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## Accessibility Plan

### GENERAL

#### Introduction

Stryder Motorfreight Inc. Accessibility plan is intended to support the principles and requirements outlined within the Accessible Canada Act (ACA), Accessibility Standards Canada (ASC), Canada Transportation Act (CTA), and the Accessible Canada Regulations (the "regulation").

This plan outlines Stryders' strategy and approach to identify, prevent and remove barriers to accessibility and is intended to be read in conjunction with the company's Accessibility Policy and Program.

#### Policy Statement and Commitment

Stryder supports the guidelines and principles within the accessibility Regulations and Law.

Stryder is committed to making our premises, services, products and equipment available to all people respecting their individual needs, dignity, independence and equal opportunity. While continuing to identify, prevent and remove barriers for all persons, including visitors, employees and service providers with disabilities. Using a collaborative approach and consultations with individuals with disabilities to improve accessibility to our services, facilities and employment opportunities.

#### Plan Availability

This plan is made available on Stryders' Company Website and upon request will be made available in an accessible format.

For alternate plan formats,

Accessibility Coordinator:

Stefanie Wright

*Safety and Compliance Manager,*

Mail: Stryder Motorfreight Inc. Head Office

7271 Nelson Road, Richmond B.C

Canada, V6W 1G3

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## Accessibility Plan

### Accessibility Committee

Stryder has identified representatives from across the company such as Operations, Safety and Compliance, Human Resources, Marketing, IT with the help of the established health and safety committee. Consultations with applicable employees and departments accountable to develop and revise policy and/or procedure that impacts accessibility requirements.

### EMPLOYMENT

Stryder is committed to reinforcing our *people focused* value by ensuring fair and equal opportunities for all current and prospective employees are implemented.

#### Recruiting

- The company has included accessibility options within our job descriptions posted for recruiting giving candidates the option to request alternative accessible formats and communication support.
- Consultation will take place directly with applicants to provide and/or arrange alternate accessible formats and communication support to accommodate their needs due to their disability.
- Include the accessibility plan and objectives during the interview process

#### Current Employees

- Provided training to current employees on the identification, process and expectations required for a reasonable accommodation
- Provide awareness training for employee to remove the stigmas around disabilities and barriers.

#### Performance Management and Career Development

Stryder has reviewed current practices and implemented a wage increase program called "in-Step" to ensure our employees are receiving additional wage increments regularly. The Management team has been working towards a scheduled review period within their respective teams to ensure no person(s) are overlooked for future career development opportunities.

Each department manager is required to ensure their employees are provided the tools and resources to complete their job effectively without delay. With regular one on one reviews, both the department manager and employee have an opportunity to address performance, goals and barriers within the workplace.

#### Workplace Emergency Response Information

Stryder shall provide individualized Workplace Emergency Response information to employees who have a disability:

- If a disability is such that the individual information is necessary and the Company is aware of the need for accommodation due to the employee's disability.



## Accessibility Plan

- If the employee who receives individual Workplace Emergency Response Information requires assistance and with the associate's consent, Stryder may provide the Workplace Emergency Response Information to the person designated by the company to aid the employee.
- As soon as practicable after becoming aware of the need for accommodation due to the associate's disability

### THE BUILT ENVIRONMENT

Stryders' goal is to ensure all facilities, current or future, are equipped or have the ability to be equipped, with necessary modifications to allow people with disabilities to enter and exit our buildings with ease.

Such modifications include, but are not limited to:

- Ramp access for wheelchairs, delivery carts, etc.
- Outdoor travel paths for pedestrians
- Accessible parking spots

### INFORMATION AND COMMUNICATION TECHNOLOGIES (ICT)

Stryder is dedicated to meeting the communication needs of people with disabilities. Stryder will, upon request, consult with people with disabilities to determine their information and communication needs.

Such communication methods include, but are not limited to:

- Accessible Formats
- Accessible websites and web content
- Clear signage and signalization within the facilities and parking areas

### INFORMATION OTHER THAN (ICT)

When requested, Stryder will provide communication supports as it relates to the effective facilitation of communications to employees, contractors, customers and clients in a manner that considers their disability.

Such communication methods include, but are not limited to:

- Using plain language, symbols and pictures on documents and training
- Audible option on forms
- Provide short guides to assist in training and communication

### PROCUREMENT OF GOODS, SERVICES AND FACILITIES

Stryder will ensure accessibility is considered when procuring goods, services or facilities at the beginning of the buying process.



# Accessibility Plan

## DESIGN AND DELIVERY OF PROGRAMS AND SERVICES

Stryder will ensure that every employee is provided with training as it pertains to persons with disabilities.

All employees, in accordance with their duties, will be trained on the accessibility program and policy as soon as practicable within the onboarding process. Employees will receive further training as legislative requirements or internal requirements change.

Such design and delivery methods include, but are not limited to:

- Providing additional formats of programs and training upon request
- Audible options on forms
- Provide short guides to assist in training and communication
- Use inclusive language
- Allow employees additional time to complete training(s)
- Find alternate methods of training upon request

## TRANSPORTATION

Stryder does not coordinate a transportation system, or a fleet of transportation vehicles as defined in the Accessible Canada Act. This means that the standards for transportation are not in the scope of this plan.

## CONSULTATION

To Align with Stryder's commitment to make our workplace environment accessible to all, the company has developed the Accessibility plan in consultation with our employees, including those with disabilities.

Information has been gathered through the following methods:

- Companywide survey
- One on One meetings
- General engagement and team building
- General Research on barriers identified within the industry

Stryder will continue to survey employees, including those with disabilities and any working group that has been developed as part of this Accessibility Plan, to measure progress and ensure that the company is aware and active in reaching the goals that we have set out to achieve regarding accessibility.

