

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT (“AODA”)

INTRODUCTION, STATEMENTS OF COMMITMENT AND ACTION PLAN

In 2005, the Government of Ontario passed the Accessibility for Ontarians with Disabilities Act (the “AODA”) with the goal to make Ontario accessible by 2025.

The Integrated Accessibility Standards Regulations (“IASR”) under the AODA requires that, effective January 1, 2014, Valiant Machine & Tool Inc. (“Valiant”) shall establish, implement, maintain and document a multi-year accessibility plan which outlines the organization’s strategy to prevent and remove barriers for persons with disabilities and to meet its requirements under the IASR.

The IASR is comprised of several standards under the AODA. The standards include:

- **Accessible Information and Communications** addressing the removal of barriers in access to information by providing communication in person, through print, a website or other means. The standard also includes processes for receiving and responding to feedback;
- **Employment Accessibility** addressing paid employment practices relating to Team Member - Employer relationships, which could include recruitment, hiring, and retention policies and procedures;
- **Transportation** setting out the requirements to prevent and remove transportation barriers and addresses aspects of accessible public transportation; and
- **Design of Public Spaces** addressing access into and within buildings and outdoor spaces in conjunction with Ontario's Building Code. The standards could include things like aisle and door width, counter height, parking and signs.

Under the IASR, the following accessibility standards set certain requirements applicable to Valiant:

- Customer Service
- Training
- Information and Communications
- Employment

Related to the AODA and the IASR, The Ontario Human Rights Code states all employers shall meet the accommodation needs of Team Members with disabilities. The duty to accommodate recognizes that people have different needs and require different solutions to gain equal access to services and employment. The goal of accommodation is to allow people with disabilities to equally benefit from and take part in services or the workplace.

This multi-year plan outlines Valiant’s strategy to prevent and remove barriers to address the current and future requirements of the IASR and to fulfill Valiant’s commitment as outlined in the Company’s AODA Policy.

In accordance with the requirements set out in the IASR, Valiant shall

- Establish, review and update this plan;
- Post this plan on the Company’s public website;
- Report on the progress of the plan implementation;
- Make available this plan in an accessible format, upon request; and
- Review and update this plan at least once every five (5) years.

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT (“AODA”)
INTRODUCTION, STATEMENTS OF COMMITMENT AND ACTION PLAN

ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE

Commitment:

Valiant is committed to interacting, communicating and conducting its business activity based on the inclusion of all persons, including those with disabilities. We recognize people with disabilities may have different needs and we will in accordance with government guidelines, support the identification, removal and prevention of barriers for persons with disabilities.

Actions Taken:

Valiant has implemented and maintains the following customer service accessibility measures:

Assistive Devices

We will continue to ensure Team Member familiarity with various assistive devices, through training and communication best practices, that customers with disabilities may use while accessing our goods or services.

Communication

We will communicate with people with disabilities in ways that take into account their disability.

Service Animals

We welcome people with disabilities and their service animals. The Company allows service animals in the lobby or reception areas of our premises that open to the public and not otherwise excluded by law. If so excluded by law and as required in the alternative, Valiant shall ensure that other measures are available.

Support Persons

Valiant shall allow a support person accompanying a person with a disability on our premises.

Notice of Temporary Disruption

Valiant shall communicate to our customers, including those with disabilities, in the event of a planned or unexpected disruption to services or facilities, detailing the reason for the disruption, its anticipated length of time and a description of alternative facilities or services, if available. The Company will place this notice at the front entrance of the impacted Valiant location as well as on the affected communication device.

Team Member Training

Valiant has provided relevant AODA training to all affected Team Members and, through the “Safety Talks” activity, all Team Members throughout the Company on an ongoing basis, including policy changes. The AODA policy review is part of the the new hire orientation process.

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT (“AODA”)

INTRODUCTION, STATEMENTS OF COMMITMENT AND ACTION PLAN

Feedback Process

Customers who wish to provide feedback on the way Valiant interacts, communicates or conducts its business activity to people with disabilities can do so in person by phone or by e-mail, with a response provided in a timely manner.

Required legislative compliance: January 1, 2012

Completion date: January 1, 2012

INTEGRATED ACCESSIBILITY STANDARDS

GENERAL

Training

Commitment

Valiant is committed a training and communication process to ensure that affected Team Members receive appropriate training on the requirements of the Integrated Accessibility Standards Regulation (IASR) and on the Ontario Human Rights Code as it pertains to persons with disabilities.

