



**Accessibility for Ontarians with Disabilities Act:  
Multi-Year Accessibility Plan**

Last Revision Date: October 2017



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## **Introduction**

Shawcor Ltd is a global energy services company specializing in technology based products and services for the pipeline and pipe services and the petrochemical and industrial markets. The Company operates eight divisions, with fixed and mobile manufacturing and services facilities located around the world employing over 6,000 people

Shawcor Ltd. is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act.

Our Multi-Year Accessibility Plan shows how Shawcor will play its role in making Ontario an accessible province for all Ontarians.

## **Section One: Past Achievements to Remove and Prevent Barriers**

Shawcor Accomplishments and Progress to Date:

### **AODA Customer Service Standard Requirements: Completed January 2014 to January 2015**

- Creation and posting of Customer Service Policy and Procedures.
- Customer Service Training - Mandatory training was completed by all existing Shawcor employees in Ontario. Training became a mandatory component of new employee onboarding in Ontario.
- Customer Service Feedback - Alternate methods provided to the public to provide feedback to Shawcor. Methods available online and in person with reception through completion of the Accessibility Feedback Form or emailing [accessibility@shawcor.com](mailto:accessibility@shawcor.com).

### **AODA Individual Emergency Evacuation Procedures: Completed January 2012**

- All existing and new employees in Ontario who require an individual workplace emergency response plan are provided with an individual plan that considers their disability.
- All Shawcor employees in Ontario are made aware of the availability of individual emergency evacuation plans during the onboarding process through training.
- Emergency touch point individuals and managers are aware of employees' individual plans and are equipped to assist the individual per their plan when evacuation is necessary.

**Disability Management and Return to Work Programs - Ongoing**

- Shawcor has a comprehensive and structured disability leave management program, ensuring employees' successful return to work in accordance with their disability.

**AODA Employment Accommodations- Completed January 2016**

- All existing and new Shawcor employees in Ontario who require an individual workplace accommodation plan are provided with an individual plan that considers their disability.
- Candidates engaging in the recruitment process for positions in Ontario are provided with the opportunity to request reasonable accommodations.
- An accommodation message has been developed and implemented for all positions posted in Ontario, requests or concerns can be emailed to [accessibility@shawcor.com](mailto:accessibility@shawcor.com).

**Information and Communications- Completed January 2014 to January 2016**

- Shawcor's websites and the content on those websites conform to WCAG 2.0 Level A and are taking all necessary steps to make all websites and content conform to WCAG 2.0 Level AA by January 1, 2021.
- As necessary, Shawcor consults with people with disabilities to determine their information and communications needs.
- Electronic forms of Shawcor's feedback processes and all publically available information are accessible to persons with disabilities upon request, or Shawcor will provide hard copies in the unusual event that they are inaccessible.






**Design of Public Spaces- Completed January 2017 and Ongoing**

- Shawcor has been making changes to the outside and inside of our Ontario facilities to prevent and remove accessibility barriers. Examples of these are modifying walkways and doorways and ensuring accessible washrooms are available.
- Shawcor is committed to meeting the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces.
- Processes are in place to notify the public and its employees of the service disruption and the available alternatives.

**General Requirements**

Compliance Date	General Requirements	Details	In Progress	Ongoing	Complete
January 1, 2014	<p><b>Establishment of Accessibility Policies</b></p> <p>Every obligated organization shall develop, implement and maintain policies governing how the organization achieves, will achieve accessibility through meeting its requirements under the accessibility standards referred to in the AODA</p>	<ul style="list-style-type: none"> <li>• Policy complete and posted on Shawcor external website and internal intranet</li> <li>• Policy included in Ontario onboarding</li> <li>• Policy reviewed annually</li> </ul>		✓	✓  ✓
January 1, 2014	<p><b>Accessibility Plans</b></p> <p>a) Establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to</p>	<ul style="list-style-type: none"> <li>• Multi-Year-Accessibility Plan complete and posted to the Shawcor website and Intranet</li> <li>• Complete review of the plan at least every five years</li> </ul>		✓	✓

