



## Multi Year Accessibility Plan

### INTRODUCTION

De Havilland Aircraft of Canada Limited (“**De Havilland**” or the “**Company**”) strives to meet the needs of its employees and customers with disabilities and is working hard to remove and prevent barriers to accessibility.

Our organization is committed to fulfilling our requirements under the *Accessibility for Ontarians with Disabilities Act, 2005* and its regulations (collectively the “AODA”). This accessibility plan outlines the steps De Havilland is taking to meet those requirements and to improve opportunities for people with disabilities.

Our plan shows how De Havilland will play its role in making Ontario an accessible province for all Ontarians.

### **PAST ACHIEVEMENTS TO REMOVE AND PREVENT BARRIERS**

This document includes a summary of the accessibility initiatives De Havilland has completed.



**Part I – GENERAL REQUIREMENTS**

Section	Initiative	Description	Action	Status	Compliance Date
3	Establishment of Accessibility Policies	3.(1) Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this Regulation.	Revised, approved and published	Completed  Revised	June 2019  February 3, 2023
4	Accessibility Plans	4.(1) Large organizations shall,  a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization’s strategy to prevent and remove barriers and meet its requirements under this Regulation;  b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and  c) review and update the accessibility plan at least once every five years.	Multi Year Accessibility revised, published and posted on the website.  Accessibility plan will be available in either soft or hard copy format as may be requested	Completed  Revised	June 2019  February 28, 2023



Section	Initiative	Description	Action	Status	Compliance Date
6	Self-Serve Kiosks	6.(2) Large organizations and small organizations shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.	None	Not Applicable	January 1, 2014
7	Training	7.(1) Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the <i>Human Rights Code</i> as it pertains to persons with disabilities to, (a) all employees, and volunteers; (b) all persons who participate in developing the organization's policies; and (c) all other persons who provide goods, services or facilities on behalf of the organization.	Training is provided to all employees, volunteers, persons who participate in the development of the Company's policies, and other persons who provide goods and services on behalf of the Company. Training is provided as part of the on-board orientation.  Re-train all current employees on policy and practices to refresh understanding	Completed  Updated training presentation	January 1, 2016  December 2019



**PART II – Information and Communications Standards**

Section	Initiative	Description	Action	Status	Compliance Date
11	Feedback	11.(1) Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request.	Feedback forms are provided at reception upon request. If requested, an accessible format will be provided.  Updated when business moved to new location	Completed	January 1, 2015  June 30, 2022
12	Accessible Formats & Communication Supports	12.(1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, a) in a timely manner that takes into account the person's accessibility needs due to disability; and b) at a cost that is no more than the regular cost charged to other persons.	Upon request an assessment will be made and an appropriate format will be determined.	Available on request	June 1, 2019
12		12.(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	The functional HRBP will review requests and determine suitability.	On request	June 1, 2019
12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	This will be done through the company website – <a href="http://www.dehavilland.com">www.dehavilland.com</a>	Completed  Completed	June 1, 2019  July 2019



Section	Initiative	Description	Action	Status	Compliance Date
13	Emergency Procedures, Plans or Public Safety Info	13.(1) In addition to its obligations under section 12, if an obligated organization prepares emergency procedures, plans or public safety information and makes the information available to the public, the obligated organization shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.	Documentation and communication are held in the Health and Safety office.  Revised when moved to new location and now available in the Human Resources office on the 2 <sup>nd</sup> floor.	Completed	January 1, 2012  June 30, 2022
14	Accessible Websites & Web Content	14.(2) Designated public sector organizations and large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG)2.0, initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out in this section.	The Company's website meets the requirements as set out by WCAG 2.0 AA	Development in conjunction with Corporate is continuing to meet the WCAG 2.0 Level AA requirement defined	<b>June 30, 2021</b> All internet websites and web content must conform with WCAG 2.0 Level AA, other than, <ul style="list-style-type: none"> <li>• success criteria 1.2.4 Captions (Live)</li> <li>• success criteria 1.2.5 Audio Descriptions (Pre-recorded).</li> </ul>



**PART III – Employment Standard**

Section	Initiative	Description	Action	Status	Compliance Date
22	Recruitment – General	22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	All employees and applicants are notified about the availability of accommodation for applicants with disabilities.	Completed Updated	January 1, 2016 March 2021
23	Recruitment, Assessment or Selection Process	23.(1) During a recruitment process, an employer shall notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used. (2) If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.	All applicants are notified that accommodations are available upon request.  Upon request the employer will provide appropriate accommodation in conjunction with the Health Center	Completed Ongoing	January 1, 2016 June 2021
24	Notice to Successful Applicants	24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	Integrated in the Employment Letter	Completed	June 1, 2019



Section	Initiative	Description	Action	Status	Compliance Date
25	Informing Employees of Supports	25.(1) Every employer shall inform its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.	Accomplished through training and conversations with identified employees	Completed Ongoing	January 1, 2016 March 2021
25		25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	Part of the On Boarding orientation process	Ongoing	June 1, 2019
25		25.(3) Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.	Will be communicated through training	As required to do so	June 1, 2019



