

Accessibility Policy & Multi-Year Accessibility Plan

Statement of Commitment to Accessibility

Peel Plastic Products Limited is committed to providing a barrier-free environment for our business partners, clients/customers, employees (permanent, temporary or contract), job applicants, suppliers, visitors, and to others who enter our premises, access our information, or conduct business with us. As an organization, we respect and uphold the requirements set forth under the *Accessibility for Ontarians with Disabilities Act (2005)* and its standards including the *Customer Service Standard*; the *Integrated Accessibility Standards Regulation for Information and Communications; Employment; Transportation*; and for the *Built Environment*.

Approximately 1.8 million Ontarians live with a disability, and as the population grows older, this number will increase. Peel Plastic Products Limited has an important responsibility for ensuring a safe, dignified, and welcoming environment for everyone. We are committed to ensuring our organization's compliance with accessibility legislation by incorporating policies, procedures, equipment requirements, training for employees, and best practices. We will review these policies and practices on a regular basis.

For more detailed information on our accessibility policies, plans, and training programs, please contact the Human Resources Department.

Multi-Year Accessibility Plan

Peel Plastic Products Limited will develop, maintain and document an Accessibility Plan outlining the company's strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities. This plan will be posted on the company website and will be reviewed at least once every five years. A copy of the Accessibility Plan can be made available and in an accessible format upon request.

Training

Peel Plastic Products Limited will ensure that training is provided as per the requirements of the Regulation and keep appropriate records of training. The training will apply to all employees; those who develop company policies and all other persons who provide goods, services or facilities on behalf of the company.

New employees will be trained as part of the onboarding process and all employees will be trained when changes are made to the policies.

Information and Communications

Feedback

Peel Plastic Products will ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing accessible formats and communications supports, upon request.

Accessible Format and Communication

Upon request, Peel Plastic Products Limited will provide, or will 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.

Accessible Website and Web Content

Peel Plastic Products Limited will ensure that the company websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level A and Level AA by the compliance deadline

Employment

Recruitment

Peel Plastic Products Limited will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

Informing Employees of Supports

Peel Plastic Products Limited will continue to inform its employees of its policies used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees during their new hire orientation process.

Accessible Formats and Communication Supports for Employees

Upon the request of an employee with a disability, Peel Plastic Products Limited will consult with the employee to arrange for the provision of accessible formats and communication supports for information that is needed to perform their job.

Workplace Emergency Response

Peel Plastic Products Limited will provide individualized workplace emergency response information to employees who have a disability and if such individualized information is necessary. Peel Plastic Products Limited will provide this information as soon as practicable after becoming aware of the need for accommodation.

Individual Accommodation Plans

Peel Plastic Products Limited will develop and have in place a written process for the development of individual accommodation plans for employees with disabilities.

Performance Management, Career Development and Advancement & Redeployment

Peel Plastic Products Limited will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.

Appendix A – Multi Year Accessibility Plan

Part 1 – General Requirements

Section	Standard	Description	Action	Status
3	Establishment of Accessibility Standards	3.(1) Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements referred to in this Regulation.	Develop policy	Complete
4	Accessibility Plans	4. (1) Large organizations shall, (a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under this Regulation; (b) post the accessibility plan on their website, if any, and provide the	(a) create multi-year accessibility plan (b) post plan on website (c) the Human Resources department will review and update the accessibility plan at least once every five years	Complete

		plan in an accessible format upon request; and (c) review and update the accessibility plan at least once every five years.		
7	Training	7. (1) Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to, (a) all employees, and volunteers; (b) all persons who participate in developing the organization's policies; and (c) all other persons who provide goods, services or facilities on behalf of the organization.	Provide e-learning based training to appropriate individuals. This will include new employees as they are hired and onboarded.	Ongoing

Part II – Information and Communications Standards

Section	Standard	Description	Action	Status
11	Feedback	11. (1) Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request.	Determine what accessible formats and communication supports we will provide upon request Ensure staff and management are aware of the requirement to provide accessible formats and communication supports upon request	Complete
12	Accessible Formats & Communication Supports	12. (1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, (a) in a timely manner that takes into account the person's accessibility needs due to disability; and (b) at a cost that is no more than the regular cost charged to other persons.	Determine what accessible formats and communication supports we will provide to persons with disabilities upon request.	Complete
12	Accessible Formats & Communication Supports	12. (2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	Accommodation will occur on an as needed basis.	Complete
12	Accessible Formats & Communication Supports	12. (3) Every obligated organization shall notify the public about the availability of accessible formats and communication support	Notify that accommodation is available upon request	Complete
14	Accessible Website &	14. (2) Designated public sector organizations and large organizations shall	Develop web site as per requirement.	In

	Web Content	make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out in this section.		Process
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Part III – Employment Standard

