

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

INTEGRATED ACCESSIBILITY STANDARDS – Multi Year Plan

Part I – GENERAL REQUIREMENTS

Section	Initiative	Description	Action	Status	Compliance Date
3	Establishment of Accessibility Policies	3.(1) Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this Regulation.		Complete	January 1, 2014
4	Accessibility Plans	<p>4.(1) Large organizations shall,</p> <p>a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization’s strategy to prevent and remove barriers and meet its requirements under this Regulation;</p> <p>b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and</p> <p>c) review and update the accessibility plan at least once every five years.</p>	<p>Establish an AODA committee that will be responsible for:</p> <ul style="list-style-type: none"> ● The various compliance aspects of the act ● Working with company leadership to move accessibility plans forward 	Complete & On-going	January 1, 2014

6	Self-Serve Kiosks	6.(2) Large organizations and small organizations shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self- service kiosks.	Not applicable in current business	N/A	January 1, 2014
7	Training	7.(1) Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to, (a) all employees, and volunteers; (b) all persons who participate in developing the organization’s policies; and (c) all other persons who provide goods, services or facilities on behalf of the organization.	Provide training to employees regarding the AODA as well as the Integrated Accessibility Standards and Human Rights Code within 30 days of hire Review of job specific training ie – training for hiring managers during recruitment process	On-going	January 1, 2015

PART II – Information and Communications Standards

Section	Initiative	Description	Action	Status	Compliance Date
11	Feedback	11.(1) Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request.	Communicate feedback standard to those responsible for surveys/ receiving feedback	Complete	January 1, 2015
12	Accessible Formats & Communication Supports	12.(1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, a) in a timely manner that takes into account the person’s accessibility needs due to disability; and b) at a cost that is no more than the regular cost charged to other persons.	Determine alternate formats ie: larger print and/ or audio recordings so that alternate formats can be requested in a timely manner	On-going	January 1, 2016
12		12.(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	Communicate to employees/ managers this requirement and how to request an alternate format if an agreement is reached	On-going	January 1, 2016
12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.		On-going	January 1, 2016

13	Emergency Procedures, Plans or Public Safety Info	13.(1) In addition to its obligations under section 12, if an obligated organization prepares emergency procedures, plans or public safety information and makes the information available to the public, the obligated organization shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.	Not applicable in current business	N/A	January 1, 2012
14	Accessible Websites & Web Content	14.(2) Designated public sector organizations and large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG)2.0, initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out in this section.		Complete	<p>January 1, 2014 New internet websites and web content must conform with WCAG 2.0 Level A</p> <p>January 1, 2021 All internet websites and web content must conform with WCAG 2.0 Level AA, other than:</p> <ul style="list-style-type: none"> ● success criteria 1.2.4 captions (live) ● success criteria 1.2.5 audio descriptions (pre-recorded)

15	Educational & Training Resources & Materials	<p>15(1) Every obligated organization that is an educational or training institution shall do the following, if notification of need is given:</p> <ol style="list-style-type: none"> 1. Provide educational or training resources or materials in an accessible format that takes into account the accessibility needs due to a disability of the person with a disability to whom the material is to be provided by, <ol style="list-style-type: none"> i. procuring through purchase or obtaining by other means an accessible or conversion ready electronic format of educational or training resources or materials, where available, or ii. arranging for the provision of a comparable resource in an accessible or conversion ready electronic format, if educational or training resources or materials cannot be procured, obtained by other means or converted into an accessible format. 2. Provide student records and information on program requirements, availability and descriptions in an accessible format to persons with disabilities. 	Not applicable	N/A	January 1, 2013
16	Training to Educators	<p>16(1) In addition to the requirements under section 7, obligated organizations that are school boards or educational or training institutions shall provide educators with accessibility awareness training related to accessible program or course delivery and instruction.</p>	Not applicable	N/A	January 1, 2013

