



Electrical Contacts Limited

Policy: Accessibility for Ontarians with Disabilities (AODA)

Revision		0.1
Review Date		
Approvals	Signature	
President: Peter Allen <i>Peter Allen</i>	<i>[Signature]</i>	Date: 2026-07-14
MT Team #1: <i>Viktor Irwin</i>	<i>[Signature]</i>	Date: 2026-07-14
MT Team #2: <i>A. Condino</i>	<i>A. Condino</i>	Date: 2026-07-14
MT Team #3: <i>Aaron Grant</i>	<i>[Signature]</i>	Date: 2026-07-17

PURPOSE:

The purpose of this policy is to affirm Electrical Contacts Limited's (ECL) commitment to accessibility and to serving all Associates, job applicants, contractors, and visitors, including persons with disabilities, in a manner that respects dignity, independence, integration, and equal opportunity.

SCOPE:

This policy applies to all Associates of ECL, as well as to job applicants, contractors, and visitors accessing ECL facilities, services, or employment opportunities.

Definitions:

Accessibility: The design of workplaces, processes, and services to ensure that persons with disabilities can access and participate fully and safely.

Accommodation Any modification or adjustment to a job, workplace, or work process that enables a person with a disability to perform their duties. Accommodation will be provided up to the point of undue hardship in accordance with the Ontario Human Rights Code.

Barrier: Anything that prevents a person with a disability from fully participating in the workplace. Barriers may be physical, technological, or related to workplace practices.

Disability: As defined under the Ontario Human Rights Code, includes physical, mental, developmental, and learning disabilities, whether visible or non-visible.

Bona Fide Occupational Requirement (BFOR): A job requirement that is reasonably necessary to the safe and efficient performance of the role. In a manufacturing environment, this may include physical capabilities, use of personal protective equipment, or adherence to safety procedures. ECL will ensure that any requirement identified as a BFOR is legitimate, necessary, and applied in accordance with human rights legislation.

Undue Hardship: The limit of ECL's obligation to accommodate under the Ontario Human Rights Code, based on cost, outside sources of funding, and health and safety considerations.

POLICY STATEMENT:

Electrical Contacts Limited is committed to maintaining a workplace and service environment that is inclusive, accessible, and free from barriers. In accordance with the Accessibility for Ontarians with Disabilities Act, 2005, including the Integrated Accessibility Standards Regulation (IASR), and the Ontario Human Rights Code, ECL will identify, remove, and prevent barriers to accessibility and will provide accommodation to individuals with disabilities up to the point of undue hardship.

This policy will be reviewed and amended as necessary to reflect applicable legislative changes or organizational developments, ensuring continued relevance, accuracy, and compliance with current standards.



Electrical Contacts Limited

Revision	0.1
Review Date	
Approvals	Initials
President: Peter Allen	<i>[Signature]</i> Date: 2026-07-20
MT #1: <i>Viktorva Irwin</i>	<i>V.I.</i> Date: 2026-07-15
MT #2: <i>David Condina</i>	<i>D.C.</i> Date: 2026-07-14
MT #3: <i>Helen Grant</i>	<i>[Signature]</i> Date: 2026-07-13

ECL recognizes that accessibility is an ongoing responsibility and will integrate accessibility considerations into all aspects of the employment lifecycle, including recruitment, hiring, training, performance management, career development, and return-to-work processes.

ECL operates within a manufacturing environment where health and safety are critical. Certain roles may include bona fide occupational requirements that are necessary for the safe and efficient performance of the job. ECL will ensure that any such requirements are established in good faith, are reasonably necessary, and meet the legal requirements under human rights legislation. Where a standard or requirement creates a barrier, ECL will assess and implement accommodation measures wherever possible, up to the point of undue hardship, including consideration of health and safety risks.

ECL is committed to treating all Associates, job applicants, contractors, and visitors with dignity, independence, integration, and equal opportunity, and to fostering a respectful workplace where accessibility and inclusion are shared responsibilities.

RESPONSIBILITIES:

Employer:

- Ensuring compliance with the Accessibility for Ontarians with Disabilities Act, 2005, including the Integrated Accessibility Standards Regulation (IASR), and the Ontario Human Rights Code
- Providing accommodations to Associates and applicants up to the point of undue hardship
- Identifying, removing, and preventing barriers within the workplace
- Developing, implementing, and maintaining accessibility policies, procedures, and practices
- Ensuring accessible recruitment, hiring, and employment practices
- Establishing and maintaining a multi-year accessibility plan
- Ensuring accessible formats and communication supports are available upon request
- Maintaining a process for receiving and responding to accessibility feedback
- Ensuring workplace emergency response information is provided where required

Direct Supervisors and Managers:

- Implementing accessibility practices within their departments
- Responding to accommodation requests in a timely, respectful, and confidential manner
- Participating in the accommodation process, including reviewing Functional Abilities Forms (FAFs) and implementing appropriate workplace adjustments
- Working collaboratively with Human Resources and the Associate to develop and maintain accommodation plans
- Monitoring the effectiveness of accommodations and addressing concerns as they arise
- Ensuring Associates are aware of available support and expectations
- Applying bona fide occupational requirements appropriately and ensuring they do not create unnecessary barriers
- Maintaining a safe work environment while supporting accommodation measures

This policy will be reviewed and amended as necessary to reflect applicable legislative changes or organizational developments, ensuring continued relevance, accuracy, and compliance with current standards.



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Revision	0.1	
Review Date		
Approvals	Initials	Date:
President: Peter Allen	<i>PA</i>	2026-07-10
MT #1:	<i>U.I</i>	Date: 2026-07-15
MT #2:	<i>A.C.</i>	Date: 2026-07-14
MT #3:	<i>AG</i>	Date: 2026-07-17

Associates:

- Participating in required accessibility training
- Supporting a respectful and inclusive workplace
- Communicating accommodation needs in a timely manner where appropriate
- Cooperating in the accommodation process by providing relevant information, including Functional Abilities Forms (FAFs) or other appropriate documentation where required
- Working collaboratively with ECL to support the development and implementation of accommodation measures
- Following established workplace procedures, including health and safety requirements, while participating in accommodation plans

Human Resources:

- Leading the implementation and administration of this policy
- Supporting Managers and Supervisors in the accommodation process
- Coordinating and maintaining accommodation documentation, including individualized accommodation plans and Functional Abilities Forms (FAFs)
- Ensuring recruitment, onboarding, and employment practices are accessible and compliant
- Supporting return-to-work and disability management processes
- Maintaining confidentiality of medical and accommodation-related information
- Monitoring legislative requirements and updating policies as required

Training Coordinator:

Coordinating and delivering accessibility training in accordance with legislative requirements

- Ensuring all Associates receive accessibility training as required and within appropriate timelines
- Maintaining accurate training records, including completion tracking and reporting
- Supporting the development and delivery of accessible training materials and formats
- Working with Human Resources and Supervisors to ensure training is accessible and meets operational needs