Section	Standard	Description	Action	Status
22	Recruitment, general	22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	Update job postings to include accessibility accommodations	Complete
23	Recruitment, Assessment or Selection Process	23. (1) During a recruitment process, an employer shall notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used.	Review existing processes	Complete
23	Recruitment, Assessment or Selection Process	23. (2) If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.	Review existing processes	Complete
24	Notice to Successful Applicants	24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	Review and update existing process	Complete
25	Informing Employees of Supports	25. (1) Every employer shall inform its employees of its 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 due to disability.	Review and update existing process	Complete
25	Informing Employees of Supports	25. (2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	Review current onboarding procedures and update existing process	Ongoing
25	Informing Employees of Supports	25. (3) Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.	Review current processes	Ongoing
26	Accessible Formats & Communication Supports for Employees	26. (1) In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for, (a) information that is needed in order to perform the employee's job; and	Review procedures with Human Resources staff	Complete

		(b) information that is generally available to employees in the workplace.		
26	Accessible Formats & Communication Supports for Employees	26. (2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	Review procedures with Human Resources staff	Complete
27	Workplace Emergency Response Information	27. (1) Every employer shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability.	Notify that accommodation is available upon request All requests will be handled on an individual case basis	Complete
27	Workplace Emergency Response Information	27. (2) If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.	Notify that accommodation is available upon request. All requests will be handled on an individual case basis	Complete
27	Workplace Emergency Response Information	27. (3) Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.	Review current processes	Complete
27	Workplace Emergency Response Information	27. (4) Every employer shall review the individualized workplace emergency response information, (a) when the employee moves to a different location in the organization; (b) when the employee's overall accommodations needs or plans are reviewed; and (c) when the employer reviews its general emergency response policies.	Review current processes	Complete
28	Documented Individual Accommodation Plans	28. (1) Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.	Develop written process	Complete
28	Documented Individual Accommodation Plans	28. (2) The process for the development of documented individual accommodation plans shall include the following elements: 1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. 2. The means by which the employee is assessed on an individual basis. 3. The manner in which the employer can request an evaluation by an outside	Develop written process	Complete

		<p>medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved.</p> <p>4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.</p> <p>5. The steps taken to protect the privacy of the employee's personal information.</p> <p>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> <p>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</p>		
28	Documented Individual Accommodation Plans	<p>28. (3) Individual accommodation plans shall,</p> <p>(a) if requested, include any information regarding accessible formats and communications supports provided, as described in section 26;</p> <p>(b) if required, include individualized workplace emergency response information, as described in section 27; and</p> <p>(c) identify any other accommodation that is to be provided.</p>	Develop written process	Complete
29	Return to Work Process	<p>29. (1) Every employer, other than an employer that is a small organization,</p> <p>(a) shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and</p> <p>(b) shall document the process.</p>	Review current processes	Complete
29	Return to Work Process	<p>(2) The return to work process shall,</p> <p>(a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and</p> <p>(b) use documented individual accommodation plans, as described in section 28,</p>	Review current processes	Complete

		as part of the process.		
30	Performance Management	30. (1) An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.	Review current processes	Complete
31	Career Development and Advancement	31. (1) An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.	Review current processes	Complete
32	Redeployment	32. (1) An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.	Review current processes and update	Complete

Part IV.2 Customer Service Standards

Section	Standard	Description	Action	Status
80.46	Establishment of Policies	(1) ... every provider shall develop, implement and maintain policies governing its provision of goods, services or facilities, as the case may be, to persons with disabilities.	Develop, implement and maintain policies	Complete
80.46	Establishment of Policies	<p>(2) The provider shall use reasonable efforts to ensure that the policies are consistent with the following principles:</p> <ol style="list-style-type: none"> 1. The goods, services or facilities must be provided in a manner that respects the dignity and independence of persons with disabilities. 2. The provision of goods, services or facilities to persons with disabilities must be integrated with the provision of goods, services or facilities to others, unless an alternative measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the goods, services or facilities. 3. Persons with disabilities must be given an opportunity equal to that given to others to obtain, use and benefit from the goods, services or facilities. 4. When communicating with a person with a disability, the provider shall do so in a manner that takes into account the person's disability. O. Reg. 165/16, s. 16. <p>(3) Without limiting subsections (1) and (2), the policies must deal with the use of assistive devices by persons with disabilities to obtain, use or benefit from the goods, services or facilities or with the availability of other measures, if any, which enable them to do so. O. Reg. 165/16, s. 16.</p>	Prepare documents describing the policies	Complete

