the accessibility needs and individual accommodation plan of the Associate are taken into account when assessing their performance, managing their career development, advancement and redeployment.

Training

- 7.03.14 The Company will train Associates dealing with customers and the public on behalf of Wolf Steel Ltd. or Napoleon Home Comfort, or otherwise involved in the development of related policies on the



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requirements of the Integrated Regulation Standards and the Ontario Human Rights Code as it relates to persons with disabilities.

7.03.15 The Company will provide training to all Associates as appropriate to the duties of the Associate.

7.03.16 Training Components:

1. Purpose of the Accessibility for Ontarians with Disability Act, 2005.
2. Requirements of Accessibility Standards for Customer Service, Ontario Regulation 429/07.
3. Requirements of the Integrated Accessibility Standards, Ontario Regulation 191/11. Applicable portions of the Ontario Human Rights Code, 1900 (disability related obligations).

7.03.17 All training of Associates (existing) was completed by January 1, 2015. Training of new Associates or contract Associates after January 1, 2015 is provided on an on-going basis, through the New Hire Onboarding and Orientation procedure.

7.03.18 Where training requirements are revised by legislation or governing bodies, The Company will provide additional or revised training to all Associates required within the specified timeline.

7.03.19 The Human Resources Department keeps a record of training that includes the dates training was provided and the number of Associates who attended the initial training and individual training records or group training records for all Associates thereafter.

7.04 Accessible Formats of Document & Communication Supports

7.04.01 Upon request, The Company will provide or arrange for the provision of information in an accessible format that takes into account the individual's disability, in a timely manner and at a cost no more than the regular cost to others.

7.04.02 If the information is unconvertible, upon request, the Company will provide an explanation as to why it is convertible and provide a summary of the unconvertible information or communications in the persons preferred format while taking into account their disability.

7.05 Emergency Procedure, Plans or Public Safety Information

The Company is committed to providing and maintaining premises that respect the dignity and independence of all persons, including those with disabilities. The following measures have been implemented by the Company:

7.05.01 Upon request, The Company will provide or arrange for the provision of information in an accessible format that takes into account the individual's disability, in a timely manner and at a cost no more than the regular cost to others.

7.05.02 If the information is unconvertible, upon request, the Company will provide an explanation as to why it is convertible and provide a summary of the unconvertible information or communications in the persons preferred format while taking into account their disability.

7.05.03 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.

7.05.04 An Accessible Format Request Form has been developed and is available on the Company's internal UKG – Human Resources Information System (HRIS), for completion by Company staff upon receipt



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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.

7.06 Procuring or Acquiring Goods, Services or Facilities

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

- 7.06.01 Use of accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not practicable to do so;
- 7.06.02 Where The Company has decided that it is not practicable to incorporate accessibility criteria and features, The Company will provide an explanation upon request;
- 7.06.03 Provide educational awareness and tools to internal stakeholders and communication to external stakeholders, informing on changes to procurement procedures and purchasing criteria.

7.07 Design Of Public Spaces

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.

- 7.07.01 Consider all aspects of Accessibility Standards for the Design of Public Spaces when building or undertaking major renovations/modifications
- 7.07.02 Renovation occurred of such as service counters, waiting areas or receptions in the sales facilities (Napoleon Home Comfort).
- 7.07.03 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.

7.08 Requesting Information or Providing Feedback

- 7.08.01 Wolf Steel Ltd. and Napoleon Home Comfort provides the public with opportunity to provide feedback on our Accessibility Program. Information about the Feedback process is available at the entrance to main offices or on the Company website, www.napoleon.com. Individuals may request an “AODA Feedback Form” or may provide feedback verbally (in person or by telephone) or written (hand written or e-mail). The Feedback Process is open to members of the Organization, including Associates, contractors, vendors and suppliers.
- 7.08.02 Individuals that provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

If you have questions, concerns or feedback regarding this policy or related policies and procedures, we encourage you to contact the Human Resources department.



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This policy and its related procedures will be reviewed yearly and as required in the event of legislated changes or additional requirements.