

## **Our Commitment**

NorthWest Rubber is committed to treating all people in a way that allows them to maintain their dignity and independence. This vision is built upon a foundational belief in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner. We are dedicated to breaking down barriers to accessibility, preventing new barriers from arising and to meeting the accessibility requirements prescribed by government legislation.

NorthWest Rubber also recognizes the importance of providing our services in a manner that is accessible to all clients. This includes openly communicating and responding to the needs of those with disabilities in order to provide them with excellent customer service.

## **Definitions**

### **Barrier**

- Anything that prevents a person with a disability from fully participating in all aspects of society because of their disability; anything that interacts with a disability in a way that may hinder the person's full and effective participation in society on an equal basis such as physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technology barrier, or a barrier established or perpetuated by an enactment, a policy or a practice.

### **Disability**

- Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness, including diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, blindness or visual impediment, 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;
- A condition of mental impairment or a developmental disability;
- A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- A mental disorder;
- Any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment — or a functional limitation — whether permanent, temporary or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person's full and equal participation in society; or
- An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997, or comparable workplace safety legislation.

### **Accessibility Training (\*Ontario Only\*)**

In order to promote building an inclusive and accessible environment for all employees and clients, NorthWest Rubber employees will be trained on:

1. The purpose of accessibility legislation (such as the *Accessibility for Ontarians with Disabilities Act (AODA)* or the *Accessibility for Manitobans Act (AMA)*), Human Rights legislation, and requirements of standards under the applicable legislation.
2. How to interact and communicate with persons with various types of disability.
3. How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person;
4. How to use equipment or devices available on NorthWest Rubber premises or otherwise provided by NorthWest Rubber that may help with the provision of services to a person with a disability; and
5. What to do if a person with a particular type of disability is having difficulty accessing NorthWest Rubber's services.

This training is mandatory for all NorthWest Rubber's employees, individuals who participate in the development of NorthWest Rubber's policies, and every other person who provides services on behalf of NorthWest Rubber (collectively "Northwest Rubber Representatives"). For newly hired employees, training will be provided as soon as practicable and within 3 months of their hire date, at the latest. NorthWest Rubber Representatives will be trained when changes are made to our accessible policy. NorthWest Rubber will also assess the need to update our training on an ongoing basis. The training provided will be appropriate to the duties of the individual.

NorthWest Rubber also provides training on how to accommodate employees with a disability to staff whose role encompasses such responsibilities, for example Recruiters. These individuals will be trained on:

1. How to make employment opportunities accessible to people with disabilities;
2. How to interact and communicate with applicants or employees who face barriers, use assistive devices, or are assisted by a support person or service animal;
3. An overview of accessibility legislation (such as the *Accessibility for Ontarians with Disabilities Act (AODA)*), Human Rights legislation, and any employment-related standards under applicable legislation; and
4. Our organization's accessible employment policies, practices and measures, including updates or changes.

NorthWest Rubber will keep records of the dates on which training was provided and the number of individuals to whom it was provided.

### **Employer & Employee Responsibilities** **NorthWest Rubber (Employer) Responsibilities**

Ensure we are identifying and removing barriers for people with disabilities by:

- Encouraging people with disabilities to use personal assistive devices to improve access to

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NorthWest Rubber's services.

- Enabling people with disabilities to access our services by offering assistive measures.
- Communicating with a person with a disability in a manner that takes into account the individual's disability.
- Allowing people with disabilities to bring their guide dog or service animal with them to work.
- Permitting people with disabilities who use a support person to accompany them and ensuring that a person with a disability has access to a support person while at NorthWest Rubber's facilities.
- Training employees about accessibility policies, principles, strategies, and tools (\*Ontario only\*)
- Establishing a process for people to provide feedback on how services are delivered and explain how NorthWest rubber will respond to any feedback.
- Reviewing the policy as often as necessary to ensure that it adheres to the legislative requirements.
- Keeping records of all reported incidents.

