



CAN-HR-02PL004 R00

ACCESSIBILITY POLICY

Contributors & Authors: Michael Hunks, Jen Miller, Grace Chang

Revision Date: October 21, 2020

Notes: Replacing *Ontario Accessibility AODA Procedure* dated February 2015; Revised July 2018.

Approval & Authority

Position	Name	Signature	Date
Sr. Director of Human Resources	Jennifer Miller		October 21, 2020

HR Department
Corporate Office
#260, 2301 Premier Way
Sherwood Park, AB T8H 2H3
Canada
Phone: (780) 416-8701
Fax: (780) 416-8723



Revision Summary		
Revision No.	Date	Description
00	October 21, 2020	Updated <i>Ontario Accessibility AODA Procedure</i> (2018 revised) onto Acuren's policy template; included reference to <i>The Accessibility for Manitobans Act</i> ; additions to 4.0 sections under Recruitment and Support for an Employee with a Disability; added 5.0 Responsibilities; added Appendix A Multi-Year Accessibility Plan.



TABLE OF CONTENTS

1.0	OBJECTIVE.....	1
2.0	SCOPE	1
3.0	DEFINITIONS	1
4.0	POLICY	2
5.0	RESPONSIBILITIES.....	5
6.0	FEEDBACK PROCESS	5
7.0	REFERENCES.....	6
8.0	CONTACT	6
9.0	APPENDIX A – ACUREN’S MULTI-YEAR ACCESSIBILITY PLAN 2020-2025	7

1.0 OBJECTIVE

Acuren is committed to ensuring equal access and participation for people with disabilities. This policy communicates Acuren's obligations to meet the accessibility standards under the *Accessibility for Ontarians with Disabilities Act (AODA)* and *The Accessibility for Manitobans Act (AMA)*.

2.0 SCOPE

This policy applies to any person who deals with members of the public or other third parties on behalf of Acuren Inc. and Tacten Industrial Inc. and their subsidiaries in Canada collectively known as "ACUREN".

3.0 DEFINITIONS

Integrated Accessibility Standards: Accessibility standards were established to identify, remove and prevent barriers and increase accessibility for persons with disabilities in the areas of customer service, information and communications, employment, transportation and design of public spaces.

Assistive Device: any tool, technology, or equipment that facilitates the performance of everyday tasks by a person with a disability. Examples of assistive devices include, but are not limited to, wheelchairs, walkers, hearing aids, oxygen tanks, and communication boards.

Accessibility Barrier: An obstacle that prevents a person with a disability from fully participating in all aspects of society because of his or her disability. This includes a physical barrier, an architectural barrier, information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice.

Disability: Under *the AMA*, a disability is a condition that limits a person's daily activities. Persons with disabilities may have long-term physical, mental, intellectual or sensory impairments which, in interaction with various barriers, may hinder their participation on an equal basis with others. A disability, aging, an injury and other life events may temporarily or permanently affect mobility, dexterity (use of hands), vision, hearing, communication, understanding or mental health.

Under the AODA, 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*.

Guide Dog: a dog trained as a guide for a blind person that also meets the conditions and qualifications prescribed by *Guide Dogs, RRO 1990, Reg 58*.

Service Animal: any animal accompanying a person with disability, so long as:



- a) It is readily apparent that the animal is used by the person for reasons relating to his or her disability;
or
- b) The person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

Support Person: a person who accompanies a person with disability in order to help with communication, mobility, personal care or medical needs or with access to goods or services.

4.0 POLICY

4.1 Acuren is committed to making every reasonable effort to accommodate people with disabilities, provided such accommodation does not cause Acuren undue hardship. This policy is consistent with the fundamental principles governing the AODA: dignity, equal opportunity, independence and integration.

4.1.1 Dignity

People with disabilities are treated as equally valued and respected as any other individuals.

4.1.2 Equal Opportunity

Persons with disabilities have the same opportunities to benefit from the services and programs provided by Acuren as other customers and employees. This means taking the individual needs of a person with a disability into account, even if doing so results in different treatment.

4.1.3 Independence

People with disabilities are free to choose the manner in which they are served.

4.1.4 Integration

People with disabilities have full access to the goods and services provided by Acuren. This principle includes the use of alternate measures in cases where full integration does not serve the best needs of a person with a disability.

