



Hubbell Canada

POLICY PROCEDURE
PP718 Accessibility Policy

Version # : 3.0

Date: 7/12/2024

Approved By: Brenda Carter-Jennings

Status: Current

Accessibility Policy

Purpose and Application

Under the *Accessibility for Ontarians with Disabilities Act, 2005* all municipalities must meet the requirements of accessibility standards established by regulation. This policy establishes the accessibility standards for customer service for Hubbell Canada, in accordance with Ontario Regulation 429/07. This policy applies to all employees of Hubbell Canada, agents, volunteers and contracted service staff.

Definitions

Accessible means customer service is provided in a manner that is capable of being easily understood or appreciated; easy to get at; capable of being reached or entered; obtainable.

Disability means:

- a) Any degree of physical 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 impairment, 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,
- 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*

Guide Dog means a dog trained as a guide for a visually impaired person and having the qualifications prescribed by the Blind Persons' Rights Act R.S.O. 1990, c. B.7, s. 1 (1).



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Service Animal is an animal for a person with a disability, if it is readily apparent that the animal is used by the person for reasons relating to his/her disability; or if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

Policy Statement

Hubbell Canada is committed to providing exceptional and accessible service for its customers. Goods and services will be provided in a manner that respects the *dignity and independence* to all customers. The provision of services to persons with disabilities will be *integrated* wherever possible. Persons with disabilities will be given an opportunity *equal* to that given to others, to obtain, use or benefit from the goods and services provided by and on behalf of Hubbell Canada

Policy Requirements

1) Accessibility Training Policy

- a. Every person who deals with members of the public or who participates in developing Hubbell Canada's policies, practices and procedures governing the provision of goods and services to the public; including Company staff, volunteers, agents, contractors and others who provide service on behalf of Hubbell Canada will receive training regarding the provision of goods and services to persons with disabilities.
- b. The training will include the following information:
 - i. The purposes of the Accessibility for Ontarians with Disabilities Act,
 - ii. How to interact and communicate with persons with various types of disabilities,
 - iii. How to interact with persons with disabilities who use an assistive device, or require the assistance of a service animal or support person
 - iv. How to use equipment made available by the Company to help people with disabilities to access goods and services
- c. What to do if a person with a disability is having difficulty accessing the Company's goods and services. Training will be provided to each person according to his or her needs and duties and as soon as is practicable on an ongoing basis in connection with changes to policies, practices and procedures governing the provision of goods or services to persons with



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disabilities. A record of the dates on which training is provided and the number of individuals to whom it is provided will be kept.

- d. As a safety measure all people requiring wheelchair assistance in the warehouse must be accompanied by a support person.

2) Feedback Process

Hubbell Canada accepts feedback from the public in a variety of methods including:

- Phone
- In person
- Fax
- Email
- And, through feedback forms

All feedback is reviewed by the Corporate Directors. Complaints are investigated and follow up is provided to the customer if requested.

3) Use of Service Animals and Support Persons

- a. If a person with a disability is accompanied by a guide dog or other service animal, Hubbell Canada will ensure that the person is permitted to enter a Hubbell Canada facility with the animal and to keep the animal with him or her unless the animal is otherwise excluded by law. Where a service animal is excluded by law, Hubbell Canada will ensure that other measures are available to enable the person with a disability to obtain, use and benefit from the Company's goods and services. The service animal must be under the care and control of the individual at all times.
- b. If a person with a disability is accompanied by a support person, Hubbell Canada will ensure that both persons are permitted to enter a Company facility, and that the person with a disability is not prevented from having access to the support person. Hubbell Canada may require a person with a disability to be accompanied by a support person when in a Company facility, but only if a support person is necessary to protect the health or safety of the person with a disability or the health or safety of others in the facility. If an amount is payable



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by a support person for admission, or otherwise, to a premise, Hubbell Canada will ensure notice is given in advance about the amount.

Notice of Temporary Disruptions

Hubbell Canada shall provide notice of disruption of services to the public.

Any Notice of Disruption will contain the following:

- Reason for the disruption
- Anticipated duration
- Alternative facilities or services

Company staff will provide such notice in at least one of the following three methods:

- Notice physically posted at the site of the disruption
- Notice on Company website
- Notice in local newspaper

5) Notice of availability of documents

- a. Hubbell Canada will provide the public notice of the availability of the documents, required by the Accessibility Standards for Customer Service, (O. Reg 429/07) upon request. Notice of availability will be provided on the Hubbell Canada website and through other printed methods.

6) Format of documents

- a. If Hubbell Canada is required, by the Accessibility for Ontarians with Disabilities Act, 2005, to give a copy of a document to a person with a disability, the Company will take into account the person's ability to access the information and will provide the document or information contained in the document in a format that meets those needs as agreed upon with the person.

Multi-Year Accessibility Plan

- a. Hubbell Canada will review the facility on an annual basis to determine if any changes are required to meet accessibility requirements.



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Required changes will be documented and corrected as quickly as possible.

- b. Hubbell Canada will review the accessibility requirements prior to any renovations to the facility to ensure that any changes made to the existing facility meet the requirements of accessibility.

