

Section #:	AODA Accessibility Policy and Plan	Date of Implementation	May 1, 2021
Policy ##:	AODA Employment Standards Policy - Ontario	Last Reviewed Date	Dec 1, 2023
Approved By:	VP, Human Resources	Authorized By:	Human Resources

Intent

Würth Canada Ltd. is dedicated to providing accessible services and work environment for all employees, prospective employees, and clients. This policy outlines the company’s compliance with Parts I and III of the *Integrated Accessibility Standards Regulation (IASR)* set forth under the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*. This policy ensures Würth Canada Ltd. provides services and employment practices that follow the principles of dignity, independence, integration, and equal opportunity.

Definitions

Accessible format: Includes large print, recorded audio and electronic formats, braille, and other formats usable by persons with disabilities. Communication supports Includes captioning, alternative and augmentative communication supports, plain language, sign language, and other supports that facilitate effective communication.

Information: Includes data, facts, and knowledge that exists in any format, including text, audio, digital, or images, and conveys meaning.

Career development and advancement: Additional responsibilities within an employee’s current position and the movement of an employee from one job to another in an organization or any combination of them. Both additional responsibilities and employee movement are usually based on merit, seniority, or a combination of both.

Performance management: Activities related to assessing and improving employee performance, productivity, and effectiveness with the goal of facilitating employee success.

Redeployment: The reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.

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

General Principles

Establishment of Accessibility Policies and Plans

Würth Canada Ltd. will develop, implement, and maintain policies governing how it will achieve accessibility through these requirements. The company is committed to meeting the accessibility needs of persons with

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disabilities in a timely manner. This is reflected in policies which upon request will be made publicly available in an accessible format. The company will establish, implement, maintain, and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR. Accessibility plans will be made available in an accessible format upon request, and will be posted on its website.

The company will review and update its accessibility plan once every five years and will establish, review, and update its accessibility plans in consultation with persons with disabilities or an advisory committee. Annual status reports will be prepared to report on the progress of the steps taken in implementing the companies' accessibility plan. This status report will be posted on our website. If requested, the report will be created in an accessible format.

Training Requirements

Wurth Canada Ltd. will provide training for its employees regarding the IASR and the Ontario *Human Rights Code* as they pertain to individuals with disabilities. Training will also be provided to individuals who are responsible for developing the companies' policies, and all other persons who provide goods, services, or facilities on behalf of the company. Training will be provided regularly to new employees and as changes to the companies' accessibility policies occur. Wurth Canada Ltd. will maintain records on the training provided, when it was provided, and the number of employees who were trained.

Recruitment, Assessment and Selection

Wurth Canada Ltd. will notify employees and the public about the availability of accommodation for job applicants who have disabilities. Applicants will be informed that these accommodations are available, upon request, for the interview process and for other candidate selection methods. Where an accommodation is requested, the company will consult with the applicant and provide or arrange for suitable accommodations in a manner that takes into account the applicant's accessibility needs due to disability. Successful applicants will be made aware of the company's policies and supports for accommodating people with disabilities.

Accessible Formats and Communication Supports for Employees

Wurth Canada Ltd. will ensure that employees are aware of policies for employees with disabilities and any changes to these policies as they occur. The company will provide the information required to new employees as soon as practicable after they begin their employment. If an employee with a disability requests it, the company will provide or arrange for the provision of accessible formats and communication supports for the following:

- Information needed in order to perform their job; and
- Information that is generally available to all employees in the workplace.

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The company will consult with the employee making the request to determine the best way to provide the accessible format or communication support.

Workplace Emergency Response Information

Where required, Wurth Canada Ltd. will create individualized workplace emergency response plans for employees with disabilities. This information will be created in consultation with the employee and take into account the unique challenges created by the individual’s disability and the physical nature of the workplace. This information will be reviewed when:

- The employee moves to a different physical location in the organization;
- The employee’s overall accommodation needs or plans are reviewed; or
- The company reviews general emergency response policies.

Documented Individual Accommodation Plans

Wurth Canada Ltd. will develop and have in place written processes for documenting individual accommodation plans for employees with disabilities. The development process for these plans will include:

- The ways in which the employee can participate in the development of the plan;
- The means by which the employee is assessed individually;
- The ways that an employer can request an evaluation by an outside medical expert, or other experts (at the employer’s expense) to determine whether accommodation can be achieved, or how it can be achieved;
- The ways that an employee can request the participation of a representative from their bargaining agent or other representative from the workplace (if the employee is not represented by a bargaining agent) for the creation of the accommodation plan;
- The steps taken to protect the privacy of the employee’s personal information;
- The frequency with which the individual accommodation plan should be reviewed or updated and how it should be done;
- The way in which the reasons for the denial of an individual accommodation plan will be provided to the employee; and
- The means of providing the accommodation plan in an accessible format, based on the employee’s accessibility needs.

The individual accommodation should also include information regarding accessible formats, communication supports (upon request), individualized workplace emergency response information, and any other accommodation provided.

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Return to Work

Würth Canada Ltd. will develop and implement return-to-work processes for employees who are absent from work due to a disability and require disability-related accommodations in order to return to work. This process will outline the steps the company will take to enable a smooth return to work for the employee. All steps and individual accommodation plans will be documented and created in consultation with the employee.

Performance Management and Career Changes

Würth Canada Ltd. will consider the accessibility needs, including documented individual accommodation plans, of employees with disabilities during the company's performance management process. These will also be considered in the event of redeployment, or when offering career development or advancement opportunities.

Review

This policy will be reviewed regularly to ensure that it reflects current practices of Würth Canada Ltd. as well as legislative requirements.

Questions:

Please reach out to our Accessibility team as follows: accessibility@wurth.ca