

Accessibility Policy and Multi-Year Accessibility Plan

This Accessibility Plan outlines the policies and actions that Dovercourt Management Corporation, Autotek Electroplating Ltd., and Olympic Coaters Ltd., (hereafter referred to as the “Company”) will put into place to improve opportunities for people with disabilities.

Statement of Commitment

The Company is committed to meeting the requirements of the accessibility standards, established by *Accessibility for Ontarians with Disability Act, AODA 2005*.

The Company will make all reasonable efforts to ensure that its policies, procedures and practices as it relates to customer service are in compliance with the Accessibility Standards for Customer Service.

The Company will make available and have a written process for the development of documented individual accommodation plans for employees with disabilities. The Company will ensure that this process provides and allows respect for independence, dignity and equal opportunities and is in compliance with the Accessibility Standards for Employment.

The Company will ensure that accommodations for persons with disabilities are made available and that its public website meets any accessibility standards.

Accessible Emergency Information

The Company is committed to providing its employees and customers with publicly available emergency information in an accessible way when necessary or upon request.

Training

The Company will provide training to employees and other staff members on Ontario’s accessibility law and on the *Ontario Human Rights Code* as it relates to people with disabilities.

The Company will take the following steps to ensure that employees are provided with the training needed to meet Ontario’s accessibility laws by July 1, 2016.

- All new hires will be trained within the first 60 days of hire as part of the orientation process
- All employees and staff will have an initial training session covering the relevant sections of the Human Rights Code and yearly refresher training as required or upon any changes that would be relevant to their training and/or position

Information and Communications

The Company is committed to meeting the communication needs of people with disabilities. In consultation with persons with disabilities, a plan will be developed to meet their needs.

The Company will take the following steps to make all websites and content on those sites conform with WCAG 2.0, Level A by January 1, 2021.

- Web content will be written in clean and understandable language
- Alternate text will be provided for images, where available
- Ensure keyboard and mouse navigation, where available

Employment

The Company is committed to fair and accessible employment practices for all employees. The Company will notify both staff and the public through any postings for employment opportunities that people with disabilities will be accommodated throughout the employment process, including hiring.

The Company will implement the following steps by January 1, 2017.

- The Company's Employee Handbook will be updated to include accommodation policies for employees with disabilities and made available to all current employees and provided to new employees during their orientation session.
- The Company shall offer all applicants selected for an interview accommodation upon request and provide the materials or arrange for the provision of suitable accommodation based upon their specific disability needs.

The Company will develop a process for the individual accommodation and return-to-work for employees absent due to a disability.

The Company will implement the following steps by January 1, 2018.

- Communicate to all staff the return-to-work process and have employees participate in the development of their individual accommodation plan.
- At all times, deal with each request on a one-by-one basis and protect the privacy of the employee.
- Assist in the completion of any evaluation performed by an outside medical or other expert to help determine accommodation needs
- Ensure that any workplace accommodations are in compliance with the requirements of the employment standards and Human Rights Code.
- Provide the accommodation plan in a format that takes into account the employee's disability.
- Allow for the inclusion of the employee's emergency response information to be included within their workplace accommodation plan.
- Ensure that a policy is set to allow for all workplace accommodations to be reviewed and updated

Transportation

The Accessibility Standards for TSP's does not apply to The Company.

Design of Public Spaces

The Accessibility Standards for the Design of Public Spaces will be reviewed on a yearly basis as it applies to the Company.

Multi-Year Accessibility Plan

Customer Service

Compliance Date	Requirement	Action
01-Jan-12	Provide Accessible Customer Service	Create and implement Accessibility Standards for Customer Service Plan Prepare and implement training for all employees and volunteers to serve customers of all abilities Create accessible ways for people to provide feedback Publish the accessibility policy

Part I - General Requirements

Compliance Date	Requirement	Action
01-Jan-14	Establish Accessibility Policies	Develop and implement Accessibility Integrated Standards Policy
	Establish Accessibility Plans	Establish-implement-maintain and document a multi-year accessibility plan Post Accessibility Plan on web-site Provide plan in accessible format on request Review and update accessible plan at least once every five years
01-Jan-15	Self-Serve Kiosks File Accessibility Compliance Report Training	Not Applicable Review current training schedule Source vendors and prepare training materials required Develop and implement training program on the requirements of the accessibility standards as it pertains to persons with disabilities Review and update training plan as required
31-Jan-16	File Accessibility Compliance Report	Filed
31-Dec-17	File Accessibility Compliance Report	Filed
31-Dec-20	File Accessibility Compliance Report	Filed
31-Dec-23	File Accessibility Compliance Report	Filed

Part II - Information and Communications

Compliance Date	Requirement	Action
01-Jan-14	Accessible web-sites and contents	Review current web-site Implement requirements to conform to WCAG Level 2.0 - Level A
01-Jan-15	Feedback	Identify current sources of internal and external feedback Develop processes for receiving and responding to feedback Develop alternate formats
01-Jan-16	Accessible formats and communications	Review and update process as required Review process for accessible requests Identify vendors for accessible formats (if required) Update web-sites for accessible formats and communications support
01-Jan-21	Accessible web-sites and contents	Review current web-site Implement requirements to conform to WCAG Level 2.0 - Level AA

Part III - Employment Standards

Compliance Date	Requirement	Action
01-Jan-12	Workplace Emergency Response Information	Review current accommodation needs Implement workplace emergency response form Provide individualized workplace emergency response information to employees who have a disability Maintain records of individualized emergency workplace consent form
01-Jan-16	Recruitment - General Recruitment - Assessment or selection process Notice to Successful Applicants Informing Employees of Supports Accessible Formats and Communication Supports for Employees Documented Individual Accommodation Plans Return to Work Process Performance Management Career Development and Advancement Redeployment	Review process and update as required Review current recruitment processes and systems and update as required Include accessibility notification as a part of all future job postings Review current recruitment processes and systems and update as required Review and revise all applicable human resource policies for new employees Update Employee Handbook to include AODA policies Inform current employees of 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 Review and revise all applicable human resource policies to include support for persons with disabilities Implement a process to inform employees of any changes to policies on job accommodations Review existing communication measures Consult with the employee making the request in determining the suitability of an accessible format or communication support Implement additional communication supports as required Refine existing written process for responding to accommodation in accordance with requirement Refine existing written policies for employees who have been absent due to a disability Develop and document a return to work process for employees that require disability related accommodations in order to return to work Create a process to communicate to the employee when an individual accommodation plan is denied and the reasons for the denial Implement accessibility needs of employees into current performance measuring standards Implement accessibility needs into current requirements Implement additional training to assist with any career advancement Review current process

Part III - Employment Standards (Continued)

Implement the accessibility needs of employees with disabilities as well as individual accommodation plans when redeploying employees with disabilities
Update all human resource policies as required

Part IV - Design of Public Spaces Standard

Compliance Date
01-Jan-17

Requirement
Remove barriers in buildings and public spaces

Action
Review accessibility in building and public spaces
Implement plan to repair or correct deficits as required
Review plan on a yearly basis or as required
Implement designs for AODA in public spaces that we have direct control over in any future major renovations or retrofit

Transportation Standard

Compliance Date
2011 to 2017

Requirement
Industry specific standard for ensuring that all public transportation systems including subways buses trains and taxis are accessible

Action
Not Applicable