80.46	Establishment of Policies	(4) Every provider, other than a small organization, shall prepare one or more documents describing the policies established under this section and, on request, shall give a copy of any such document to any person. O. Reg. 165/16, s. 16.	Provide a copy of the documents on request	Complete
80.46	Establishment of Policies	(6) The notice required by subsection (5) may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances. O. Reg. 165/16, s. 16.	Notify that documents are available on request.	Complete
80.47	Use of service animal and support persons	(3) If a service animal is excluded by law from the premises, the provider shall ensure that other measures are available to enable a person with a disability to obtain, use or benefit from the provider's goods, services or facilities. O. Reg. 165/16, s. 16.	Update procedures - Service animals permitted in non-production areas	Complete
80.47	Use of service animal and support persons	(4) If a person with a disability is accompanied by a support person, the provider 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 on the premises. O. Reg. 165/16, s. 16.	Update procedures	Complete
80.47	Use of service animal and support persons	(5) The provider may require a person with a disability to be accompanied by a support person when on the premises, but only if, after consulting with the person with a disability and considering the available evidence, the provider determines that, (a) 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; and (b) there is no other reasonable way to protect the health or safety of the person with a disability and the health or safety of others on the premises. O. Reg. 165/16, s. 16.	Person with a disability required to be accompanied by a support person only for a legitimate health and safety-related reason, and only after consultation	Complete
80.48	Notice of temporary disruptions	(2) Notice of the disruption must include the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available. O. Reg. 165/16, s. 16. (3) Every provider, other than a small organization, shall prepare a document setting out the steps that the provider will ensure are taken in connection with a temporary disruption and, on request, shall give a copy of the document to any person. O. Reg. 165/16, s. 16.	Prepare documentation and provide copy of document on request	Complete
80.48	Notice of temporary disruptions	(4) Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the document required by subsection (3) is available on request. O. Reg. 165/16, s. 16. (5) The notices required by subsections (2) and (4) may be given by	Notify that the document is available on request	Complete

		posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances. O. Reg. 165/16, s. 16.		
80.49	Training for staff	<p>(1) ...every provider shall ensure that the following persons receive training about the provision of the provider's goods, services or facilities, as the case may be, to persons with disabilities:</p> <ol style="list-style-type: none"> 1. Every person who is an employee of, or a volunteer with, the provider. 2. Every person who participates in developing the provider's policies. 3. Every other person who provides goods, services or facilities on behalf of the provider. O. Reg. 165/16, s. 16. <p>(2) The training must include a review of the purposes of the Act and the requirements of this Part and instruction about the following matters:</p> <ol style="list-style-type: none"> 1. How to interact and communicate with persons with various types of disability. 2. 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. 3. How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods, services or facilities to a person with a disability. 4. What to do if a person with a particular type of disability is having difficulty accessing the provider's goods, services or facilities. O. Reg. 165/16, s. 16. 	Provide training to applicable staff	Complete
80.49	Training for staff	(4) Every provider shall also provide training on an ongoing basis in respect of any changes to the policies described in section 80.46. O. Reg. 165/16, s. 16.	Provide training on any changes to accessibility policies	Ongoing
80.49	Training for staff	(5) Every provider, other than a small organization, shall keep records of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided. O. Reg. 165/16, s. 16.	Keep records of the training provided	Complete
80.49	Training for staff	<p>(6) Every provider, other than a small organization, shall,</p> <p>(a) prepare a document that describes its training policy, summarizes the content of the training and specifies when the training is to be provided; and</p> <p>(b) on request, give a copy of the document to any person. O. Reg. 165/16, s. 16.</p>	Prepare a document on the training policy	Complete
80.49	Training for staff	(7) Every provider, other than a small organization, shall notify persons to	Prepare a document and provide copy	Complete

		whom it provides goods, services or facilities that the document required by subsection (6) is available on request. O. Reg. 165/16, s. 16.	of document on request	
80.49	Training for staff	(8) The notice required by subsection (7) may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances. O. Reg. 165/16, s. 16.	Notify that the document is available on request	Complete
80.50	Feedback process required	(1) Every provider shall establish a process for receiving and responding to, (a) feedback about the manner in which it provides goods, services or facilities to persons with disabilities; and (b) feedback about whether the feedback process established for purposes of clause (a) complies with subsection (3). O. Reg. 165/16, s. 16.	Establish a feedback process	Complete
80.50	Feedback process required	(2) The feedback process must specify the actions that the provider will take if a complaint is received about the manner in which it provides goods, services or facilities to persons with disabilities. O. Reg. 165/16, s. 16.	Prepare a document describing the feedback process	Complete
80.50	Feedback process required	(3) Every provider shall ensure that the feedback process is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communication supports, on request. O. Reg. 165/16, s. 16.	Provide a copy of the document on request	Complete
80.50	Feedback process required	(4) Every provider shall make information about the feedback process readily available to the public. O. Reg. 165/16, s. 16. (5) Every provider, other than a small organization, shall prepare a document describing the feedback process and, on request, shall give a copy of the document to any person. O. Reg. 165/16, s. 16.	Notify that the document is available on request	Complete
80.51	Format of documents	(1) If a provider is required by this Part to give a copy of a document to a person with a disability, the provider shall, on request, provide or arrange for the provision of the document, or the information contained in the document, to the person in an accessible format or with communication support, (a) in a timely manner that takes into account the person's accessibility needs due to disability; and (b) at a cost that is no more than the regular cost charged to other persons. O. Reg. 165/16, s. 16.	Provide documents or information in an accessible format or with communication support	Complete