

The Company Multi-Year Accessibility Plan

ONTARIO, CANADA

Introduction and Statement of Commitment

In 2005, the government of Ontario passed the Accessibility for Ontarians with Disabilities Act (the “AODA”). The AODA requires that effective January 1, 2014, Upper Canada Forest Products (the “Company”) 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 and to meet its requirements of the Integrated Accessibility Standards (the “IAS”).

This multi-year accessibility plan (the “Accessibility Plan”) outlines the Company’s strategy to prevent and remove barriers for persons with disabilities and to address the current and future requirements of the IAS in order that the Company may fulfill its commitment as outlined in the Company’s Integrated Accessibility Standards Policy for Ontario, Canada (the “Policy”). Please also refer to our Customer Service Policy for information on how we strive to provide accessible goods, services and facilities to every member of the public.

General Accessibility Standards

Requirement	Responsible Individual/Department	Action	Status
<p>Accessibility Policy</p> <p>Develop, implement and maintain polices governing how The Company achieves or will achieve accessibility through meeting the requirements of the IAS.</p> <p>Statement of organizational commitment to meeting the accessibility needs of persons with disabilities in a timely manner.</p>	Human Resources Department	Human Resources will create and implement a written policy and a statement of commitment which will be included in our Human Resource Policies, along with an overarching statement with reference to the Policy inserted in the Team Member Handbook. This policy can be available and made publicly available upon request.	Complete
<p>Multi-Year Accessibility Plan</p> <p>Establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under this Regulation Post the accessibility plan on the website and provide the plan in an accessible format upon request.</p> <p>Review and update the accessibility plan at least once every five years.</p>	Human Resources Department	<p>Review the requirements of the IAS and determine how the Company will meet all of the requirements and work towards preventing and removing barriers to accessibility.</p> <p>Post the accessibility plan on the Company's website.</p> <p>Review and update the accessibility plan as often as necessary but at least every 5 years. Diarize first review to take place no later than January 1, 2019.</p>	Complete and Ongoing
<p>Training</p> <p>Provide training to all existing employees, volunteers and all persons who participate in the development of AODA Policies.</p> <p>Training must include:</p> <p>i. the requirements of the IAS; the Human Rights Code as it pertains to persons with disabilities; and</p> <p>ii. the AODA Policies as required by the IAS.</p> <p>Keep a record of the training provided, including the dates on which the training is provided and the number of individuals to whom it is provided.</p>	Human Resources Department	<p>Online training on the requirements of the IAS, and the Human Rights Code as it pertains to persons with disabilities has been provided to all employees. Training on how to communicate and serve persons with various types of disabilities has also been provided to employees.</p> <p>Training has been incorporated into the Company's onboarding process and records of the training provided are maintained.</p>	Complete and Ongoing

Information and Communication Standards

Requirement	Responsible Individual/Department	Action	Status
<p>Feedback</p> <p>Ensure that processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of Accessible Formats and Communications Supports, upon request.</p> <p>Notify the public that Accessible Formats and Communications Supports are available in respect of its feedback procedures.</p>	Human Resources and Marketing Department	<p>Human Resources is responsible for providing Accessible Formats and Communication Supports if requested by an employee in the course of utilizing any internal feedback process.</p> <p>The Marketing Department is responsible for providing Accessible Formats and Communication Supports to a customer who requests same in the course of utilizing a Company feedback process.</p> <p>Notification of the availability of Accessible Formats and Communication Supports will be posted on the Company's website.</p>	Complete
<p>Accessible Formats and Communication Supports</p> <p>Upon request, provide or arrange for the provision of Accessible Formats and Communication Supports in order to make its communications or information about the goods, services and/or facilities it offers accessible to persons with disabilities.</p> <p>Provide Accessible Formats and Communication Supports in a timely manner at a cost that is no more than the regular cost charged to other persons and in a manner that takes account the person's accessibility needs due to disability.</p> <p>Consult with the person making the request when determining the suitability of an Accessible Format or Communication Support and notify the public of the availability of same.</p>	Human Resources Department	<p>Training on the need to provide Accessible Formats and Communication Supports upon request has been provided to all employees.</p> <p>Notification of the availability of Accessible formats will be posted on the Company's website.</p>	Complete and Ongoing
<p>Accessible Websites and Web Content</p> <p>Ensure that, where practicable, a New Internet Website and web content on such site(s) conforms with WCAG 2.0 Level A.</p> <p>By January 1, 2021 ensure that, where practicable, any website or content on that site(s) published after January 1, 2012 conforms with WCAG 2.0 Level AA to the extent required by the IAS.</p>	IT Department	<p>The Company will ensure IT Personnel and the Marketing Department who is responsible for management of the Company's website are aware of the requirements to create an accessible website and the timelines for so doing.</p> <p>The Company will ensure its website meets the applicable accessibility standards by January 1, 2021.</p>	Ongoing



