

5.10 Integrated Accessibility Standards/Accessible Employment Standards Policy

This policy applies to all Applicants (as defined herein) and employees.

5.10.1 Purpose

The following policy has been established by Brenntag to govern the provision of services with Ontario Regulation 191/11, "Integrated Accessibility Standards" under the Accessibility for Ontarians with Disabilities Act, 2005 and the "Accessible Employment Standard Regulation" under The Accessibility for Manitobans Act. These standards are developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment. Brenntag is governed by this policy as well as the Accessibility Standards for Customer Service Policy and the relevant legislation noted above in meeting the accessibility needs of persons with disabilities.

5.10.2 Commitment

Brenntag is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. Brenntag is 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 and The Accessibility for Manitobans Act.

5.10.3 Accessibility Plan

- 5.10.3.1 Brenntag 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.
- 5.10.3.2 The Accessibility Plan will be reviewed and updated at least every five (5) years and will be posted on the company's website. Upon request, Brenntag will provide a copy of the Accessibility Plan in an accessible format.

5.10.4 Training Employees and Volunteers

- 5.10.4.1 Brenntag will ensure that training is provided on the requirements of the accessibility standards referred to in the Regulation and continue to provide training on the Human Rights Code as it pertains to persons with disabilities, to:
 - a. all its employees;
 - b. all persons who participate in developing Brenntag's policies; and,

- c. all other persons who provide goods, services, or facilities on behalf of the company

5.10.4.2 The training will be appropriate to the duties of the employees and other persons.

5.10.4.3 Employees will be trained when changes are made to the accessibility policy. New employees will be trained when the employee starts in their position.

5.10.5 Information and Communications Standards

5.10.5.1 Feedback - Brenntag will continue to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communications supports, upon request.

5.10.5.2 Accessible Formats and Communication Supports

- a. Upon request, Brenntag 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.
- b. Brenntag will consult with the person making the request in determining the suitability of an accessible format or communication support.
- c. Brenntag also will notify the public about the availability of accessible formats and communication supports.

5.10.6 Employment Standards

5.10.6.1 Recruitment - Brenntag will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

5.10.6.2 Recruitment, Assessment or Selection Process

- a. Brenntag will notify job applicants, when they are individually selected to participate further in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.
- b. If a selected applicant requests an accommodation, Brenntag will 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.

5.10.6.3 Notice to Successful Applicants - When making offers of employment, Brenntag will notify the successful applicant of its policies for accommodating employees with disabilities.

5.10.6.4 Informing Employees of Supports

Brenntag will continue to inform its employees of its policies (and any updates to those 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 as soon as practicable after commencing employment.

5.10.6.5 Accessible Formats and Communication Supports for Employees

Upon the request of an employee with a disability, Brenntag will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his/her job, and information that is generally available to other employees.

In determining the suitability of an accessible format or communication support, Brenntag will consult with the employee making the request.

5.10.6.6 Workplace Emergency Response Information

Brenntag will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if Brenntag is aware of the need for accommodation due to the employee's disability. Brenntag will provide this information as soon as practicable after becoming aware of the need for accommodation.

Where the employee requires assistance, Brenntag will, with the consent of the employee, provide the workplace emergency response information to the person designated by Brenntag to provide assistance to the employee.

Brenntag will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodations needs or plans are reviewed.

5.10.6.7 Documented Individual Accommodation Plans

Brenntag will maintain a written process for the development of documented individual accommodation plans for employees with disabilities.

If requested, information regarding accessible formats and communications supports provided will also be included in individual accommodation plans.

In addition, the plans will include individualized workplace emergency response information (where required), and will identify any other accommodation that is to be provided.

5.10.7 Return to Work Process

Brenntag maintains a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

The return to work process outlines the steps Brenntag will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

This return to work process will not replace or override any other return to work process created by or under any other statute (i.e., the Workplace Safety Insurance Act, 1997, of Ontario, or The Workers Compensation Act of Manitoba).

5.10.8 Performance Management, Career Development and Advancement & Redeployment

Brenntag 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.

5.10.9 Questions about this policy

5.10.9.1 This policy has been developed to break down barriers and increase accessibility for persons with disabilities in the areas of information, communications, and employment.

- a. Internal Parties: Questions regarding this policy may be directed to a representative in the Human Resources Department.
- b. External Parties: If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation will be provided by:

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