

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT (AODA) POLICY

Rev.0 Date: 1/10/2025

POLICY STATEMENT

FCC Canada is committed to providing a safe work environment for all internal and external stakeholders including the person with disability with the purpose to:

- Meet the current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination.
- Achieve excellence in providing services, or facilities to all customers including people with disabilities.
- Ensure equal access for people with disabilities that allows them to maintain their dignity and independence.
- * Meet the needs of people with disabilities in a timely manner by removing and preventing barriers to accessibility under the Accessibility for Ontarians with Disabilities Act (AODA), 2005, and Ontario's accessibility laws.

At FCC Canada, we understand that obligations under the AODA and the accessibility standards do not substitute or limit our obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law. We believe in integration and our accessible policies are consistent with the principles of independence, dignity, integration, and equal opportunity for people with disabilities. Therefore, our obligations will cover aspects such as:

Training

We are providing training to all staff, volunteers, and our employees according to their specific role to ensure accessible service as per Ontario's accessibility standards, and Ontario Human Rights Code related to persons with disabilities. We also train our personnel who develops our organization's policies as well as subcontractors and suppliers who provide services, or facilities on behalf of our organization. Our training topics includes the following aspects:

- Our policies, purpose, scope, and the requirements of the AODA, and the customer service standards.
- Means and methods:
 - ✓ on how to interact and communicate with people with various types of disabilities.
 - ✓ on how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person.
 - ✓ how to use the equipment or devices available on-site or otherwise that may help with providing goods, services, or facilities to people with disabilities.
 - ✓ on what to do if a person with a disability is having difficulty in accessing our services, or facilities.

We train every person first day of their employment in respect of any policies established within our company and we maintain accurate records.

Assistive Devices

At FCC, people with disabilities may use their personal assistive devices when accessing our services, or facilities. In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, we are providing other measures to ensure the person with a disability can access our goods, services, or facilities. FCC currently does not use any assistive device. In the future, if we have people with disabilities, we will accommodate them with their requirement of assistive devices and we will provide the associated training.

Communication

We communicate with people with disabilities in ways that consider their disability including sign language, or written communication based on their accommodating requirement. We are working with the person with disabilities to determine what communication is better for them. We also have an accessible process for receiving and responding to feedback to persons with disabilities upon request according with the internationally recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements and in accordance with Ontario's accessibility laws.

Service Animals

We welcome people with disabilities and their service animals who are allowed on the parts of our premises that are open to the public and third parties. When we cannot easily identify that an animal is a service animal, our staff may ask for documentation from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability identified through visual harness or a vest, or when it helps the person perform certain tasks. A regulated health professional is defined as a member of one of the following colleges:

- College of Audiologists and Speech-Language Pathologists of Ontario
- College of Chiropractors of Ontario



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- College of Nurses of Ontario
- College of Occupational Therapists of Ontario
- College of Optometrists of Ontario
- College of Physicians and Surgeons of Ontario
- College of Physiotherapists of Ontario
- College of Psychologists of Ontario
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

If service animals are prohibited by another law, we are explaining why the animal is excluded, under which law and we are discussing another way of providing goods, services, or facilities.

Notice of Availability of Documents

FCC Canada notifies the employees, subcontractors, suppliers, and visitors that documents related to accessible customer service, are available upon request by posting a notice on the safety board. We provide these documents in an accessible format, in a timely manner and, at no additional cost, printed/hard copy, or electronic support, on request. We consult with the person making the request to determine the suitability of the format or communication support.

Employment

At FCC Canada, we notify employees, job applicants, and the public that accommodations can be made during recruitment and hiring. We consult with the applicants and provide or arrange for suitable accommodation. We notify successful applicants of policies for accommodating employees with disabilities through our onboarding experience after accepting offers of employment.

Job postings include an accessibility and accommodation statement to encourage applications from people with disabilities. FCC Canada welcomes and values diversity. We encourage people with disabilities to apply and are committed to providing support during the hiring process. If they need accommodations for their application or interview, they must contact us at tacanada@fccco.com. We will work with everyone to ensure a fair and accessible experience.

During onboarding, all new hires will receive a copy of this policy which and their rights under AODA. HR will implement an inclusive interview process, offering accessible formats for tests or interviews upon request.

We also notify staff that supports are available for those with disabilities as soon as practicable after they begin their employment. We provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that consider an employee's accessibility needs due to a disability. We consult with employees when arranging for the provision of suitable accommodation in a manner that considers the accessibility needs due to disability. We consult with the person making the request in determining the suitability of an accessible format or communication supports specifically for information needed to perform the employee's job, and information that is generally available to employees in the workplace. Where needed, we are also providing customized emergency information to help an employee with a disability during an emergency. With the employee's consent, we are providing workplace emergency information to a designated person who is helping that employee during an emergency. We are providing the information as soon as practicable after we become aware of the need for accommodation due to the employee's disability. We are reviewing the individualized workplace emergency response information in the following situation:

- **...** When the employee moves to a different location within our organization.
- ❖ When the employee's overall accommodations needs or plans are more current; and
- **❖** When FCC review its general emergency response policies.

We have developed written process to establish individual accommodation plans for employees who have been absent from work due to a disability and require disability-related accommodations to return to work. At FCC, we are committed to establish, revise, or remove any policies that do not respect and promote the principles of dignity, independence, integration, and equal opportunity for people with disabilities. This policy is made available in accessible formats upon request.

Pedro Lopez-Bravo

Sr. VP of Operations Director

1/10/2025