	POLICY NAME: Accessibility for Persons with Disabilities	POLICY NO: 1040.32
DATE: December 1, 2026	POLICY OWNER: Dominic Mailloux VP CO Human Resources	APPROVED BY: Gonzalo Cajade SVP & CHRO

APPLIES TO: All customers and Ontario provincially regulated employees of BWXT Canada Ltd.

POLICY:

I. PURPOSE
   a. To communicate BWXT Canada's (Company) commitment to accessibility for persons with disabilities and to comply with the "Accessibility for Ontarians with Disabilities Act, 2005" (AODA) guidelines.

II. GENERAL
   a. BWXT Canada is committed to ensuring equal access, participation and opportunity for persons with disabilities and to meeting their accessibility needs in a timely manner. BWXT will identify, prevent and remove accessibility barriers and will provide access to its goods, services, facilities and employment practices in a manner that respects the dignity and independence of persons with disabilities and promotes integration and equal opportunity. Every reasonable effort will be made to ensure all persons with disabilities:
      i. Have access to our facilities by providing reasonable accommodations that do not put health and safety at risk.
      ii. Have access to information in a format that accommodates their disabilities.
      iii. Are respected as individuals and allowed to act in their own manner.
      iv. Are given equal opportunities.
   b. General Requirements
      i. Accessibility Plans:
         1. The Company will develop, implement, maintain, and document an Accessibility Policy and Plan (Multi-Year Plan) outlining the company's strategy and steps to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities.
         2. The VP CO Human Resources will ensure the Accessibility Policy and Plan will be reviewed and updated at least once every five years and will be posted on the Company's intranet and website. Upon request and in a timely manner, the Company will provide a copy of the Accessibility Policy or Plan in an accessible format.
         3. The Accessibility Plan will be posted to the company website.
   c. Training:
      i. The Company will provide training to all employees, to anyone who is involved in the development of policies, plans, practices, and procedures related to the provision of our goods and services, and to all other persons who provide goods, services, or facilities on behalf of the company.
      ii. The training includes the following:
         1. An overview of Accessibility for Ontarians with Disabilities Act, 2005 (AODA), Ontario Human Rights Code (OHRC) concerning to disabilities, and IASR (Integrated Accessibility Standards Regulation).
         2. An overview of the Company's policies and procedures in relation to accessibility Customer Service Standard.
         3. How to interact and communicate with people with various types of disabilities.
         4. How to interact with people with disabilities who use an assistive device or require assistance of a service animal or support person.
         5. What to do if a person with disabilities is having difficulty accessing BWXT's goods or services.
         6. How to use equipment or devices available on the Company's premises, or otherwise provided by the Company, that may assist persons with disabilities in accessing goods, services or facilities.

7. Any other integrated standards training the employee must complete based on their job description.

iii. Training will be provided when changes have been made to this policy. A record of training will be kept for all employees working at the Company. Records will include: the employee's name, date of completion, and what types of training was completed.

d. Information and Communication Standards
   i. Feedback:
      1. Any person who wishes to provide feedback on the way BWXT Canada provides goods, services, and opportunities to people with disabilities can provide feedback in the following way(s):
         a. Approaching any supervisor or manager and directly provide feedback.
         b. By filling out an Accessibility Feedback Form (also available on corporate website: https://www.bwxt.com/wp-content/uploads/2025/04/AODA-Feedback-Form.pdf).
         c. by contacting Human Resources
         d. through our corporate hotline at 855-871-9138 or ethics@bwxt.com.

e. Accessible formats and supports will be provided for feedback processes upon request.