## GLOSSARY

Accessible Canada Act	Is a federal law that aims to find, remove and prevent barriers facing people with disabilities.
Accessibility	Refers to the needs of persons with disabilities being intentionally and thoughtfully considered when products, services and facilities are built or modified so they can be used and enjoyed by persons of all abilities



## Accessibility Plan

Barrier	Anything—including anything physical, architectural, technological or attitudinal, anything that is based on information or communications or anything that is the result of a policy or a practice—that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation.
Disability	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.
Facilitator	Person responsible for collecting data regarding the accessibility plan and reporting requirements.
Reasonable Accommodation (RA)	A change or adjustment that enables a person with a disability to apply for a job, perform job duties, or enjoy the benefits and privileges of employment that are equal to those enjoyed by similarly situated employees without disabilities. The change/adjustment promotes equal employment opportunity for an individual with a disability.
Undue Hardship	An undue hardship may exist when an accommodation is significantly difficult, unduly costly, extensive, substantial, or disruptive, or would change the nature or operation of the business.
Qualified Candidate or Employee	An individual with a disability who satisfies the requisite skill, experience, education and other job-related requirements of a position and who—with or without reasonable accommodation—can perform the essential functions of that position or can complete the application and selection process.
Essential Function	Duties that are fundamental to a position that the individual holds or desires that he/she cannot do the job without performing them.
Equal Employment Opportunity	The principle that everyone has equal way to pursue a job that is based on merit regardless of characteristics such as race, sex or sexual orientation. Equal Opportunity for Employment (EEO) law makes it illegally possible for employers to discriminate under certain features.
Interactive Process	A Collaborative effort between employee and company representative to discuss the need for an accommodation as well as identify effective accommodation solutions.

### Acronyms

ACA	Accessible Canada Act
ASC	Accessibility Standards Canada
CTA	Canada Transportation Act
ICT	Information and Communication Technologies
RA	Reasonable Accommodation



## Accessibility Plan

RAC	Reasonable Accommodations Coordinator
RAAM	Reasonable Accommodations Appeals Manager
EEO	Equal Employment Opportunity
IP	Interactive Process
TSP	Transportation Service Provider
ATPRR	Accessible transportation planning and reporting regulation
ADA	Americans with Disabilities Act

### REPORTING

As required by the Accessible Canada Act, Stryder will publish a status report every year that measures the progress against our commitments. Stryder will also review and update our Accessibility plan (and associate documents) every 3 years.

### TRAINING

Stryder will ensure that training is provided to all employees in accordance with ACA and the Human Rights Code as it pertains to persons with disabilities. All employees will be trained as soon as practicable during onboarding

Due Date	Barriers Type	Identified Barrier Action and Initiatives	Expected Outcome
		<b>Employment</b>	
06/01/23	Recruitment, assessment and selection	<ul style="list-style-type: none"> <li>- Include accommodations available on site upon request</li> <li>- Include policy/program in onboarding</li> <li>- Add inclusive terms on posted ads</li> </ul>	- Ensures all employees are informed of the Accommodation plan and requirements within the company
07/01/23	Training and Awareness	<ul style="list-style-type: none"> <li>- Ensure training of the human rights code is conducted within first 30 days of employment</li> <li>- Set up training workstation at all facilities for general use</li> <li>- Offer accessibility training/awareness presentation to managers</li> <li>- Post supporting signage and directives to encourage understanding and buy-in</li> </ul>	<ul style="list-style-type: none"> <li>- Staff understand accessibility and supports implementation of the plan</li> <li>- Information on progress on implementation of Stryder's Accessibility Plan is available to employees</li> <li>- Management to ensure company commitment to accessibility is in writing, endorse the commitment at meeting and celebrate progress</li> </ul>
06/01/23	Performance evaluation	<ul style="list-style-type: none"> <li>- Ensure that the accessibility need of employees with disabilities are considered</li> <li>- Provide accessible formats and communications supports upon request by the employee</li> </ul>	- Allows for clear communication regarding employee performance
06/01/23	Performance Management	- Take the employee's disability into account when measuring performance, productivity, effectiveness in order to facilitate the employees success	- Clear goals and expectations of work performance with accommodations in mind
06/01/23	Career Development and advancement	- Offer career development opportunities for staff that take into consideration disabilities (when applicable)	- Allows employees to grow their strengths and develop their careers within the company
06/01/23	Return to work	- Update current RTW Program to ensure RTW has incorporated components of accessibility and accommodations within the program	- Allows employees with disabilities to continue work at a capacity that they can accommodate due to their disability.
07/01/23	Non-Visible disabilities	<ul style="list-style-type: none"> <li>- Inform and educate employees</li> <li>- Provide assistance to support employees with non-visible disabilities at work</li> </ul>	- Educates the team and removes the Stigma associated with disabilities
		<b>The Built Environment (Physical Environment)</b>	
06/01/23	Emergency Response	Ensure accommodations or support are available in the event of an emergency	- Ensures all employees with disabilities have a plan in place to remove themselves from emergency situations with ease despite disabilities
06/01/23	New Construction	Require approval and consult	- All new facilities are equipped with necessary Accessibility options prior to work commencing
06/01/23	Shared Spaces	- Ensure accommodations are made for ease of access within shared spaces	- All shared spaces can be accessed regardless of potential disability
06/01/24	Facility Accessibility	- Ensure facilities are equipped with ramp access points	- Facilities can be accessed by those with disabilities and also provide an access point for delivery drivers or couriers to allow cart access
09/01/23	Accessible restroom availability	- Ensure all facilities are equipped with Handicap stalls in common area washrooms	- Allows all employees or visitors to access washrooms



