



HAWK PLASTICS LIMITED: ACCESSIBILITY POLICY

PURPOSE:

Hawk Plastics Limited is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence.

We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and by meeting our accessibility requirements under the ***Accessibility for Ontarians with Disabilities Act*** (“AODA”) and Ontario’s accessibility laws.

The Company is committed to meeting its current and ongoing obligations under the Ontario *Human Rights Code* respecting non-discrimination.

APPLICATION AND SCOPE:

This Policy is made pursuant to the requirements of the ***Accessibility for Ontarians with Disabilities Act, 2005*** (“AODA”) and the ***Integrated Accessibility Standards Regulation*** (“IAS Regulation”) of the AODA and addresses how the Company will achieve accessibility.

The Company understands its obligations under the AODA and its accessibility standards do not substitute or limit its obligations under the ***Ontario Human Rights Code*** or obligations to people with disabilities under any other law.

The Company is committed to excellence in serving and providing goods, services or facilities to all customers including people with disabilities. Our accessible customer service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

This Policy will be reviewed and updated as necessary at least every five years and posted on our website.

For purpose of this Policy and Plan, “disability” is defined as follows:

- 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,
- a condition of mental impairment or a developmental disability,
- a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,

- a mental disorder, or an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

TRAINING:

The Company is committed to and provides training to all its employees and volunteers in accessible customer service, other Ontario's accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities.

In addition, the Company will train:

- all persons who participate in developing its policies; and
- all other persons who provide goods, services or facilities on behalf of the Company.

The training includes:

- (a) purpose of the ***Accessibility for Ontarians with Disabilities Act, 2005*** and the requirements for the provision of accessible Customer Service Standards
- (b) Training on ***the Ontario Human Rights Code*** as it related to persons with disabilities
- (c) on the requirements of the ***Integrated Accessibility Standards Regulation*** ("IAS Regulation") as appropriate to duties of the employees, volunteers, and other persons, including:
 - i. Information and Communication Standards;
 - ii. Employment Standards;
 - iii. Design of Public Spaces Standard; and
 - iv. Transportation Standards.

Training is provided as soon as practicable after an employee or volunteer joins the Company and on an on-going basis whenever this Policy is updated or modified.

The Company has flexibility to determine the training needs and the way in which employees, volunteers, or other persons are trained.

Staff may be trained at:

- a) An Orientation Session
- b) A mandatory Online module
- c) In a Conference/Staff Group Setting
- d) Or other formats that work best for the Company.

The Company maintains records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided.

Whenever this Policy is subject to updates or amendments, Staff members will be re-trained by means of on-site training, through online modules, or other formats that work best for the Company.

INFORMATION AND COMMUNICATION STANDARDS:

The Company communicates with people with disabilities in ways that take into account their disability. All employees are trained during the on-boarding process and annually on how to interact

and communicate effectively with people with various types of disabilities. The company will consult with the individual making the request to determine the suitability of the format or support.

The Company shall communicate with people with disabilities in the following manners:

- a) Digital files
- b) Large prints sans-serif type face
- c) Text Transcripts
- d) Email, Text, Letter mail, Telephone
- e) Third-party sign-language interpreter

The Company will work with persons with disabilities to determine what method of communication works best for them.

Accessible Formats and Communication Supports:

The Company has a process for receiving and responding to feedback and this process is accessible to persons with disabilities upon request.

Upon request, and in accordance with the compliance schedule set out in the IAS Regulation, the Company will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner and at a cost that is not greater than the cost charged to other persons, if any. The Company will consult with the person making the request to determine the suitability of an accessible format or communication support and notify the public about the availability of these formats and supports.

The Company shall provide the requestor with

- a) An explanation as to why the information or communications are unconvertible; and
- b) A summary of the unconvertible information or communications.

The Company will notify the public about the availability of accessible formats and communication supports by

In person: 5295 Burke Street, Old Castle, Plant 1 Reception Area

Telephone: 519-737-1452 extension 230

Email: mcolella@hawkplastics.com

Mail: Attention Human Resources Manager

Plant 1

5295 Burke Street

Old Castle, Ontario

N9G 0B9

Our Information technology websites meet internationally recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA requirements in accordance with Ontario's Accessibility laws.

Emergency Information:

Where the Company prepares emergency procedures, plans or public safety information and makes such information available to the public, it shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

EMPLOYMENT STANDARDS:

The Company is committed to ensuring that its employment practices comply with the *AODA, IAS Regulation* and the *Ontario Human Rights Code*.

