



BLACK CREEK METAL INC.

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CUSTOM STEEL FABRICATION - STRUCTURAL STEEL



Black Creek Metal Inc. Accessibility Policies Accessibility for Ontarians with Disabilities Act (AODA)

STATEMENT OF ORGANIZATIONAL COMMITMENT

Black Creek Metal Inc. is committed to providing a barrier-free environment for all stakeholders, including our clients, employees, job applicants, suppliers, and any visitors who may enter our premises, access our information, or use our services. As an organization, we respect and uphold the requirements set forth under the *Accessibility for Ontarians with Disabilities Act, 2005*, and its associated regulations.

Black Creek Metal Inc. understands that we have a responsibility for ensuring a safe, dignified, and welcoming environment for everyone. We are committed to ensuring our organization's compliance by incorporating accessibility legislation into our policies, procedures, equipment requirements, training, and best practices. We will review these policies and practices annually, as organizational changes occur, or in anticipation of compliance deadlines. In addition, we will strive to meet the needs of individuals with disabilities in a timely and effective manner.

Providing an accessible and barrier-free environment is a shared effort, and we are committed as an organization to working with the necessary parties to make accessibility for all a reality. For more detailed information on our accessibility policies, plans, and training programs, please contact Human Resources.

Sincerely,

Merle Beam
President
merleb@blackcreekmetal.com

ARCHIVES

Human Resources will maintain a hard and electronic copy of this document.

The page(s) immediately after the title page will be a record of the changes to this document. That record will include:

- the name of the person requesting the change;
- the date the change was accepted;
- details of the wording removed and added; and
- the signature of the Vice President beside each record indicating approval of the changes.

NOTE: Several revisions on the same day will only require one signature from the President and will be inclusive of all changes for that date.

The hard and electronic copies will be retained by Human Resources.

INFORMATION AND COMMUNICATIONS

Black Creek Metal Inc. will communicate with people with disabilities in ways that take into account their disability.

When asked, we will provide information about our organization and its services, including public safety information, in accessible formats or with communication supports when requested by submitting an Alternate Format Request Form.

We will also meet internationally-recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario's accessibility laws.

ACCESS TO DOCUMENTS

Within this document, Black Creek Metal Inc. describes its policies, practices and procedures with respect to the AODA and its applicable regulations.

Upon request, Black Creek Metal Inc. shall provide a copy of this document or any part thereof to any person. If communication in an alternate format is required, those will be made available within seven (7) business days after receipt of an Alternate Format Request Form.

The information in the paragraph above will be posted in the foyer at the main entrance of the office of Black Creek Metal Inc. and also on the Black Creek Metal Inc. website at www.blackcreekmetal.com

WORKER TRAINING

We are committed to training office staff in Ontario's accessibility laws and aspects of the Ontario Human Rights Code that relate to persons with disabilities. As our office is the only space open to the public, our office staff will receive this training at onboarding, or as soon thereafter as possible. The management team including the President, Vice President, Project Managers and Human Resources will also receive training.

The training program will be reviewed annually by Human Resources or as legislation changes. If required, the training program will be updated and administered appropriately.

Office workers will complete the training on the AODA website <https://www.aoda.ca/free-online-training/>

The program includes the items below.

- How to interact and communicate with persons with various types of disabilities
- How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person.
- What to do if a person with a particular type of disability is having difficulty accessing the provider's goods or services.

Upon completion of the training, office workers will email the completion certificate to Human Resources.

Furthermore, office workers are informed of the following:

- The two doors at the office entrance have automatic door openers for easy access;
- There is a ramp in the office leading to the boardroom;
- Next to the boardroom there is a washroom that is accessible to people who might be using assistive devices such as wheelchairs; and
- That washroom has grab bar with paper holder attached to the wall beside the toilet.

Finally, office workers will be required to read the Black Creek Metal Inc. Accessibilities Policies and sign a document indicating their willingness to comply with this.

Records of the training shall be kept on file by Human Resources.

MULTI-YEAR ACCESSIBILITY PLAN

The purpose of the Black Creek Metal Inc. Multi-year Accessibility Plan is to establish, implement, maintain and document our strategy to prevent and remove barriers and meet the requirements under this regulation.

Human Resources will review AODA legislation annually, within the first week of March to determine what amendments are required of this policy to be compliant with the legislated requirements.

The Accessibility Plan will be posted on our website and available in accessible formats upon request.

This Accessibility Plan will be reviewed by management at least once every five years and updated as necessary.

INDIVIDUAL ACCOMMODATION PLAN

The individualized Accommodation Plan (IAP) for employees with disabilities shall be developed by Human Resources and approved by the company President or Vice President.