Section	Initiative	Description	Action	Status	Compliance Date
26	Accessible Formats & Communication Supports for Employees	<p>26.1 In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for,</p> <p>(a) information that is needed in order to perform the employee's job; and</p> <p>(b) information that is generally available to employees in the workplace.</p>	<p>(a) Job descriptions and Work Instructions will be provided in accessible format when requested</p> <p>(b) If requested, postings and announcement will be provided in accessible format</p>	As requested to do so	June 1, 2019
26		<p>26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>	Upon request	As requested to do so	June 1, 2019
27	Workplace Emergency Response Information	<p>27.(1) Every employer shall provide 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.</p>	<p>All employees have been notified to request such accommodation. Information is held with the Human Resources Department.</p> <p>Updated for new office location</p>	As requested to do so	<p>January 1, 2012</p> <p>June 30, 2022</p>





Section	Initiative	Description	Action	Status	Compliance Date
27		(2) If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.	Emergency Wardens are informed of all individualized workplace emergency response requirements for their zone.  Updated for new office location	As requested to do so	January 1, 2012  June 30, 2022
27		(3) Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.	Upon request	As requested to do so	June 1, 2019
27		(4) Every employer shall review the individualized workplace emergency response information, (a) when the employee moves to a different location in the organization; (b) when the employee's overall accommodations needs or plans are reviewed; and (c) when the employer reviews its general emergency response policies.	Upon request and when the needs arises  Review of identified employees requiring assistance during annual policy reviews.	As requested to do so  Ongoing	January 1, 2012  May 2021



Section	Initiative	Description	Action	Status	Compliance Date
28	Documented Individual Accommodation Plans	28.(1) Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.	A documented individual accommodation plan will be designed when required	As required	June 1, 2019
29	Return to Work Process	29.(1) Every employer, other than an employer that is a small organization,  (a) shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and  (b) shall document the process.	The Company's return to work process is detailed in the Company's Accessible Employment Policy.	Complete	June 1, 2019
29		29. (2) The return to work process shall,  (a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and  (b) use individual documented accommodation plans, as described in section 28, as part of the process.	The Company's return to work process is detailed in the Company's Accessible Employment Policy.	Complete	June 1, 2019



Section	Initiative	Description	Action	Status	Compliance Date
30	Performance Management	30.(1) An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.	As required to do so	As required to do so	June 1, 2019
31	Career Development & Advancement	31.(1) An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.	As required to do so	As required to do so	June 1, 2019
32	Redeployment	32.(1) An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.	As required to do so	As required to do so	June 1, 2019



**Part IV – Design of Public Spaces**

Section	Initiative	Description	Action	Status	Compliance Date
80.22	Exterior Paths of Travel	80.22 Obligated organizations, other than small organizations, shall ensure that any exterior paths of travel that they construct or redevelop and intend to maintain meet the requirements set out in this Part	Although the Company does not currently have plans to construct or redevelop exterior paths of travel, the obligations under the Regulation will be met in the event of such construction.	If and when required	June 1, 2019
80.32	Off-Street Parking	80.32 Obligated organizations shall ensure that when constructing new or redeveloping off-street parking facilities that they intend to maintain, the off-street parking facilities meet the requirements set out in this Part	Although the Company does not currently have plans to construct or redevelop off-site parking facilities, the obligations under the Regulation will be met in the event of such construction.	If and when required	June 1, 2019
80.41	Service Counters	<p>80.41 (1) When constructing new service counters, which includes replacing existing service counters, the following requirements must be met:</p> <p>1. There must be at a minimum one service counter that accommodates a mobility aid for each type of service provided and the accessible service counter must be clearly identified with signage, where there are multiple queuing lines and service counters.</p> <p>2. Each service counter must accommodate a mobility aid, where a single queuing line serves a single or multiple counters.</p>	Although the Company does not currently have plans to construct or replace existing service counters, the obligations under the Regulation will be met in the event of such construction.	If and when required	June 1, 2019



**Part V – Customer Service**

Section	Initiative	Description	Action	Status	Compliance Date
80.46	Implement Customer Service Policy	<p>80.46 (1) In addition to the requirements in section 3, every provider shall develop, implement and maintain policies governing its provision of goods, services or facilities, as the case may be, to persons with disabilities.</p> <p>(2) The provider shall use reasonable efforts to ensure that the policies are consistent with the following principles:</p> <ol style="list-style-type: none"> <li>1. The goods, services or facilities must be provided in a manner that respects the dignity and independence of persons with disabilities.</li> <li>2. The provision of goods, services or facilities to persons with disabilities must be integrated with the provision of goods, services or facilities to others, unless an alternative measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the goods, services or facilities.</li> <li>3. Persons with disabilities must be given an opportunity equal to that given to others to obtain, use and benefit from the goods, services or facilities.</li> <li>4. When communicating with a person with a disability, the provider shall do so in a manner that takes into account the person's disability.</li> </ol> <p>(3) Without limiting subsections (1) and (2), the policies must deal with the use of assistive devices by persons with disabilities to obtain, use or benefit from the goods, services or facilities or with the availability of other measures, if any, which enable them to do so.</p>	The Company has implemented an Accessibility Policy that includes a section addressing the requirements under the Customer Service Standard.	Complete	<p>June 1, 2019</p> <p>The Accessibility Policy was updated in February 2023.</p>