		(2) Obligated organizations that are school boards or educational or training institutions shall keep a record of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided.			January 1, 2013
17	Producers of Educational or Training Material	17(1) Every obligated organization that is a producer of educational or training textbooks for educational or training institutions shall upon request, make accessible or conversion ready versions of the textbooks available to the institutions.	Not applicable	N/A	January 1, 2015 For accessible or conversion ready versions of textbooks
		(2) Every obligated organization that is a producer of print-based educational or training supplementary learning resources for educational or training institutions shall upon request, make accessible or conversion ready versions of the printed materials available to the institutions.	Not applicable	N/A	January 1, 2020 For accessible or conversion ready versions of printed materials that are educational or training supplementary learning resources

18	Libraries of educational & training institutions	<p>18(1) Subject to subsection (2) and where available, the libraries of educational and training institutions that are obligated organizations shall provide, procure or acquire by other means an accessible or conversion ready format of print, digital or multimedia resources or materials for a person with a disability, upon request.</p> <p>(2) Special collections, archival materials, rare books and donations are exempt from the requirements of subsection (1).</p>	Not applicable	N/A	<p>January 1, 2015 For print based resources or materials</p> <p>January 1, 2020 For digital or multimedia resources or materials</p>
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PART III – Employment Standard

Section	Initiative	Description	Action	Status	Compliance Date
22	Recruitment – General	22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	Incorporate language into Ontario job postings that make applicants aware that accommodation is available upon request, in accordance with the AODA	Complete & On-going	January 1, 2016
23	Recruitment, Assessment or Selection Process	<p>23.(1) During a recruitment process, an employer shall 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.</p> <p>(2) If a selected applicant requests an accommodation, the employer shall 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.</p>	Ensure that recruitment/ selection processes can be provided in alternate formats (ie – written or oral)	On-going	January 1, 2016

24	Notice to Successful Applicants	24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	Include language in Ontario offer letters that outlines Mueller's accommodation policies	On-going	January 1, 2016
25	Informing Employees of Supports	25.(1) Every employer shall inform its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.	Policies to be posted on Company shared drive HR folder	Complete	January 1, 2016

25		25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	Include accessibility policies in new hire binder / provide during employee orientation	Complete	January 1, 2016
25		25.(3) Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.	See 25. (1) Any updates to be posted on Company shared drive HR folder		January 1, 2016
26	Accessible Formats & Communication Supports for Employees	26.1 In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for, (a) Information that is needed in order to perform the employee's job; and (b) Information that is generally available to employees in the workplace.	Include language in Accommodation policy that aligns with this section of the act.	On-going	January 1, 2016
26		26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	Include language in Accommodation policy that aligns with this section of the act.	On-going	January 1, 2016

27	Workplace Emergency Response Information	27.(1) Every employer shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability.	Prepare individualized workplace emergency response templates as part of the accommodation policy	Complete & On-going	January 1, 2012
27		(2) If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.		On-going	January 1, 2012
27		(3) Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.		On-going	January 1, 2012
27		(4) Every employer shall review the individualized workplace emergency response information, (a) when the employee moves to a different location in the organization; (b) when the employee's overall accommodations needs or plans are reviewed; and (c) when the employer reviews its general emergency response policies.		On-going	January 1, 2012

28	Documented Individual Accommodation Plans	28.(1) Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.	Include process in the Accommodation policy	Complete & On-going	January 1, 2016
28		<p>28 (2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none"> 1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. 2. The means by which the employee is assessed on an individual basis. 3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if and how accommodation can be achieved. 4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan. 5. The steps taken to protect the privacy of the employee's personal. 	Include process in the Accommodation policy	Complete & On-going	January 1, 2016

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| | | <ol style="list-style-type: none">6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability. | | | |
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29	Return to Work Process	<p>29.(1) Every employer, other than an employer that is a small organization,</p> <p>(a) shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and</p> <p>(b) shall document the process.</p> <p>29. (2) The return to work process shall,</p> <p>(a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and</p> <p>(b) use individual documented accommodation plans, as described in section 28, as part of the process.</p> <p>29. (3) The return to work process referenced in this section does not replace or override any other return to work process create by or under any other statute</p>		Complete & Ongoing	January 1, 2016
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30	Performance Management	30.(1) An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.		On-going	January 1, 2016
31	Career Development & Advancement	31.(1) An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.		On-going	January 1, 2016
32	Redeployment	32.(1) An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.		On-going	January 1, 2016