### **Employee Responsibilities**

- Maintain a high ethical standard of personal conduct as it relates to persons with a disability, regardless of position held.
- Review this policy and obtain the required training on providing accessible customer service to persons with a disability (\*Ontario only\*). Uphold the intent of the policy and provide all people with disabilities accessible customer service.

### **Customer Service and Information & Communication Standards**

Commitment to Accessible Customer Service

NorthWest Rubber recognizes the importance of:

- Providing services in a manner that respects the dignity and independence of person with disabilities.
- Integrating the provision of services to persons with disabilities with the provision of services to others, unless an alternative measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the services.
- Giving persons with disabilities an opportunity equal to that given to others to obtain, use and benefit from NorthWest Rubber's services.
- Communicating with a person with a disability in a manner that takes into account the person's disability.

In establishing and implementing this policy, NorthWest Rubber will:

- Identify barriers to accessible customer service that exist respecting the services that provides;

- Seek to remove any existing barriers it is responsible for so that all persons that use its services can do so using the same means;
- Seek to ensure that persons with disabilities are provided access to NorthWest Rubber's services by alternate means if an existing barrier cannot reasonably be removed;
- Seek to prevent new barriers from being created.

No fees or charges related to the accommodation will be imposed unless NorthWest Rubber cannot reasonably accommodate the person otherwise, and only to the extent permitted by applicable legislation.

### **Communication**

We will communicate with people with disabilities in ways that take into account their disability and/or any barriers the individual is facing. We will work with the person with a disability to determine the method of communication works for them.

### **Personal Assistive Devices**

A personal assistive device is one or more devices used by a person with a disability to help them independently complete everyday tasks and to remove or reduce barriers. Accessibility devices include mobility aids (e.g., wheelchairs and walkers), portable communication devices, headwands, hearing aids and much more.

People with disabilities are permitted to use their own assistive devices when our premises for the purpose of obtaining, using or benefiting from our services.

We will ensure that our employees are trained on how to interact with individuals using various assistive devices and how our employees can provide alternative service methods.

### **Accessibility Features**

To ensure barrier-free access to our facilities, we maintain our accessibility features so they can be used as intended. For example, we keep our entrance area clear of ice and snow, and common spaces, such as waiting rooms and hallways, free from clutter.

### **Service Animals**

Service animals are used by people with many different kinds of disabilities. For example, service animals used for people who are blind, hearing alert animals for people who are deaf, and animals trained to alert an individual to an oncoming seizure.

Persons with a disability accompanied by a service animal may enter our facilities and keep the service animal with them, unless the animal is otherwise excluded by law from the premises.

When we cannot easily identify that an animal is a service animal, our employees may request verification from the client. The client that is accompanied by a service animal is responsible for maintaining care and control of the animal at all times.

If service animals are prohibited by another law, we will do the following to ensure people with disabilities can access our services and facilities:

- explain why the animal is excluded; and
- discuss with the client another way of accessing our services and facilities.

### **Support Person**

A support person accompanies a person with a disability in order to help them with communication, mobility, personal care or medical needs.

A person with a disability who is accompanied by a support person will be allowed to have that person accompany them at our facilities. At no time will a person with a disability who is accompanied by a support person be prevented from having access to their support person while on our premises.

### **Notice of Service Disruptions**

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of NorthWest Rubber. In the event of any planned temporary disruption of our facilities or services that our clients with disabilities access, reasonable efforts will be made to provide advance notice. In some circumstances unplanned disruptions occur and as such advance notice is not possible but in the event that an unplanned disruption occurs every effort will be made to post notice as soon as possible. We will advise clients why an accessibility feature is unavailable, how long it will be unavailable, and other ways to access our services.

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### **Accessible Emergency Information**

NorthWest Rubber is committed to providing both its employees and clients with emergency information in accessible format upon request.

### **Web Accessibility**

NorthWest Rubber will make any new internet websites and new web content on such a website conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level A and increasing to Level AA. By approximately June 2026 all internet website and web content will conform to WCAG 2.0 Level AA.