		<b>Information and Communication Technologies (ICT)</b>	
06/01/23	Document accessibility	- Company Policies and programs to be available online - Supply physical copies of all directive type documents	- Easy access for employees to find information relevant to their position and the company
06/01/23	Company website	- Include site specific accessibility availability	- a quick source of information for clients and visitors to view
09/01/23	Video presentations inaccessible to people with hearing impairments	Include Caption options on video presentations	- Provides an additional format for communication through video presentation
		<b>Communication, other than ICT</b>	
07/01/23	Emergency Response	Implement air horn signalization for ER	Allows more options and areas to signal an emergency
06/01/23	Feedback Processes	Include email address on website for program point of contact	Creates an opportunity to communicate directly
08/01/23	Company policy and programs	Issue company wide emails on updated or new programs and policies	Streamline communication to capture larger audience
		<b>Procurement of goods, services and facilities</b>	
06/01/23	Assessment and selection process	- Implement standard process to include accessibility elements	Ensures that all goods, services, or additional facilities are available with accessibility in mind
		<b>Design and Delivery of programs and services</b>	
06/01/23	Training needs	- Include paper copies and presentations where practicable - Allow additional time if needed to complete training - Find alternate method of delivering training when needed	- Clear and concise delivery of necessary information - Assists those with learning disabilities or cognitive disabilities to have an alternate method of collecting and understanding necessary information
		<b>Transportation</b>	
06/01/23	Transit requirements at all facilities	- Inform new hires of potential transit issues if applicable	- All employees who use transit are aware of the potential issues that may occur
07/01/23	Accessible Parking	- Ensure a plan is available for parking requirements at each facility - Ensure there is safe access to the required work stations from the parking lot	- All employees understand where they can park their personal vehicles while on site and access the facility safely

EHS_POL_ACC_11.0			
	Accessibility Policy		
Created By:	Name/Signature (EHS)		Date
	Stefanie Wright		03/10/23
Approved By:	Name/Signature (CAO)		Date
	Sarah Dunsmore		03/15/23
Effective Date:	March 2023		
Annual Review By:	RAC, EHS, OPS		
Date:			

**Mission Statement:**

The purpose of this policy is to outline Stryder Motorfreight Inc. provisions for people with disabilities. We want to make our premises, services, products and equipment available to all people respecting their individual needs, dignity, independence and equal opportunity.

**Scope:**

This policy applies to all prospective or current employees of the company, as well as contractors and visitors, who possess a disability of any kind that restricts them in various ways.

**Frequency:**

To occur during work hours at all Stryder locations.

**Process:**

1. Stryder has taken action to ensure that people with disabilities will be able to move about safely and easily and make full use of our facilities.
2. Stryder is committed to providing exceptional and accessible service to its employees, clients and guests and shall use reasonable efforts to ensure that the policies, procedures and practices are consistent with the following principles:
  - 2.1. Products and services are provided in a manner that respects the dignity and independence of all workers.
  - 2.2. The provision of services to persons with disabilities will be integrated wherever possible.
  - 2.3. Persons with disabilities will be given an opportunity equal to that given to others.
3. Disabilities that this policy refers to include but are not limited to:
  - 3.1. Conditions that require the use of wheelchair or other movement support device or mechanism.
  - 3.2. Physical impairments that obstruct everyday activities (e.g. opening doors, walking up stairs, reading signs etc.)
  - 3.3. Non-visible disabilities such as;
    - 3.3.1. Chronic Health Conditions and Illnesses
      - 3.3.1.1. Diabetes
      - 3.3.1.2. Cancer
      - 3.3.1.3. Arthritis
      - 3.3.1.4. Asthma
    - 3.3.2. Sensory Impairments
      - 3.3.2.1. Hard of hearing
      - 3.3.2.2. Low or restricted vision
      - 3.3.2.3. Mobility limitations

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Effective Date:	March 2023

- 3.3.3. Mental health and learning disabilities
  - 3.3.3.1. Depression
  - 3.3.3.2. Anxiety disorders
  - 3.3.3.3. Attention deficit disorder(s)
- 3.4. Conditions that require assistance or constant medical care.
- 4. Other conditions are subject to Stryder Managements judgement and will be considered on an individual case by case basis.
- 5. Stryder has several provisions for people with disabilities.
  - 5.1. Stryder head office is equipped with a wheelchair accessible ramp at the front entrance to allow ease of access for visitors to our office areas.
    - 5.1.1. Posted emergency response actions for employees to assist when possible, those with disabilities.
    - 5.1.2. Stryder facilities are equipped with reserved parking spots for people with disabilities.
    - 5.1.3. Facilitate return to work practices with specific accommodations based on a worker's physical assessment and injury requirements.

EHS_PRO_ACP_33.0	PROGRAM		
	<i>Accessibility</i>		
Created By:	Name/Signature (EHS)		Date
	Stefanie Wright		March 2023
Approved By:	Name/Signature (COO)		Date
	Sarah Dunsmore		March 2023
Effective Date:	March 2023		
Annual Review By:	RAC, EHS, COO		
Date:			

**Purpose:**

The purpose of this program is to benefit all persons, especially persons with disabilities, through the realization, within the purview of matters coming within the legislative authority of Parliament, of a Canada without barriers, on or before January 1, 2040, particularly by the identification and removal of barriers, and the prevention of new barriers

**Scope:**

Under the federally regulated sector of Stryder Motorfreight, the company must identify, remove and prevent barriers within the company and realize full inclusion for people with disabilities. This includes the requirements set out by Accessible transportation planning and reporting regulation under the authority of the Canadian Transportation Agency.

