

# BWXT Precision Manufacturing Inc Multi-Year Accessibility Plan

## 2012 - 2021

### Intent

This Accessibility plan outlines the policies and actions that BWXT Precision Manufacturing Inc. (BWXT) will put in place to prevent and remove barriers to accessibility and describes the Company's approach to meeting or exceeding the requirements communicated under the Integrated Accessibility Standards, Ontario Regulation 191/11. This plan is a continually expanding and fluid document that will be updated at least every five years, as BWXT's accessibility strategy evolves.

### BWXT's Commitment to Accessibility

BWXT is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of persons with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with disabilities Act.

### Feedback

BWXT welcomes feedback in relation to this Plan, in the format most convenient to the person providing feedback.

Created: July 10, 2020

Review and Updated (as applicable): November 30, 2023

### Reviewed by the Plant Leadership Team

  
\_\_\_\_\_  
Angela Gregson, HR Manager

  
\_\_\_\_\_  
Adam Radoja, Finance Manager

  
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Dave Lynch, Production Support Manager

  
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Dave Allingham, VP Components

  
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Allen Banh, Engineering Manager

  
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Ron Ipperiel, Program Manager – Parts & Proposals

  
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Ray Hopkinson, Quality Manager

  
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Noelle Jones, Operational Process Manager

## Accessibility Standards for Customer Service

| Legislated Requirement   | Deliverables   | Compliance Date | Accountability | Action Taken/Strategies for Compliance   | Status   |
|--|--|-----------------|----------------|--|--|
| 1. Establish policies, practices and procedures outlining how BWXT will provide goods or services to persons with disabilities in an integrated manner that respect the dignity and independence of the individual and provide persons with disabilities an equal opportunity to use the goods or services. To adopt policies addressing the use of assistive devices by persons with disabilities to access BWXT's goods and services. Make public. | Prepare and post document of policies, practices and procedures developed to ensure access to goods or services to persons with disabilities. Policies are developed to deal with persons with disabilities who use assistive devices to obtain, use or benefit from its goods and services. | 2012            | HR             | <p>Policy created – <b>BWXT-CA 1410 (old version: HR-15 Integrated Accessibility Policy)</b> and covers the following requirements per Ontario Regulation 429/07 – Accessibility Standards for Customer Service:</p> <ul style="list-style-type: none"> <li>- Use of assistive devices, support animals and support persons</li> <li>- Communicate in a manner that takes not account the person disability</li> <li>- Notice of disruptions</li> <li>- Training for staff</li> <li>- Feedback process</li> <li>- Filing an Accessibility report</li> </ul> <p>Internal &amp; Web Postings - Accessibility statement noted</p> | <p>Policy – Complete<br/>Note: HR-15 Integrated Accessibility Policy merged and updated to <b>BWXT-CA 1410</b></p> <p>Posting - Complete</p> |
| 2. Permit persons with disabilities to be accompanied by support persons or service animals. Service animals are permitted when accompanying any person with a disability while on the premise of BWXT, except where animals are excluded by law.  | BWXT will ensure that persons with disabilities will be allowed to bring support persons or service animals on Company premises. If service animals are not permitted to enter an area of the facility, an appropriate alternative must be made available.                                   | 2012            |                | Noted in policy <b>BWXT-CA 1410</b>  | Complete   |
| 3. Notify the public of temporary disruptions in facilities/services used in particular by persons with disabilities.  | Notice of service disruptions will include information about the reason for the disruption, how long the disruption will last, and a description of any alternative facilities or services available.  | 2012            |                | Noted in policy <b>BWXT-CA 1410</b>  | Complete   |
| 4. Provide training to individuals that interact with members of the public.   | Training is provided to all persons who interact with the public on BWXT's behalf as well as participate in developing policies,   | 2012            |                | Noted in policy <b>BWXT-CA 1410</b>  | Complete   |

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|  | practices and procedures regarding the provisions of goods and services to persons with disabilities.<br><br>Training will occur on an ongoing basis in order to incorporate changes to policies, practices and procedures. |      |  |                                     |          |
| 5. Implement a process for receiving and responding to feedback regarding the provision of goods and services to persons with disabilities. Feedback may be provided in person, by telephone, in writing, or electronically. | Establish a process for receiving and responding to feedback to persons with disabilities. Feedback process available on website.   | 2012 |  | Noted in policy <b>BWXT-CA 1410</b> | Complete |
| 6. Notify the public that customer service standard documents are available, upon request.   | All customer service standard documents will be posted on company website.  | 2012 |  | Noted in policy <b>BWXT-CA 1410</b> | Complete |

