

Accessibility Policies and Multi-Year Accessibility Plan
(the “Accessibility Plan”)
made under Ontario Regulation 191/11

Introduction

The Integrated Accessibility Standards Regulations (“**IASR**”), O. Reg. 191/11 under the *Accessibility for Ontarians with Disabilities Act, 2005* (the “**AODA**”) require that effective January 1, 2014, TAKUMI STAMPING CANADA INC. (“TAKUMI” or the “Company”) establish, implement, maintain and document its accessibility policies and multi-year accessibility plan (the “**Accessibility Plan**”), which outlines the Company’s strategy to prevent and remove barriers for persons with disabilities and to meet its requirements under the IASR.

The Accessibility Plan will be available in an accessible format upon request. The Accessibility Plan will be reviewed and updated, if applicable, at least once every five years.

Application

The Accessibility Plan applies to all employees and customers of the Company in Ontario, and, where indicated, to any independent contractor representatives providing services on behalf of the Company in Ontario.

Our Commitment

In fulfilling our mission, the Company strives to treat all individuals in a manner that allows them to maintain their dignity and independence. The Company promotes integration and equal opportunity and is committed to meeting the needs of people with disabilities in a timely manner. We will seek to achieve this by preventing and removing barriers to accessibility and by meeting accessibility requirements under the *AODA*. This Accessibility Plan sets out the Company’s policy on how we will achieve accessibility generally, as well as in employment, information and communications, and the design of public spaces (built environment).

Under the IASR, the following accessibility strategies set out the requirements that are applicable to the Company:

1. Workplace Emergency Response Information;
2. Training;
3. Information and Communication;

4. Employment; and
5. Design of Public Spaces Standards.

Accessibility Standards for Customer Service

The Company is committed to compliance with the Accessibility Standards for Customer Service, as set out in O. Reg. 191/11 under the AODA, which requires providing its services in ways that respects the dignity and independence of people with disabilities.

The Company's employees have been trained on the Company's Customer Service Policy, and all new employees hired will receive such training as part of their orientation with the Company.

A copy of the Company's AODA Accessible Customer Service Policy is available at our premises and will be made available to members of the public and third parties on request.

Integrated Accessibility Standards Regulations (IASR)

The following sets out how the Company is committed to complying with the IASR.

1. Workplace Emergency Response Information

Where the Company is aware that an employee has a disability and that there is a need for accommodation, individualized workplace emergency response information will be provided to the employee as soon as practicable if such information is necessary given the nature of the employee's disability.

Action Taken:

The Company will be implementing the following measures to address Emergency Response for employees who have disabilities:

- individualized workplace emergency response information procedures will be developed for employees with disabilities where required;
- where employees disclose a disability and are being accommodated according to their disabilities, workplace emergency response information forms will be prepared where required;
- where required, the Company provides assistance to specific disabled employees, with the disabled employees' prior consent, to help them evacuate the workplace in case of an emergency or disaster. Plans for providing assistance will be set out in individualized emergency plans for the employees;

- individualized emergency plans will be communicated to the employees' respective managers and safety personnel on an 'as needed' basis; and
- on an ongoing and regular basis, and as per the applicable terms of the IASR, the Company will review and assess general workplace emergency response procedures and individualized emergency plans to ensure accessibility issues are addressed.

Legislated Compliance Date: January 1, 2012

Compliance Status: Completed

2. Training

The Company is committed to providing training on the requirements of the accessibility standards referred to in the IASR and on the Ontario *Human Rights Code*, as it pertains to persons with disabilities.

Planned Action:

In accordance with the IASR, the Company will:

- determine and ensure that appropriate training on the requirements of the IASR and on the Ontario *Human Rights Code* as it pertains to persons with disabilities, is provided to all employees, independent contractor representatives, volunteers, third-party service providers who provide services related to products, services and facilities on the Company's behalf, and persons participating in the development and approval of the Company's policies;
- ensure that the training is provided to persons referenced above as soon as practicable;
- keep and maintain a record of the training provided, including dates the training was provided and the number of individuals to whom it was provided; and
- ensure that training is provided on any changes to the Company's policies on an ongoing basis.

Required Legislative Compliance: January 1, 2015

Compliance Status: In-Process – anticipated completion for all employees by May 29, 2026

Information and Communication

The Company is committed to making company information and communications accessible to persons with disabilities. The Company will incorporate new accessibility requirements under the information and communication standards to ensure that its

information and communications systems and platforms are accessible and are provided, upon request, in accessible formats that meet the needs of persons with disabilities.

a. Feedback, Accessible Formats and Communication Supports

Planned Action:

In accordance with the IASR, the Company will:

- ensure that existing and new processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request and in a timely manner;
- more broadly, as a general principle where accessible formats and communication supports for persons with disabilities are requested:
 - provide or arrange for the provision of such accessible formats and communication supports;
 - consult with the person making the request to determine the suitability of the accessible format or communication support;
 - provide or arrange for the provision of accessible formats and communication supports in a timely manner that takes into account the person's accessibility needs due to disability, and at a cost no more than the regular cost charged to other persons; and
- notify the public about the availability of accessible formats and communication supports.

Required Legislative Compliance Date for Feedback: January 1, 2015

Current Status: Completed

Required Legislative Compliance Date for Accessible formats and communication supports: January 1, 2016.

Current Status: Completed

b. Accessible Websites and Web Content

Planned Action:

In accordance with the IASR, the Company recognizes its obligation to provide web content which conforms with the World Wide Consortium Web Content Accessibility Guidelines (WCAG 2.0) Level AA, except for exclusions set out in the IASR.