**Frequency:**

A planning and reporting cycle is a period of 3 years during which a regulated entity prepares and publishes an accessibility plan and two progress reports.

First year – prepare and publish an accessibility plan

Second year – prepare and publish a progress report

Third year – prepare and publish a progress report

When the 3-year cycle ends, a new cycle begins.

**Definitions:**

Accessible Canada Act	A federal law that aims to find, remove and prevent barriers facing people with disabilities.
Barrier	Anything—including anything physical, architectural, technological or attitudinal, anything that is based on information or communications or anything that is the result of a policy or a practice—that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation.
Disability	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.
Facilitator	Person responsible for collecting data regarding the accessibility plan and reporting requirements.

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	6.3.1.3 "Is there flexibility regarding the time allocated to take this test?"
Reasonable accommodations coordinator; Accessibility Advisory Committee; Management team	<p>7.0 <u>FULLFILLING REQUESTS</u></p> <p>7.1 If there is more than one possible accommodation, Stryder will give primary consideration to the workers preference.</p> <p>7.2 The RAC does have discretion, however, to choose among various accommodations that enable you to perform the essential job functions.</p> <p>7.2.1 If a different accommodation is granted, the RAC should document the rationale for the alternative selection as part of the recordkeeping process and follow up to see if the accommodation is meeting the identified need to everyone's satisfaction.</p> <p>7.3 As a general rule, the decision on an RA request is made within 10 business days.</p> <p>7.3.1 If the RA cannot be completed within a 10-day period, the worker and their manager will be given written notification that documents the delay, reason (e.g., extenuating circumstances such a delay in acquiring necessary equipment), and expected timing for completing the process.</p>
All Employees	<p>8.0 <u>EMPLOYEE RESPONSIBILITY</u></p> <p>8.1 Accommodation is a multi-party process and those seeking an individual accommodation have roles and responsibilities to play as well. They include but are not limited too;</p> <p>8.1.1 Where possible, employees should advise or inform their supervisor of their need for an accommodation.</p> <p>8.1.2 Employees must offer sufficient support and assistance in facilitating the process by providing information such as:</p> <p>8.1.2.1 Why the accommodation is required (is it because of a religious requirement, a physical or mental disability, or because of pregnancy or family status)</p> <p>8.1.2.2 Relevant information (for example, medical reports that speak to limitations, or information that explains specific religious requirements)</p> <p>8.1.2.3 Suggestions for solutions (for example, a specific adaptive software or hardware device, or extra</p>

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	<p>sick days to allow for increased illness during pregnancy)</p> <p>8.1.3 Generally, employees are only obligated to discuss their requirements with those that need to know, such as supervisor, HR, or a representative from Disability Services in Access and Diversity.</p> <p>8.1.4 Employees seeking accommodations are required to participate and cooperate in accommodation efforts on an ongoing basis</p> <p>8.1.5 Employees must be prepared to accept reasonable solutions.</p> <p>8.1.5.1 There is no obligation on the employer's part to provide the perfect solution.</p>
Accessibility Advisory Committee	<p>9.0 <u>ROLE OF THE ACCESSIBILITY ADVISORY COMMITTEE</u></p> <p>9.1 The accessibility advisory committee is responsible for the following;</p> <p>9.1.1 Ensuring implementation of the regulatory requirements</p> <p>9.1.2 Advising staff completing accessibility compliance documents</p> <p>9.1.3 Drafting compliance documents for sign-off from subcontractors (if applicable)</p> <p>9.1.4 Review and response to accessibility feedback from staff, the public, clients or external agencies.</p> <p>9.1.5 Consultation activities within the organization</p> <p>9.1.6 Reviewing legislation for changes</p>
Reasonable accommodations coordinator	<p>10.0 <u>ROLE OF THE REASONABLE ACCOMODATIONS COORDINATOR</u></p> <p>10.1 The designated Reasonable Accommodations Coordinator's (RAC) role is to:</p> <p>10.1.1 Review and process all requests for RA's</p> <p>10.1.2 Act as the primary decision maker and arbiter for any requests</p> <p>10.1.3 Request and review medical documents, as needed, to confirm that an applicant or employee requesting an RA is an "individual with a disability" and whether the requested accommodation is necessary to:</p> <p>10.1.3.1 Enable the person to participate in the selection process for a job</p> <p>10.1.3.2 Perform the essential functions of a position</p>

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	<p>10.1.3.3 Access the normal benefits and privileges of employment</p> <p>10.1.3.4 Collaborate with external subject matter experts and/or appropriate internal staff (e.g., managers/supervisors, HR, Facilities, Finance, Legal, Safety, Security, IT) to make informed decisions regarding approval or denial of an RA</p> <p>10.1.3.5 Collect and track information regarding the RA process at each key step (e.g., initial request, nature of accommodation, time to fulfill, cost of accommodation, satisfaction level of all parties) and provide a quarterly report to management.</p> <p>10.1.3.6 Serve as primary contact for individuals with disabilities, managers and supervisors, and any other parties involved on a need-to-know basis throughout the process</p> <p>10.1.3.7 Provide an on-going assessment of the RA program.</p> <p>10.2 The RAC is responsible for all recordkeeping and tracking related to RA requests, including:</p> <p>10.2.1 Number of RA requests through the job application and selection process and whether those requests are granted or denied.</p> <p>10.2.2 Number of RA requests from employees and prospective employees and whether those requests are granted or denied</p> <p>10.2.3 Job titles for which RAs have been requested</p> <p>10.2.4 Number and types of RA requests for each job that have been approved and denied</p> <p>10.2.5 Reasons for denials of RA requests</p> <p>10.2.6 Timeframe for processing each RA request</p> <p>10.2.7 Sources of technical assistance consulted in trying to identify possible reasonable accommodations.</p>
Management	<p>11.0 <u>ROLE OF MANAGERS AND SUPERVISOR</u></p> <p>11.1 The more actively engaged and supportive managers/supervisors are in this process, the better.</p> <p>11.2 Should work closely with the RAC to implement all aspects of the RA policies and guidelines.</p>

