

November 10, 2023

Disability Accommodation Policy

Purpose:

Preston Hardware is firmly committed to fostering a welcoming and inclusive environment that accommodates the diverse needs of all our customers, employees, and visitors. We place great emphasis on accessibility and are fully dedicated to complying with the provisions of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA).

Our commitment to accessibility ensures equitable access for individuals with disabilities to our services, facilities, and employment opportunities. We are dedicated to proactively identifying and eliminating obstacles that hinder their participation in our organization.

By adhering to the principles outlined in the AODA, we aim to create an environment where everyone, regardless of their abilities, can fully engage with our offerings, receive top-quality service, and enjoy equal employment opportunities.

Definitions:

Accessibility: Aims to provide every individual, including those with disabilities, an equitable opportunity to access, use, and benefit from Preston Hardware's goods, services, facilities, and information. It encompasses physical, digital, and communication access, with strategies to remove barriers and promote inclusivity.

Disability: For this policy, disability includes all physical or mental disabilities, injuries, or illnesses without regard for whether the individual was born with a disability, it resulted from an accident or is an impairment or disease that gradually developed over time. Some examples of a disability include a birth defect, mental illness, developmental disability, learning disability, work-related injury, or illness eligible for WSIB benefits, or a temporary disability such as a broken limb.

Employment Accommodation: An individualized process where Preston Hardware prevents, removes, or mitigates barriers in the workplace that prevent an employee from participating equally in all aspects of the recruitment processes or employment, as applicable, because of the person's disability. Employment accommodation must be done in consultation with the individual requiring the accommodation and be tailored to meet the current and known needs. Employment accommodation may be temporary (short-term or long-term), or permanent depending on the restrictions and abilities of the person with a disability and the requirements of the position. Examples of employment accommodation include workstation adjustments, job redesign, policy and practice adjustments, technical aids/assistive devices, graduated Return To work, human support, alternate communication formats, reassignment, and building modifications.

Return to Work (RTW): The provision of modified work for employees who require a temporary period of accommodation to enhance the recovery process from disability, illness, or injury and support a timely and safe RTW.

Scope:

This policy applies to:

- All employees of Preston Hardware regardless of whether the employee is full-time or part-time, permanent, or fixed term.
- Individuals who perform work on behalf of Preston Hardware through fee-for-service, secondment, volunteer, or other contractual arrangements.
- All members of Preston Hardware's Board of Directors.
- Customers, clients, stakeholders, and visitors to Preston Hardware's premises, services, and digital platforms.



Policy Statement:

- **Customer Service Accessibility:** Preston Hardware is dedicated to establishing accessible customer service to individuals from all walks of life. We are committed to an ongoing and evolving approach, which involves the development and implementation of improved strategies. We aim to take reasonable measures to ensure that services are consistently delivered in a manner that respects the dignity and independence of individuals with disabilities. We are continuously working to cultivate a supportive environment that encourages customers to confidently seek our assistance. To achieve this, our employees will undergo comprehensive training to enhance their ability to assist customers with disabilities effectively. Furthermore, we will continually develop and implement accessible methods for customers to provide valuable feedback, seek information, or request assistance. Our unwavering goal is to make everyone's experience with us welcoming and inclusive.
- **Employee Accommodations:** At Preston Hardware, we are dedicated to evolving our workplace into an inclusive and accommodating environment. Our active collaboration with employees will help us identify and implement reasonable employment accommodations to empower individuals with disabilities to fulfill their job responsibilities. Our approach to accommodation requests will remain flexible and tailored to individual cases, ensuring we adapt to meet unique needs. Maintaining privacy and confidentiality throughout the accommodation process will continue to be our utmost priority, enabling employees to thrive within our supportive work environment.

Our commitment to providing employment accommodation extends throughout the entire employment cycle, from recruitment to training, career development, performance evaluations, work-related events and meetings, assignments, discipline, and more. Employees and the public shall be notified of the availability of employment accommodations for applicants with disabilities during the recruitment process.

Job applicants shall be notified that employment accommodations are available upon request when they are invited to participate in an assessment or selection process. If an applicant requests employment accommodation, we consult with them to provide suitable accommodations that consider their accessibility needs due to disability.

We maintain detailed documentation of our employment accommodation and RTW efforts, ensuring a clear record of options considered and decisions made.

Employees seeking accommodation can find the Accommodation Request Form attached to this Policy. The form is designed to facilitate the accommodation process and ensure that individuals with disabilities can request necessary accommodations with ease. We are also committed to providing accessible formats and communication support to individuals with disabilities in a timely manner, considering the person's specific accessibility needs. If you have any questions or require assistance in completing the form, please do not hesitate to reach out to our HR team for guidance.