#### Integrated Accessibility Standards - General

| Legislated Requirement  | Deliverables  | Compliance Date | Accountability | Strategies for Compliance  | Status/Progress to Date |
|---|---|-----------------|----------------|--|-------------------------|
| 1. Establish accessibility policies and procedures outlining how BWXT will develop, implement, and maintain legislation. Make public.             | Develop, implement and maintain polices related to how BWXT has and will continue to achieve accessibility.<br><br>Provide document to public in an accessible format upon request. | January 2014    |                | BWXT's Accessibility Policy will be posted on the company website. Upon request, BWXT will provide a copy of the Accessibility Policy in an accessible format. The Accessibility Policy will be periodically reviewed to ensure they accurately reflect BWXT's practices.<br>- Policy <b>BWXT-CA 1410</b> has been created<br>- Posting on website to be updated | Complete<br>Complete    |
| 2. Provide a statement of organizational commitment to meet the accessibility needs of persons with disabilities in a timely manner. Make public. | Develop a statement of commitment that will guide BWXT's mandate to meet the accessibility needs of persons with disabilities.  | January 2014    |                | BWXT's Statement of Commitment has been incorporated into the Accessibility Policy. <b>BWXT-CA 1410</b><br>Accessibility Policies are posted on the company website and on the S drive, under Human Resources, Policies.   | Complete<br>Complete    |

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|   | Provide document to public in an accessible format upon request.   |              |  |   |   |
| 3. Develop multi-year accessibility plan. Make public.  | <p>Establish, implement and maintain a multi-year accessibility plan that addresses strategies to remove and/or prevent barriers.</p> <p>Post multi-year plan on company bulletin board.</p> <p>Review and update plan every five (5) years.</p> <p>Provide document in accessible format upon request.</p>                                      | January 2014 |  | <p>BWXT's Accessibility Plan has been created and is note in <b>BWXT-CA 1410</b></p> <p>The Accessibility Plan will be posted on the company bulletin board.</p> <p>The Accessibility Plan will be posted on the website.</p> | <p>Complete</p> <p>Complete</p> <p>Complete</p> |
| 4. Provide training on the requirements of the Integrated Accessibility Standard (IASR) and on the Human Rights Code as it pertains to persons with disabilities. | <p>Develop and provide training to all employees, volunteers, persons who participate in developing policy; all persons who provide goods, services, or facilities on behalf of BWXT regarding the requirements of accessibility standards as it relates to persons with disabilities.</p> <p>Records to be maintained on training provided.</p> | January 2015 |  | <p>Human resources will develop a training module and implement training plans.</p> <p>BWXT will incorporated the IASR and Human Rights modules into new employee orientation. Training records maintained in HR files.</p>   | Complete  |

**Integrated Accessibility Standards – Information & Communications**

| Legislated Requirement   | Deliverables  | Compliance Date             | Accountability | Strategies for Compliance  | Status/Progress to Date          |
|--|---|-----------------------------|----------------|--|----------------------------------|
| 1. Provide emergency procedures, plans or public safety information that is made available to public in accessible formats or with communication supports, upon request. |   | 2012                        |                |  |                                  |
| 2. Develop and implement internet websites and web content to conform with the World Wide Web Consortium Web Content Accessibility                                       | Website content published after January 1, <b>2012</b> will conform with WCAG 2.0, Level A. | January 2014 (new websites) |                | Working with Sean Speiran to update website per AODA requirements. | Complete – corporate requirement |

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| Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA.  | Website content published after January 1, <b>2012</b> BWXT will develop websites that comply with WCAG 2.0 standard, Level AA                                | January 2021, all internet websites |  |   |                      |
| 3. Implement a process for receiving and responding to feedback that is accessible to persons with disabilities or arrange for accessible formats and communications supports, upon request. | BWXT to establish an accessible process for receiving and responding to feedback with persons with disabilities. Feedback process to be available on website. | 2015                                |  | Noted in policy <b>BWXT-CA 1410</b><br>Feedback process noted on website. | Complete<br>Complete |
| 4. Provide or arrange for accessible formats and communications supports for persons with disabilities, upon request. Let the public know.   |   | 2016                                |  | Noted in policy <b>BWXT-CA 1410</b>                                       | Complete             |