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	<p>11.3 The role of a manager/supervisor in this process is to:</p> <p>11.3.1 Consult with HR and Safety department if they observe or learn about a candidate's or employee's need for an RA</p> <p>11.3.2 Determine whether the individual can perform the essential job functions and, where necessary, assess whether an RA can be made to enable the individual to safely perform these functions.</p> <p>11.3.2.1 Employee must request their medical provider complete <a href="#">SMCR_ADM_MIF_35.0 - Medical Inquiry Form - Accommodation Request</a></p> <p>11.3.2.2 Completed medical inquiry form must be provided to management prior to approval of accommodation.</p> <p>11.3.3 Identify the individual's abilities and limitations and collaborate with the person on finding potential accommodations</p> <p>11.3.4 Work with HR and Safety department, when requested, to obtain medical information regarding the disability and the individual's functional limitations.</p> <p>12.0 <i>Note: It is a violation of Stryder's policies to discriminate or retaliate against qualified job candidates or employees because they need, or may need, a reasonable accommodation for a disability. Violations of this policy may be subject to disciplinary action.</i></p>
Reasonable accommodations coordinator; Accessibility Advisory Committee; Management team	<p>13.0 <u>MULTI-YEAR ACCESSIBILITY ACTION PLAN</u></p> <p>13.1 Stryder is dedicated to treating accessibility as a long-term change initiative that involves employees.</p> <p>13.2 The accessibility Action Plan describes the measures that Stryder will take to identify, remove and prevent barriers to persons with disabilities who utilize the facilities and services of Stryder.</p> <p>13.3 Annually a status report will be completed that will outline the progress taken towards implementing the Accessibility action plan.</p>
Reasonable accommodations coordinator; Accessibility Advisory Committee; Management team	<p>14.0 <u>REASONABLE ACCOMMODATIONS</u></p> <p>14.1 A change or adjustment that enables a person with a disability to apply for a job, perform job duties, or enjoy the benefits and privileges of employment that are equal to those enjoyed by similarly situated employees without disabilities.</p>