Planned Action:

In accordance with the IASR, Valiant shall undertake following actions:

- Develop and provide appropriate training on the requirements of the IASR and on the Ontario Human Rights Code as it pertains to persons with disabilities;
- Maintain a record of the training, including the dates and the names of those trained; and
- Provide training in the event of changes to the prescribed policy.

Required legislative compliance: January 1, 2015

Completion date: January 1, 2015

INFORMATION AND COMMUNICATION STANDARDS

Commitment:

Valiant is committed to making Company information and communications accessible to persons with disabilities, incorporating new accessibility requirements under the information and communication standard to information and communications systems and platforms in accessible formats.

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT (“AODA”)
INTRODUCTION, STATEMENTS OF COMMITMENT AND ACTION PLAN

1. Emergency Procedure and Plan Information

Commitment:

Valiant is committed to providing and maintaining premises that respect the dignity and independence of persons with disabilities.

Action Taken:

Valiant implemented the following measure effective January 1, 2012:

- Valiant requires everyone entering the work site to have reviewed our Health and Safety Policy and General Safety Rules, including Emergency Preparedness measures. The Company shall provide this information in an accessible format or with appropriate communication support, as soon as practicable, upon request.

Required legislative compliance: January 1, 2012

Completion date: This action has been a Valiant practice for several years prior to the required compliance date.

2. Feedback, Accessible Formats and Communication Supports

Feedback Action:

- Existing processes for receiving and responding to feedback are accessible to persons with disabilities by various accessible formats and communication supports available upon request and in a timely manner.

Planned Action:

In accordance with the IASR, Valiant will:

- Examine and incorporate suitable assistive technologies, accessible formats and communication supports for Valiant’s internet website;
- Provide accessible formats and communication supports in a timely manner with consideration given to accessibility needs and comparative cost to the communication formats and supports;
- Provide notification on the internet website regarding the availability of accessible formats and communication supports.

Required legislative compliance: Feedback - January 1, 2015; Accessible formats and communication supports - January 1, 2016

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT (“AODA”)
INTRODUCTION, STATEMENTS OF COMMITMENT AND ACTION PLAN

3. Accessible Website and Website Content

Valiant shall ensure that its internet website and web content under its direct control conform to the Web Content Accessibility Guidelines (WCAG) 2.0 Level A, increasing to Level AA as per the IASR requirements.

Action taken:

- Optimization of web pages and web content for accessibility, according to WCAG; and
- New content posted and added to existing web pages and / or any significant refresh after January 1, 2014 will be accessible, as required, according to WCAG 2.0 Level A.

Planned Action:

In accordance with the IASR, Valiant will:

- Optimize all existing internet websites and web content to conform with WCAG 2.0 Level AA by January 1, 2021.

4. Producers of Education or Training Material

Valiant shall comply with, as applicable within the Province of Ontario, the IATR relative to documentation and all training resources and materials provided to our customers, upon request and in a timely manner.

Planned Action:

In accordance with the IASR, Valiant will:

- Upon request, provide accessible or conversion ready versions of the printed materials supplied to customers within the Province of Ontario.

Required legislative compliance: January 1, 2020

Completion date: TBD

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT (“AODA”)
INTRODUCTION, STATEMENTS OF COMMITMENT AND ACTION PLAN

EMPLOYMENT STANDARDS

1. Recruitment

Commitment:

Valiant is committed to fair and accessible employment practices, across all stages of the employment process, to attract and retain the best Team Members, including those with disabilities.

Planned Action:

In accordance with the IASR, Valiant will undertake following:

a) General Recruitment

As applicable during the recruitment process, notification of accommodation availability for applicants with disabilities in the recruitment process including:

- A review and, as necessary, modification of existing recruitment policies, procedures and processes;
- Referencing accommodation availability on job postings; and
- Ensure compliance of the website and web content to the Information and Communication Standards as required by the IASR.

b) Recruitment, Assessment and Selection

Valiant will notify job applicants regarding the accommodation availability in relation to materials and processes, upon interview selection. This action will include:

- A review and, as necessary, modification of existing recruitment policies, procedures and processes; and
- Notification of accommodation availability of accommodation, in a manner that takes into account the applicant’s accessibility needs due to disability, when scheduling an interview.

c) Notice to Successful Applicants

Valiant, when presenting an offer of employment, will notify the successful applicant of the Company policy for accommodating Team Members with disabilities, including:

- A review and, as necessary, modification of existing recruitment policies, procedures and processes; and
- A reference to Valiant’s accommodation policy regarding Team Members with disabilities.