Compliance Date	General Requirements	Details	In Progress	Ongoing	Complete
	<p>prevent and remove barriers and meet its requirements under the <i>AODA</i>,</p> <p>b) Post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and</p> <p>Review and update the accessibility plan at least once every five years</p>	<ul style="list-style-type: none"> <li>Amend the plan and repost on website and intranet as necessary</li> <li>Provide in an accessible format upon request</li> </ul>		✓	✓
January 1, 2015	<p><b>Training</b></p> <p>Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in the <i>AODA</i> and the <i>Human Rights Code</i> as it pertains to persons with disabilities to:</p>	<ul style="list-style-type: none"> <li>Provide training to Ontario employees and managers on <i>AODA</i> legislation, <i>ISAR</i> and the <i>Human Rights Code</i></li> <li>Include <i>AODA</i> training as a mandatory component of onboarding</li> </ul>			✓  ✓

Compliance Date	General Requirements	Details	In Progress	Ongoing	Complete
	a) All employees, and volunteers; b) All persons who participate in developing the organization's policies; and All other persons who provide goods, services or facilities on behalf of the organization.	Ontario employees <ul style="list-style-type: none"> <li>• Make AODA Training available online</li> <li>• Training incorporates accessible format</li> <li>• Manage and track completion of training for all Shawcor employees in Ontario</li> <li>• Review training periodically to ensure it continues to meet the needs of the AODA and employee population</li> </ul>		      	
<b>December 31, 2014</b> <b>December 31, 2017</b> <b>December 31, 2020</b> <b>December 31, 2023</b>	<b>File Accessibility Reports</b> File reports as required by the AODA	<ul style="list-style-type: none"> <li>• Review filing requirements on an annual basis; file as required</li> </ul>			

**Information and Communication Standards**

Compliance Date	General Requirements	Detail	In Progress	Ongoing	Complete
January 1, 2015	<p><b>Feedback</b> Every obligated organization that has a process 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</p>	<ul style="list-style-type: none"> <li>• Establish process for receiving and responding to feedback</li> <li>• Create document describing process; make available on request</li> <li>• Develop online and hard copy feedback form. Welcome feedback via accessibility email address: <a href="mailto:accessibility@shawcor.com">accessibility@shawcor.com</a></li> <li>• Create and maintain database of all feedback received</li> <li>• Description of process included in policies and made publicly available online and upon request.</li> </ul>			<p style="text-align: center;">✓</p> <p style="text-align: center;">✓</p> <p style="text-align: center;">✓</p> <p style="text-align: center;">✓</p> <p style="text-align: center;">✓</p>
January 1, 2016	<p>The obligated organization shall consult with the person making a request in determining the suitability of an</p>	<ul style="list-style-type: none"> <li>• Establish process for receiving and responding to requests.</li> <li>• Respond to employees, customers and other stakeholders as required</li> </ul>			<p style="text-align: center;">✓</p>



Compliance Date	General Requirements	Detail	In Progress	Ongoing	Complete
	accessible format or communication support.			✓	
<b>January 1, 2016</b>	Every obligated organization shall notify the public about the availability of accessible formats and communication supports	<ul style="list-style-type: none"> <li>All policies and other material made publicly available on the Shawcor website, intranet, and available in hard copy upon request.</li> </ul>			✓
<b>January 1, 2014</b> WCAG 2.0 Level A  <b>January 1, 2021</b> WCAG 2.0 Level AA	<b>Accessible Websites &amp; Web Content</b>  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 the AODA.	<ul style="list-style-type: none"> <li>Assessment of current web functionality complete to ensure compliance and adequate accessibility features</li> <li>Marketing made aware of requirements for web content effective January 1, 2021, change plan created</li> </ul>	✓  ✓		

Compliance Date	General Requirements	Detail	In Progress	Ongoing	Complete
<p><b>January 1, 2014</b> WCAG 2.0 Level A</p> <p><b>January 1, 2021</b> WCAG 2.0 Level AA</p>	<p><b>Accessible Websites &amp; Web Content</b></p> <p>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 the AODA.</p>	<ul style="list-style-type: none"> <li>Assessment of current web functionality complete to ensure compliance and adequate accessibility features</li> <li>Marketing made aware of requirements for web content effective January 1, 2021, change plan created</li> </ul>	<p>✓</p> <p>✓</p>		

