

## **1. PURPOSE**

GreenFirst Forest Products, Ontario facilities will adopt the standards of Ontario Regulation 191/11, Integrated Accessibility Standards regulation (IASR) under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) to break down barriers and increase accessibility for persons with disabilities in the areas of training, employment, information and communications, and public spaces.

According to the Accessibility for Ontarians with Disabilities Act, 2005, “disability” means:

- a) 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,
- b) a condition of mental impairment or a developmental disability,
- c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- d) a mental disorder, or
- e) an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*; (“handicap”)

This standard has been created in accordance with IASR and addresses how GreenFirst Forest Products Ontario facilities achieve accessibility through meeting the regulation’s requirements. It provides the overall strategic direction that will be followed to provide accessibility supports to Ontarians with disabilities.

The requirements of the IASR that are applicable to the GreenFirst Forest Products, Ontario facilities are as follows:

- Establishment, implementation, maintenance and documentation of a multi-year accessibility plan, which outlines the organization’s strategy to prevent and remove barriers and meet its requirements under the Regulation;
- Training; and
- Other specific requirements under the Information and Communications Standards and Employment Standards.

## **2. SCOPE**

This combined procedure and multi-year integration plan is applicable to GreenFirst Forest Products facilities in Ontario.

### **3. DEFINITIONS**

**Accessible Formats** may include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

**Accommodation** means the special arrangement made or assistance provided so that persons with disabilities can participate in the experiences available to persons without disabilities. Accommodation will vary depending on the person's unique needs.

**Communication Supports** may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

**Communications** means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received.

**IAP** means Individualized Accommodation Plan.

**Information** includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.

**Internet Website** means a collection of related web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier (URI) and is accessible to the public.

**Maintenance of Public Spaces** means activities that are intended to keep existing public spaces and elements in existing public spaces in good working order or to restore the spaces or elements to their original condition, examples of which include painting and minor repairs.

**New Internet Website** means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.

**Redeployment** means the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated.

**Unconvertible** means if it is not technically feasible to convert the information or communications. It also means if the technology to convert the information or communications is not readily available.

**Web Content Accessibility Guidelines** means the World Wide Web consortium recommendation, dated December 2008, entitled “Web Content Accessibility Guidelines” (WCAG) 2.0.

## **4. RESPONSIBILITY**

### **Corporate Human Resources**

Corporate Human Resources is responsible to:

- Develop a procedure and communicating the requirements to the Ontario Sites.
- Ensure the required information is posted on the GreenFirst Forest Products public website.
- Ensure recruitment practices conform with this accessibility plan.

### **Business Unit**

Each Ontario forestry and manufacturing business unit is responsible for implementing the requirements of this procedure.

## **5. GENERAL REQUIREMENTS**

### **Part 1 – GENERAL**

GreenFirst Forest Products is committed and guided by the four core principles of Dignity, Independence, Integration and Equal Opportunity and supports the full inclusion of persons as set out in the Canadian Charter of Rights and Freedoms, and the Accessibility for Ontarians with Disabilities Act, 2005. We believe in integration and equal opportunity. We are committed to meeting the needs of persons with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act.

GreenFirst Forest Products, Ontario facilities shall use every effort to ensure that we meet the needs of people with disabilities, through the implementation of this procedure and accessibility plan.

#### **5.1 Multi-Year Accessibility Plan**

This Multi-Year Accessibility Plan outlines a phased-in strategy to prevent and remove barriers and addresses the current and future requirements of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA). GreenFirst Forest Products, Ontario facilities will report annually on the progress and implementation of this plan, post the information on the GreenFirst Forest Products website

and will provide it in alternative formats upon request. This plan will be reviewed and updated at least once every five years.

## **5.2 Training**

GreenFirst Forest Products, Ontario facilities will ensure that training is provided to all employees, volunteers, third party contractors who provide goods and services on our behalf, and those that develop the organizations policies, on the requirements of the accessibility standards referred to in the Regulation and on the Human Rights Code as it pertains to persons with disabilities. If any changes are made to this procedure or the requirements, training will be provided. GreenFirst Forest Products, Ontario facilities will maintain a record of the dates when training is provided and the number of individuals to whom it was provided.

