

## **Multi-Year Accessibility Plan**

### **General Requirements**

#### **Accessibility Policy and Multi-Year Accessibility Plan**

NCS International Co. (The Company) has developed, implemented and will maintain policies, including its Accessibility for **Ontarians with Disabilities Act (AODA) Policy**, governing how the company has achieved or will achieve accessibility by meeting its requirement under the IASR.

Within this accessibility policy, the company has also established, implemented, documented and will maintain a Multi-Year Accessibility Plan, which outlines the company's strategy to identify, remove and prevent barriers and increase accessibility for persons with disabilities, in accordance with the company's obligations under the AODA.

The Multi-Year Accessibility Plan will be reviewed and updated at least once every five years and will be posted on the company's website. Upon request, the company will provide a copy of the Multi-Year Accessibility Plan in an accessible format.

#### **Actions Taken:**

- Accessible Customer Service Policy and Accessibility Policy developed and implemented.
- Multi-Year Accessibility Plan developed and in progress

#### **Training Workers**

The Company provides training on the requirements of the accessibility standards referred to in the IASR and on the Code as it pertains to persons with disabilities to all Workers.

The training shall be appropriate to the duties of the Workers. In that regard, all Workers are required to complete the training modules relating to the General Requirement, Accessible Customer Service Standard, Information and Communications Standard and Employment Standard. Workers must also complete the training module developed by the Ontario on Human Rights Commission on the requirements of the Code pertaining to persons with disabilities.

New Workers must complete the training within 30 days of their start date.

Additional training will be provided to Workers as necessary on the content and requirements of The Company's Accessibility Policy, including when changes are made to this Policy. Records of the training provided, including confirmation from Workers that the training modules have been completed, including the dates such training was completed, shall be maintained in accordance with the requirements of the AODA. If The Company provides additional training on this Accessibility Policy to its Workers, it will keep records of the date such training was provided and the number of Workers the training was provided to.

**Actions Taken:**

- Instructions with respect to completing the training requirements has provided to all relevant Workers – target for total completion of training is April 30 2026
- Instructions with respect to training requirements to be provided to all new Workers as part of orientation process;
- Additional training on accessibility in the workplace scheduled to occur on an ongoing basis;
- Ongoing training of new Workers and otherwise as necessary

## ***Information and Communications Standard***

### **Accessible Websites and Web Content**

The Company's public website and any content published after March 31, 2026, will conform with World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level AA, other than certain requirements specifically excluded under the IASR, and except where this requirement is not practicable.

**Actions Taken:**

- Website and web content reviewed and is currently being updated for compliance.
- The Company will ensure that all new content added to its public corporate website conforms to the guidelines.

### **Feedback**

The Company's Corporate public website and any content published will conform with World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level AA, other than certain requirements specifically excluded under the IASR, and except where this requirement is not practicable.

**Actions Taken:**

- The Company has developed an accessible feedback process as described in our Accessible Customer Service Policy;
- information about the feedback process, and the availability of accessible formats and communication supports, is posted on the NCS International Co. website - <https://ncsintl.com/>;
- Ongoing review of any feedback received and any requests for accessible formats and communication supports

### **Accessible Formats and Communication Supports**

Upon request, The Company will provide, or will arrange for the provision of, accessible formats and communication supports for persons with disabilities in connection with their communications with The Company or when accessing information or documents from The Company. The Company will do so in a timely manner that takes into account the person's accessibility needs due to disability and at a cost that is no more than the regular cost charged to other persons.

The Company will consult with the person making the request in determining the suitability of an accessible format or communication support. The availability of accessible formats and communication supports is posted on our website.

In particular, if The Company at any time prepares emergency procedures, plans or public safety information which is made available to the public, The Company will provide the information in an accessible format, or with appropriate communication supports, as soon as practicable, upon request.