- **Clear Communication:** Our commitment to accessibility will be reflected in an evolving approach to communication with individuals who have disabilities. We will take great care to ensure that the information we provide adheres to established accessibility standards. Our ongoing priority will be to ensure that accessibility remains a fundamental consideration in the design of our digital content and website. This commitment will ensure that information is fully inclusive and accessible, guaranteeing equal access for all, and will remain a continuous focus.
- **Physical Access:** Preston Hardware's commitment to physical access will continue to be a dynamic and evolving approach. We will maintain a strong emphasis on developing and continuously maintaining physically accessible environments within our warehouse, store, showroom, and office spaces. This will involve regular assessments and addressing potential access barriers promptly. Our objective will be to ensure that our facilities remain welcoming and



accommodating to all, regardless of mobility or disability status. This approach will continue to evolve, promoting inclusivity and equal access for everyone in our community.

- **Feedback and Requests for Accommodation:** We highly value feedback on our accessibility initiatives and actively encourage input from our community. Our approach will be rooted in promptly addressing concerns as they arise. For those requiring accommodation, having questions, or providing feedback, we invite you to reach out to our HR team (Kristina@prestonhardware.com, sanaz.ghafaradli@prestonhardware.com) without hesitation. Your input will be invaluable and shape our continuous commitment to maintaining an inclusive and accommodating environment for all.

Roles and Responsibilities:

Managers:

- Leads and maintains a work environment that removes barriers, promotes respect, and supports employees who require employment accommodation or RTW support.
- Safeguards confidentiality of employees' personal and health information.
- Works cooperatively with the HR Team, and employees to develop employment accommodation and RTW plans and should it be necessary, health reassignment.
- Advise the HR Team as early as possible about upcoming operational changes that may cause an accommodated employee to need new or different employment accommodation.
- Maintains contact with employees who are absent from work due to injury or illness, communicates concern for the employee's health, obtains information about the expected RTW date and anticipated employment accommodation needs, and prepares for their timely and safe return.
- Ensures all job applicants are made aware of the availability of employment accommodation during the recruitment process and are provided accommodation, short of undue hardship when they request it.

Employees:

- Supports the employment accommodation and RTW of other employees, including accepting some change in duties when necessary to accommodate a co-worker's needs.
- Treats with dignity and respect other employees who require employment accommodation and/or are returning to work after an absence due to disability, injury, or illness.
- Completes training on the requirements of the accessibility standards.
- Identifies to the manager as soon as possible any employment accommodation needs that relate to their ability to perform job duties or participate fully in the workplace.
- Cooperates with requests for health information about capabilities, limitations, and prognosis, and with independent medical evaluations when required, to provide clear and sufficient information to support employment accommodation or RTW.
- Collaborates in developing an employment accommodation and/or RTW plan.
- Accepts an accommodation/ RTW solution that meets the employee's accommodation needs, even if the solution is not necessarily the one the employee would have preferred.
- Adheres to the employment accommodation or RTW plan, monitors how well it is working, and advises the manager promptly about any difficulties encountered.
- Advises the manager and HR Team promptly of any changes in health/disability status that may require changes in an existing employment accommodation/ RTW plan.



HR Team:

- Provides advice and coaching to managers about this policy and its implementation and related relevant legislation.
- Safeguards confidentiality of employees' personal and health information.
- Works with managers to determine when the conditions for requesting a health reassignment exist, coordinates the provision of required documentation, and conducts timely searches for possible health reassignments.
- Obtains information and assistance, as appropriate, about the employee's capabilities/limitations/needs and employment accommodation and RTW options and maintains thorough documentation of the processes and decisions, monitoring and revising the plans to respond to changing employee and operational needs.
- Works with the manager and the controller to conduct timely searches for possible health reassignments within their department or across Preston Hardware if required when an employee cannot be accommodated in their position.

Controller:

- Ensures managers, and others responsible for implementing this policy understand Preston Hardware's obligations concerning accommodations and RTW.
- Ensures all employees are provided information about the rights and obligations of Preston Hardware with respect to accommodations and the RTW plan.
- Ensures the mandatory training that all employees must take is developed and delivered.

Review and Revision:

This Policy will be reviewed and updated as necessary to ensure its ongoing relevance and effectiveness.

Date of Policy:

This Policy is effective as of November 10th, 2023