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	<p>14.1.1 The change/adjustment promotes equal employment opportunity for an individual with a disability.</p> <p>14.2 There are three categories of RAs:</p> <p>14.2.1 Modification or adjustments to a job application and selection process to permit an individual with a disability to be considered for a job (e.g., providing application forms in alternative formats like large print or Braille, providing a sign language interpreter, or allowing extra time to take a test)</p> <p>14.2.2 Modifications or adjustments to enable a qualified individual with a disability to perform the essential functions of the job (e.g., providing phone amplification, computer screen magnification, or a flexible work arrangement)</p> <p>14.2.3 Modifications or adjustments that enable employees with disabilities to enjoy equal benefits and privileges of employment (e.g., ensuring training or special events hosted by Stryder are held in locations that are physically accessible, and accommodating employees during training programs and presentations).</p> <p>14.3 Stryder is committed to providing qualified job candidates and employees who have disabilities with reasonable accommodations upon request, unless the accommodation would pose an undue financial and/or operational hardship for Stryder.</p> <p>14.4 You may request a reasonable accommodation (RA) to:</p> <p>14.4.1 Participate in the job application process</p> <p>14.4.2 Perform the essential functions of your job</p> <p>14.4.3 Enjoy the benefits and privileges of employment with Stryder.</p> <p>15.0 <i>Note: It is a violation of Stryder's policies to discriminate or retaliate against qualified job candidates or employees because they need, or may need, a reasonable accommodation for a disability. Violations of this policy may be subject to disciplinary action.</i></p> <p>16.0 What accommodations are reasonable?</p> <p>16.1 The reasonableness of an accommodation depends upon the circumstances of each case.</p> <p>16.2 Examples of reasonable accommodations include, but are not limited to, the following:</p> <p>16.2.1 Making facilities accessible to and usable by people with disabilities</p>
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	<ul style="list-style-type: none"> <li>16.2.2 Restructuring jobs</li> <li>16.2.3 Modifying work schedules</li> <li>16.2.4 Providing or modifying equipment, devices or materials</li> <li>16.2.5 Providing qualified readers, interpreters, or other support services during the application, interview, and testing processes, and during training and other employment-related activities, including social functions.</li> <li>16.2.6 Changing workplace practices (e.g., emergency evacuation procedures or security requirements for nearby parking)</li> <li>16.2.7 Providing leave</li> <li>16.2.8 Arranging for transfer or reassignment to a vacant position.</li> </ul> <p>17.0 Personal Items</p> <ul style="list-style-type: none"> <li>17.1 Stryder is not required to provide personal items that you need both on and off the job, such as <ul style="list-style-type: none"> <li>17.1.1 hearing aids,</li> <li>17.1.2 prosthetic limbs,</li> <li>17.1.3 wheelchairs,</li> <li>17.1.4 eyeglasses</li> </ul> </li> <li>17.2 Such items may, however, constitute an RA where they are specifically designed to meet job-related—not personal—needs.</li> <li>17.3 One example would be eyeglasses that enable you to view a computer monitor, which you may not need outside the office.</li> <li>17.4 RAs may also include permitting you to use aids or services that the employer is not otherwise required to provide. <ul style="list-style-type: none"> <li>17.4.1 For example, while Stryder may not provide you with a motorized scooter, it might make a reasonable accommodation so you have a place on site to store the scooter.</li> </ul> </li> </ul> <p>18.0 Undue Hardship</p> <ul style="list-style-type: none"> <li>18.1 An accommodation is not a reasonable accommodation if it imposes an undue hardship for Stryder.</li> <li>18.2 An undue hardship may exist when an accommodation is <ul style="list-style-type: none"> <li>18.2.1 significantly difficult,</li> <li>18.2.2 unduly costly,</li> <li>18.2.3 extensive,</li> <li>18.2.4 substantial,</li> <li>18.2.5 disruptive,</li> <li>18.2.6 or would change the nature or operation of the business.</li> </ul> </li> </ul>
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<p>Reasonable accommodations coordinator; Accessibility Advisory Committee; Management team; Recruiting department</p>	<p>19.0 <u>REASONABLE ACCOMMODATIONS FOR JOB CANDIDATES</u></p> <p>19.1 Job candidates with disabilities who want to request an RA must complete the <a href="#">SMCR_ADM_ORA_34.0 - Onboarding Accommodation Request</a> which should be made available at the first possible opportunity in the application process.</p> <p>19.2 The RAC is responsible for helping candidates complete the form and processing their requests.</p> <p>19.2.1 A copy of the form goes to the candidate, and the RAC keeps the original form.</p> <p>19.3 The RAC should not speculate that just because a candidate requests an RA during the hiring process that the individual will also need an RA to perform the job if hired.</p> <p>19.4 The candidate may or may not need an RA upon hire, and if an accommodation is needed, it may not be the same type or degree as the one needed during the application and selection process.</p> <p>19.5 It is generally the responsibility of the individual with the disability to request an accommodation.</p> <p>19.6 Stryder must reasonably accommodate disabilities when made aware of them;</p> <p>19.6.1 the organization is not responsible for accommodating any disability that is not observable or made known.</p> <p>19.6.2 Once Stryder is aware of a candidate’s disability, the supervisor and RAC should initiate discussions about an RA and initiate the request process.</p>
<p>Reasonable accommodations coordinator; Accessibility Advisory Committee; Management team;</p>	<p>20.0 <u>REASONABLE ACCOMMODATION REQUEST APPROVAL</u></p> <p>20.1 After careful review of all necessary documents provided, the RAC with the assistance of the AAC and department manager, must complete <a href="#">SMCR_ADM_AAF_32.0 - Accommodation Approval</a></p> <p>20.1.1 The <a href="#">Accommodation Approval Form</a> is used as a guide to determine timeframes and actions associated with the facilitation of reasonable accommodations.</p>
<p>Reasonable accommodations coordinator; Accessibility Advisory Committee; Management team;</p>	<p>21.0 <u>DENYING ANY REASONABLE ACCOMMODATION REQUEST</u></p> <p>21.1 If Stryder and the employee/prospective employee cannot agree on a reasonable accommodation that is effective and does not impose an undue hardship, the request denial must be documented using <a href="#">SMCR_ADM_MIF_36.0 - Accommodation Denial Form</a></p> <p>21.2 Examples of why a request might be denied include:</p>

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	<p>21.2.1 inadequate medical documentation to establish that the individual has a disability or needs reasonable accommodation;</p> <p>21.2.2 the requested accommodation would not be effective; and the accommodation would pose an undue hardship for the company.</p> <p>21.3 The denial form must document:</p> <p>21.3.1 The reason for the denial</p> <p>21.3.2 The name and job title of the person who made the decision</p> <p>21.3.3 If a specific requested accommodation is denied and another offered in its place, the reasons for the denial and the reasons Stryder believes the chosen accommodation will be effective</p> <p>21.3.4 Information about the individual's right to file an EEO complaint and to invoke any other applicable statutory processes</p> <p>21.3.5 Information about the availability of the appeals process.</p> <p>22.0 <i>Note: Your organization needs to develop and communicate your appeals process. Ideally, someone outside the RAC's management hierarchy should be designated to resolve RA appeals, and your Legal department be consulted before a final decision is rendered and communicated. The appeal process should take no longer than 30 days, and the person designated to handle appeals should communicate the final decision and accompanying rationale both verbally and in writing to the employee.</i></p> <p>22.1 The <a href="#">Accommodation Denial Form</a> should be attached to the Reasonable Accommodation Request Form.</p> <p>22.2 Before notifying the individual of the denial, the RAC should consider consulting with appropriate Legal and HR personnel to get agreement on the decision.</p>
Reasonable accommodations coordinator; Accessibility Advisory Committee; Management team;	<p>23.0 <u>REASSIGNMENT</u></p> <p>23.1 If no effective accommodation will allow an employee to perform the essential functions of the job, a job reassignment may be the "last resort."</p> <p>23.2 Stryder is under no obligation to create a new position or move other employees from their jobs in order to create a vacancy.</p> <p>23.3 Reassignment may be made only to a vacant position and when the person with a disability meets the qualifications.</p>