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Information and Communication Standards (continued)

Requirement	Responsible Individual/Department	Action	Status
<p>Accessible Websites and Web Content</p> <p>Ensure that, where practicable, a New Internet Website and web content on such site(s) conforms with WCAG 2.0 Level A.</p> <p>By January 1, 2021 ensure that, where practicable, any website or content on that site(s) published after January 1, 2012 conforms with WCAG 2.0 Level AA to the extent required by the IAS. Statement of organizational commitment to meeting the accessibility needs of persons with disabilities in a timely manner.</p>	IT Department	<p>The Company will ensure IT personnel the Marketing Department who is responsible for management of the Company's website are aware of the requirements to create an accessible website and the timelines for so doing.</p> <p>The Company will ensure its website meets the applicable accessibility by January 1, 2021.</p>	Ongoing

Employment Standards

Requirement	Responsible Individual/Department	Action	Status
<p>Recruitment, Assessment and Selection</p> <p>Notify the public and employees about the availability of accommodation for applicants with disabilities in its recruitment processes.</p> <p>Notify 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.</p> <p>Consult with an applicant requesting accommodation to provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.</p>	Human Resources Department	When candidates participate in the recruitment, assessment and selection process they receive an auto response directed to their email notifying them of the availability of accommodation during the recruitment, assessment and selection process.	Ongoing - we are in the midst of implementing a new HRIS system, so this will be transferred from our current platform to the new platform once rolled out in Sept/Oct 2018
<p>Notice to Successful Applicants</p> <p>Notify successful applicants of The Company's policies for accomodating employees with disabilities.</p>	Human Resources Department	The Company will develop a clause to be added to offer letters that will serve to notify successful applicants about the Company's policies on accommodating employees with disabilities.	Complete
<p>Informing Employees of Supports</p> <p>Inform employees of policies used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.</p> <p>Provided to new employees as soon as practicable after commencing employment.</p> <p>Provide employees with updated information whenever there is a material change to its policies on the provision of job accommodations for employees with disabilities.</p>	Human Resources Department	<p>The Company's training program will notify all existing employees of the Company's policies to support employees with disabilities.</p> <p>In addition - all new hires receive a copy of the Individual Accommodation and Return to Work Policy.</p>	Complete

Employment Standards (continued)

Requirement	Responsible Individual/Department	Action	Status
<p>Accessible Formats and Communication Supports for Employees</p> <p>Upon the request of an employee with a disability, provide or arrange for the provision of Accessible Formats and Communication Supports in order to ensure that (i) information required by the employee to perform his/her job; and (ii) information generally available to employees in the workplace, is accessible to the employee with a disability.</p> <p>Consult with the employee making the request to determine the suitability of any Accessible Format or Communication Support. However, where the needs of an employee with a disability may be accommodated in various different ways, The Company reserves the right to determine the type Accessible Format or Communication Support that will be provided in the circumstances.</p>	<p>Human Resources Department and Managers</p>	<p>Managers will be trained on the requirement to provide Accessible Formats and Communication Supports to employees upon request as well as the need to consult with the employee to determine how their needs may be met.</p> <p>Managers will be instructed to contact Human Resources where assistance in providing Accessible Formats and Communication Supports is required.</p>	<p>Complete</p>
<p>Accessible Formats and Communication Supports for Employees</p> <p>Provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if the Company is aware of the need for accommodation due to the employee's disability.</p> <p>Provide this information as soon as practicable after becoming aware of the need for accommodation.</p> <p>With the consent of the employee, provide the workplace emergency response information to the person designated by the Company to provide assistance to the employee if the employee needs assistance by reason of disability</p> <p>Review individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodation needs or plans are reviewed and when the company reviews its general emergency response policies.</p>	<p>Human Resources Department and Managers</p>	<p>MA notice about the availability of individualized workplace emergency response information was posted on the health and safety bulletin board in each store.</p> <p>Employees were also notified about the availability of individualized emergency response information during AODA training.</p> <p>Managers will receive training on the requirement to provide individualized emergency response information to ensure that they notify Human Resources if they become aware of an employee who would require such information. Managers and Human Resources will also receive training on the circumstances that would trigger the need to review individualized emergency response information</p>	<p>Complete</p>

