

## **INTEGRATED ACCESSIBILITY STANDARDS POLICY**

The following policy has been established by K+S Windsor Salt Ltd. to govern the provision of services with Regulation 191/11, "Integrated Accessibility Standards" ("Regulation") under the *Accessibility for Ontarians with Disabilities Act, 2005*.

K+S Windsor Salt Ltd. is governed by this policy as well as the Accessibility Standards for Customer Service Policy and the *Accessibility for Ontarians with Disabilities Act, 2005* in meeting the accessibility needs of persons with disabilities.

### **Commitment**

K+S Windsor Salt Ltd. is committed to treating all people in a way that allows them to maintain their dignity and independence. We are committed to meeting the needs of persons with disabilities in a timely manner, and will do so by preventing and removing identified barriers to accessibility and meeting accessibility requirements under the *Accessibility for Ontarians with Disabilities Act*.

This policy will be implemented in accordance with the time frames established by the Regulation.

### **Accessibility Plan**

K+S Windsor Salt Ltd. will develop, maintain and document an Accessibility Plan outlining the company's strategy to prevent and remove identified barriers from its workplace and to improve opportunities for persons with disabilities.

The Accessibility Plan will be reviewed and updated at least once every five years, and will be posted on the company's website. Upon request, K+S Windsor Salt Ltd. will provide a copy of the Accessibility Plan in an accessible format.

### **Training Employees and Volunteers**

K+S Windsor Salt Ltd. will ensure that training is provided on the requirements of the accessibility standards referred to in the Regulation and continue to provide training on the *Human Rights Code* as it pertains to persons with disabilities, to:

- all its employees;
- all persons who participate in developing K+S Windsor Salt Ltd.'s policies; and,
- all other persons who provide goods, services or facilities on behalf of the company

The training will be appropriate to the duties of the employees and other persons.

Employees will be trained when changes are made to the accessibility policy. New employees will be trained during Health and Safety Orientation.

K+S Windsor Salt Ltd. will keep a record of the training it provides.

## **INFORMATION AND COMMUNICATIONS STANDARDS**

### **Feedback**

K+S Windsor Salt Ltd. will continue to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communications supports, upon request.

### **Accessible Formats and Communication Supports**

Upon request, K+S Windsor Salt Ltd. will provide, or will arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability.

K+S Windsor Salt Ltd. will consult with the person making the request in determining the suitability of an accessible format or communication support.

K+S Windsor Salt Ltd. will also notify the public about the availability of accessible formats and communication supports.

### **Accessible Websites and Web Content**

K+S Windsor Salt Ltd. will ensure that our Internet websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level A except where this is impracticable.

## **EMPLOYMENT STANDARDS**

### **Recruitment**

K+S Windsor Salt Ltd. will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

### **Recruitment, Assessment or Selection Process**

K+S Windsor Salt Ltd. will notify job applicants, when they are individually selected to participate further in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.

If a selected applicant requests an accommodation, K+S Windsor Salt Ltd. will consult with the applicant and 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.

### **Notice to Successful Applicants**

When making offers of employment, K+S Windsor Salt Ltd. will notify the successful applicant of its policies for accommodating employees with disabilities.

### **Informing Employees of Supports**

K+S Windsor Salt Ltd. will continue to inform its employees of its policies (and any updates to those 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. This information will be provided to new employees as soon as practicable after commencing employment.

### **Accessible Formats and Communication Supports for Employees**

Upon the request of an employee with a disability, K+S Windsor Salt Ltd. will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his/her job, and information that is generally available to other employees. In determining the suitability of an accessible format or communication support, K+S Windsor Salt Ltd. will consult with the employee making the request.

### **Workplace Emergency Response Information**

K+S Windsor Salt Ltd. will 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 K+S Windsor Salt Ltd. is aware of the need for accommodation due to the employee's disability. K+S Windsor Salt Ltd. will provide this information as soon as practicable after becoming aware of the need for accommodation.