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	<p>23.4 The department Manager, in consultation with the RA, is responsible for searching for a reassignment and consulting with the affected employee to determine whether he/she:</p> <ul style="list-style-type: none"> <li>23.4.1 Wants to limit the search in any way</li> <li>23.4.2 Is qualified for a particular job</li> <li>23.4.3 Would need a reasonable accommodation to perform the essential functions of the new position.</li> </ul> <p>23.5 In cases where reassignment is the only alternative, the department manager must explain to employees why they cannot be accommodated in their current positions and find out what parameters, if any, they would consider in a reassignment.</p> <p>23.6 The department manager should inquire whether an employee is willing to be reassigned:</p> <ul style="list-style-type: none"> <li>23.6.1 Outside the facility or outside the commuting area and, if so, to what locations</li> <li>23.6.2 To a different type of position for which they are qualified and, if so, to what type(s)</li> <li>23.6.3 To a different area within the department and, if so, to which one(s)</li> <li>23.6.4 To a lower grade position—if reassignment to the same pay grade is not feasible—and, if so, down to what level.</li> </ul>
Management team;	<p>24.0 <u>APPEALS PROCESS</u></p> <p>24.1 When Stryder is unable to fulfill a request for an RA, an employee or job candidate may appeal the decision within 10 business days of the denial.</p> <ul style="list-style-type: none"> <li>24.1.1 The employee or candidate appeal, can submit the necessary documents to their direct manager or hiring manager who will submit the associated documents to the Reasonable Accommodations Appeals Manager RAAM</li> </ul> <p>24.2 The person in this job function will:</p> <ul style="list-style-type: none"> <li>24.2.1 Review the RA request and all related documentation, standards, procedures and potential accommodations considered</li> <li>24.2.2 Meet and/or consult with the individual or/and others involved parties</li> <li>24.2.3 Evaluate the effectiveness of the request and that it does not create an undue hardship, giving primary consideration to the individual's preferences.</li> </ul>

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	<p>25.0 Stryder must issue a written determination within 15 business days of the appeal.</p> <p>26.0 If the requested accommodation is determined to be effective and does not create an undue hardship, the determination will specify the type of accommodation and, if necessary, direct the appropriate Stryder representative to implement it promptly.</p>
Management team;	<p>27.0 <u>CONFLICT OF INTEREST</u></p> <p>27.1 The RAC and other HR personnel will be recused from handling, investigating or making final decisions if an individual files an appeal or complaint challenging Stryder’s handling of an RA request.</p> <p>27.2 This recusal is a safeguard against any actual or perceived “conflicts of interest.”</p>
Reasonable accommodations coordinator; Accessibility Advisory Committee; Management team;	<p>28.0 <u>INTERACTIVE PROCESS</u></p> <p>28.1 The RA process should be an interactive one that involves the mutual sharing of information and ideas between the individual with a disability, that person’s manager and the RAC.</p> <p>28.2 “Interactive” is characterized by direct, candid and mutually cooperative communication that helps the RAC make a well-considered and informed decision to either grant or deny the RA request.</p> <p>28.3 The process is an opportunity to:</p> <p>28.3.1 Obtain and exchange information regarding what a person with a disability needs to contribute to his/her fullest potential</p> <p>28.3.2 Consider accommodation alternatives that meet both the business and personal needs of the parties involved</p> <p>28.3.3 Consult, if needed, with internal and/or external subject matter experts.</p>
Reasonable accommodations Reasonable accommodations coordinator; Accessibility Advisory Committee; Management team;	<p>29.0 <u>VERIFYING DISABILITIES</u></p> <p>29.1 When a disability or the need for an accommodation is not obvious, Stryder may ask candidates and employees for reasonable documentation about the disability and related functional limitations.</p> <p>29.2 Stryder may require only the documentation that is needed to establish that a person has a disability, and that the disability necessitates a reasonable accommodation. Such documentation may include:</p>

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	<p>29.2.1 Past, present and expected future nature, severity and duration of the impairment (e.g., functional limitations, symptoms, side effects of any treatments)</p> <p>29.2.2 Types of activities the impairment limits</p> <p>29.2.3 Extent of the limitations</p> <p>29.2.4 Why the individual requires an accommodation—either in general or a specific type—and how the RA will assist the individual to apply for a job, perform the essential functions of the job, or enjoy a benefit of the workplace.</p> <p>29.3 In limited circumstances, medical examinations or more detailed medical documentation may be needed to determine whether an employee can perform the essential functions of the job and what accommodations may be appropriate.</p> <p>29.4 The RAC should inform the individual why the provided documentation is insufficient and what additional information is needed.</p> <p>29.4.1 Any additional requests for information should specify what type of information is needed regarding the disability, its functional limitations, and the need for reasonable accommodation.</p> <p>29.5 The individual requesting an accommodation may be asked to sign a limited release allowing Stryder to submit a list of specific questions to the health care or vocational professional. (<a href="#">SMCR_ADM_AMI_37.0 - Authorization for the release of medical information</a>).</p> <p>29.6 Stryder may <i>not</i> request medical information when:</p> <p>29.6.1 Both the disability and the need for reasonable accommodation are obvious, or</p> <p>29.6.2 The individual already provided Stryder with sufficient information to document the existence of the disability and functional limitations, unless the disability is temporary or the condition is subject to change.</p> <p>29.7 If an employee has a visible or apparent disability, but there is a question as to whether the requested accommodation would be effective, a subject matter expert should be consulted.</p>
<p>Reasonable accommodations coordinator; Accessibility Advisory Committee; Management team;</p>	<p>30.0 <u>ANALYZING ESSENTIAL FUNCTIONS</u></p> <p>30.1 The reasonable accommodation process often can be accomplished without a formal analysis of the job’s essential functions and the employee’s job-related limitations.</p>

