



Accessibility Policy

De Havilland Aircraft of Canada

If you are a person with a disability and require reasonable accommodations to read this document, please contact a member of the Human Resources team.



COPYRIGHT INFORMATION

Published under the Authority of:

HUMAN RESOURCES
De Havilland Aircraft of Canada
3615 34th St. NE
Calgary, AB
T1Y 6Z8

Document Title: Accessibility Policy
Version: 2
Date: February 28, 2023
Document Identifier: POLICY DHC ACCESSIBILITY POLICY



Printed on recycled paper



Document Control

Record of Amendments

Document Number	Revision	Effective Date	Expiry Date
HS.DHC.017.POL	Initial Draft	June 1, 2019	Feb 7, 2023
	Amended and put in new corporate policy format	February 8, 2023	Feb 27, 2023
	Final version put into new format	February 28, 2023	

Approvals

VP, Human Resources	Rob Kearley	Approved: Robert Kearley Date: 13 MARCH 2023
CPO, De Havilland of Canada	Brenda Allen	Approved: <i>Bl</i> Date: 10 MARCH 2023
Chief Executive Officer De Havilland Aircraft of Canada	Brian Chafe	Approved: <i>BC</i> Date: 10 March 2023

Under the *Accessibility for Ontarians with Disabilities Act, 2005*, all public and private sector organizations in the Province of Ontario must meet the requirements of accessibility standards established by regulation. This policy establishes the accessibility policy, multi-year accessibility plan and related commitments, in accordance with the *Integrated Accessibility Standards* (Ontario Regulation 191/11) for the Ontario operations of De Havilland Aircraft of Canada Limited ("De Havilland" or the "Company").

INTENDED AUDIENCE

All employees, contractors, leaders, customers, suppliers, job applicants and visitors of De Havilland Aircraft of Canada Limited.

Employees included in a Collective Agreement will also refer to the applicable article in the Collective Agreement. If there are variances in this policy to the Collective Agreement, the Collective Agreement will supersede this policy.



Table of Contents

1.0	SCOPE	Page 4
1.1	Definitions	
2.0	GENERAL ACCESSIBILITY POLICY	Page 5
2.1	Commitment to Accessible Information and Communications	
2.2	Accessible Employment	
2.3	Training Commitment	
3.0	ACCESSIBLE CUSTOMER SERVICE	Page 9
3.1	<i>Accessible Customer Communications</i>	
3.2	<i>Assistive Devices</i>	
3.3	<i>Service Animals</i>	
3.4	<i>Support Persons</i>	
3.5	Temporary Unavailability of Access to Goods or Services for Customers with Disabilities	
3.6	<i>Accessible Customer Service Training</i>	
4.0	AVAILABILITY OF THIS POLICY	Page 11



1.0 Scope

This Policy applies to all De Havilland Representatives in the Province of Ontario.

For the purposes of this Policy, “**Representative**” means employees, volunteers, others that provide goods or services on De Havilland’s behalf and all those who are involved in the development of De Havilland’s policies, practices and procedures.

1.1 Definitions

As used in this Policy, the following terms have the meanings identified below:

“**Accessible Formats**” means any form of large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

“**Communication Supports**” means captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

“**Disability**” as defined in the Ontario *Human Rights Code* means:

- (a) any degree of physical 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 impairment, 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.

“**Web Content Accessibility Guidelines**” means the World Wide Web Consortium Recommendation, dated December 2008, entitled “Web Content Accessibility Guidelines (WCAG) 2.0”.



“Website” means a collection of related webpages, images, videos, or other digital assets that are addressed relative to a common Uniform Resources Identifier (URI) and is accessible to the public.

2.0 GENERAL ACCESSIBILITY POLICY

The Company is committed to accessibility for persons with disabilities based upon the core principles of dignity, independence, inclusion, integration, responsiveness and equality of opportunity. We are committed to meeting the needs of persons with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting the accessibility requirements under the AODA.