At all times before, during and after this IAP is created, no information will be divulged regarding the worker's disability by anyone involved in taking the request for accommodation or those involved in developing, administering, implementing, or approving the IAP.

Each of these employees will be advised, at the onset, that this information is, and must remain, confidential unless a waiver has been signed.

If the requestor wants to make the reason for the plan known, he or she will sign a Waiver for the Release of Confidential Information and provide allowing for the release of information.

The process for requesting and approving an IAP is as follows:

1. The employee requesting accommodation shall submit the Request for an Individualized Accommodation Plan (IAP) form.

- a. If necessary, the requestor will also submit a completed Alternative Format Request Form.
2. The IAP will include an Individualized Workplace Emergency Response Information if requested by the employee or deemed necessary by the employer. (See the Individualized Workplace Emergency Response Information below for full details.)
 - a. The employee requesting accommodation will be interviewed by Human Resources before the plan is created.
 - i. The employee can request the participation of a representative from their workplace in the development of the accommodation plan.
 - b. The employee should provide their input on the possible contents of the plan at that time.
 - c. The employer can request an evaluation of the worker by an outside medical or other expert, at the employer's expense,
 - i. to assist the employer in determining if accommodation can be achieved; and, if so,
 - ii. how accommodation can be achieved.
 - d. That employee will meet with the management team once the plan is created.
 - e. When the plan is agreed upon, the worker will sign the individualized accommodation plan.
 - f. The plan will be reviewed annually or upon request by the management team or by the employee.
3. If an IAP is denied, Human Resources will provide the reasons in writing to the employee. If requested, Human Resources will read the written response to the employee.

INDIVIDUALIZED WORKPLACE EMERGENCY RESPONSE PLAN

Black Creek Metal Inc. will provide an Individualized Workplace Emergency Response Plan (IWERP) to a worker with a disability:

- if the disability is such that the IWERP is necessary; and
- if the employer is made aware of the need for assistance in an emergency due to the worker's disability.

The IWERP will be created as soon as Black Creek Metal Inc. is informed of the need for this. This will be reviewed,

- a) when the worker moves to a different location in the organization;
- b) when the worker's overall accommodations needs or plans are reviewed; and
- c) when the employer performs the annual review of the IAP.
- d) If the worker with the IWERP will require assistance, Black Creek Metal Inc. will designate employees who will provide that assistance when necessary due to an emergency, that assistance will be documented in the IAP.

ACCESSIBILITY FOR CUSTOMER SERVICE

SERVICE ANIMALS AND SUPPORT PERSONS

If a person with a disability is accompanied by a guide dog or other service animal, Black Creek Metal Inc. shall ensure that the person is permitted to enter the premises with the animal and to keep the animal with him or her in areas open to the public.

If a person with a disability is accompanied by a support person, Black Creek Metal Inc. shall ensure that both persons are permitted to enter the premises together and that the person with a disability is not prevented from having access to the support person while in areas open to the public.

Black Creek Metal Inc. may require a person with a disability to be accompanied by a support person when on the premises, but only if a support person is necessary to protect the health or safety of the person with a disability or the health or safety of others on the premises.

DISRUPTION OF SERVICES

If a person with disabilities usually uses particular facilities or services of the provider in order to obtain, use or benefit from a provider's goods or services, and if there is a temporary disruption in those facilities or services in whole or in part, the provider shall give notice of the disruption to the public.

This notice must include the following information:

- reason for the disruption;
- anticipated duration; and
- description of alternative facilities or services, if any, that are available by
 - posting the information on the public entrance office door at the front of the building; and
 - posting the information on our website if the access is restricted for a duration longer than one business day.
- The postings will be performed by the Office Administrator or, a designate in their absence.

FEEDBACK

Feedback regarding the manner in which customer care is provided to Black Creek Metal Inc. by persons with disabilities is greatly appreciated.

Feedback can be provided in person, by telephone, in writing or by delivering electronic text by email or otherwise and directed to Human Resources.

If verbal communication is received, the information will be recorded on the AODA – Feedback Form.

Human Resources will review all feedback received and address the feedback, whether positive or negative, with the company President or Vice President within seven (7) business days.

The respondent, President or Vice President, will decide what actions must be taken to rectify the situation with the goal of removing the barrier or improving service as necessary. That decision will be in writing by the respondent.

The respondent will provide written feedback to the party submitting the feedback within seven (7) business days and the response shall be made readily available to the public when requested.

Human Resources will maintain a hard copy and electronic copy of the feedback provided and the written response from the company President or Vice President.

PROCUREMENT

We will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities. If it is not possible and practical to do so, we will provide an explanation upon request.