

Integrated Accessibility Standards Policy & Commitment Statement and Multi-Year Accessibility Plan for all Ontario, Canada Divisions of ATS Corporation

Introduction

ATS Corporation and its affiliates (collectively “ATS” or the “Company”), fully supports the inclusion of persons with disabilities in all of its operations. In accordance with the requirements of the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”) and the Ontario *Human Rights Code* (“Code”), ATS strives to conduct its business in a way that is accessible, inclusive, and responsive to the needs of persons with disabilities.

The purpose of this document is to describe ATS’s policies governing how the organization achieves or will achieve accessibility through compliance with AODA and, in particular, Ontario Regulation 191/11 the *Integrated Accessibility Standard Regulation* (“IASR”). This policy identifies what ATS will do in order to achieve accessibility as an organization and contains ATS’s Multi-Year Accessibility Plan (collectively the “Accessibility Plan”).

Requirements

The IASR under AODA require that ATS establish, implement, maintain, and document its accessibility policies and MYAP, which outlines ATS’s strategy for preventing and removing barriers for persons with disabilities and to meeting requirements under the IASR.

The Accessibility Plan outlines the steps ATS is taking to meet the AODA requirements and improve opportunities for people with disabilities and describes the accessibility initiatives that ATS has taken and plans to take. The Accessibility Plan can be found on ATS’s website and is also available in an accessible format upon request. The Accessibility Plan will be reviewed and updated, if applicable, at least once every five years.

Application

The Accessibility Plan applies to all employees and customers of ATS, and where indicated, to any independent contractors working for ATS.

Commitment Statement

ATS is committed to meeting the accessibility needs of persons with disabilities in an effective and timely manner by preventing and removing barriers for persons with disabilities in accordance with the IASR. ATS’s goal is to foster an inclusive organizational culture that is guided by the principles and requirements of the AODA, the IASR and the Code. ATS promotes integration and equal opportunity and is committed to meeting the needs of peoples with disabilities in a timely manner. We will seek to achieve this by preventing and removing barriers to accessibility and by meeting accessibility requirements under the AODA.

This Accessibility Plan sets out ATS’s policy on how it achieves accessibility generally, as well as in employment, information and communications and design of public spaces (built environment).

Accessibility Standards for Customer Service

ATS is committed to providing products and services in a way that respects the dignity and independence of people with disabilities. ATS has as an Accessible Customer Service Policy that addresses the AODA's specific standards for accessible customer service. A copy of this Policy may be accessed [here](#). [Customer Service Policy.]

Self-service Kiosks

ATS's self-service kiosks (where located) have regard to the accessibility for persons with disabilities and ensure that the kiosks incorporate appropriate accessibility features.

Training

ATS will provide training to all of its employees, volunteers, persons who participate in developing the organization's policies, on the accessibility standards referred to in the *IASR* and on the requirements of the *Code* as it pertains to persons with disabilities. Training will be provided as soon as practicable. Training will also be included as part of orientation for all new hires. The training provided will take into consideration and be appropriate to the duties of those receiving the training.

Records of the training provided will be maintained and will include: (i) the dates on which training was provided and (ii) the names and number of individuals to whom training was provided. Training will also be provided on any changes to ATS policies on an ongoing basis.

Information and Communications

ATS is committed to making company information and communications accessible to persons with disabilities. ATS will incorporate new accessibility requirements under the information and communication standards to ensure that its information and communications systems and platforms are accessible and are provided, upon request, in accessible formats that meet the needs of persons with disabilities.

Feedback: ATS will continue to ensure that its processes for receiving and responding to feedback are accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communication supports upon request.

ATS will advise the public about the availability of accessible formats and communication supports with respect to its feedback processes through a notification on the ATS Automation website.

Accessible formats and communication support: Upon request, ATS will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account each person's accessibility needs due to disability and (if applicable) at a cost that is no more than the regular cost charged to other persons.

ATS will consult with the person making the request for an accessible format or communication supports when determining the suitability of an accessible format or communication supports.

ATS will continue to advise the public about the availability of accessible formats and communication supports with respect to its feedback processes on the ATS Automation website.

Accessible websites and web content: In accordance with *IASR*, ATS will work toward making any Ontario-based websites and web content conform with the World Wide Consortium Web Content Accessibility Guidelines (WCAG 2.0) Level AA. ATS will also take reasonable steps to ensure that all new Ontario-based websites and web content controlled by ATS conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG 2.0) Level AA, except where meeting the requirement(s) is not practicable.

Assistive Devices

ATS welcomes all persons with disabilities who use assistive devices.

Use of Service Animals and Support Persons

Persons with disabilities may bring their service animal or support person in order to access our facilities. Unless otherwise excluded by law, such persons may keep their service animal or support person with them at all times.

ATS will ensure that all employees are trained on how to interact with persons with disabilities who are accompanied by a service animal or support person.

ATS's accessibility policies governing the use of service animals are available in accessible formats upon request.

Notice of Temporary Disruptions

Customers and third parties will be notified of planned or unexpected disruptions to any assistive facilities or services used by persons with disabilities. This notice will include information about the reasons for the disruption, how long the disruption is expected to last, and whether any alternative facilities or services are available.

Employment

ATS is proud to have a diverse workforce, with a safe, inclusive, and accessible work environment. ATS is committed to fair and accessible employment practices that attract, retain and support employees with disabilities. ATS's policies and practices are intended to foster diversity, inclusiveness, and accessibility in ATS, while ensuring that the workplace is free from discrimination and harassment. The privacy and confidentiality of the personal information of persons with disabilities will be maintained in accordance with the requirements of the applicable accessibility legislation.