2.1 Commitment to Accessible Information and Communications

(i) Accessible Formats and Communication Supports

De Havilland will endeavor to create, provide and receive information and communications in ways that are accessible to people with disabilities. De Havilland will notify the public about the availability of accessible formats and communication supports. When asked, De Havilland will provide information about the Company and its services, communications made available to the Company's customers and the public (including this policy), and any publicly available emergency procedures, plans or public safety information in accessible formats or with communication supports.

De Havilland will provide or arrange for accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs and at a cost that is no more than the regular cost charged to other persons. De Havilland will consult with the person making the request to determine the suitability of any accessible format or communication support provided.

If the Company determines that it is not technically feasible to convert the information or communications or that the technology to convert the information or communications is not readily available, De Havilland shall, upon request, provide the person that requires the information with an explanation as to why the information or communications are unconvertible; and a summary of the unconvertible information or communications.

(ii) Website Accessibility

Except where not practicable, the Company ensures that its current internet website(s), web content (backdated to 2012) and web-based applications conform to the World Wide Web



Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level AA (other than success criteria 1.2.4 and 1.2.5).

(iii) Feedback Regarding Accessibility

De Havilland encourages persons with disabilities to provide comments on the services they receive, including feedback regarding the accessibility of those services and the Company's feedback process itself.

Feedback may be delivered to De Havilland in person, by telephone, mail, email, facsimile or other means available to the person.

Customers may use any of the following feedback channels:

In person at De Havilland's office:

5800 Explorer Drive
Mississauga, Ontario
L4W 5K9

HR office – 2nd floor

By telephone, facsimile or e-mail:

Telephone: (437)-291-3458 or 1-844-359-3428
Fax: (416) 874-6245
Email: hr@dehavilland.com

By mail: in writing or through electronic or audio recording.

5800 Explorer Drive
Mississauga, Ontario
L4W 5K9

All feedback will be reviewed for possible improvement in De Havilland's services and accessibility to its services. Feedback will be directed to the most appropriate Company employee for resolution, and any complaints will be addressed as soon as possible. Persons providing feedback can expect an acknowledgment of their feedback to be issued within ten (10) business days. The acknowledgment will indicate when the matter will be addressed, and when the individual will be notified further with respect to the matter. Correspondence with the individual will take into account their accessibility needs and will be provided in accordance with De Havilland's commitment to accessible information and communication supports, described above.



2.2 Accessible Employment

The Company has implemented the following practices and procedures to promote the inclusion of applicants for employment and existing employees with disabilities in its workplace.

(i) Recruitment

De Havilland notifies employees and the public about the availability of accommodations for applicants with disabilities during the recruitment process and when job applicants are individually selected to participate in an assessment or selection process.

If a selected applicant requests an accommodation, De Havilland consults with the applicant and provides or arranges for the provision of a suitable accommodation (including with respect to any materials or processes used in the application process), taking into account the applicant's disability.

When making offers of employment, the Company notifies successful applicants of its policies for accommodating employees with disabilities.

(ii) Employee Notification

De Havilland informs its employees of its policies used to support its employees with disabilities: (a) to new employees as soon as practicable after they begin their employment; and (b) whenever there is a change to existing policies on the provision of job accommodations that take into account accessibility needs due to a disability.

(iii) Accessible Formats and Communication Supports

Where an employee with a disability requests it, De Havilland will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for: (a) information that is needed in order to perform the employee's job; and (b) employment information that is generally available to employees in the workplace.

De Havilland will consult with the employee making the request in determining the suitability of an accessible format or communication support.

(iv) Individual Accommodation Plans

De Havilland has a written process for the development of a documented Individual Accommodation Plan. A copy of this process can be found in the Accessible Employment Policy, which is posted on the Company's website and intranet.



(v) Return to Work Process

De Havilland has a return-to-work process for employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work. A copy of this process can be found in the Accessible Employment Policy, which is posted on De Havilland's website and intranet.

(vi) Performance Management, Career Development and Advancement and Redeployment

De Havilland takes into account the accommodation needs of its employees, including any individual accommodation plans of employees, when: (a) using performance management; (b) providing career development and advancement opportunities; and (c) redeploying employees.

(vii) Workplace Emergency Response Information

De Havilland provides individualized Workplace Emergency Response Information to employees who have a disability if the disability is such that the individualized information is necessary, and the employer is aware of the need for accommodation due to the employee's disability. More details regarding this process can be found in the Accessible Employment Policy, which is posted on the Company's intranet.