   i. Accessible Formats and Communication Supports:
      1. Upon request and in a timely manner, the Company will consult and provide/arrange accessible formats and communication supports for persons with disabilities. The Company will also notify the public about the availability of accessible formats and communication supports on the company website.
   ii. Assistive Devices:
      1. The Company welcomes and will provide assistance as required to those who require assistive devices such as: scanners, verbal communicators, laptops with screen-reading or communicating software, wheelchairs, walkers, or oxygen tanks (where health and safety guidelines permit).
   iii. Support Persons:
      1. BWXT may require a person with a disability to be accompanied by a support person only where, after consulting with the person and considering the available evidence, the Company determines that a support person is necessary to protect the health or safety of the person or others and that there is no other reasonable way to protect health or safety. Where BWXT requires the support person, any applicable admission or presence fee for the support person will be waived. If a person with a disability and their support person is attending an event with a fee, the Company shall ensure that notice is given in advance of the amount.
   iv. Service Animals:
      1. Service animals will be allowed access on Company premises except where restricted due to health and safety guidelines (e.g., manufacturing shops, construction sites). If a concern should be raised, for example, due to a severe allergy to the service animal, the Company will make all reasonable efforts to meet the needs of all individuals involved.
   v. Accessible Websites and Web Content:
      1. BWXT Canada will take reasonable steps to ensure that its public facing websites and web content meet applicable accessibility requirements, including ***Web Content Accessibility Guidelines (*** WCAG**),** under the IASR. Where information is not accessible, BWXT Canada will, upon request and in consultation with the individual, provide or arrange for the information in an accessible format or with appropriate communication supports.

f. Employment Standards
   i. Employment:
      1. BWXT Canada is committed to welcoming people with disabilities with respect to recruitment, employment, training, career development, and career progression.
   ii. Recruitment, Assessment, and Selection Process:
      1. The Company will notify job applicants about the availability of accommodations at the end of each job posting on internal and third-party job boards, social media posts and any job postings posted by a third-party agency on behalf of BWXT
      2. The Company will notify job applicants of the availability of accommodations when they are individually selected to participate further in an assessment or selection process.

Upon request, a representative of the Company will consult with the selected applicant and provide/arrange a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

iii. Recruitment Materials
   1. Human Resources will provide written recruitment materials to candidates in alternative accessible formats upon request.

iv. Notice to Successful Applicants:
   1. When making offers of employment, the Company will notify the successful applicant of its policies for accommodating employees with disabilities.

v. Informing Employees of Supports:
   1. The Company will continue to inform its employees of its policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practical after commencing employment.

vi. Accessible Formats and Communication for Employees:
   1. The Company will (upon request of an employee with a disability) consult to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his/her job, and information that is generally available to other employees.
   2. In determining the suitability of an accessible format or communication support, the Company will consult with the employee making the request.

vii. Documented Individual Accommodation Plans:
   1. The Company will maintain a written process for the development of documented individual accommodation plans for employees with disabilities The Accommodation Workbook and related accommodation documents will be used to support and document this process. The Company will develop an individual accommodation plan for an employee with a disability where required, based on the employee's accessibility needs and the circumstances of the accommodation request.
   2. If requested, individual accommodation plans will also include information regarding accessible formats and communications supports provided.
   3. In addition, the plans will include individualized workplace emergency response information (where required) and will identify any other accommodations that are to be provided.

viii. Workplace Emergency Response Information:
   1. The Company will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if the Company is aware of the need for accommodation due to the employee's disability. The Company will provide this information as soon as practicable after becoming aware of the need for accommodation.
   2. Where the employee requires assistance (with the consent of the employee), the Company will provide the workplace emergency response information to the person designated by the Company to provide assistance to the employee.
   3. The Company will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodation needs are reviewed, or when the emergency response policies are reviewed.

ix. Return to Work Process:
   1. The Company will maintain a documented return to work process *(Graduated Return to Work Plan)* for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work. The Graduated Return to Work Plan and related accommodation documents may be used to support and document this process.
   2. The return-to-work process will outline the steps taken to facilitate the return to work and will include documented individual accommodation plans.
   3. This return-to-work process will not replace or override any other return to work process created by or under any other statute (i.e., Workplace Safety Insurance Act, 1997).

x. Performance Management, Career Development, Advancement, and Redeployment:

