	Title: Information & Communications Standard Policy - HR006	
	Status: Released	Type: Policy/Procedure
Document No.: 16519	Effective Date: Dec 5, 2014	Revision: 0
Plant: Fergus Plant, 2500; Stratford Plant, 2000	Department: Human Resources	

At A.O. Smith Enterprises Ltd., we follow a core set of values and guiding principles when we conduct our business activities. We act with integrity, we treat each other with respect and dignity at all times, we will adhere to all legislative and regulatory requirements, and we are fair in our dealings with our customers, team members or citizens of the communities in which we work. This Document can be made available in a different format upon request.

COMMITMENT

This policy is intended to meet the requirements of the *Integrated Accessibility Standards, Ontario Regulation 191/11* for the Information and Communications Standard set forth under the *Accessibility for Ontarians with Disabilities Act, 2005*. This policy applies to the provision of information and communication services and materials for people with disabilities. All information and communications materials and services provided by A.O. Smith Enterprises Ltd. shall follow the principles of dignity, independence, integration and equal opportunity.

SCOPE

This policy shall apply to every person who deals with members of the public or their agents on behalf of A.O. Smith Enterprises Ltd, whether the person is an employee, visitor, customer or otherwise.


DEFINITIONS

Accessible Formats – include but not limited to large print, recorded audio and electronic formats, and other formats usable by persons with disabilities.

Communication Supports – include but not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Conversion Ready – an electronic or digital format that facilitates conversion into an acceptable format.

Extranet Website – a-controlled extension of the intranet, or internal network of an organization to outside users over the Internet.

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Information – includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and conveys meaning.

Internet Website – a collection of related Web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier (URI) and are accessible to the public.

Intranet Website – an organization’s internal website that is used to privately and securely share any part of the organization’s information or operational systems within the organization and includes extranet websites.

Kiosk – an interactive electronic terminal, including a point-of-sale device, for public use that allows users to access one or more services or products.

Support Person – in relation to a person with a disability, another person who accompanies the person with a disability in order to help with communication, mobility, personal care or medical needs or with access to goods, services or facilities.

Web Content Accessibility Guidelines – refers to the World Wide Web Consortium Recommendation, dated December 2008, entitled “Web Content Accessibility Guidelines (WCAG) 2.0.”

GENERAL PRINCIPLES


In accordance with the *Integrated Accessibility Standards, Ontario Regulation 191/11*, this policy addresses the following:

- A. General Requirements
- B. Accessible Formats and Communication Supports
- C. Accessible Websites and Web Content
- D. Emergency Procedures, Plans or Public Safety Information
- E. Exceptions
- F. Feedback

A. General Requirements

Establishment of Accessibility Policies and Plans

A.O. Smith Enterprises Ltd. will develop, implement and maintain policies governing how it will achieve accessibility through these requirements. A.O. Smith Enterprises Ltd. is responsible for

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including a statement of its commitment to meeting the accessibility needs of persons with disabilities in a timely manner in its policies. This should be achieved through documentation in A.O. Smith's policies and making these documents publicly available, in an accessible format upon request.

A.O. Smith Enterprises Ltd. will establish, implement, maintain and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR regulation. A.O. Smith Enterprises Ltd. will post its accessibility plans on their website, if any, and provide the plan in an accessible format upon request. A.O. Smith Enterprises Ltd. will review and update its accessibility plan once every five years and will establish, review and update its accessibility plans in consultation with persons with disabilities or an advisory committee. Annual status reports will be prepared to report on the progress of steps taken to implement A.O. Smith's accessibility plan and post this status on its website. If requested, the report shall be created in an accessible format.

Procuring or Acquiring Goods and Services, or Facilities

A.O. Smith Enterprises Ltd. will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities. The only exception is in cases where it is impracticable to do so.

Training Requirements


A.O. Smith Enterprises Ltd. will provide training for its employees regarding the IASR and the Ontario *Human Rights Code*. Training will be provided for individuals who are responsible for developing A.O. Smith's policies, and all other persons who provide goods, services or facilities on behalf of A.O. Smith Enterprises Ltd.

Self-Serve Kiosks

A.O. Smith Enterprises Ltd. will incorporate accessibility features when designing, procuring or acquiring self-service kiosks. A.O. Smith Enterprises Ltd. will always be aware of the accessibility features of self-service kiosks for persons with disabilities.

B. Accessible Formats and Communication Supports

A.O. Smith Enterprises Ltd. will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner and at no additional cost to the individual. A.O. Smith Enterprises Ltd. will take into account the person's accessibility needs when customizing individual requests.

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C. Accessible Websites and Web Content

All departments governed by A.O. Smith Enterprises Ltd. will make its web content conform to the Web Content Accessibility Guidelines (WCAG) 2.0 at Level AA. Web content includes any information which resides on an internet or intranet web site.

D. Emergency Procedures, Plans or Public Safety Information

All obligated organizations who prepare public emergency procedures, plans or public safety information are responsible for providing the information in an accessible format or with appropriate communication supports as soon as practicable, upon request.


E. Exceptions

The *Information and Communications Standard* does not apply to products and product labels; unconvertible information or communications; or information that the organization does not control directly or indirectly through a contractual relationship. If the organization determines that information or communications are unconvertible, the organization should provide the person requesting information or communication with the following:

- a. An explanation as to why the information or communications are unconvertible;
- b. A summary of the unconvertible information or communications;
- c. Information is regarding as *unconvertible* if it is not technically feasible to convert the information or communications; or if the technology to convert the information is not readily available.

F. Feedback Process

Every obligated organization which has processes in place for receiving and responding to feedback must ensure these processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request. A.O. Smith Enterprises Ltd. will notify the public about the availability of these accessible formats should they ask for it.

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QUESTIONS ABOUT THIS POLICY

This policy exists to achieve service excellence for all of our customers including those with disabilities. If anyone has a question about the policy, or if the purpose of a policy is not understood, a representative of our Customer Service Department will provide an explanation.

MODIFICATIONS TO THIS OR OTHER POLICIES

At A.O. Smith Enterprises Ltd. we are committed to developing customer service policies that respect and promote the dignity and independence of persons with disabilities. Therefore, no changes will be made to this policy before considering the impact on those with disabilities.

Any policy of A.O. Smith Enterprises Ltd. that does not respect and promote the dignity and independence of persons with disabilities will be modified or removed.

ADMINISTRATION


If you have any questions or concerns about this policy or its related procedures please contact:

Name: Mary Shannon
 Telephone: 519-843-1610 ext. 4305
 Email: mshannon@hotwater.com
 In person: 599 Hill Street West
 Fergus, Ontario, N1M 2X1

This policy and its related procedures will be reviewed as required in the event of legislative changes.

REFERENCES

- Accessibility for Ontarians with Disabilities Act, 2005
http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_05a11_e.htm#BK19

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http://www.e-laws.gov.on.ca/html/source/regs/english/2011/elaws_src_regs_r11191_e.htm#BK0
- Ministry of Community and Social Services, *Making Ontario Accessible* (Access ON)
<http://www.mcscs.gov.on.ca/en/mcss/programs/accessibility/index.aspx>
- Ontario Human Rights Code, 1990
http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90h19_e.htm
- WWW Consortium Web Content Accessibility Guidelines 2.0
<http://www.w3.org/WAI/intro/wcag>