The Company notifies employees, job applicants, and the public that accommodations can be made during the recruitment and hiring processes. The Company commits that it will continue to notify employees, job applicants, and the public about its accommodation process. Upon request, the Company will consult with the individual about their accommodation needs to provide adjustments and arrangements to their job responsibilities or the workplace suited to the supports that they need.

Recruitment:

The Company welcomes and encourages applications from candidates with disabilities. Accommodations are available upon request for candidates participating in the selection process, as publicized in our job postings. The Company notifies selected candidates involved in the selection process that accommodations are available upon request, including accommodation requests for the interview stages. We consult with all applicants who request disability-related accommodations to arrange suitable accommodations in response to their individual accessibility needs, including accessible formats and/or communication supports.

Successful applicants are informed about the Company's policies on disability-related accommodations when offers of employment are extended. Whenever a selected applicant requests an accommodation, the Company consults with the applicant and provides or arranges for suitable accommodation in a manner that considers the applicant's accessibility needs due to a disability.

Our employees and staff are notified about available supports for individuals with disabilities as soon as practicable upon the commencement of their employment or volunteer relationship. The Company provides updated information and training to staff whenever there is a change to our existing accessibility or accommodations policies.

Accessible Formats & Communication Supports for Staff:

The Company consults with its Staff at every stage of the employment cycle for coordinating the provision of suitable accommodation in a manner that considers the accessibility needs due to disability. Whenever an individual requests disability-related accommodations, the Company will also consult with the person in determining the suitability of an accessible format or communication supports, specifically for:

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

Performance Management, Career Development and Advancement, Redeployment:

The Company has a written process to develop an individual accommodation plans for employees.

The Company is committed to support every employee, including individuals with disabilities, in their professional advancement within this organization.

The Company has a written process for employees who have been absent from work due to disability and require disability-related accommodations in order to return to work.

Our performance management, career development, and redeployment processes consider the accessibility needs of all employees.

Workplace Emergency Response Information:

The Company, where needed, will provide individualized workplace emergency response information to assist an employee with disability during an emergency. With the employee's consent, the Company will provide workplace emergency information to a designated person who is providing assistance to that employee during an emergency. The Company provides this information as soon as practicable after becoming aware of the need for accommodation.

Upon consultation with the individual, the Company will provide an individualized workplace emergency response plan information according to their disability-related needs. If needed, this may include alternate formats that accommodate their disability-related needs.

The Company will review the individualized workplace emergency response information:

- a) When the employee moves to a different location in the organization;
- b) When the employee's overall accommodations needs or plans are reviewed; and
- c) When the employer reviews its general emergency response policies.

CUSTOMER SERVICE POLICY:

The Company is committed to excellence in serving all customers, including people with disabilities. Our accessible customer service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

We will do so by removing and preventing barriers to accessibility and by meeting our accessibility requirements under Ontario's accessibility laws and our obligations under the *Human Rights Code*.

UNIVERSAL PROTOCOLS:

- Person-First Language: Always refer to the person first, then the disability ("a person who is blind" rather than "a blind person").
- Direct Engagement: Always speak directly to the individual, even if they are accompanied by a support person or sign language interpreter.
- Autonomy: Do not touch a person, their assistive device (wheelchair, cane), or their service animal without their express permission.
- Patience: Allow the individual to set the pace of the interaction. Do not finish their sentences or rush their movements.

SERVING PERSONS WITH PHYSICAL OR MOBILITY DISABILITIES:

- Eye Level: If an interaction lasts longer than a few moments, pull up a chair so that you are at eye level with the person using a wheelchair or scooter.
- Clear Paths: Ensure counters are clear and pathways are wide enough for a 360-degree turn.

- Non-Interference: Never lean on or push a person's wheelchair. It is considered an extension of their personal body space.

SERVING PERSONS WHO ARE BLIND OR HAVE LOW VISION:

- Identification: Always identify yourself and your role when you approach.
- Verbal Precision: Use precise descriptive language. Instead of saying "It's over there," say "The exit is ten paces to your right."
- Departure: Always announce when you are leaving the conversation or the room so the individual is not left speaking to empty space.
- Document Support: Offer to read written information aloud or provide it in large print or digital formats.