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	<p>30.1.1 For example, if an employee who uses a wheelchair requests that a desk be elevated on blocks and that accommodation is implemented, the process is completed without a formal analysis of the essential job functions.</p> <p>30.2 Other situations may require an analysis to determine whether the employee can perform the essential functions of the position and if the request is granted, whether the accommodation is reasonable, if there is an alternative/vacant position they could perform, or if the accommodation presents undue hardship to Stryder.</p>
Reasonable accommodations coordinator; Accessibility Advisory Committee; Management team;	<p>31.0 <u>COMMUNICATION</u></p> <p>31.1 Stryder shall communicate that a description of Stryder’s reasonable accommodation procedures and any related forms are readily available, using these channels:</p> <ul style="list-style-type: none"> <li>31.1.1 Careers web page</li> <li>31.1.2 Intranet</li> <li>31.1.3 Interview process</li> <li>31.1.4 New employee orientation</li> <li>31.1.5 Manager training guides</li> <li>31.1.6 Appropriate company meetings</li> <li>31.1.7 Annual benefits open enrollment</li> <li>31.1.8 Anywhere other HR and Safety information is posted.</li> </ul> <p>31.2 In cases where there is a concern over an employee’s performance, an RA can be noted along with other resources (e.g., training and development, EAP, tuition reimbursement) as a possible solution to the performance issue.</p>
Reasonable accommodations coordinator; Accessibility Advisory Committee; Management team;	<p>32.0 <u>MONITORING</u></p> <p>32.1 To measure the success of the accessibility plan, program, policy and associated practices, regular monitoring must be conducted.</p> <p>32.2 Monitoring should be conducted for the following:</p> <ul style="list-style-type: none"> <li>32.2.1 Monitor progress from action log</li> <li>32.2.2 Log/review feedback</li> <li>32.2.3 Frequency of requests</li> <li>32.2.4 Communication</li> </ul> <p>32.3 Implemented accommodations must be monitored for their effectiveness.</p> <p>32.4 Monitoring accommodations must occur once a month until fully remedied and as needed following full implementation.</p>



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	<p>32.4.1 Department managers must complete <a href="#">SMCR_ADM_MAR_33.0 - Monitoring Accommodations</a> for any active accommodations.</p> <p>32.4.1.1 Completed forms must be submitted to the RAC</p>
Reasonable accommodations coordinator; Accessibility Advisory Committee; Management team;	<p>33.0 <u>EVALUATING</u></p> <p>33.1 Regular monitoring of the accessibility program, policy and plan will be conducted regularly to evaluate the measurable performance indicators as well as the lived experiences of the committee and other stakeholders.</p> <p>33.2 The committee will meet every 3 months to determine the following;</p> <p>33.2.1 Effectiveness of the implemented actions</p> <p>33.2.2 Review of newly provided feedback</p>
Reasonable accommodations coordinator; Accessibility Advisory Committee; Management team;	<p>34.0 <u>CONSULTATIONS</u></p> <p>34.1 While maintaining respect for consultation participants' right to privacy, the facilitator must record the;</p> <p>34.1.1 Method of consult (i.e. in-person, virtual, survey etc.)</p> <p>34.1.2 With whom was consulted (i.e. Individual, expert, and organizations)</p> <p>34.1.3 Comments and/or data received.</p> <p>34.2 Stryder will publish additional guidance on consulting persons with disabilities.</p> <p>34.3 An internal survey was sent out to gather data from current employees regarding potential barriers faced within Stryder.</p>
Reasonable accommodations coordinator; Accessibility Advisory Committee; Management team;	<p>35.0 <u>PUBLICATION</u></p> <p>35.1 The ACA requires the publication of an accessibility plan respecting Stryders' policies, programs, practices and services in relation to the identification and removal of barriers, and the prevention of new barriers, in the areas listed above.</p> <p>35.2 If barriers cannot be identified in any one of the above areas mentioned in section 2.0, or if an area is not relevant within Stryder, this must be noted under the respective heading prior to submission.</p>
Reasonable accommodations coordinator; Accessibility Advisory	<p>36.0 <u>REVIEW</u></p> <p>36.1 The above accessibility program, policy, plan and associated documents must be reviewed and updated as needed, every 3 years or as specified by the regulations.</p>

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Committee; Management team;	<p>36.1.1 Consultation with peoples with disabilities must be present when updating and/or creating plans.</p> <p>36.2 An annual review of the plan will also be conducted that will incorporate updates as required.</p> <p>36.3 New identified priority action items will be incorporated into the plan as well as any legislative changes.</p>
Reasonable accommodations coordinator; Accessibility Advisory Committee; Management team;	<p>37.0 <u>CONFIDENTIALITY OF MEDICAL INFORMATION</u></p> <p>37.1 All Stryder personnel are required to respect employee confidentiality.</p> <p>37.2 All requests for an RA and all steps taken to review the request and provide any accommodation will be treated as a confidential matter.</p> <p style="padding-left: 40px;">37.2.1 Information will be disclosed only on a need-to-know basis.</p> <p>37.3 When requesting accommodations, all documentation and information concerning employees' medical condition or medical history must be collected on forms separate from other personnel-related forms and maintained in separate medical files.</p> <p>37.4 The information will be treated as confidential medical records.</p> <p>37.5 Medical information may be provided to: <i>{Note to employer: Please verify with your legal adviser}</i></p> <p style="padding-left: 40px;">37.5.1 Supervisors/managers who need to be informed about work restrictions or reasonable accommodations</p> <p style="padding-left: 40px;">37.5.2 First-aid and safety personnel who need to be informed if the disability requires emergency treatment</p> <p style="padding-left: 40px;">37.5.3 Government compliance officials</p> <p style="padding-left: 40px;">37.5.4 Workers' compensation offices that need information as required by law</p> <p style="padding-left: 40px;">37.5.5 Insurance providers who may require information such information</p> <p style="padding-left: 40px;">37.5.6 Other Stryder authorized personnel who need to be consulted in order to identify, obtain and install the accommodation solution.</p>