

Thordon Bearings Inc.
A Thomson Gordon Group Company

Policy and Statement of Commitment to Accessibility

Thordon Bearings Inc. and The Thomson Gordon Group Inc. (TGG) 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.

TGG 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 (Insert contact information).

Policy

TGG is committed to providing a barrier-free environment for all stakeholders, including clients, employees, job applicants, suppliers, and any visitors who enter the premises, access information provided by the company, or use the company's goods and services.

The company will work to identify and remove barriers, and prevent new barriers, for persons with disabilities as they relate to employment, communication, the built environment, and transportation at TGG. This policy outlines the company's accessibility plan and strategy for identifying, removing, and preventing these barriers.

Scope

This policy applies to all employees, contractors, sub-contractors and visitors of the Thomson Gordon Group Inc.

Responsibility

1. It is the responsibility of TGG to assess current policies, practices and procedures, premises and information and communication systems to identify barriers for persons with disabilities.
2. It is the responsibility of TGG to address the identified barriers and develop a five-year plan for the removal and prevention of these barriers.
3. It is the responsibility of TGG. to post the plan in a visible place on the premises and on the corporate website.
4. It is the responsibility of TGG to provide all information relating to the plan in alternative formats upon request.
5. It is the responsibility of TGG to review and update the plan at least once every five years.
6. It is the responsibility of the Human Resources Manager to:

- a) Identify and understand structures, laws, rules, policies, programs, practices and services of, or applicable to, TGG regarding accessibility and barriers to access that people with disabilities may encounter.
- b) Ensure the Company meets its obligations under the AODA to develop a multi-year accessibility plan and other requirements as required under the law.
- c) Develop and implement an accessibility plan that includes, among other things:
 - The identification and prioritization of barriers that need to be addressed as per established standards over the next year and subsequent years through consultation with people with disabilities, and employees
 - An annual action plan to eliminate barriers as per established standard and priority
 - Evaluate the progress made toward achieving objectives as per AODA target dates and completion dates
 - Update the multi-year accessibility plan and make it available to the general public
 - Act as the organization's ambassador in the elimination of barriers and promotion of accessibility
 - Communicate all documents (e.g. policies, plans) to employees of TGG and ensure they are trained on accessibility issues and the policies and plans as required by law
 - Prepare and submit the necessary reports and documentation to management and the government
 - Examine and monitor progress to ensure the plan is being implemented accordingly

Definitions

Barrier: Includes any physical, architectural, technological, or attitudinal, anything that is based on information or communications, or anything that is the result of a policy or a practice that hinders the full and equal participation in society of a person with an impairment, including a physical, mental, intellectual, cognitive, learning, communication, or sensory impairment, or a functional limitation.

Disability: Any impairment, including a physical, mental, intellectual, cognitive, learning, communication, and sensory impairment, or functional limitation that is either permanent, temporary, or episodic in nature. It can be evident or not in interaction with a barrier to hinder a person's full and equal participation in society.

Multi-year accessibility plan

- The Thomson Gordon Group will work to improve accessibility by developing a multi-year accessibility plan that conforms to the Regulation which outlines a phased-in strategy to prevent and remove barriers and address the current and future requirements of the AODA and its standards.
- TGG will report annually on the progress and implementation of the plan, posting this information on the company's bulletin boards and on the company's website. The plan will be provided in alternative formats upon request.
- The multi-year plan must be reviewed and updated at a minimum of once every five years.
- The plan will be publically posted on the company's website and will also be posted on the company's bulletin boards.
- Upon request, the plan will be provided in accessible formats.

- When a person with a disability makes a request for an alternative accessible format or communication support, that person must be consulted as to their needs. The plan must be provided in a timely manner and the cost of providing the plan in an accessible format must not be more than the regular cost charged to other people.

Training

TGG will ensure that training is provided to all employees who deal with customers and the public on the company's behalf, and to persons participating in the development and approval of its policies, practices and procedures on the requirements of the Regulation and on the **Human Rights Code** as it pertains to persons with disabilities.

The type and intensity of training on the requirements of accessibility standards and the **Human Rights Code** will vary according to the duties of the employee, and others.

TGG will maintain a record of the dates when training is provided and the number of individuals to whom it was provided.

Training will re-occur when there are changes to the accessibility policies.

Information and Communication

TGG will, upon request, provide or 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. This includes:

- Assessing and reviewing the communication needs of people with visual, hearing, learning, and cognitive disabilities and the barriers to communication that exist within Thordon Bearings Inc.
- Explaining how TGG will produce and deliver alternately formatted material essential to Thordon Bearings Inc. visitors and customers, and what those materials are
- Notifying the public about the availability of accessible formats and communications supports
- Consulting with a person with a disability when alternative accessible formats and communication supports are requested
- Have a process in place for visitors and customers to request and to be provided with information and communication in an accessible format and explaining when an accessible format is not feasible
- Posting this information on the company's bulletin boards and corporate website
- If the information or communications are unconvertible, upon request, TGG will provide an explanation of why it is unconvertible, and provide a summary of the unconvertible information or communications
- Reviewing this process at least annually or when there are changes to the law or to practices and procedures or when an incident/breach occurs

Accessible websites and web content

The Thomson Gordon Group Inc. will ensure that all websites and web content comply with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 at Level AA. This includes monitoring website accessibility and compliance with the guidelines and the law.

Employment

TGG will identify, remove and prevent barriers in employment by evaluating existing policies and procedures as well as the overall workplace.

TGG will provide individualized workplace emergency response information to employees who have disclosed a disability. With the employee's consent, provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.

The individualized workplace emergency response information will be reviewed:

- When the employee moves to a different location in the company
- When the employee's overall accommodations needs or plans are reviewed, and
- When the employer reviews its general emergency response policies

TGG will promote employment opportunities for the designated groups including persons with disabilities. On the company's website and in job advertisements, specify that accommodation is available for job applicants with disabilities. Thomson Bearings will inform candidates about the availability of accommodations:

- When called for an interview
- During the selection process
- At the time of job offer
- At orientation

TGG will inform employees of policies and supports for employees with disabilities as soon as practicable after new employees begin employment. We will update information provided to employees as policies change.

TGG will develop a written process for developing individual accommodation plans for employees with disabilities. We have a return-to-work process for employees absent due to disabilities who require accommodation to return to work.

TGG will ensure that its procedures take into account the accessibility needs of employees with disabilities and their individual accommodation plans:

- When assessing their performance
- In managing their career development and advancement
- When redeploying them

Contact Information

If you have questions on this policy, want to provide feedback or have a complaint, the Human Resources Manager for the Thomson Gordon Group Inc. should be contacted to deal with such matters and can be reached at:

laurar@thomson-gordon.com

905-319-6878 – direct line or

905-335-1440 ext. 218