SERVING PERSONS WHO ARE DEAF, ORAL DEAF, DEAFENED, OR HARD OF HEARING:

- Attracting Attention: Attract the person's attention with a gentle wave or a light touch on the shoulder before speaking.
- Visibility: Face the person directly. Ensure your face is well-lit and avoid covering your mouth while speaking, as many individuals rely on lip-reading or facial expressions.
- Environment: Reduce background noise if possible, as it can interfere with hearing aids.
- Alternatives: If verbal communication is ineffective, offer a pen and paper or use a digital messaging device.

SERVING PERSONS WITH DEVELOPMENTAL DISABILITIES:

- Plain Language: Use clear, simple sentences and avoid technical dialect or complex metaphors.
- Verification: Ask the person to repeat back information or confirm their understanding.
- Concrete Concepts: Use concrete examples rather than abstract ideas to explain processes or instructions.
- Respectful Tone: Speak in a natural, adult tone. Never use "baby talk" or a patronizing voice.

SERVING PERSONS WITH LEARNING DISABILITIES:

- Multi-Modal Delivery: Provide information in more than one way (explain it verbally while also providing a written summary).
- Time Allocation: Give the individual extra time to read, process, or sign documents.
- Demonstration: Offer to demonstrate a task rather than providing only written instructions.

SERVING PERSONS WITH MENTAL HEALTH DISABILITIES:

- Calm Demeanour: Maintain a calm, non-confrontational, and professional tone.
- Flexibility: Be prepared to repeat information or move the conversation to a quieter, more private area if the individual appears overwhelmed.
- Focus on the Goal: Focus the conversation on the specific service or task at hand rather than the individual's behaviour or symptoms.

SERVING PERSONS WITH SPEECH OR LANGUAGE IMPAIRMENTS:

- Active Listening: Give the person your full attention. Do not interrupt or try to finish their sentences.

- Clarification: If you do not understand, do not pretend you do. Politely ask them to repeat the information or try an alternative method (could you spell that for me? would you like to write that down?).
- Binary Questions: Where helpful, ask "yes" or "no" questions to simplify the exchange.

Assistive Devices:

People with disabilities may use their personal assistive devices when accessing our goods, services or facilities.

In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with a disability can access our goods, services or facilities.

The Company will ensure that our Staff are trained and familiar with various assistive devices we have on site, or that we provide, that may be used by customers with disabilities while accessing our goods, services, or facilities.

Communication:

The Company communicates with people with disabilities in ways that take into account their disability.

Removing barrier is a key focus. As such the company shall communicate with persons with disabilities by the following methods:

Email: Large font, above 16 point, sans-serif type face

Telephone Services. Personnel is trained on engaging in telephone communications in a clear and plain language, with attention for speaking clearly and slowly

Website: Under the Accessibility tab the Company's AODA Policy, Feed Back Process and Emergency Response Process are available

Website: Under the accessibility tab, the Hawk Plastic Limited Safety video available detailing accommodation requests for guests, customers, third-party vendors and contractors

Plant 1 Waiting Area: All visitors, incumbents, customers, third-party visitors and contractors must sign in to view the Hawk Plastics Safety video providing accommodation requests instructions

Third-Party Sign Language Interpreter: Available upon request for incumbents during the interview process, on-boarding process and for employees.

Letter mail: Large font, above 16 point, sans-serif type face

We will work with the person with a disability to determine what method of communication works for them.

Service Animals:

The Company welcomes people with disabilities and their service animals. Service animals are allowed on the parts of our premises which is open to the public and/or third parties.

When we cannot easily identify whether an animal is a service animal, our staff may ask the individual to provide documentation from a regulated health professional that confirms the individual needs the service animal for reasons relating to their disability.

The Company acknowledges that a service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

A regulated health professional is defined as a member of one of the following colleges:

- College of Audiologists and Speech-Language Pathologists of Ontario
- College of Chiropractors of Ontario
- College of Nurses of Ontario
- College of Occupational Therapists of Ontario
- College of Optometrists of Ontario
- College of Physicians and Surgeons of Ontario
- College of Physiotherapists of Ontario
- College of Psychologists of Ontario
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

If service animals are prohibited by another law, we will ensure the customer with disabilities can access our goods, services or facilities by explaining why the animal is excluded and discussing with the customer another way of providing goods, services or facilities.