### Employment Standards

Compliance Date	General Requirements	Detail	In Progress	Ongoing	Complete
<p><b>January 1, 2016</b></p>	<p><b>Recruitment, General</b></p> <p>Every employer shall notify its employees and the public about the availability of accommodation for</p>	<ul style="list-style-type: none"> <li>Incorporate language on postings to make internal and external applicants aware that accommodation is available in accordance with AODA</li> </ul>			<p>✓</p>


Compliance Date	General Requirements	Detail	In Progress	Ongoing	Complete
	applicants with disabilities in its recruitment process.				
January 1, 2016	<p><b>Recruitment, Assessment or Selection Process</b></p> <p>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 process being used</p> <p>If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for</p>	<ul style="list-style-type: none"> <li>• Incorporate language in all notifications to applicants for positions located in Ontario, that accommodations for interviews are available upon request</li> <li>• Review recruitment process to ensure barriers may be removed or accessible features provided, upon request in accordance with AODA</li> <li>• Provide training for persons performing the recruitment function; including hiring managers</li> <li>• Provide training on how to engage in conversations to fulfill accommodation requests</li> </ul>		<p style="text-align: center;">✓</p> <p style="text-align: center;">✓</p> <p style="text-align: center;">✓</p>	<p style="text-align: center;">✓</p>

Compliance Date	General Requirements	Detail	In Progress	Ongoing	Complete
	the provision of a suitable accommodation in a manner that considers the applicant's accessibility needs				
<b>January 1, 2016</b>	<b>Informing Employees of Supports</b> 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 consider an employee's accessibility needs due to disability.	<ul style="list-style-type: none"> <li>Change and communication strategy developed to educate and advise Shawcor employees on Shawcor's accessibility policies, plan and processes</li> </ul>			✓
<b>January 1, 2016</b>	Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	<ul style="list-style-type: none"> <li>Accessibility policies and processes to be included in onboarding process for Ontario</li> </ul>			✓
<b>January 1, 2016</b>	Employers shall provide updated	<ul style="list-style-type: none"> <li>Develop process and strategy to communicate</li> </ul>			

Compliance Date	General Requirements	Detail	In Progress	Ongoing	Complete
	information to its employees whenever there is a change to existing policies on the provision of job accommodations that consider an employee's accessibility needs due to disability.	any policy changes by email and posting on Intranet		✓	
January 1, 2016	The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	<ul style="list-style-type: none"> <li>• Internal process developed for responding to requests from employees which includes consulting with the individual to determine accommodation needs</li> <li>• Process developed for advising employee of solution</li> </ul>			✓  ✓
January 1, 2012	<b>Workplace Emergency Response Information</b>  1) Every employer shall provide individualized workplace emergency response information to employees who	<ul style="list-style-type: none"> <li>• Process established to provide employees in Ontario who request, or for whom Shawcor is aware of the need for accommodation due to the employee's disability, to receive individualized workplace emergency response information</li> </ul>			✓

Compliance Date	General Requirements	Detail	In Progress	Ongoing	Complete
	<p>have a disability, if the disability is such that the individualized information is necessary and where the employer is aware of the need for accommodation due to the disability.</p>	<ul style="list-style-type: none"> <li>Continue to review existing and future accommodation needs and provide individualized information as necessary.</li> </ul>		✓	
<p><b>January 1, 2012</b></p>	<p>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.</p>	<ul style="list-style-type: none"> <li>Record and track response times for employee requests for accommodation via email and determine reasonable implementation time</li> </ul>		✓	
<p><b>January 1, 2012</b></p>	<p>2) Every employer shall review the individualized workplace emergency response information,</p> <p>a) When the employee</p>	<ul style="list-style-type: none"> <li>Employees to notify management or HR in a timely manner when their needs change; Shawcor to respond accordingly</li> <li>Review IWERI when an employee with an IWERI changes work locations</li> </ul>		✓	