Where the employee requires assistance, K+S Windsor Salt Ltd. will, with the consent of the employee, provide the workplace emergency response information to the person designated by K+S Windsor Salt Ltd. to provide assistance to the employee.

K+S Windsor Salt Ltd. will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodations needs or plans are reviewed.

### **Documented Individual Accommodation Plans**

K+S Windsor Salt Ltd. will maintain a written process for the development of documented individual accommodation plans for employees with disabilities.

If requested, information regarding accessible formats and communications supports provided will also be included in individual accommodation plans.

In addition, the plans will include individualized workplace emergency response information (where required), and will identify any other accommodation that is to be provided.

### **Return to Work Process**

K+S Windsor Salt Ltd. maintains a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

The return to work process outlines the steps K+S Windsor Salt Ltd. will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

This return to work process will not replace or override any other return to work process created by or under any other statute (ie. the *Workplace Safety Insurance Act, 1997*).

## **Performance Management, Career Development and Advancement & Redeployment**

K+S Windsor Salt Ltd. will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.

### **Questions about this policy**

This policy has been developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment. If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation will be provided by the Human Resources Manager (519-972-2233).

# ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

## INTEGRATED ACCESSIBILITY STANDARDS – Multi Year Plan

### Part I – GENERAL REQUIREMENTS

Section	Initiative	Description	Action	Status	Compliance Date
3	Establishment of Accessibility Policies	3.(1) Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this Regulation.	Review completed policy with Management for approval. Post on website for public access.	Completed.	January 1, 2014
4	Accessibility Plans	4.(1) Large organizations shall,  a) 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;  b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and  c) review and update the accessibility plan at least once every five years.	Attended a public workshop. Review completed plan with Management for approval.  Post on website for public access.  HR and Safety to review every 5 years.	Completed	January 1, 2014

7	Training	<p>7.(1) Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to,</p> <ul style="list-style-type: none"> <li>(a) all employees, and volunteers;</li> <li>(b) all persons who participate in developing the organization's policies; and</li> <li>(c) all other persons who provide goods, services or facilities on behalf of the organization.</li> </ul>	<p>Annual Legal Compliance Training for Staff.</p> <p>Review training for bargaining unit employees.</p> <p>Determine methods and timing for training.</p> <p>Determine who will conduct the training.</p>	Under review.	January 1, 2015
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## PART II – Information and Communications Standards

Section	Initiative	Description	Action	Status	Compliance Date
11	Feedback	11.(1) Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request.	<p>Conduct review of all feedback processes across the site.</p> <p>Determine ways to make more accessible and ensure employees/others are notified of options.</p> <p>Consult with all facility departments about feedback collected and how.</p>	Under review.	January 1, 2015
12	Accessible Formats & Communication Supports	12.(1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, a) in a timely manner that takes into account the person's accessibility needs due to disability; and b) at a cost that is no more than the regular cost charged to other persons.	<p>Determine what will be provided (Electronic, paper, Closed captioning etc.)</p> <p>Review all training methods to ensure all employees receive information (ie: language barriers, reading barriers)</p>	Under review.	January 1, 2016
12		12.(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	<p>Ensure all staff is trained on different options and Customer Service standards.</p> <p>Develop a protocol for when suitable accommodation cannot be made.</p>	Under review.	January 1, 2016
12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Determine what facility documentation will have this (invoices, notice at security, job postings, marketing, etc.)	Under review.	January 1, 2016

<p>14</p>	<p>Accessible Websites &amp; Web Content</p>	<p>14.(2) Designated public sector organizations and large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG)2.0, initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out in this section.</p>	<p>Consult with IT about levels to ensure compliance.</p> <p>Continuously review guidelines</p>	<p>Under review.</p>	<p><b>January 1, 2014</b> New internet websites and web content on those sites must conform with WCAG 2.0 Level A.</p> <p><b>January 1, 2021</b> All internet websites and web content must conform with WCAG 2.0 Level AA, other than,</p> <ul style="list-style-type: none"> <li>• success criteria 1.2.4 Captions (Live)</li> <li>• success criteria 1.2.5 Audio Descriptions (Pre-recorded).</li> </ul>
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### PART III – Employment Standard

