

# Accessibility for Ontarians with Disabilities Act (AODA) Policy

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<b>Created by:</b>	Sarah Briscoe	Approval stage		
		DRAFT		FINAL

## 1. Objectives and purpose

1.1. Technica Mining (“Technica”) is committed to ensuring equal access and participation for people with disabilities. Technica is dedicated to providing accessible services and work environment for all employees, prospective employees and clients. This policy outlines the company’s compliance with the *Integrated Accessibility Standards Regulation* (IASR) under the AODA standards.

## 2. Who should know this policy/procedure?

2.1. All Technica Mining employees are responsible for knowing this policy and familiarizing themselves with its contents and provisions.

## 3. Definitions

### 3.1 Disability (as defined by the Ontario Human Rights Code) –

3.1.1 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,

3.1.2 A condition of mental impairment or a developmental disability,

3.1.3 A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,

3.1.4 A mental disorder, or

3.1.5 An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997

- 3.2 Accessible format – includes large print, recorded audio and electronic formats, braille, and other formats usable by persons with disabilities
  - 3.3 Communication support – includes captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communication.
  - 3.4 Information – includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and conveys meaning.
  - 3.5 Career development and advancement – additional responsibilities within an employee’s current position and movement of an employee from one job to another in an organization or any combination thereof.
  - 3.6 Performance Management – activities related to assessing and improving performance, productivity and effectiveness with the goal of facilitating employee success.
  - 3.7 Reasonable Accommodation – providing disabled persons with an equal opportunity to attain the same level of performance or enjoy the same level of benefits and privileges experienced by others and where it respects the principles of dignity, inclusion and individualization. Accommodations will vary and will be provided to the point of undue hardship.
  - 3.8 Undue hardship - the reasonable limit to how far an employer must go to accommodate an employee who is unable to perform the regular duties of his or her job due to disability, personal injury or illness. Examples would include not being able to accommodate due to cost and/or health and safety risks.
- 4. Contacts
    - 4.1. The Human Resources Department officially interprets this policy. Please direct any questions pertaining to this specific policy to Human Resources.
- 5. Roles and responsibilities  
Personnel involved with the execution of this policy have the following responsibilities:
- 6. General Principles
    - 6.1. Technica will develop, implement and maintain policies governing how it will achieve accessibility through these requirements.
    - 6.2. Technica is committed to meeting the accessibility needs of persons with disabilities in a timely manner. This is reflected in policies which, upon request, will be made publicly available in an accessible format.

- 6.3. The company will establish, implement, maintain and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meets its accessibility requirements. Accessibility plans will be made available in an accessible format upon request, and will be posted on Technica's website.
  - 6.4. Technica will review and update its accessibility plan once every five (5) years. Annual status reports will be prepared to report on the progress of the steps taken in implementing the companies' accessibility plan. This status report will be posted on our website. If requested, the report will be created in an accessible format.
7. Training Requirements
    - 7.1. Technica will provide the appropriate training for its employees as it pertains to individuals with disabilities.
    - 7.2. Training will be provided to employees as required when changes to the companies' accessibility policies occur.
    - 7.3. Training records will be maintained to record when it was provided and the number of employees who were trained.
8. Recruitment, Assessment and Selection
    - 8.1. Technica will notify employees and the public about the availability of accommodation for job applicants who have disabilities.
    - 8.2. Applicants will be informed that reasonable accommodations are available, upon request, for the interview process and for other candidate selection methods.
    - 8.3. When an accommodation is requested, the company will consult with the applicant and provide or arrange for reasonable accommodations in a manner that considers the applicant's accessibility needs due to disability.
9. Career Development
    - 9.1. Technica will consider the accessibility needs, including documented individual accommodation plans, of the employees with disabilities during the company's performance management process. These will also be considered in the event of redeployment or when offering career development or advancement opportunities.
10. Communication Support for Employees
    - 10.1. Technica will ensure that employees are aware of policies for employees with disabilities and any changes to these policies as they occur. The company will provide the information required to new employees as soon as practicable after they begin their employment.
    - 10.2. If an employee with a disability requests it, the company will provide or arrange for additional accessible formats and communication supports for information needed for

the employee to perform their job and any information that is generally available to all employees in the workplace.

10.3. The company will consult with the employee making the request to determine the best way to provide the accessible format or communication support.

## 11. Workplace Emergency Response Information

11.1. Where required, Technica will create individualized workplace emergency response plans for employees with disabilities. This information will be created in consultation with the employee and consider the unique challenges created by the individual's disability and the physical nature of the workplace.

## 12. Individual Accommodation Plans

12.1. Technica will develop a written process for documenting individual accommodation plans for employees with disabilities. The development process will include:

12.1.1. The ways in which the employee can participate in the development of the plan;

12.1.2. The means by which the employee is assessed individually;

12.1.3. The ways that Technica can request an evaluation by an external medical provider to determine whether accommodation can be achieved or how it can be achieved;

12.1.4. The steps taken to protect the privacy of the employee's personal information

12.1.5. The frequency with which the individual accommodation plans should be reviewed or updated

12.1.6. The means for which Technica will provide the reasons for the denial of an individual accommodation plan to the employee; and

12.1.7. The means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs

## 13. Return to Work

13.1. Technica 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.

13.2. The process will outline the steps that Technica will take to enable an easy and safe return to work for the employee. All steps and individual accommodation plans will be documented and created in consultation with the employee.

## 14. Review

14.1. This policy will be reviewed annually to ensure that it reflects current practices of Technica as well as legislative requirements.

15. Related documents/forms

15.1. There are no related documents associated with this policy/procedure.

16. Revision history

This policy supersedes the following archived policies:

16.1. None – New Policy

17. Approval

**Approved by:**

COO or Designee:

  
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(signature)

07/26/24  
\_\_\_\_\_  
(date)

Human Resources Manager or Designee:

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(signature)

\_\_\_\_\_  
(date)

HSE Superintendent or Designate:

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(signature)

\_\_\_\_\_  
(date)

**Reviewed by:**

JHSC worker representative (if involved):

  
\_\_\_\_\_  
(signature)

09-05-2024  
\_\_\_\_\_  
(date)