In accordance with the IASR, GreenFirst Forest Products, Ontario facilities will take the following steps to ensure employees are appropriately trained:

- Determine the training requirements of the IASR and the Ontario Human Rights Code as it pertains to people with disabilities and ensure it is provided to employees, volunteers and persons developing organizational policies;
- Ensure third party contractors working on behalf of GreenFirst Forest Products, have received appropriate training;
- Ensure training is provided to the above noted individuals as soon as practicable;
- Maintain records of training, including the dates on which the training is provided and the number of individuals to whom it's provided. Contractor's training records shall be made available to GreenFirst Forest Products upon request.
- Ensure training is provided on any related procedure changes.

## **Part 2 – INFORMATION AND COMMUNICATIONS STANDARDS**

GreenFirst Forest Products, Ontario facilities will create, provide and receive information and communications in ways that are accessible to persons with disabilities.

If it is determined that it is not technically feasible to convert the information or communications or that the technology to convert the information or communications is not readily available, we shall provide the person that requires the information with an explanation as to why the information or communications are unconvertible; and a summary of the unconvertible information or communications.

## **5.3 Feedback, Accessible Formats and Communication Supports**

GreenFirst Forest Products, Ontario facilities will ensure that its process for receiving and responding to feedback from the public is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communications supports, upon request.

Existing processes for receiving and responding to public feedback are accessible to persons with disabilities by various accessible formats and communication supports, available on GreenFirst Forest Products' public website (<https://greenfirst.ca/accessibility>). In addition, in accordance with the IASR, GreenFirst Forest Products, Ontario facilities will provide or arrange for accessible formats and communication supports for persons with disabilities:

- Upon request and in a timely manner that takes into account the persons' accessibility needs due to a disability;
- Consult with the person making the request and determine suitability of an accessible format or communication support;
- Notify the public about the availability of accessible formats and communication supports via the Accessibility link on the GreenFirst Forest Products public website.

#### **5.4 Emergency Procedures, Plans or Public Safety Information**

If GreenFirst Forest Products, Ontario facilities prepares emergency procedures, plans or public safety information and makes the information available to the public, the information will be provided in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

#### **5.5 Website Accessibility**

GreenFirst Forest Products, Ontario facilities shall take the following steps to make its internet website and web content conforms with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 initially at Level A and increasing to Level AA:

- Ensure that any web content developed internally or externally meets the Information and Communication Standards and that content developers/vendors have the necessary expertise to develop such content;
- Ensure that by January 1, 2021 all internet website and web content backdated to 2012 conforms to WCAG 2.0 Level AA.

**Required Legislative Compliance Date: All Content (WCAG 2.0 Level AA), except for exclusions set out in the IASR - January 1, 2021**

**Status:** In progress.

## **Part 3 – EMPLOYMENT STANDARDS**

GreenFirst Forest Products, Ontario facilities is committed to fair and accessible employment practices. The Employment Standards builds upon the existing requirements under the Ontario Human Rights Code in relation to how accessibility throughout the entire employment cycle is provided. It applies to all GreenFirst Forest Products Ontario employees and does not apply to volunteers and other non-paid individuals.

### **5.6 Recruitment**

GreenFirst Forest Products, Ontario facilities shall take the following steps to notify employees and the public about the availability of accommodations for applicants with disabilities as follows:

- Advise employees and the public of GreenFirst Forest Products' accessibility commitment via the Accessibility link on the GreenFirst Forest Products public website;
- If a selected applicant requests an accommodation, GreenFirst Forest Products, Ontario facilities shall consult with the applicant and provide or arrange for the provision of a suitable accommodation that takes into account the applicant's disability;
- Include an accessibility statement in written offers of employment.

### **5.7 Employee Notification of Supports**

GreenFirst Forest Products, Ontario facilities shall inform its employees of the policies used to support 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 a disability as follows:

- As required to new employees as soon as practicable after they begin their employment;
- Notification to all existing 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 a disability.