Any website controlled by the Company shall meet the requirements set out in the IASR.

Required Legislative Compliance: January 1, 2021.

Current Status: In Process – anticipated completion by May 29, 2026

Employment

a. Recruitment

The Company is committed to fair and accessible employment recruiting practices that attract and retain employees with disabilities. This includes providing accessibility at all stages of the employment cycle.

Planned Action:

In accordance with the IASR, the Company will do the following:

(i) Recruitment General

The Company will notify employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process. This will include:

- review and, as necessary, modification of existing recruitment policies, procedures and processes; and
- specifying that accommodation is available for applicants with disabilities, on the Company's website and on job postings.

(ii) Recruitment, assessment and selection

The Company will notify job applicants, when they are individually selected to participate in an assessment or selection process and inform them that accommodations are available upon request in relation to the materials or processes to be used in the assessment/selection process. This will include:

- review and, as necessary, modification of existing recruitment policies, procedures and processes;
- inclusion of availability of accommodation notice as part of the script in the scheduling of an interview and/or assessment; and

- consultation with the applicant and arrangement for provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to the disability where a selected applicant requests accommodation.

(iii) Notice to Successful Applicants

When making offers of employment, the Company will notify the successful applicant of its policies for accommodating employees with disabilities. This will include:

- a review and, as necessary, modification of existing recruitment policies, procedures and processes; and
- inclusion of notification of the Company's policies on accommodating employees with disabilities in offer of employment letters.

Required legislative compliance: January 1, 2016

Current Status: Completed

b. Informing Employees of Supports and General Provision of Accessible Formats and Communications Supports

In the event that the Company implements policies to provide support to 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 a disability, the Company will inform all employees of those policies.

This will include:

- providing information as soon as practicable after new employees begin employment, specifically in the orientation process;
- keeping employees up to date on changes to existing policies, including any policies regarding job accommodations with respect to disabilities;
- where an employee with a disability so requests it, the Company will provide or arrange for provision of suitable accessible formats and communications supports for:
 - information that is needed in order to perform the employee's job;
 - information that is generally available to employees in the workplace; and

- in meeting the obligations to provide the information that is set out above, the Company will consult with the requesting employee in determining the suitability of an accessible format or communication support.

Required legislative compliance: January 1, 2016

Current Status: Completed

c. Documented Individual Accommodation Plans/Return to Work Process

The Company will incorporate new accessibility requirements under the IASR to ensure that barriers in accommodation and return to work processes are eliminated and corporate policies surrounding accommodation and return to work are followed, where applicable.

Planned Action:

The Company will review and assess the existing workplace practices concerning workplace accommodation and return-to-work to ensure that they include a process for the development of documented individual accommodation plans for employees with disabilities, if such plans are required.

In accordance with the provisions of the IASR, the Company will ensure that the process for the development of documented individual accommodation plans includes the following elements:

- information regarding the manner in which the employee requesting accommodation can participate in the development of the plan;
- information regarding the means by which the employee is assessed on an individual basis;
- information regarding the manner in which the Company can request an evaluation by an outside medical or other expert, at the Company's expense, to assist the Company in determining if and how accommodation can be achieved;
- information regarding the manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan;
- steps to protect the privacy of the employee's personal information;

- information regarding the frequency with which individual accommodation plans will be reviewed and updated and the manner in which this will be done;
- the reasons for a denial where an individual accommodation plan is denied;
- information regarding the means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs;
- the following will be included if individual accommodation plans are established:
 - any individualized workplace emergency response information that is required;
 - any information regarding accessible formats and communication supports that have been provided for or arranged, in order to provide the employee with:
 - information that is needed in order to perform the employee's job;
 - information that is generally available to employees in the workplace; and
- identify any other accommodation that is to be provided to the employee.

The Company will ensure that the return to work process as set out in its existing policies outlines:

- the steps the Company will take to facilitate the employee's return to work after a disability-related absence;
- the development of a written individualized return to work plan for such employees; and
- the use of individual accommodation plans, as discussed above, in the return to work process.

Required legislative compliance: January 1, 2016
Current Status: Completed

e. Performance Management, Career Development and Redeployment

The Company will 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;
- when providing career development and advancement to employees with disabilities; and
- when redeploying employees with disabilities.

Planned Action:

In accordance with the IASR, the Company will:

- review, assess and, as necessary, modify existing policies, procedures and practices to ensure compliance with the IASR;
- take the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account when:
 - assessing performance;
 - managing career development and advancement; and
 - redeployment is required.
- review, assess and, as necessary, include in performance management workshops, accessibility criteria;
- take into account the accessibility needs of employees with disabilities when providing career development and advancement to its employees with disabilities, including notification of the ability to provide accommodations on internal job postings; and
- take into account the accessibility needs of employees with disabilities when redeploying employees, including review and, as necessary, modification of employee transfer checklist.

Required legislative compliance: January 1, 2016

Current Status: Completed

5. Design of Public Spaces

While the Company has no plans to engage in new construction or redevelopment which would be captured by the requirements of the IASR concerning the Design of Public Spaces, the Company recognizes its obligations under the relevant sections of the Regulation and is committed to incorporating barrier-free design principles into any public spaces that are newly constructed and redeveloped on or after January 1, 2017.

Feedback:

For more information on this Accessibility Plan or for accessible formats of the Accessibility Plan, please contact:

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