

Multi - Year Accessibility Plan

Human Resources Department

	APPROVAL	
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1.0 INTRODUCTION AND PURPOSE

Acklands - Grainger Inc. ("Grainger") is committed to meeting the needs of people 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, 2005* ("AODA"). The *Integrated Accessibility Standards*, Regulation 191/11 ("IASR") under the AODA establishes standards to address barriers that persons with disabilities face in the areas of information and communications, employment and the design of public spaces.

This 2021 -2026 Multi-Year Accessibility Plan ("Plan") outlines the strategy of Grainger to prevent and remove barriers to address the current and future requirements of the AODA, and to fulfill Grainger's commitment as outlined in the Grainger Accessibility Policies.

In accordance with the requirements set out in the IASR, Grainger will:

- Establish, review and update this Plan in consultation with persons with disabilities;
- Post the Plan on the website, www.grainger.ca;
- Provide the Plan in an accessible format, upon request; and
- Review and update the Plan at least once every five (5) years.

2.0 SCOPE AND APPLICATION

This policy is applicable to all Grainger team members that provide services or interact with people with disabilities on behalf of Grainger in Canada.

3.0 POLICY

DEFINITIONS

Assistive Devices – Auxiliary aids such as communication aids, cognition aids, personal mobility aids and medical aids (e.g., canes, crutches, wheelchairs, or hearing aids).

Communication Supports – Supports that facilitate effective communications, including, captioning, alternative and augmentative communication supports, plain language and sign language.

Disability – As per the Ontario Human Rights Code, means:

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



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e) An injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act.*

Employees/Team Members – Every person who deals with members of the public or other third parties on behalf of Grainger whether the person does so as a team member, agent, or otherwise.

Persons with Disabilities – Individuals who have a disability as defined under the Ontario *Human Rights Code* (see above).

Service Animals – Animals individually trained to do work or perform tasks for the benefit of a person with a disability.

Support Persons – Any persons, whether a paid professional, volunteer, family member, or friend, who accompany an individual with a disability in order to help with communications, personal care or medical needs, or with access to services.

CUSTOMER SERVICE STANDARDS

Commitment:

Since 2015, Grainger has been in compliance with the Accessibility Standards, originally as set out under Regulation *429/07*, and now under the IASR. Grainger is committed to excellence in serving all customers, including persons with disabilities, and will provide goods, services and facilities in a way that is accessible and respects the dignity and independence of persons with disabilities.

Actions Taken:

- All team members, and all those who are involved in the development and approvals of customer service policies, practices and procedures, as well as others providing services to our customers, are trained on an on-going basis to communicate with persons with disabilities. Training includes the following:
 - o Review of the purpose of the AODA and the requirements of the Customer Service Standard;
 - o How to interact and communicate with people with various types of disabilities;

 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 alternative means to help provide goods or services to people with disabilities;
- What to do if a person with a disability is having difficulty in accessing the Company's goods and services; and
- The Company's policies, practices and procedures relating to the Customer Service Standard.
- All team members, volunteers and others dealing with the public are trained and are familiar with various assistive devices that may be used by customers with disabilities while accessing our services.
- Grainger provides fully accessible telephone service to customers and communication with customers by TTY if telephone communication is not suitable to their needs.
- The Company ensures accommodation to customers serviced by a guide dog or other service animal in public areas.
- Where a person with a disability is accompanied by a support person, the support person is accommodated.
- Customers are notified in the event of a planned or unexpected disruption of service or inaccessibility of
 facilities used by persons with disabilities by placing standard notices of temporary disruption at all public
 entrances and service counters on Grainger premises.



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- Feedback is encouraged from persons with disabilities through multiple accessible ways, as outlined on our Company website, www.grainger.ca, by email, in person, by telephone or by mail. Any feedback from customers will be documented.
- Grainger communicates its Accessible Customer Service Standard policy on the Grainger website www.grainger.ca or provides the policy upon request.
- New team members receive training regarding the Customer Service Standard as needed at or following start date.

Status: Complete

EMERGENCY PROCEDURE, PLANS OR PUBLIC SAFETY INFORMATION

Commitment:

Grainger is committed to providing and maintaining premises that respect the dignity and independence of persons with disabilities.

Actions Taken:

- Any emergency procedures plans and public safety information that are prepared by Grainger and made available to the public, will be available in accessible formats or with communication supports upon request.
- Requests can be made to the Director, Environment, Health & Safety for such procedures, if applicable, and requests will be documented by the Company.

Status: Complete

WORKPLACE EMERGENCY RESPONSE INFORMATION

Commitment:

Grainger is committed to providing individualized workplace emergency response information to a team member with a disability requiring accommodation.

Actions Taken:

- Individualized workplace emergency response information procedures have been developed for team members with disabilities as required.
- Workplace Emergency Response Information forms have been prepared for team members who have disclosed a disability and who are being accommodated according to their disabilities.
- Grainger provides assistance to specific disabled team members, with consent, to help them evacuate the workplace during an emergency.
- Workplace Emergency Response Information forms have only been communicated to the team members' managers and other affected persons on an as-needed basis.
- Grainger reviews and assesses general workplace emergency response procedures and individualized emergency plans on an on-going basis.
- Managers and the Director, Environmental Health & Safety will ensure that the individual workplace response information are updated as necessary.



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Status: Complete

TRAINING

Commitment:

Grainger is committed to training team members, and other persons involved in developing policies on Ontario's accessibility laws and on accessibility aspects of the Ontario *Human Rights Code* that apply to persons with disabilities.