### **Employment Standards**

#### **Recruitment**

NorthWest Rubber will take the following actions during recruitment and assessment processes, and when employees are hired:

- Notify the public and our employees that we will accommodate people with disabilities during the recruitment process;
- 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 utilized;
- Consult with job applicants who request an accommodation to support them through the recruitment, selection and/or assessment process and take into account their needs, so that the accommodations provided are effective; and
- Notify the successful applicant of NorthWest Rubber's policies for accommodating our employees with disabilities.

#### **Informing Employees about Accommodation Policies and Procedures**

NorthWest Rubber will inform our employees of the policies used to support employees with disabilities, including, but not limited to, policies on provision of job accommodations that take into account an employee's accessibility needs due to disability, by:

- On request, consulting with our employees with disabilities to determine those accessible formats or communication supports that may be of assistance in accessing workplace information, and how such individualized accommodation may be provided; and
- Providing the information as soon as practicable after commencement of employment, and updates whenever there is a change to the policies.

## **Employment**

NorthWest Rubber is committed to providing a fair and accessible process across all stages of the employment life cycle to allow employees to reach their full potential. This includes, but it is not limited to:

- Performance management process
- Career Development
- Training
- Internal advancement or reassignment

## **Accommodation Process**

NorthWest Rubber maintains a written process for the development of documented individual accommodation plans for employees with disabilities. If requested, information regarding accessible formats and communication supports available will also be included in individual accommodation plans. In addition, the plans will include individualized workplace emergency response information (where required), and will identify any other accommodation that is to be provided.

The workplace emergency response information will be provided as soon as possible after NorthWest Rubber becomes aware of the need for accommodation. The workplace emergency response information will be reviewed when the employee moves into a different location in the organization, when the employee's workspace is modified, when the employee's overall accommodation needs or plans are reviewed, and when NorthWest Rubber reviews its general emergency response policies. In the event the employee will require assistance of another person in the event of an emergency, NorthWest Rubber may, with the employee's consent, provide the necessary information to the person designated to provide assistance to the employee.

## **Return to Work Process**

NorthWest Rubber has developed and enacted a documented return-to-work process for those employees that have been absent from work due to a disability and require disability-related accommodation in order to return to work. This process outlines the steps that NorthWest Rubber will take to facilitate the return to work of the applicable employees and the use of individual documented accommodation plans.

NorthWest Rubber will take into account the accessibility needs of its employees with disabilities (as well as their individual accommodation plans) when providing career development, advancement, or redeployment. This may occur through the consideration of what accommodations employees with disabilities may need to succeed elsewhere within our organization, to take on new responsibilities in the current role, or when redeployment has become necessary.

## **Maintain Privacy**

We protect the privacy and confidentiality of our employees' personal and personal health information. We only collect, use, and disclose information as required for the purposes of employment-related standards under applicable legislation, unless otherwise agreed to by the employee.

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### Client Feedback Process

Feedback regarding the way NorthWest Rubber provides services to people with disabilities is welcomed and may be made through the below mediums. All feedback will be directed to NorthWest Rubber's Corporate HR Team and actions taken to respond to the feedback received will be documented. NorthWest Rubber will respond within 15 days.

Email	tracyb@northwestrubber.com
Address	2315 Bristol Circle Suite 205 Oakville, ON L6H 6P8

NorthWest Rubber will make sure our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, upon request.

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NorthWest Rubber will document the actions taken to respond to feedback that is received. That information is available, upon request.

### Notice of Availability of Documents

Upon request, NorthWest Rubber will provide, or will arrange to provide, information in an accessible format and with communication supports in a timely manner that takes into account the client's accessibility needs due to his/her disability. The accessible format will be provided at no additional cost.

NorthWest Rubber will consult with the client making the request in determining the suitability of an accessible format or communication support.

NorthWest Rubber will also notify the public the availability of accessible format or communication supports. Notification will be given by posting information at facilities owned by NorthWest Rubber, the NorthWest Rubber website, or any other reasonable method.

### Questions about this Policy

If anyone has any questions about our policy, or if the purpose of a policy is not understood, please contact NorthWest Rubber's Corporate Human Resources Department at 289-208-7892.