Mueller Water Products

CORPORATE POLICY BULLETIN

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SUBJECT

Accessibility for Ontarians with Disabilities Act – Customer Service Policy

APPROVED BY: Senior Vice President, Human Resources

POLICY OWNER: Human Resources

PURPOSE

To provide employees with guidelines in regards to the Customer Service Standard under the Accessibility for Ontarians with Disabilities Act

SCOPE

This policy applies to all employees of Mueller Water Products, Inc. and its subsidiaries in the province of Ontario (“Company”).

POLICY STATEMENT

The goal of the Accessibility for Ontarians with Disability Act, 2005 (the ‘Act’) is to create a more accessible Ontario, by identifying to the extent possible, preventing and eliminating barriers experienced by persons with a disability.

A standard for customer service (‘the standard’) has been established under the Act to ensure goods and services are, when at all possible, equally accessible to every member of the public.

We at Mueller Water Products are committed to providing its goods and services in a way that respects the dignity and independence of people with disabilities. We are also committed to giving people with disabilities the same opportunity to access our goods and services and allowing them to benefit from the same services, in the same place and in a similar way as other customers.

1. Application

The policy applies to all members of our organization and those who act on our behalf including our employees, agents and contract employees.

2. Definitions

- i. **Accessibility Report** – the report required to be filed pursuant to section 14 of the Act
- ii. **Assistive Device** – any device used to assist a person in performing a particular task or tasks or to aid that person in activities of daily living
- iii. **Disability** – has the same definition as is provided under the Accessibility for Ontarians with Disabilities Act and the Human Rights Code, R.S.O 1990, c H.19.
- iv. **Service Animal** – an animal is a service animal for a person with a disability, if:
 - a. it is readily apparent that the animal is used by the person for reasons relating to his/her disability; or
 - b. if the person provides documentation from a regulated health professional confirming that the person required the animal for reasons related to the disability
- v. **Support Person** – a person who accompanies a person with a disability to assist with communication, mobility, personal care or medical needs or with access to goods or services

3. Core Principles of the Policy

We endeavour to ensure that the Policy and related practices and procedures are consistent with the following four (4) core principles:

- i. **Dignity** – persons with a disability must be treated as valued customers as deserving of service as any other customer
- ii. **Equality of Opportunity** – Persons with a disability should be given an opportunity equal to that given to others to obtain, use and benefit from our goods and services
- iii. **Integration** – wherever possible, persons with a disability should benefit from our goods and services in the same place and in the same or similar manner as any other customer. In circumstances where integration does not serve the needs of the person with a disability, goods and services will, to the extent possible, be provided in another way that takes into account the persons individual needs
- iv. **Independence** – goods and services must be provided in a way that respects the independence of persons with a disability. To this end, we will always be willing to assist a person with a disability but will not do so without the express permission of the person

4. Implementation

The Company has created an Accessibility Committee responsible for:

- i. Developing and implementing policies, practices and procedures to ensure the

- accessible provision of goods and services to persons with a disability.
- ii. Developing and implementing an accessibility training program as required under the Act
- iii. Developing a feedback procedure as required under the Act
- iv. Filing Accessibility Reports as required under section 14 of the Act

5. Providing Goods and Services to People with Disabilities

The Company is committed to excellence in serving all customers including people with disabilities and we will carry out our functions and responsibilities in the following areas:

- i. **Communication** – we will communicate with people with disabilities in ways that take into account their disability. We will train staff who communicate with customers on how to interact and communicate with people with various types of disabilities
- ii. **Telephone Services** – we are committed to providing fully accessible telephone service to our customers. We will train staff to communicate with customers over the telephone in clear and plain language and to speak clearly and slowly. We will offer to communicate with customers by other means of communication that may apply (i.e – email, TTY, relay services) if telephone communication is not suitable to their communication needs or is not available.
- iii. **Assistive Devices** – we are committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our goods and services. We will ensure that our employees are trained and familiar with various assistive devices that may be used by customers with disabilities while accessing our goods or services
- iv. **Billing** – we are committed to providing accessible invoices to all our customers. For this reason, invoices will be provided in alternate formats upon request. We will answer any questions customers may have about the content of the invoices in person, by telephone or e-mail.