#### **Actions Taken:**

- The Company has selected a designated individual who will receive and respond to any requests for accessible formats and communication supports;
- The availability of accessible formats and communication supports is posted on the Company website;
- Ongoing review of any requests for accessible formats and communication supports

### ***Employment Standard***

The entitlements and obligations set out herein apply only with respect to applicants and employees of The Company, as defined above.

### **Recruitment, Assessment or Selection Process**

The Company notifies its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process by including information on the availability of accommodation for applicants in any job posting, whether posted internally or

externally.

The Company will notify applicants when they are individually selected to participate further in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.

If a selected applicant requests accommodation, The Company will 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.

**Actions Taken:**

- The Company has ensured that all job postings include a statement with respect to the availability of accommodation for applicants;
- The Company's recruitment process includes notifying applicants that accommodations are available upon request, and consultation with any applicant that requests an accommodation to provide for a suitable accommodation, as described above;
- Ongoing accommodation of applicants, as requested

**Notice to Successful Applicants**

Upon acceptance of offers of employment, The Company will notify the new employee of its policies for accommodating employees with disabilities by including the relevant policies in place with respect to the accommodation of employees, and by making accessible to all employees a copy of this Accessibility Policy.

**Actions Taken:**

- The Onboarding package includes a statement that The Company has policies in place with respect to the accommodation of Employees;
- Along with the Employment Agreement, all employees will receive an electronic copy of this Accessibility Policy.

**Informing Workers of Supports**

The Company informs its Workers of its policies (and any changes to those policies) used to support Workers with disabilities, including but not limited to policies on the provision of job accommodations that take into account an Worker's accessibility needs due to disability, by providing Workers with a copy of this Handbook, which includes this Accessibility Policy, and through training on the AODA.

The Company will provide this information to new Workers as soon as practicable after commencing employment.

**Actions Taken:**

- All Workers are provided with a copy of this policy which they are required to review;
- All Workers are required to complete training on the AODA and the Code, as set out herein;
- Provide notice to Workers whenever the Accessibility Policy is updated

**Accessible Formats and Communication Supports for Workers**

Upon the request of a Worker with a disability, The Company will consult with the Worker to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform the Workers' job, and information that is generally available to other employees.

In determining the suitability of an accessible format or communication support, The Company will consult with the Worker making the request.

**Actions Taken:**

- The Company is committed to providing Workers with accessible formats and communication supports on request;
- Consider requests for accessible formats and communication supports from Workers on an ongoing basis

**Workplace Emergency Response Information**

The Company is committed to ensuring the safety of all of its Workers in the event of a workplace emergency. The Company expects that where an Worker has a disability, including a temporary injury or medical condition, that could impact the Worker's ability to safely respond in the event of a workplace emergency, the Worker will alert The Company to any possible barriers the employee may face, including details of the extent of any restrictions or limitations the Worker may experience. Workers should contact their direct Manager immediately if they have any concerns relating to their ability to respond safely in the event of a workplace emergency.

The information provided by an Worker pursuant to this section will be used by The Company to design an individualized workplace emergency response plan to help an Worker overcome any barriers they may face in the event of a workplace emergency.

All new Workers will be advised of the availability of individualized workplace emergency response plans during the orientation process. Existing employees will be reminded of their obligation to report any concerns relating to their ability to safely respond in the event of a workplace emergency at regular intervals, including whenever this Accessibility Policy is updated.

All information provided by employees pursuant to this section will remain confidential,

except to the extent disclosure is necessary in order to assist the employee pursuant to their individualized workplace emergency response plan. Employees are not required to provide details regarding their medical condition or disability, only about the type of help or assistance the employee may need in an emergency.

Individualized workplace emergency response plans will be reviewed whenever an employee moves to a different location in the organization, when the employee's overall accommodation needs or plans are reviewed and when The Company reviews its general emergency response policies.