1. The Company will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.

g. Design of Public Spaces Standards
   i. Facilities:
      1. BWXT Canada is committed to ensuring that our premise and related services are welcoming and accessible to people with disabilities. As appropriate, the Company is willing to provide necessary alterations to our facilities to accommodate people with disabilities.
   ii. Temporary Disruptions:
      1. If there are any interruptions in services or accommodations that has an impact on a person with disabilities, the Company will post a notice or verbally convey the disruption. If there are any interruptions in services online, the Company will post a notice online or on the intranet. All notices will display how long the disruption will last, the reason for the disruption, and if there are any alternatives available, and contact information to contact in case of questions or an emergency.

h. Compliance Reporting

III. BWXT Canada will submit the required AODA Accessibility Compliance Reports in accordance with the reporting requirements and timelines established under the AODA and its regulations. The VP CO Human Resources is responsible for ensuring the required report is completed and filed by the applicable deadline and that supporting compliance records are maintained electronically

IV. RESPONSIBILITIES
   a. It is the responsibility of the employee to:
      i. Read and understand the policy.
      ii. Complete training when required.
      iii. Come forth to seek accommodation in a timely manner and cooperate in the accommodation process.
      iv. Cooperate with any work modifications related to safety concerns.
   b. It is the responsibility of the supervisor/manager to:
      i. Report any feedback given about accessibility.
      ii. Take into account employee accessibility needs and accommodation plans, as applicable, when managing performance, providing training, supporting career development or considering redeployment.
      iii. Participate in the accommodation process.
   c. It is the responsibility of Human Resources (HR) to:
      i. Maintain the policy and coordinate required accessibility compliance reporting.
      ii. Develop, coordinate, deliver, and track accessibility training.
      iii. Ensure compliance with applicable accessibility requirements relating to recruitment and employment.
      iv. Respond to accessibility feedback, as appropriate, and assist in arranging accessible formats and communication supports upon request.
   d. It is the responsibility of Office Services to:
      i. Provide notice for any temporary disruptions in services.

V. INTERPRETATION CONTACT
   a. Human Resources Business Partner

DEFINITIONS:

Accessibility — The term accessibility means giving people of all abilities opportunities to participate fully in everyday life. It is used to describe how widely a service, product, device, or environment is available to as many people as possible. Accessibility can be seen as the ability to access and benefit from a system, service, product, or environment.

Barrier — Barriers are obstacles that limit access and prevent people with disabilities from fully participating in society. Most barriers are not intentional. Barriers usually arise because the needs of people with disabilities are not considered from the beginning.

Disability — Ontario's accessibility law adopts the definition for disability that is in the Ontario Human Rights Code. It defines disability broadly:

a. "any degree of physical disability, 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 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,
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, or
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.

REFERENCES:

The Accessibility for Ontarians with Disabilities Act, 2005
Feedback form
Multi-Year Accessibility Plan (Cambridge, Port Elgin, and Owen Sound)
Multi-Year Accessibility Plan (Oakville)
Accommodation Workbook
Graduated Return to Work Plan

REVISION HISTORY:

REVISION NO.	DATE	AFFECTED PAGES/SECTIONS
Revision 0	Dec 1, 2012	Initial issue
Revision 1	July 1, 2015	Update to reflect new Company name.
Revision 2	December 1, 2017	Contact information updated.
Revision 3	June 17, 2019	Update policy to reflect new requirements.
Revision 4	December 11, 2020	Updated to reflect additional legislative requirements.
Revision 5	December 11, 2023	Policy reviewed and updated - now includes PMI. PMI policy will now be retired. Updated initiator and approver. Updates to Training and Support Persons sections.
Revision 6	9/30/2024	Updated formatting. Policy number changed from CA 1410 to 1040.32. 3-Year Review.
Revision 7	10/23/2026	Comprehensive policy review and update in support of AODA compliance requirements. Clarified policy governance and responsibilities, documented individual accommodation and return-to-work processes, and associated supporting documents. Updated accessibility training, support-person and website accessibility provisions, and accessibility compliance reporting requirements.

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