6. Service Animals

Persons with a disability may enter premises owned and/ or operated by the Company accompanied by a Service Animal, and keep the Service Animal with them, if the customer has access to such premises and the Service Animal is not otherwise excluded by law. If a service animal must be excluded, we explain to our customer why this is the case and explore alternative ways to meet the customer's needs. If it is not readily apparent that the animal is a Service Animal, the Company may ask the person with a disability for documentation from a regulated health professional confirming that the person requires the animal for reasons relating to his/ her disability.

7. Support Persons

A person with a disability may enter premises owned and/or operated by the Company with a support person and have access to the Support Person while on the premises. Both persons will be subject to any legal requirements related to IP, non-disclosure, etc the Company may have in place.

In certain cases, the Company might require a person with a disability to be accompanied by a support person for health or safety reasons. Before making a decision, we will consult with the person with a disability to understand their needs; consider health or safety reasons based on available evidence; and determine if there is no other reasonable way to protect the health and safety of the person or others on the premises.

Staff will receive training on how to interact with persons with a disability who are accompanied by a Support Person.

8. Notice of Temporary Disruption

The Company will provide customers with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. This notice will include information about the reason for the disruption, the anticipated duration and a description of alternative facilities or services, if available. The notice will be posted at the entrance of the applicable premises.

9. Training

The Company will provide training and ongoing training as required under the Act to all persons to whom this policy applies as well as to those persons charged with developing this Policy and related procedures and practices. Training will be provided on an ongoing basis when changes are made to these policies, practices and procedures.

Training will include the following:

- A review of the purpose of the Act and the requirements for the Standard
- A review of the Policy
- How to interact and communicate with people with various types of disabilities
- How to interact with persons with a disability who use an Assistive Device or require the assistance of a Service Animal or Support Person
- How to use devices that may be available on providers premises or otherwise that may help with the provision of goods or services to people with disabilities
- What to do if a person with a disability is having difficulty accessing our premises and/or services

Records of the training provided will be maintained and will include the training protocol, the dates on which the training occurred and a list of the individuals who have participated in the training in accordance with the requirements under the Act.

10. Feedback Process

The ultimate goal of the Company is to meet and surpass customer expectations while serving customers with disabilities. Comments on our service regarding how well those expectations are being met are welcome and appreciated. Feedback regarding the way the Company provides goods and services to people with disabilities can be made to Human Resources noted below via email, verbally, written correspondence, etc... We will ensure feedback process is accessible by providing or arranging for accessible formats and communication supports, on request. All feedback will be directed to the appropriate division. Customer complaint/ issues will be acknowledged within 5 business days with a final response within 30 business days, if required.

A record of complaints will be maintained on file for one (1) year.

11. Modifications to this or other Policies

The Company is committed to developing customer service policies that respect and promote the dignity and independence of people with disabilities. Therefore, no changes will be made to this policy before considering the impact on people with disabilities. Any policy of the Company that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

12. Questions about this Policy

This policy exists to achieve service excellence to customers with disabilities. If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation should be provided by, or referred to the Human Resources Manager. This policy, and related practices and protocols, shall be made available upon customer request. The Company will provide documents, or the information contained in the documents, required to be provided under the Standard, to a person with a disability in a format that takes the persons disability into account.

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QUESTIONS AND CONTACT

Questions regarding this policy or any Corporate Policy Bulletin should be directed to your local Human Resources representative.

The Company reserves the right to delete, modify, amend, or terminate this policy at any time.