Required legislative compliance: January 1, 2016

Completion date: January 1, 2016

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT (“AODA”)
INTRODUCTION, STATEMENTS OF COMMITMENT AND ACTION PLAN

2. Informing Team Members of Supports

Valiant, in accordance with the IASR and through the Safety Talk process, will inform all Team Members of the Company’s AODA Policy, including, but not limited to, the following:

- Valiant’s policy of supporting Team Members with disabilities through accommodation of a Team Member’s needs due to disability;
- Reference the supporting policy in the orientation information for new Team Members;
- Communicate changes to Team Members regarding Valiant’s AODA policy and practices relative to disability accommodations; and
- Where a Team Member with a disability so requests it and in consultation with the requesting Team Member, Valiant will provide or arrange for provision of suitable accessible formats and communications support for:
 - Information needed in order to perform the Team Member’s job
 - Information generally available to Team Members in the workplace;

Required legislative compliance: January 1, 2016

Completion date: January 1, 2016

3. Workplace Emergency Preparedness and Response Information

Commitment:

Valiant, when aware that a Team Member has a disability and that there is a need for accommodation due to the nature of the disability, shall provide workplace emergency preparedness and response information to the affected Team Member as soon as practicable.

Action Taken:

Valiant implemented, and maintains, the following IASR workplace emergency preparedness and response requirements:

- The development and communication of workplace emergency preparedness and response information for Team Members and others in the workplace, including those with with disclosed or accommodated disabilities, where necessary; and
- As required and as communicated to the accountable Leaders and the designated JHSEC members on an “as needed” basis, emergency plans and provided assistance including assistive devices to specific disabled Team Members, with the disabled Team Members’ prior consent, to help them evacuate the workplace in case of an emergency or a disaster.

Valiant, on an ongoing and regular basis and pursuant to the IASR, will review and assess emergency preparedness and response processes to address accessibility issues.

Required legislative compliance: January 1, 2012

Completion date: January 1, 2012

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT (“AODA”)
INTRODUCTION, STATEMENTS OF COMMITMENT AND ACTION PLAN

4. Documented Accommodation Plans / Return-to-Work Process

Commitment:

Valiant will document, implement and maintain accommodation and return-to-work policies in compliance with the IASR requirements.

Planned Action:

- Edit existing return-to-work process documents to include and facilitate the accommodation of a Team Member with a disability;
- As requested and with the consent and the input of the affected Team Member to protect his or her privacy and personal information and accessibility needs, Valiant will review, assess and standardize existing processes on a regular basis to support the development of documented individual accommodation plans, as warranted and approved, for Team Members with a disability;
- Develop and provide individual accommodation plans, as warranted, including information regarding accessible formats or communication supports, information relative to performing the affected Team Member’s functional assignment and information generally available to Team Members in the workplace.

Valiant will ensure that the return to work process as set out in its existing process references the actions taken to facilitate a Team Member’s return to work after a disability-related absence, including the actions noted above.

Required Legislative compliance: January 1, 2016

Completion date: January 1, 2016

5. Performance Management, Career Development and Redeployment

Commitment:

Valiant’s Performance Management Process (PMP) shall identify areas of positive achievement and success inclusive of Team Member development and improvement opportunities in achieving objectives. This activity will consist of the necessary improvement action steps, taking into account the accessibility needs and accommodation needs of Team Members with disabilities, to realize the performance objectives associated with the position duties, accountabilities and redeployment circumstances.

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT (“AODA”)
INTRODUCTION, STATEMENTS OF COMMITMENT AND ACTION PLAN

Planned Action:

In accordance with the IASR, Valiant will:

- Review, assess and, as necessary, modify existing policies, procedures and practices to ensure compliance with the IASR;
- Assess the accessibility needs of Team Members with disabilities, as well as individual accommodation plans as applicable, when using performance management tools;
- Consider the accessibility needs of Team Members with disabilities when providing career development and advancement to Team Members with disabilities; and
- Take into account the accessibility needs of Team Members with disabilities when redeploying Team Members.

Required legislative compliance: January 1, 2016

Completion date: January 1, 2016