#### **Actions Taken:**

- The Company has advised all current employees that if they have a disability that could impact their ability to safely respond in the event of an emergency, they must speak with their Manager or Human Resources so that an individualized workplace emergency response plan can be developed;
- New employees are advised that The Company will provide individualized workplace emergency response plans as required during the orientation process;
- Continue to include a discussion with respect to individualized workplace emergency response plans as part of orientation, continue working with employees to develop individualized workplace emergency response plans as required

#### **Documented Individual Accommodation Plans**

The Company will provide reasonable accommodation to all employees with disabilities who require accommodation in the workplace and will work with Employees to develop unique individual accommodation plans that best suit the needs of each individual Employee. The development of individual accommodation plans is the responsibility of Human Resources, in conjunction with the Employee's direct Manager, as appropriate.

When developing individual accommodation plans, The Company will follow the process set out below:

- The Company will consult with an employee who requires an accommodation in the workplace before developing an individual accommodation plan for the employee.
- Employees who require accommodation in the workplace are required to cooperate with the accommodation process, including providing The Company with medical information and documentation setting out the employee's accommodation needs, restrictions and limitations. Employees are encouraged to openly discuss their accommodation needs, as well as any medical restrictions and limitations, with The Company.
- If appropriate in the circumstances, The Company may request that an employee undergo an evaluation by an independent medical or other experts to determine the employee's individual accommodation needs, including any medical restrictions or limitations. The costs of any such evaluation by an independent medical or other experts will be paid for by The Company. The Company will refer to the results of any evaluation conducted by an independent medical or other experts to assist The

Company in determining whether and/or how the employee can be best accommodated in the workplace.

- The Company will consider the employee's individual accommodation needs, as communicated to The Company by the employee and as described in any medical information received by The Company in regards to the employee, and will develop an appropriate and reasonable individual accommodation plan which takes into account the employee's medical restrictions and limitations.
- The Company will provide the employee with an opportunity to provide comments and feedback on the individual accommodation plan before the individual accommodation plan is implemented. Where appropriate, The Company may revise the individual accommodation plan based on the employee's comments.

In advance of any meeting with The Company to discuss the development of an individual accommodation plan, an employee may submit a request in writing to The Ontario Business Manager to have a representative from The Company participate in the development of the individual accommodation plan, including a member of the Joint Health and Safety Committee (if applicable) or a Manager or Supervisor. Where the representative proposed by the employee is not appropriate, The Company will suggest a substitute representative for the employee. The employee understands that the representative may be privy to personal information, including any medical information received, regarding the employee as a result of the representative's participation in the development of the individual accommodation plan.

The Company will implement the individual accommodation plan in the workplace. If, during the implementation of the individual accommodation plan, an employee experiences difficulties or has concerns regarding the individual accommodation plan, The Company encourages the employee to raise these concerns immediately with their direct Manager. Where appropriate, The Company may make adjustments to the individual accommodation plan based on feedback received from the employee. In some cases, an employee may be required to provide updated medical information to The Company prior to changes being made to the individual accommodation plan.

The Company will take all necessary steps to ensure the protection and privacy of the employee's personal information, including any medical information received. An employee's medical information shall be stored in a secure location separate and apart from the employee's regular personnel file and will be accessible only by those employees who are involved in the development and implementation of the employee's individual accommodation plan. The Company shall maintain the confidentiality of the employee's personal information and shall not disclose the employee's personal information to any third party without the consent of the Employee, except as required by law.

An individual accommodation plan shall be reviewed and may be updated as often as is necessary to ensure the safe and reasonable accommodation of the employee. At a minimum, the individual accommodation plan shall be reviewed whenever:

- an employee's accessibility needs change;
- an employee moves to a different location or position within the Company;
- an employee, or an employee's Manager or Supervisor, communicates any concerns

to The Company in regards to the individual accommodation plan; or

- The Company receives new medical information in regards to the employee.

The Company will take all reasonable steps to provide an employee with individual accommodation in the workplace. If, for any reason, The Company is unable to provide an employee with individual accommodation in the workplace, The Company will meet with the employee to explain the reasons why The Company is unable to accommodate the employee.

