

## HR Policy Canada

### SUEZ Water Technologies & Solutions

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# AODA – Integrated Accessibility Standards Regulation (IASR) Employment Policy

#### Intent

This policy applies to the provision of accessible employment services for persons with disabilities, in accordance with O. Reg. 191/11 Integrated Accessibility Standards (IASR) under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA).

All employment services provided by SUEZ Water Technologies and Solutions will follow the principles of dignity, independence, integration, and equal opportunity.

#### Definition

Accessible formats: Include but are not limited to large print, recorded audio and electronic formats, braille, and other formats usable by persons with disabilities.

Communication supports: Include but are not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Kiosk: An interactive electronic terminal, including a point-of-sale device, for public use that allows users to access one or more services or products.

#### Guidelines

##### General Requirements

The following general requirements apply to the five standards: information and communications, employment, transportation, design of public spaces, and customer service.

##### Establishment of Accessibility Policies and Plans

SUEZ Water Technologies and Solutions will develop, implement, and maintain policies governing how it will achieve accessibility through these requirements.

SUEZ Water Technologies and Solutions will include a statement of its commitment to meeting the accessibility needs of persons with disabilities in a timely manner in its policies. These documents



will be made publicly available in an accessible format upon request.

SUEZ Water Technologies and Solutions 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 our website.

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

#### Procuring or Acquiring Goods and Services or Facilities

SUEZ Water Technologies and Solutions will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities. The only exception is in cases where it is impracticable to do so.

#### Training Requirements

SUEZ Water Technologies and Solutions will provide training on the IASR accessibility requirements and Ontario's Human Rights Code as they pertain to individuals with disabilities. This applies to all employees and volunteers, individuals who participate in developing SUEZ Water Technologies and Solutions policies, and all other persons who provide goods, services, or facilities on SUEZ Water Technologies and Solutions behalf. Training will be provided as soon as is reasonably practicable, but no later than **June 15, 2021**. Training will be provided regularly to new employees and as changes to SUEZ Water Technologies and Solutions accessibility policies occur.

#### Records

SUEZ Water Technologies and Solutions will maintain records on the training provided, when it was provided, and the number of employees who were trained.

### **Recruitment, Assessment, and Selection**

SUEZ Water Technologies and Solutions 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, SUEZ Water Technologies and Solutions will consult with the applicant and provide or arrange for suitable accommodation.

Successful applicants will be made aware of SUEZ Water Technologies and Solutions policies and supports for accommodating people with disabilities.

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

SUEZ Water Technologies and Solutions will ensure that employees are aware of our policies for employees with disabilities and any changes to these policies as they occur.

If an employee with a disability requests it, SUEZ Water Technologies and Solutions 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.

SUEZ Water Technologies and Solutions 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, SUEZ Water Technologies and Solutions will create individual workplace emergency response information for employees with disabilities. This information will account for the unique challenges created by the individual's disability and the physical nature of the workplace and will be created in consultation with the employee.

This information will be reviewed when:

- The employee moves to a different physical location in the organization;
- The employee's overall accommodation need's or plans are reviewed; or
- SUEZ Water Technologies and Solutions reviews general emergency response policies.

### **Documented Individual Accommodation Plans**

SUEZ Water Technologies and Solutions will ensure that our website and all web content published after January 1, 2012, conform to the Web Content Accessibility Guidelines (WCAG) 2.0 Level AA and will refer to the schedule set out in the IASR for specific compliance deadlines.

SUEZ Water Technologies and Solutions must also develop and have in place written processes for documenting individual accommodation plans for employees with disabilities. The process for the development of these accommodation plans should include specific elements, including:

- How the employee can participate in the development of the plan;
- How the employee is assessed individually;
- How 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;
- How an employee can request the participation of a representative from their bargaining agent or, if the employee is not represented by a bargaining agent, another representative from the workplace in the creation of the accommodation plan;
- The steps taken to protect the privacy of the employee's personal information;
- How and how often the individual accommodation plan should be reviewed or updated;
- How 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 will also:

- Include information regarding accessible formats and communication supports upon request;



- Where needed, include individualized workplace emergency response information; and
- Outline all other accommodation provided.

## **Performance Management and Career Development and Advancement**

SUEZ Water Technologies and Solutions will consider the accessibility needs of employees with disabilities when implementing performance management processes, or when offering career development or advancement opportunities.

Individual accommodation plans will be consulted as required.

## **Return to Work**

SUEZ Water Technologies and Solutions 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.

The return-to-work process outlines the steps SUEZ Water Technologies and Solutions will take to facilitate the employee's return to work and will use documented individual accommodation plans as outlined by the regulation.

## **Redeployment**

The accessibility needs of employees with disabilities will be considered in the event of redeployment.

Individual accommodation plans will be consulted as required.

## **Review**

This policy will be reviewed regularly to ensure that it reflects SUEZ Water Technologies and Solutions current practices and legislative requirements.