Service Animals are prohibited from the following areas:

Due to Health and safety Concerns, service animals are prohibited from the Plant 1 and Plant 6 Production Floors, the Plant 4 Safe Launch/Tooling Floor and the Plant 3 Shipping and Receiving Floor. However, to ensure equal access as an alternative method of accommodation for restricted areas, the organization has dedicated, trained “Buddies” such as The Human Resource Manager, President, Director of Operations, Managers and Supervisors who will safely accompany the individual to provide guidance and assistance. Their service animal remains in the Plant 1 or Plant 6 office areas.

Support Persons:

A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises.

Support persons accompanying an individual will be admitted to our premises at no charge.

In certain cases, the Company might require a person with a disability to be accompanied by a support person for the health or safety reasons of the person with a disability or others on the premises.

Before making such a decision, the Company will:

- Consult with the person with disability to understand their needs;
- Consider health or safety reasons based on available evidence;
- Determine if there is no other reasonable way to protect the health or safety of the person or others on the premises.

If the Company determines that a support person is required, we will waive the admission fee or fare (where applicable) for the support person.

NOTICE OF TEMPORARY DISRUPTION:

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, the Company will notify customers promptly. Clearly posted notices will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available.

Services and Facilities:

- a) Accessible washrooms facilities
- b) Designated accessible parking spaces in the Plant 1 and Plant 6 Manager lots
- c) The company's website and ordering portal
- d) Plant 1 and Plant 6 waiting areas

The notice will be made publicly available as follows: by email, telephone, on the Company's website, social media and/or by posted notice on the premises.

Feedback Process:

The Company welcomes feedback on how we provide accessible customer service. Customers feedback is crucial to help the Company identify barriers and respond to concerns.

The Company will make sure our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request.

Feedback on the way the Company provides goods, services or facilities to people with disabilities can provide feedback in the following way(s):

In-person at: 5295 Burke Street, Plant 1, Old Castle Ontario, N9G 0B9

By telephone by calling: 519-737-1452 extension 230

By email to: mcolella@hawkplastics.com

By mail to: 5295 Burke Street, Plant 1, Old Castle Ontario, N9G 0B9

All feedback received, including complaints, will be reviewed within a reasonable time period and the Company, will take all appropriate steps to address any issues raised.

All complaints will be processed in accordance with the Company's complaints process. Customers can expect to hear back in two to four days.

ACCESSIBILITY STANDARDS FOR OUR FACILITIES:

The Company is committed to designing our premises and related disruption free from barriers and accessible to all persons we serve, including individuals with disabilities. Where appropriate, the Company will provide necessary modifications and adjustments to our premises to accommodate persons with disabilities. The Company will comply with the Design of Public Spaces Standards with respect to public spaces that are newly constructed or redeveloped in accordance with the requirements of the IAS Regulation.

References:

- Accessible Customer Service Policy
- *Accessibility for Ontarians with Disabilities Act, 2005*
- Regulation 191/11 made under the *Accessibility for Ontarians with Disabilities Act, 2005* (Integrated Accessibility Standards)

Notice of Temporary Disruption:

The Company will notify about unexpected or planned disruption within our facilities or services generally used by people with disabilities. All notices will provide necessary information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, where available.

NOTICE OF AVAILABILITY OF DOCUMENTS:

The Company notifies the public that documents related to accessible customer service are available upon request by posting a notice in the following location(s)/way(s):

- a) The company website
- b) Social Media
- c) Employee on-boarding package
- d) Plant 1 waiting area-mandatory Hawk Plastics Limited Safety Video
- e) Posted on Health and Safety Boards in Plants 1, 2, 3, and 6

The Company will provide these documents 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 costs.

Self-Service Kiosks:

Hawk Plastics Limited shall have regard to the accessibility for persons with disabilities when designing, procuring, or acquiring self-service kiosks. We will ensure that accessibility features are considered to meet the needs of our customers and visitors, such as screen readability, height for wheelchair access, and tactile keyboard options where applicable

Changes to existing Policies:

Any policies from the Company that do not respect and promote the principles of dignity, independence, integration and equal opportunity for people with disabilities will be modified or removed.

REVIEW OF THE POLICY:

This Policy will be reviewed and may be amended from time to time based on the needs and experiences of the Company.

ACKNOWLEDGEMENT & AGREEMENT:

I acknowledge that I have read, understand the contents herein, and agree to abide by the Accessibility Policy.

SIGNATURE: _____
Employee

NAME: _____
Print

DATE: _____