Employment Standards (continued)

Requirement	Responsible Individual/Department	Action	Status
<p>Documented Individual Accommodation and Return to Work Plans</p> <p>Have in place a written process for the development of documented individual accommodation plans for employees with disabilities. The process must include the following elements:</p> <ol style="list-style-type: none"> 1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. 2. The means by which the employee is assessed on an individual basis. 3. The manner in which the Company can request an evaluation by an outside medical or other expert, at its own expense, to assist in determining if accommodation can be achieved and, if so, how accommodation can be achieved. 4. The manner in which the employee can request the participation of a representative from his or her bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan. 5. The steps the Company will take to protect the privacy of the employee's personal information. 6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done. 7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee. 8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability. <p>Where requested, an employee's individual accommodation plan will include any information regarding the provision of Accessible Formats and Communications Supports.</p> <p>Where required, an employee's individual accommodation plan will include individualized workplace emergency response information.</p>	<p>Human Resources Department and Store Managers</p>	<p>The Company has a written process and policy for the development of individual accommodation and return to work plans for employees with disabilities that takes into account all of the elements set out in the IAS.</p> <p>Human Resources (with the support of the appropriate manager) will be responsible for the creation of documented individual accommodation and return to work plans as well as the management of the accommodation process generally.</p>	<p>Complete</p>

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Employment Standards (continued)

Requirement	Responsible Individual/Department	Action	Status
<p>Performance Management</p> <p>Take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.</p>	Human Resources Department and Managers	We are in the midst of implementing a performance management process, with our new HRIS system. This will be taken into account when clearly determining what constitutes performance.	In process
<p>Career Development and Advancement</p> <p>Take into account the accessibility needs of employees with disabilities as well as any individual accommodation plans when providing career development and advancement to employees with disabilities..</p>	Human Resources Department and Managers	As we develop our Talent approach, we will take into account the accessibility needs of employees with disabilities and any IAP's when providing career development opportunities.	In process
<p>Redeployment</p> <p>Take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.</p>	Human Resources Department and Managers	Managers need to discuss with Human Resources all movement of staff to ensure that accessibility needs of employees are taken into account.	Complete

Design of Public Places (The following requirements only apply to public spaces that are newly constructed or redeveloped on and after January 1, 2017.)

Description	Responsible Individual/Department	Action	Status
<p>Exterior Paths of Travel</p> <p>Ensure that any exterior paths of travel, such as outdoor sidewalks and walkways, ramps, stairs and curb ramps that it constructs or redevelops and intends to maintain meet the technical requirements of the Design of Public Places Standards.</p>	Operations	An exterior step was removed and replaced with a small ramp to ensure it is accessible to all employees.	Complete
<p>Off-Street Parking</p> <p>Ensure that when the Company constructs new or redevelops off-street parking facilities that it intends to maintain, the off-street parking facilities meet the requirements of the Design of Public Places Standards.</p> <p>Off-street parking is a space where you can park your vehicle temporarily that is not on a public road or street.</p>	Operations	Parking lot design meets all requirements.	Complete
<p>Obtaining Services</p> <p>Ensure that the Company meets the requirements of the Design of Public Places Standards in respect of the following:</p> <ol style="list-style-type: none"> All newly constructed service counters and fixed queuing guides. All newly constructed or redeveloped waiting areas. 	Operations	Maintenance plans will be developed as required should the Company redevelop or construct accessible elements in future.	N/A
<p>Maintenance</p> <p>Ensure accessibility plans include:</p> <ol style="list-style-type: none"> Procedures for preventative and emergency maintenance of the accessible elements in public spaces. Procedures for dealing with temporary disruptions when accessible elements required are not in working order. 	Operations	Maintenance plans will be developed as required should the Company redevelop or construct accessible elements in the future.	In progress