



Effective Date: October 1, 2018	Policy Group Owner: Human Resources
Policy Title: ONTARIO ACCESSIBILITY POLICY AND MULTI-YEAR ACCESSIBILITY PLAN	

In compliance with Ontario Regulation 191/11 under the *Accessibility for Ontarians with Disabilities Act, 2005* ("AODA")

POLICY STATEMENT

The Integrated Accessibility Standards Regulations ("IASR") under the AODA require that effective January 1, 2014, Veritiv Canada, Inc. (the "Company") establish, implement, maintain and document its accessibility policies and multi-year accessibility plan (the "Accessibility Plan"), which outlines our strategy for preventing and removing barriers for persons with disabilities and to meet our requirements under the IASR and the AODA.

The Accessibility Policy and Multi-Year Accessibility Plan will be publicly available, including 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 Policy and Multi-Year Accessibility Plan applies to all employees and clients of the Company in Ontario, and, where indicated, to any independent contactors providing services on behalf of the Company.

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 Policy and Multi-Year 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. Training;
2. Information and Communication;
3. Employment; and
4. Design of Public Spaces Standards.

Accessibility Standards for Customer Service

Since January 1, 2012, the Company has been committed to compliance with the Accessibility Standards for Customer Service Regulation (O.Reg.429/07) under the AODA, which involves the providing of products and services in a way that respects the dignity and independence of people with disabilities.

Accessible Emergency Information

The Company is committed to providing the customers and clients with publicly available emergency information in an accessible way upon request.

The Company will also provide employees with disabilities with individualized emergency response information when necessary.

Integrated Accessibility Standards Regulations (IASR)

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

1. Training

The Company is committed to providing training on the requirements of the accessibility standards referred to in the IASR and on the *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 *Human Rights Code* as it pertains to persons with disabilities, is provided to all employees, independent contractor representatives, volunteers, all other persons who provide goods and services 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 the dates that 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

2. 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:

January 1, 2015 – feedback

January 1, 2016 – accessible formats and communication supports.

b. Accessible Websites and Web Content

Planned Action:

In accordance with the IASR, the Company will work toward making its Ontario-based websites and web content conform with the World Wide Consortium Web Content Accessibility Guidelines (WCAG 2.0) Level AA.

Required Legislative Compliance:

January 1, 2014: WCAG 2.0 Level A – new Internet websites and web content

January 1, 2021: WCG 2.0 Level AA – all Internet websites and web content, except for exclusions set out in the IASR.

3. 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 across 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;
- specifying that accommodation is available for applicants with disabilities, on the Company's website; and

(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:

- a 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
- if a selected applicant requests an accommodation, a 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.

(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

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

In accordance with the IASR, the Company will inform all employees of policies that support 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.

This will include:

- informing current employees and new hires of the Company's policies supporting employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's needs due to disability;
- providing information as soon as practicable after the new employee begins employment, specifically in the orientation process;
- keeping employees up to date on changes to existing policies on 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

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's existing policies include steps that the Company will take to accommodate employees with disabilities and to facilitate employees' return to work after absence due to disability.

The Company will review and assess the existing policies 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;
- 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 if 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

d. 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

4. Design of Public Spaces

While the Company has no current plans to engage in new construction or significant redevelopment of its facilities at present, the Company will meet the Accessibility Standards for all built obligations should any such construction take place in the future.

The Company will put procedures in place to prevent service disruption to its accessible parts of public spaces. In the event of a service disruption, the Company will notify the public of the service disruption and alternatives available.

Legislative Compliance Deadline: January 1, 2017

Information and Feedback

For more information on this Accessibility Plan or for accessible formats of the Accessibility Plan, please contact the Company's Human Resources department.

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Accessible formats of this document are available free upon request.