2.3 Training Commitment

De Havilland provides three types of training related to accessibility: accessible customer service training (as further discussed in section 5.6 below); integrated standards accessibility training; and training on the *Human Rights Code* as it relates to individuals with disabilities.

This training will be provided to all Representatives as soon as practicable. For newly hired employees, training will be provided within three months of their hire date, at the latest. Training will also be provided on an ongoing basis when changes are made to these policies, practices and procedures. The training provided will be appropriate to the duties of the individual.

De Havilland will keep a record of the training provided, including the dates on which the training is provided and the number of individuals to whom it is provided.



3.0 ACCESSIBLE CUSTOMER SERVICE

De Havilland is committed to providing access to goods and services to its customers in a manner that is consistent with the principles of independence, dignity, integration and equality of opportunity, and that is in compliance with the AODA. To that end, the Company recognizes the importance of:

- Providing integrated access to goods and services for individuals with disabilities;
- Openly communicating and responding to the needs of customers with disabilities in order to provide them with excellent customer service; and
- Complying with the mandatory Customer Service Standard addressed under the AODA.

3.1 Accessible Customer Communications

De Havilland's Representatives are required to communicate with customers with disabilities in a manner that takes into account their disabilities. Representatives will consider how a customer's disability may affect the way that the customer expresses, receives or processes communications and, where possible, they will ask the customer how to best communicate with the individual.

3.2 Assistive Devices

Assistive devices that may be used by individuals with disabilities are welcome on the Company's premises that are open to the public or other third parties. De Havilland will take steps to ensure that Representatives are familiar with commonly used assistive devices.

3.3 Service Animals

De Havilland welcomes guide dogs or other animals that serve individuals with disabilities in those areas of its premises that are open to customers and will permit the customer to keep the service animal with them, except for those animals that are otherwise excluded by law from the premises. In the event that a service animal is otherwise excluded by law from the premises, the Company will provide the customer with an alternative method of obtaining, using or benefitting from its goods or services.



3.4 Support Persons

De Havilland welcomes persons who support individuals with disabilities to accompany them onto those parts of its premises that are open to the public or other third parties. The Company will ensure that customers who so require have access to their support persons while on the premises. Such support persons need not be paid, professional support workers. They may be volunteers, family members or friends who provide support to the customer.

3.5 Temporary Unavailability of Access to Goods or Services for Customers with Disabilities

In the event that a facility, service or system offered by De Havilland to customers with disabilities becomes temporarily unavailable, in whole or in part, the Company will provide notice of the disruption, as is reasonable in the circumstances. The notices will be posted in a conspicuous location at building entrances and via company-side email as appropriate or in another reasonable location, in the circumstances and shall:

- Explain the reason for and anticipated length of the disruption; and
- Provide a description of and indicate the location of an alternative facility or service that is accessible to individuals with disabilities, if available.

3.6 Accessible Customer Service Training

All De Havilland's Representatives will be:

- Provided with an overview of the AODA and the Customer Service Standard under the Regulation;
- Trained on how to interact, communicate and assist people with disabilities, and in particular, people with assistive devices, and those who require the assistance of a guide dog, service animal or support person;
- How to use equipment or devices available on De Havilland's premises or that are otherwise provided by the Company that may help with the provision of goods or services to a person with a disability;
- Made aware of the policies and procedures created by the Company in accordance with the Customer Service Standard; and



-
- Trained on what to do if a person with a disability is having difficulty accessing De Havilland's goods or services.

This training will also be provided on an ongoing basis, as soon as practicable, whenever the Company's policies change with respect to customer service accessibility for individuals with disabilities.

4.0 AVAILABILITY OF THIS POLICY

A copy of this policy will be posted on De Havilland's corporate website and intranet.

Upon request, De Havilland will provide or arrange for the provision of this policy, or the information contained in this policy, to the requesting individual in an accessible format or with a communication support in a timely manner that takes into account the person's accessibility needs due to disability and at no cost. In doing so, De Havilland will consult with the person making the request in determining the suitability of the format or communication support.