### **5.8 Accessible Formats and Communication Supports for Employees**

Upon request, GreenFirst Forest Products, Ontario facilities will consult with an employee with a disability to provide or arrange for the provision of accessible formats and communication supports as outlined below:

- Information that is needed in order to perform the employees job;
- Information that is generally available to employees in the workplace; and
- Consult with the employee making the request in determining the suitability of an accessible format or communication support.

## **5.9 Workplace Emergency Response Information**

GreenFirst Forest Products, Ontario facilities shall provide individualized workplace emergency response information to employees who have a disability when:

- 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;
- The employee who receives an individual workplace emergency response information requires assistance and with the employee's consent, GreenFirst Forest Products, Ontario facilities shall provide the workplace emergency information to a designated person to provide assistance to the employee;
- As soon as practicable after becoming aware of the need for accommodation due to the employee's disability;

GreenFirst Forest Products, Ontario facilities will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when overall accommodations needs or plans are reviewed and when the facility's emergency response plan is reviewed.

## **5.10 Individual Accommodation Plan and Return to Work**

GreenFirst Forest Products, Ontario facilities will take the following steps to develop and put in place a process for developing documented Individual Accommodation Plans (IAP) and return to workplans and processes for employees that have been absent due to a disability. The IAP should include the following:

- The employee's participation in the development of the IAP;

- Assessment on an individual basis;
- Identification of accommodations to be provided;
- Timelines for the provision of accommodations;
- GreenFirst Forest Products, Ontario facilities may request an evaluation by outside medical or other expert, at our expense, to assist with determining accommodation and how to achieve accommodation;
- Employees may request the participation of a representative from their bargaining agent, where represented, or otherwise a representative from the workplace not from a bargaining agent;
- Steps taken to protect the privacy of the employee personal information;
- Frequency with which the IAP will be reviewed and updated and the manner in which it will be done;
- If denied, the reasons for denial are to be provided to the employee;
- A format that takes into account the employees disability needs;
- If requested, any information regarding accessible formats and communication supports provided;
- Identification of any other accommodation that is to be provided.

### **5.11 Performance Management, Career Development and Advancement and Redeployment**

In accordance with the IASR, GreenFirst Forest Products, Ontario facilities will implement measures to ensure that the accessibility needs of employees with disabilities are taken into account during any performance management, career development and redeployment processes.

GreenFirst Forest Products, Ontario facilities will consider the accessibility needs of employees with disabilities and, as applicable, their Individualized Accommodation Plans when:

- Conducting the Annual Contribution Appreciation Review;
- Managing career development and advancement;
- Redeployment is required.

## **PART 4.1 – DESIGN OF PUBLIC SPACES STANDARDS**



GreenFirst Forest Products, Ontario facilities shall incorporate accessibility into public spaces on its premises that are newly constructed or redeveloped on and after January 1, 2017 as follows:

- Where applicable, will implement the necessary requirements for the Design of Public Spaces Standards (Accessibility Standards for the Built Environment) for outdoor public use eating areas, outdoor play spaces, exterior paths of travel, accessible parking, and service related elements.
- Where applicable, will provide maintenance and restoration of public spaces by ensuring procedures are in place for preventative and emergency maintenance of accessible elements in public spaces and that procedures are in place for dealing with temporary disruptions when accessible elements required under this section are not in working order.

NOTE: This document is available in alternate format upon request to:

GreenFirst Forest Products      Vice-President, Newsprint and Sawmill Operations, Canada  
Email:                      info@greenfirst.ca  
Phone:                      1-705-337-9744  
Fax:                            1-705-337-9700

## **6. BUSINESS UNIT PROCEDURE REQUIREMENTS**

Business units are required to implement the requirements of this procedure.

## **7. DOCUMENTS**

Accessibility for Ontarians with Disabilities Act, 2005 (AODA)

Integrated Accessibility Standards, O. Regulation 191/11

Ontario Human Rights Code

COR-HR1-446 08, Return to Work Program

## **8. APPROVAL**

Andre Ouimette

August 29, 2021

\_\_\_\_\_  
Vice President, Newsprint and Sawmill Operations, Canada

\_\_\_\_\_  
Date