Section	Initiative	Description	Action	Status	Compliance Date
22	Recruitment – General	22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	Update job postings to include accommodation statement.  Review where jobs are posted and if barriers exist.	Under review.	January 1, 2016
23	Recruitment, Assessment or Selection Process	23.(1) During a recruitment process, an employer shall 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. (2) If a selected applicant requests an accommodation, the employer shall consult with the applicant and 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.	Determine how applicants will be notified and if barriers exist (phone, email etc.)  The Human Resources Manager or Associate will conduct these communications.  Identify barriers for interview candidates (test formatting, interview room etc.)	Under review.	January 1, 2016
24	Notice to Successful Applicants	24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	Include statement in offer letter to all candidates.	Under review.	January 1, 2016
25	Informing Employees of Supports	25.(1) Every employer shall inform its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to	Inform employees through paystub attachments when applicable.  Provide Training/Tool Box Talks/Emails when applicable.	Under review.	January 1, 2016

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25		25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	To be provided during Health and Safety Orientation  Review standards with safety department.	Under review.	January 1, 2016
25		25.(3)Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.	See section above.	Under review.	January 1, 2016
26	Accessible Formats & Communication Supports for Employees	26.1 In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports 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.	Review job descriptions to determine barriers.  Consult with new employees if there are any barriers to their job that they need accommodation for.	Under review.	January 1, 2016
26		26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	Develop a procedure for discussing with the employee what they require	Under review.	January 1, 2016

27	Workplace Emergency Response Information	27.(1) Every employer shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability.	Determine if any employee at the facility requires this information.	Completed	January 1, 2012
27		(2) If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.	Will be discussed with the Safety Department and Human Resources as needed.	Completed	January 1, 2012
27		(3) Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.	Will be discussed with the Safety Department and Human Resources as needed.	Completed	January 1, 2012
27		(4) Every employer shall 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.	Will be discussed with the Safety Department and Human Resources as needed.	Completed	January 1, 2012

28	Documented Individual Accommodation Plans	28.(1) Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.	The Safety and Human Resources department to jointly develop a written process.	Under review.	January 1, 2016
28		<p>28 (2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none"> <li>1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</li> <li>2. The means by which the employee is assessed on an individual basis.</li> <li>3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if and how accommodation can be achieved.</li> <li>4. The manner in which the employee can request the participation of a representative from their 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.</li> </ol>	<p>HR Manager to review current practices and identify compliance</p> <p>HR and Safety Manager to review with individual employees as needed.</p>	Under review.	January 1, 2016

		<p>5. The steps taken to protect the privacy of the employee's personal.</p> <p>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> <p>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>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>			
29	Return to Work Process	<p>29.(1) Every employer, other than an employer that is a small organization,</p> <p>(a) shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and</p> <p>(b) shall document the process.</p>	The Safety and Human Resources Departments to review the current process and ensure it meets all the AODA requirements.	Under review.	January 1, 2016

29		<p>29. (2) The return to work process shall,</p> <p>(a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and</p> <p>(b) use individual documented accommodation plans, as described in section 28, as part of the process.</p>			January 1, 2016
29		<p>29. (3) The return to work process referenced in this section does not replace or override any other return to work process created by or under any other statute.</p>			January 1, 2016
30	Performance Management	<p>30.(1) An employer that uses performance management in respect of its employees shall 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>	<p>Review current process</p> <p>Keep individual accommodation plans in mind</p> <p>Identify any barriers for employees</p> <p>Are all opportunities equally available?</p>	Under review.	January 1, 2016
31	Career Development & Advancement	<p>31.(1) An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.</p>	<p>Review current process</p> <p>Keep individual accommodations plans in mind</p> <p>Identify any barriers for employees</p> <p>Ensure all opportunities equally available.</p>	Under review.	January 1, 2016

32	Redeployment	32.(1) An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.	Review current process Keep individual accommodations plans in mind Identify any barriers for employees Ensure all opportunities equally available.	Under review.	January 1, 2016
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