The Company will consult with an employee who requires an individual accommodation plan to ensure that the individual accommodation plan is provided to the employee in a format that takes into account the employee's accessibility needs due to disability.

Information regarding accessible formats and communications supports provided to an employee, if any, will also be included in an individual accommodation plan.

In addition, an individual accommodation plan will include individualized workplace emergency response information (where required), and will identify any other accommodation that is to be provided to the employee.

#### **Actions Taken:**

- The Company has developed a policy, as noted above, with respect to the development of individual accommodation plans for employees.
- Continue to work with employees to develop individual accommodation plans as necessary, in accordance with this policy.

#### **Return to Work Process**

The Company is committed to ensuring the safe and successful return to work of those employees who have been absent from work due to a disability. The return to work process, including the development of individual accommodation plans, is the responsibility of direct manager.

Those employees who have been absent from work as a result of a workplace injury and who received benefits pursuant to the Workplace Safety and Insurance Act, 1997 (the "WSIA") shall return to work in accordance with the return to work process established by the WSIA.

For all other employees who have been absent from work due to a disability, and who require disability-related accommodations in order to return to work, The Company shall follow the return to work process established below:

- In order to provide the greatest chance of a successful return to work, The Company will require the employee to provide medical information from the employee's treating physician or specialist stating that the employee is fit to return

- to work, and setting out the employee's accommodation needs, medical restrictions and limitations, if any.
- Once an employee's treating physician or specialist has approved the employee to return to work, The Company will consult with the employee, either in person or over the phone, to discuss:
  - any concerns the employee has in regards to returning to work;
  - the medical information received by The Company in regards to the employee's medical restrictions and limitations; and
  - the development and implementation of an individual accommodation plan to be put in place upon the employee's return to work.
- The Company will consider the employee's individual accommodation needs, as communicated to The Company by the employee and as described in any medical information received by The Company in regards to the employee, and will develop an appropriate and reasonable individual accommodation plan which takes into account the employee's medical restrictions and limitations.
- The Company will follow the process described above for the development and implementation of an individual accommodation plan.
- The individual accommodation plan shall be put in place immediately upon the employee's return to work. Depending on the nature of the employee's disability, the individual accommodation plan may serve as a transitional plan which assists the employee to integrate back into their regular duties and responsibilities, or may provide long term, ongoing accommodation for the employee.

**Actions Taken:**

- The Company has developed a policy, as noted above, with respect to the return to work process.
- Continue to work with employees to provide a safe return to work, in accordance with this policy.

**Performance Management, Career Development and Advancement & Redeployment**

The Company will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.

**Actions Taken:**

- The Company has committed to considering the accessibility needs of Employees with disabilities whenever it conducts performance management, provides career development and advancement, or when redeploying Employees.
- Continue to act in compliance with this policy

## ***Customer Service Standard***

The Company is in compliance with all requirements set out in the Customer Service Standards. For more detailed information in this regard, please see our Accessible Customer Service Policy.

### **Actions Taken:**

- The Company has developed an Accessible Customer Service Policy in compliance with the requirements of the Customer Service Standards;
- The Accessible Customer Service Policy is available to members of the public upon request;
- The Company has developed a procedure to notify the public of temporary service disruptions;
- Instructions with respect to training requirements will be provided to all current Workers by April 30, 2026;
- Instructions with respect to training requirements shall be provided to all new Workers as part of the orientation process;
- Additional training on accessibility in the workplace will occur on an ongoing basis;
- The Company has developed an accessible feedback process;
- Notification of the availability of the Accessible Customer Service Policy, and details regarding the feedback process, are posted on our website;
- Continue to act in compliance with this Policy, including reviewing and updating this Policy as necessary, provide training to employees, receiving and responding to feedback, and continuing to alert the public to the availability of documents pursuant to this Policy, in addition to our feedback process and the availability of accessible formats and communication supports.

### **Contact For Questions**

For questions related to this Policy, please contact: the Ontario Business Manager at [AODA@ncsintl.com](mailto:AODA@ncsintl.com)