4.2 Providing Goods and Services to Persons with Disabilities

4.2.1 Communication

Acuren communicates with persons with disabilities in ways that consider their disability. Acuren trains employees who communicate with clients as to how to most effectively interact and communicate with persons with various types of disabilities.

4.2.2 Telephone Services

Acuren is committed to providing accessible telephone service to our clients. Acuren trains employees to communicate with clients over the telephone in plain language and to speak clearly and slowly. Acuren offers to communicate with clients by e-mail, fax or letter if telephone communication is not suitable to their communication needs or is not available.

4.2.3 Assistive Devices

Acuren accommodates the use of personal assistive devices including but not limited to, wheelchairs, canes and Braille display boards. Acuren ensures that employees are trained and familiar with

various assistive devices that may be used by clients with disabilities while accessing our goods and services.

4.2.4 Billing

Acuren is committed to providing accessible invoices to all our clients. For this reason, invoices may be requested in the following formats:

- Hard copy, large print or e-mail;
- Verbal description of content in person or by telephone.

4.3 Use of Service Animals and Support Persons

4.3.1 Service Animals and Guide Dogs

Service animals and guide dogs accompanying persons with disabilities are welcome on Acuren premises that are open to the public and other third parties, unless the animal is otherwise excluded by law. For example, certain dog breeds may be excluded by the provincial *Dog Owners' Liability Act* or by municipal by-laws. Additionally, there may be circumstances where allowing a service animal to accompany a person with a disability on Acuren premises might compromise the health and safety of another person. A common example would be allowing a guide dog near a person with a severe allergy to dogs. In such circumstances, Acuren will consider all relevant information to come up with a solution that meets the needs of both parties.

If it is not apparent that an animal accompanying a person with a disability is a service animal, Acuren may require the person to produce a letter from a physician or a nurse to verify the animal's role.

4.3.2 Support Persons

Where a person with a disability accessing Acuren goods or services is accompanied by a support person, Acuren employees, volunteers and third party contractors shall ensure that both persons are permitted to enter the premises together and shall ensure that the person with a disability can access the support person while on the premises.

Support persons accompanying people with disabilities are welcome at all Acuren premises that are open to the public. Permission will be obtained from the person with the disability prior to a discussion of a confidential nature taking place with the support person present.

4.4 Notice of Temporary Disruption

Acuren provides clients with notice in the event of a planned or unexpected disruption in the facilities or services usually used by persons with disabilities. This notice will include information about the reason for the disruption, the anticipated duration, and a description of alternative facilities or services, if available. The notice will be placed at all public entrances and reception counters on our premises.

4.5 Training for Employees

4.5.1 Acuren provides training to all employees, volunteers and others who regularly deal with the public or other third parties, and all those who are involved in the development and approval of customer service policies, practices and procedures.

4.5.2 Training includes the following:

- a) The purpose of the *Accessibility for Ontarians with Disabilities Act* or *The Accessibility for Manitobans Act* (depending on province the employee resides in), and the requirements of the customer service standard;
- b) How to interact and communicate with persons with various types of disabilities;
- c) How to interact with persons with disabilities who use an assistive device or require the assistance of a service animal or a support person;
- d) How to offer assistance if a person with a disability is having difficulty in accessing Acuren's goods and services; and
- e) Review of Acuren's policies, practices and procedures relating to the customer service standard.

Employees will also be trained on an ongoing basis when changes are made to these policies, practices and procedures. New employees will also be provided with such training upon hire.

4.6 Recruitment

Acuren posts information about the availability of accommodations for applicants with disabilities in its recruitment process. Acuren shall consult with any applicant who requests an accommodation in a manner that takes into account the applicant's disability. Successful applicants shall be notified about Acuren's policies for accommodating employees with disabilities as part of their offer of employment.

4.7 Support for an Employee with a Disability

4.7.1 Accessible Formats and Communication

Upon an employee's request, Acuren shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports, in a suitable format, for:

- a) Information that is needed in order to perform the employee's job; and
- b) Information that is generally available to employees in the workplace.

4.7.2 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 communications supports. If requested, the plans shall include individualized workplace emergency response information.

4.7.3 Performance Management and Career Development and Redeployment

Acuren shall take into account 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.