Section	Initiative	Description	Action	Status	Compliance Date
80.46		80.46 (4) Every provider, other than a small organization, shall prepare one or more documents describing the policies established under this section and, on request, shall give a copy of any such document to any person.	The Company has implemented an Accessibility Policy that includes a section addressing the requirements under the Customer Service Standard.	Complete  Copies of the policy provided upon request	June 1, 2019
80.46		80.46 (5) Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the documents required by subsection (4) are available on request.	The Company's Accessibility Policy will be provided to persons to whom the Company provides goods, services or facilities upon request.	Provided upon request	June 1, 2019
80.46		80.46 (6) The notice required by subsection (5) may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances.	The Company's Accessibility Policy is available on the Company's website ( <a href="http://www.dehavilland.com">www.dehavilland.com</a> )	Complete	June 1, 2019



Section	Initiative	Description	Action	Status	Compliance Date
80.47	Service Animals	<p>80.47 (2) If a person with a disability is accompanied by a guide dog or other service animal, the provider shall ensure that the person is permitted to enter the premises with the animal and to keep the animal with him or her, unless the animal is otherwise excluded by law from the premises.</p> <p>(3) If a service animal is excluded by law from the premises, the provider shall ensure that other measures are available to enable a person with a disability to obtain, use or benefit from the provider's goods, services or facilities.</p>	<p>The Company welcomes service animals onto the Company's premises that are available to the public.</p> <p>Updated when moved to new location</p>	As required	June 30, 2022



Section	Initiative	Description	Action	Status	Compliance Date
80.47	Support Persons	<p>80.47(4) If a person with a disability is accompanied by a support person, the provider shall ensure that both persons are permitted to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the premises.</p> <p>(5) The provider may require a person with a disability to be accompanied by a support person when on the premises, but only if, after consulting with the person with a disability and considering the available evidence, the provider determines that,</p> <p>(a) a support person is necessary to protect the health or safety of the person with a disability or the health or safety of others on the premises; and</p> <p>(b) there is no other reasonable way to protect the health or safety of the person with a disability and the health or safety of others on the premises.</p> <p>(6) If an amount is payable for a person's admission to the premises or in connection with a person's presence on the premises, the provider shall ensure that notice is given in advance about the amount, if any, payable in respect of the support person.</p> <p>(7) If, under subsection (5), the provider requires a person with a disability to be accompanied by a support person when on the premises, the provider shall waive payment of the amount, if any, payable in respect of the support person's admission to the premises or in connection with the support person's presence on the premises.</p>	<p>The Company welcomes support persons onto the Company's premises that are available to the public.</p> <p>Updated when moved to new office location</p>	As required	June 30, 2022





Section	Initiative	Description	Action	Status	Compliance Date
80.48	Notice of Temporary Disruptions	<p>80.48 (1) If, in order to obtain, use or benefit from a provider's goods, services or facilities, persons with disabilities usually use other particular facilities or services of the provider and if there is a temporary disruption in those other facilities or services in whole or in part, the provider shall give notice of the disruption to the public.</p> <p>(2) Notice of the disruption must include the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available.</p>	The Company provides notice of temporary disruptions as required.	As required	June 1, 2019



Section	Initiative	Description	Action	Status	Compliance Date
80.49	Training	<p>80.49 (1) In addition to the requirements in section 7, every provider shall ensure that the following persons receive training about the provision of the provider's goods, services or facilities, as the case may be, to persons with disabilities:</p> <ol style="list-style-type: none"> <li>1. Every person who is an employee of, or a volunteer with, the provider.</li> <li>2. Every person who participates in developing the provider's policies.</li> <li>3. Every other person who provides goods, services or facilities on behalf of the provider.</li> </ol> <p>(2) The training must include a review of the purposes of the Act and the requirements of this Part and instruction about the following matters:</p> <ol style="list-style-type: none"> <li>1. How to interact and communicate with persons with various types of disability.</li> <li>2. How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person.</li> <li>3. How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods, services or facilities to a person with a disability.</li> <li>4. What to do if a person with a particular type of disability is having difficulty accessing the provider's goods, services or facilities.</li> </ol>	The Company ensures that training is provided as set out in the Accessibility Policy.	Complete	June 1, 2019



Section	Initiative	Description	Action	Status	Compliance Date
80.50	Feedback Process	<p>80.50 (1) Every provider shall establish a process for receiving and responding to,</p> <p>(a) feedback about the manner in which it provides goods, services or facilities to persons with disabilities; and</p> <p>(b) feedback about whether the feedback process established for purposes of clause (a) complies with subsection (3).</p> <p>(2) The feedback process must specify the actions that the provider will take if a complaint is received about the manner in which it provides goods, services or facilities to persons with disabilities.</p>	<p>The Company has a feedback process in place, which is set out in the Accessibility Policy.</p>	Complete	June 1, 2019