#### Integrated Accessibility Standards – Employment

| Legislated Requirement  | Deliverables  | Compliance Date | Accountability | Strategies for Compliance  | Status/Progress to Date                  |
|---|---|-----------------|----------------|--|--|
| 1. Provide individualized workplace emergency response information to employees with known disability. Also, to provide, if required, emergency response information to person designated to provide assistance to employee. BWXT will review the individualized workplace emergency response information as required.          | Request employees identify their accessibility needs and if they require assistance/accommodations during an emergency.<br><br>Implement emergency preparedness plans and programs.<br><br>Include accommodations in the emergency preparedness plan. | January 2012    |                | Noted in policy <b>BWXT-CA 1410</b><br><br>Communicate availability of Accommodation Plans to current employees and during the new hire orientation process.   | Complete<br><br>Complete                 |
| 2. Notify job applicants during the recruitment process that accommodations are available upon request when an individual is selected in the assessment process.<br><br>Consult with the applicant and provide suitable accommodation in a manner that takes into account the applicants accessibility needs due to disability. | Hiring managers are aware of the requirements and should notify candidates that BWXT provides accommodation during the interview/selection process.   | January 2016    |                | Noted in policy <b>BWXT-CA 1410</b><br><br>BWXT will notify all internal/external job applicants by added an accommodation statement to job postings.<br>BWXT will advise that accommodation is available upon request when inviting an applicant to an interview or assessment. | Complete<br><br>Complete<br><br>Complete |

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|   |  |      |  | When arranging accommodation, BWXT will consult with the applicant to determine their specific accessibility needs. |                          |
| 3. Notify successful applicants of policies for accommodating employees with disabilities.  | Hiring managers are aware of the requirements and should notify successful applicants that BWXT provides accommodation to employees with disabilities. | 2016 |  | Noted in policy <b>BWXT-CA 1410</b>   | Complete                 |
| 4. Inform employees of policies used to support employees with disabilities.<br>Provide the information required to new employees as soon as practicable after they begin and provide updated information when changes to policies occur.   | Orientation for all new employees regarding policies of employment equity and accommodation.   | 2016 |  | Noted in policy <b>BWXT-CA 1410</b><br><br>Relevant policies are reviewed during orientation for all new employees. | Complete<br><br>Complete |
| 5. Provide or arrange for accessible formats and communication supports upon request for workplace information which includes: <ul style="list-style-type: none"> <li>• information required to perform their jobs;</li> <li>• general information that is available to all employees at work</li> </ul>  | Ensure process to provide supports are in place.   | 2016 |  | Educate Managers about these requirements over the next year.   | Complete                 |
| 6. Implement a process for documented individual accommodation plans for employees with disabilities. The process for the development of individual plans will include the following: <ul style="list-style-type: none"> <li>• The employee requesting accommodation will participate to develop the individual accommodation plan;</li> <li>• The employee will be assessed individually;</li> <li>• The employer can request evaluation by an outside medical or other expert;</li> <li>• the employee's personal information will be protected;</li> <li>• individual accommodation plans will be reviewed and updated;</li> </ul> | Ensure a process of documented individual accommodation plans are integrated in BWXT's Policies and Procedures.  | 2016 |  | Noted in policy <b>BWXT-CA 1410</b>   | Complete                 |

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| <ul style="list-style-type: none"> <li>• if an accommodation plan is denied, the employee will receive reasons for the denial; and</li> <li>• the plan will be provided in a format that takes the employees accessibility needs into account.</li> </ul>                |  |      |  |  |          |
| 7. Develop a process for employees who are returning to work due to a disability and require disability related accommodations. Include outline of steps that BWXT will take to facilitate return to work while taking individual accommodation plan into consideration. | Create and maintain return to work process. Ensure existing return to work program address steps required to address accommodation needs.  | 2016 |  | Noted in policy <b>BWXT-CA 1410</b><br><br>Also see HS-05 – Return to Work Program.        | Complete |
| 8. Consider accessibility needs of employees with disabilities as well as individual accommodation plans when using performance management process.  | BWXT to consider employee accessibility needs when providing performance management. Process to be documented and communicated to employees and management that deal with performance management activities. | 2016 |  | Noted in policy <b>BWXT-CA 1410</b><br><br>- refer to Perform Review policy once complete. | Complete |
| 9. Consider accessibility needs as well as individual accommodation plans when assessing career development and advancement of employees with disabilities.  | BWXT to consider employee accessibility needs when providing career development. Processes to be documented and communicated to employees and management that deal with career development.                  | 2016 |  | Noted in policy <b>BWXT-CA 1410</b>  | Complete |
| 10. Take into account accessibility needs of employees with disabilities as well as individual accommodation plans when considering redeployment of employees.   | BWXT to consider employee accessibility needs when redeployed. Processes to be documented and communicated to employees and management that deal with redeployment.  | 2016 |  | Noted in policy <b>BWXT-CA 1410</b>  | Complete |