Actions Taken:

- Appropriate training on the requirements of the IASR and on the Ontario Human Rights Code and similar human rights legislation in Canada as it pertains to persons with disabilities has been provided to team members, volunteers, third-party contractors who provide goods, services and facilities on Grainger's behalf and persons participating in the development and approval of Grainger's policies.
- New team members receive training as needed or following their start date. Records of dates and number of participating individuals will be kept with Human Resources.
- Training will be provided on an ongoing basis by Human Resources where there are any changes to legislation or practices.

Status: Complete

INFORMATION AND COMMUNICATION STANDARDS

Commitment:

Grainger is committed to making information and communications accessible to persons with disabilities. The Company will incorporate new accessibility requirements under the information and communication standards to ensure that its information and communications systems and platforms are accessible and are provided in accessible formats that meet the needs of persons with disabilities.

1. Feedback, Accessible Formats and Communication Supports

Actions Taken:

- Upon request, accessible formats and communication supports will be provided or arranged in a timely
 manner that accounts for the person's needs due to disability and at a cost no more than the regular cost
 charged to other persons.
- Grainger's Branch Managers will consult with the person making a request to determine the suitability of the accessible format or communication supports.
- The public will be notified through the Company website about the availability of accessible formats and communication supports.
- Grainger will ensure current and new processes for receiving and responding to feedback are accessible to persons with disabilities.

Status: Complete

2. Accessible Websites and Web Content



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Planned Action effective January 1, 2021:

• Internet websites, web applications and web content controlled by Grainger will conform with the World Wide Web Content Accessibility Guidelines (WCAG) 2.0, Level AA (except as exempted under the IASR).

Status: Completed

EMPLOYMENT STANDARDS

Commitment:

Grainger is committed to fair and accessible employment practices in all stages of the employment cycle that will respect the dignity and independence of current and prospective team members with disabilities.

1. Recruitment, Assessment and Selection

Actions Taken:

- The Company has and will continue to review and modify recruitment policies, procedures and processes to ensure fair and accessible recruitment processes.
- Grainger notifies team members, as well as the public about the availability of accommodation for job applicants with disabilities during the recruitment process. Notification will be provided in an accessible manner, if necessary.
- The availability of accommodation during the recruitment process is indicated on the Grainger website and job postings.
- Job applicants who are individually selected to participate in an assessment or selection process are
 notified of available accommodation upon request. The availability of accommodation is communicated
 through a script in scheduling interviews and/or assessments. Notification is provided in an accessible
 manner, if necessary.
- If a selected applicant requests accommodation, the hiring managers and Human Resources consult with the applicant and arrange for suitable accommodation in a manner that takes into account the accessibility needs.
- All successful applicants are notified through their offer letter of the workplace policies for accommodation employees with disabilities, and notification will be provided in an accessible manner, if necessary.

Status: Completed

2. Informing Employees of Supports

Actions Taken:

- Grainger informs all current and new team members of workplace policies that support team members with disabilities, including accommodation policies that take into account needs due to disability.
- New team members are informed of workplace policies that support team members with disabilities as soon as practicable via e-mail and through the Company's intranet.
- Grainger informs team members of any changes to existing workplace policies with respect to accommodating disability via e-mail and through the Company's intranet.



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 Upon request to managers, Grainger will provide or arrange for suitable accessible formats and communication supports for information needed to perform the team member's job, and general team member information. In order to provide suitable accessible formats or communication supports, managers and Human Resources will consult the requesting team member.

Status: Completed

3. Documented Individual Accommodation Plans and Return to Work Processes

Actions Taken:

- Grainger's existing policies include steps that the Company will take to accommodate a team member with a disability and to facilitate a team member's return to work after absenteeism due to disability.
- Grainger will develop written individual accommodation plans for team members with disabilities, if necessary, with managers and Human Resources.
- The process for developing each individual accommodation plan for a team member with a disability requiring accommodation will be in accordance with the IASR.
- Current policies on accommodation are reviewed and modified to integrate the process for developing written individual accommodation plans for team members with a disability, if necessary.
- If applicable, individual accommodation plans include information regarding accessible formats and communication supports, individualized workplace emergency response information, and any other accommodation.
- Managers and Human Resources ensure that individual accommodation plans are updated as necessary.
- Human Resources will develop a written Return to Work process for team members absent due to disability and requiring accommodation.
- The written Return to Work process will outline the steps Grainger will take to facilitate the return to work after a disability-related absence, and to develop and use written individual accommodation plans.
- Current policies on returning to work are reviewed and modified to integrate the written Return to Work process.

Status: Complete

4. Performance Management, Career Development and Redeployment

Actions Taken:

- Grainger has and will continue to review, assess and modify, if necessary, existing policies, procedures
 and practices on performance management, career development and redeployment to ensure
 compliance with the IASR.
- The Company will consider the accessibility needs of team members with disabilities, and as applicable, their individualized accommodation plans, when assessing performance, management, career development and advancement, and redeployment.
- Managers who conduct performance management and career development and advancement meetings, and make redeployment decisions will be trained on accounting for accessibility needs.

Status: Complete



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ACCESSIBILITY STANDARDS FOR THE BUILT ENVIRONMENT

Commitment:

Grainger is committed to removing barriers in public spaces and buildings that will uphold the dignity and independence of persons with disabilities.

Actions Taken:

- Grainger will ensure that any of the following public spaces that are newly constructed or redeveloped by Grainger will meet the accessibility requirements under the IASR:
 - Recreational trails and beach access routes
 - Outdoor public eating areas (e.g. rest stops or picnic areas)
 - Outdoor play spaces
 - Outdoor paths of travel (e.g. sidewalks, ramps, stairs)
 - Accessible parking
 - Service-related elements (e.g. service counters, fixed queuing lines and waiting areas)

Status: Complete