4.7.4 Workplace Emergency Response Information

If an employee's disability is such that workplace emergency response information is necessary and Acuren is aware of the need for accommodation, this information shall be provided to employees. In addition, this information shall be provided, with the employee's consent, to the person designated

to provide assistance. The information shall undergo review when the employee moves to a different location, when the employee's overall accommodation needs, or plans are reviewed and when Acuren reviews its general emergency response plan.

4.7.5 Return to Work Process

Acuren shall have 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 shall outline the steps that Acuren shall take to facilitate the return to work.

4.8 Policy Modifications

Acuren will modify or repeal any policy that is inconsistent with the principles set out in AODA or the *Accessibility for Manitobans Act*.

4.9 Notice of Availability of Documents

4.9.1 Acuren notifies the public that documents related to accessible customer service are available upon request by a notice posted on the company website and on publicly accessible bulleting boards in regional offices.

4.9.2 Acuren will provide this document in an accessible format or with communication support, on request. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and at no additional cost.

5.0 RESPONSIBILITIES

5.1 Employees

Employees are expected to understand their rights and responsibilities under this Policy. Employees are to provide a welcoming environment for people with disabilities and to facilitate requests for accommodation in a timely manner to the point of undue hardship. Employees are to attend training appropriate to the duties of their role to identify, prevent and remove accessibility barriers.

5.2 Managers

Managers are responsible to have thorough knowledge of this policy and provide leadership in building an inclusive and accessible environment. If supervising an employee with a disability, the Manager will provide the necessary support for the employee. Managers are to attend training and where applicable, ensure their staff receive training, appropriate to the duties of their role to identify, prevent and remove accessibility barriers.

6.0 FEEDBACK PROCESS

Acuren's goal is to meet or surpass customer expectations while serving all customers, including people with disabilities. Comments on our services relating to how well those expectations are being met are welcome and appreciated.

6.1 An accessible feedback process permits feedback to be given through multiple methods. Acuren is pleased to provide accessible formats and communication support for its feedback processes to persons with disabilities upon request.

- 6.2 Members of the Public and Customers may provide feedback on the way Acuren provides goods, services or facilities to people with disabilities via the methods provided below:
- a) In Person: 2190 Speers Road, Oakville, ON L6L 2X8
 - b) Toll free: 1-877-299-2857
 - c) Mail: Human Resources Department, 2190 Speers Road, Oakville, ON L6L 2X8
 - d) Email: hrcompliance@acuren.com
 - e) Website: www.acuren.com/contact-us/

All feedback will be acknowledged within 7 business days. Complaints will be addressed according to particular needs.

7.0 REFERENCES

Manitoba Human Rights Code

Ontario Human Rights Code

Accessibility for Ontarians with Disabilities Act, 2005

The Accessibility for Manitobans Act

8.0 CONTACT

For clarification of this policy, contact the HR Compliance Advisor at hrcompliance@acuren.com.

9.0 APPENDIX A – ACUREN’S MULTI-YEAR ACCESSIBILITY PLAN 2020-2025

Under the Accessibility for Ontarians with Disabilities Act (AODA), Ontario organizations are required to develop multi-year accessibility plan to help make Ontario accessible by 2025. Acuren believes in inclusion and is committed to meeting the needs of people who face accessibility barriers.

Policy

- Acuren will review the Accessibility policy annually and update as needed to ensure accessibility.
- Acuren will continue to post the Accessibility policy on our website available to the public.
- Acuren will make information available in an accessible format or provide communication supports to people with disabilities in a way that considers their disability upon request.

Information and Communications

- Ensure compliance with the required criteria of Web Content Accessibility Guidelines (WCAG) 2.0 Level AA by January 1, 2021.

Training

- Develop an accessibility training/awareness presentation for employees residing in Ontario and Manitoba by January 31, 2021.
- Ensure that applicable employees complete the Accessibility Training by June 30, 2021.
- Include the Accessibility Training in the orientation process for new hires into Ontario and Manitoba starting February 1, 2021.

Recruitment

- We will continue to confirm our commitment to accommodating employees with disabilities as per our Accessibility Policy.

Employment

- Acuren will maintain a documented return to work process for employees who require disability-related accommodations in order to return to work.

Feedback

- Acuren will take steps to prevent and remove any accessibility barriers identified by the public, employees and clients as requested.

Plan Review

- This plan will be reviewed as needed, at least every 5 years.