7) Individualized workplace emergency response information for employees

- a. Hubbell Canada will make every reasonable effort to provide tailored emergency response information to employees with disabilities, addressing potential emergencies including, but not limited to, the following:

- fire
- power outages
- severe weather
- natural disasters
- security incidents

- b. Hubbell Canada is committed to ensuring that accessibility plans are accessible to all stakeholders and will offer the following accommodations for those who require them:

- i. Accessible format - providing documents in large print for individuals with vision loss.
- ii. Communication support - reading documents aloud, adding captioning to videos or using written notes to communicate with individuals who are hard of hearing.



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- c. When it is known that an employee may need help in an emergency due to a disability, the following steps will be taken to ensure their safety:
 - i. Provide tailored emergency response information to the employee to address their specific needs during an emergency.
 - ii. Obtain the employee's consent to share their emergency response information. Once consent is obtained, share this information with designated individuals who are responsible for assisting the employee during emergencies.
 - iii. Review and update the employee's emergency response information regularly and under the following circumstances:
 - 1. When the employee changes their work location.
 - 2. When reviewing the employees' overall accommodation needs.
 - 3. When updating the organization's general emergency response policies.
- d. Hubbell Canada will provide individualized workplace emergency response information under the following conditions:
 - i. When the employee's disability is such that the information is necessary; and
 - ii. Hubbell Canada is aware of the need for accommodation because of the employee's disability.
- e. Several ways are available for an employee to inform Hubbell Canada of the need to provide individualized workplace emergency response information:
 - i. A new employee may request accommodations during the recruitment process.
 - ii. Existing employees may inform Hubbell Canada of a disability. For example, an existing employee who develops vision loss and



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requests screen reader software for his/her computer. Or an existing employee who develops a temporary disability such as a broken leg.

- f. Hubbell Canada may initiate a dialogue to offer assistance and accommodation to an employee who is clearly unwell or perceived to have a disability.

8) Individual Accommodation Plans (IAP)

Hubbell Canada is committed to providing individual accommodation plans for workers with disabilities to ensure their work environments are fully accessible. These plans detail necessary accommodations which may include informational accommodations such as the following:

- Documents in digital form or real-time captioning at meetings
- Workstation accommodations, for example, a raised desk or a quiet workstation
- Scheduling accommodations, such as shifts at certain times or a compressed work week
- Structural accommodations, for example, automatic doors or accessible washrooms

Workers are encouraged to initiate discussions with their managers about their accommodation needs, leveraging their unique understanding of the accommodations that will best support their job performance.

The process in which an accommodation plan will be created is as follows:

a. Discussing Accommodations

Following initial discussions about the need for accommodation, the worker and employer should delve into the specifics of the worker's requirements. This conversation should focus on how the worker can effectively perform job-related functions with the necessary accommodations, rather than discussing the details of the worker's disability. Key functions that might be addressed include:



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- Accessing the workplace or workstation
- Communicating verbally or in writing
- Maintaining focus, organization, or energy level
- Coping with stress or social situations

Hubbell Canada will keep a worker's personal and medical information secure and confidential and disclose it only to people involved in that worker's accommodation process.

Should there be a need to deny an accommodation request, Hubbell Canada will provide a written explanation to the worker, ensuring transparency and documentation of the decision.

b. Details in the Individual Accommodation Plan

The worker and employer should then create the individual accommodation plan, which should state:

- The worker's name and title or department
- The manager or supervisor's name, and title or department
- When accommodations should start, and when they should end, if applicable
- How the employer will provide accessible-format workplace information if needed
- How the employer will provide emergency information in an accessible format if needed
- When or how often the plan should be reviewed and updated

The plan will also include the following items:

a. Tasks

The plan should also list tasks the worker performs differently, such as:



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- Climbing stairs
- Reading
- Organizing

b. Job functions

The plan should include all job functions involving those tasks, such as:

- Entering the workplace or visiting the manager's office
- Written communication with colleagues and awareness of company events and policies
- Multi-tasking and keeping track of appointments
- Which of these job functions are essential

c. Accommodations

The plan must list accommodations that would allow the worker to perform each function, such as:

- Moving throughout the workplace without using stairs
- Receiving written information in accessible formats
- Accessing records of appointment times and tasks needing priority



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d. Strategies

The plan should then outline strategies for these accommodations, such as having:

- A ramp at the front door or meetings on the first floor
- Digital versions of all documents using email and screen reading software
- Calendars and flowcharts and/or tasks given priority levels when assigned

e. Actions needed

Actions needed to implement these strategies, such as:

- Installing a ramp or arranging meeting space
- Buying or downloading screen reader software on the worker's computer
- Buying a calendar and creating a priority system

A few people are responsible for these actions, such as:

- Human Resources
- maintenance personnel
- IT
- The worker's manager

Any documents relating to this information, such as a copy of an emergency response plan or a copy of the accommodation plan in an accessible format, should be attached to the plan. The worker's copy of the plan, or the denial if applicable, must be in a format the worker can access.



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Reviewing the Plan

Finally, the worker and employer must observe how successful the plan is. They should review the plan and make any needed changes on pre-scheduled dates, as well as if:

- An accommodation is not working correctly
- The worker's ability to perform certain job tasks changes
- The worker's job location or responsibilities change

9) Related and Supporting Documentation

- a. Hubbell Canada and Corporate Policies
- b. Hubbell Canada Training Records
- c. Hubbell Canada Multi Year Accessibility Plan – PP718a