Compliance Date	General Requirements	Detail	In Progress	Ongoing	Complete
	<p>moves to a different location in the organization</p> <p>b) When the employee's overall accommodation needs or plans are reviewed; and</p> <p>c) When the employer reviews its general emergency response policies</p>	<ul style="list-style-type: none"> <li>• Review all affected IWERIs when Shawcor's general emergency response policy changes</li> </ul>		<p style="text-align: center;">✓</p> <p style="text-align: center;">✓</p>	
<p><b>January 1, 2016</b></p>	<p>1) The process for the development of documented individual accommodation plans shall include the following elements:</p> <ul style="list-style-type: none"> <li>• The manner in which an employee requesting accommodation</li> </ul>	<ul style="list-style-type: none"> <li>• Create a process for the development of documented plans that will incorporate the requirements set out in the AODA in addition to:               <ul style="list-style-type: none"> <li>○ Manner in which employee can request</li> <li>○ Under which circumstances a medical assessment is required</li> <li>○ Who will be assessing the medical provided</li> </ul> </li> </ul>		<p style="text-align: center;">✓</p>	

Compliance Date	General Requirements	Detail	In Progress	Ongoing	Complete
	<p>can participate in the development of the individual accommodation plan.</p> <ul style="list-style-type: none"> <li>• The means by which the employee is assessed on an individual basis.</li> <li>• The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if accommodation can be achieved.</li> <li>• The manner in which the employee can request the participation of a representative from their bargaining agent, where the</li> </ul>	<ul style="list-style-type: none"> <li>○ Work with Disability Management provider to determine the process for assessing and responding to individual accommodation plans</li> <li>○ Accommodation plans will include confidentiality requirements and outline how information may be shared</li> <li>• Provide training to Shawcor employees and managers on the Accessibility policies and processes for requesting individual plans</li> </ul>			



Compliance Date	General Requirements	Detail	In Progress	Ongoing	Complete
	<p>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 an accommodation plan.</p> <ul style="list-style-type: none"> <li>• The steps taken to protect the privacy of the employee's personal information</li> <li>• The frequency with which the individual accommodation plan will be reviewed and updated and how it will be done</li> </ul>				

Compliance Date	General Requirements	Detail	In Progress	Ongoing	Complete
	<ul style="list-style-type: none"> <li>If an individual accommodation plan is denied, then the manner in which the reasons for the denial will be provided to the employee</li> </ul> <p>The means of providing the individual accommodation plan in a format that considers the employee's accessibility needs</p>				
January 1, 2016	<p><b>Return to work process</b></p> <ul style="list-style-type: none"> <li>Develop and have in place a documented return to work process for employees who have been absent from work due to a disability and require accommodations to return to work.</li> <li>The process shall outline the steps</li> </ul>	<ul style="list-style-type: none"> <li>Written process for employees who have been absent from work due to disability and require accommodation to return to work.</li> <li>Written process for responding to accommodation/accessibility requests and developing accommodation plans in accordance with the elements set out in the AODA.</li> </ul>			<p style="text-align: center;">✓</p> <p style="text-align: center;">✓</p>

Compliance Date	General Requirements	Detail	In Progress	Ongoing	Complete
	<p>the employer will take to facilitate the return to work of employees who were absent due to disability, utilizing the employees' individual accommodation plans</p>				
<p><b>January 1, 2016</b></p>	<p><b>Performance Management</b>            An employer that uses performance management in respect of its employees shall consider 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</p>	<ul style="list-style-type: none"> <li>Continue using established performance management process; assess accommodation needs on individual basis.</li> </ul>			

Compliance Date	General Requirements	Detail	In Progress	Ongoing	Complete
January 1, 2016	<p><b>Career Development &amp; Advancement</b></p> <p>An employer that provides career development and advancement to its employees shall consider 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.</p>	<ul style="list-style-type: none"> <li>Continue using established advancement process; assess accommodation needs on individual basis.</li> </ul>		✓	



### **For More Information**

For more information on this accessibility plan, please contact us at [accessibility@shawcor.com](mailto:accessibility@shawcor.com)

### **Website and social media addresses:**

Website: [www.shawcor.com](http://www.shawcor.com)

LinkedIn: <https://www.linkedin.com/company/shawcor/>

YouTube: [www.youtube.com/user/ShawCorLtd](http://www.youtube.com/user/ShawCorLtd)

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