Recruitment: In our recruitment processes, ATS will advise employees and the public about the availability of accommodation for applicants with disabilities. This will include:

- reviewing and, as necessary, modification of existing recruitment policies, procedures, and processes.
- specifying that accommodation is available for applicants with disabilities, on ATS's website and on job postings.

Recruitment, Assessment or Selection Process: ATS will 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. This will include:

- reviewing and, as necessary, modification of existing recruitment policies, procedures, and processes.
- inclusion of availability of accommodation notices as part of the script in the scheduling of an interview and/or assessment.

If a selected job applicant requests accommodation relating to their participation in the hiring process, ATS will consult with the individual and provide or arrange for the provision of reasonable accommodation that takes into account the applicant's disability-related needs.

Notice to Successful Applicants: When making offers of employment, ATS will notify successful applicants of our policies for accommodating employees with disabilities. This will include:

- reviewing and, as necessary, modification of existing recruitment policies, procedures, and processes.
- inclusion of notification of ATS's policies on accommodating employees with disabilities in offer of employment letters.

Informing Employees of Supports: We will notify our employees of ATS's policies (and any updates where there is a change to those policies) for supporting employees with disabilities, including our policies regarding the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new hires as soon as practicable after the new hire begins employment, specifically in the orientation process.

Accessible Formats and Communication Supports for Employees: If an employee with a disability asks for information in an accessible format or to receive communication supports, ATS will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for information that the employee needs to perform their job, as well as information that is generally available to other employees.

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

Workplace Emergency Response Information: ATS will provide individualized workplace emergency response information to employees with disabilities, as soon as practicable, where the disability is such that individualized information is necessary and ATS is or becomes aware of the need for accommodation.

Where an employee who receives individualized workplace emergency response information requires assistance, ATS will designate a person to provide assistance and, with the employee's consent, ATS will provide the workplace emergency response information to such person. Individualized emergency response information will be communicated to the employees' respective managers and safety personnel on an 'as needed' basis.

ATS will review individualized workplace emergency response information, at minimum, whenever:

- the employee moves to a different location within ATS.
- the employee's workspace is modified.
- the employee's overall accommodation needs, or plans are reviewed; or
- ATS reviews its general emergency response policies.

Documented Individual Accommodation Plans: ATS will develop and maintain a written process for the development of documented individual accommodation plans for employees with disabilities.

In accordance with the provisions of the *IASR*, ATS ensures that the process for the development of documented individual accommodation plans include the following elements:

- information regarding the manner in which the employee requesting accommodation can participate in the development of the plan;
- information regarding the means by which the employee is assessed on an individual basis;
- information regarding the manner in which ATS can request an evaluation by an outside medical or other expert, at ATS's expense, to assist ATS in determining if and how accommodation can be achieved;
- steps to protect the privacy of the employee's personal information;
- information regarding the frequency with which individual accommodation plans will be reviewed and updated and the manner in which this will be done;
- the reasons for a denial where an individual accommodation plan is denied;
- information regarding the means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs;
- the following will be included if individual accommodation plans are established:
 - any individualized workplace emergency response information that is required;
 - any information regarding accessible formats and communication supports that have been provided for or arranged, in order to provide the employee with:
 - information that is needed in order to perform the employee's job;
 - information that is generally available to employees in the workplace; and
 - identify any other accommodation that is to be provided to the employee.

If requested, information regarding accessible formats and communication supports provided will also be included in individual accommodation plans. Additionally, the plans will include individualized workplace emergency response information (where required and in accordance with the Workplace Emergency Response Information Standard). Plans will also identify any other accommodation that is to be provided.

Return to Work Process: ATS will develop and maintain 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 will outline the steps that ATS will take to facilitate the return to work and will include a documented individual accommodation plan, where required.

Performance Management, Career Development and Advancement: ATS will take into account the accessibility needs of employees with disabilities, as well as all individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or redeploying employees.

In accordance with the *IASR*, ATS will:

- review, assess and, as necessary, modify existing policies, procedures and practices to ensure compliance with the *IASR*;
- take the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account when:
 - assessing performance;
 - managing career development and advancement; and
 - redeployment is required.
- review, assess and, as necessary, include in performance management workshops, accessibility criteria;
- take into account the accessibility needs of employees with disabilities when providing career development and advancement to its employees with disabilities, including notification of the ability to provide accommodations on internal job postings; and

- take into account the accessibility needs of employees with disabilities when redeploying employees, including review and, as necessary, modification of employee transfer checklist.

Design of Public Spaces

While ATS has no current plans to engage in new construction or significant redevelopment of its facilities at present, ATS will meet the Design of Public Spaces Standards under the AODA, where it is required by law to do so.

Feedback Process

We welcome your comments and feedback. If you would like to share your thoughts regarding the Company's AODA policies, practices, and procedures, please contact us at: AODA@atsautomation.com

ATS will continue to ensure that its processes for receiving and responding to feedback are accessible to persons with disabilities by providing, or arranging for the provisions of, accessible formats and communication supports, upon request.

Complaints will be addressed as quickly as possible. Customers and third parties can expect acknowledgement of feedback within five business days. The acknowledgement will indicate when the matter will be addressed and when the customer/third party will be notified. ATS will follow up with any required action within the timeframe noted in the acknowledgement. Every effort will be made to provide the response in a format that is accessible to the person who provided the comments.

Questions: If you have any questions or would like more information on ATS's accessibility policies or any other AODA related matter, please contact: Laura Pierce at AODA@atsautomation.com Tel: 519-653-6500