

MULTI-YEAR ACCESSIBILITY PLAN

Statement of Commitment and Purpose

In 2005, the government of Ontario passed the Accessibility for Ontarians with Disabilities Act (the “AODA”). It is the goal of the Ontario government to make Ontario accessible by 2025. The Integrated Accessibility Standards Regulations (“IASR”) under the AODA require that effective January 1, 2014, bmg GLASS + ALUMINUM INC. establish, implement, maintain and document a multi-year accessibility plan which outlines the organization’s strategy to prevent and remove barriers for persons with disabilities and to meet its requirements under the IASR.]

Scope

Under the AODA, the following accessibility standards set certain requirements that are applicable to bmg. GLASS + ALUMINUM INC:

- Customer Service;
- Information and Communications;
- Employment; and
- Accessibility Standards for the Built Environment

This multi-year plan outlines the bmg. GLASS + ALUMINUM INC. strategy to prevent and remove barriers to address the current and future requirements of the AODA, and in order to fulfill the bmg. GLASS + ALUMINUM INC commitment as outlined in the [bmg. GLASS + ALUMINUM INC Accessibility Customer Service Policy](#).

In accordance with the requirements set out in the IASR, bmg. GLASS + ALUMINUM INC will:

- Establish, review and update this plan in consultation with persons with disabilities;
- Post this plan on its website (www.bmgglass.com);
- Report as required on its website (www.bmgglass.com) on the progress of the implementation of this plan;
- Provide this plan in an accessible format, upon request; and
- Review and update this plan at least once every five years.

- Accessibility Standards for Customer Service
- Integrated Accessibility Standards Regulations
- Emergency Procedure, Plans or Public Safety Information
- Workplace Emergency Response Information
- Procuring or Acquiring Goods, Services or Facilities
- Training
- Information and Communication Standards
- Feedback, Accessible Formats and Communication Supports
- Accessible Websites and Web Content
- Employment Standards
 1. Recruitment
 2. Informing Employees of Supports
 3. Documented Individual Accommodation Plans/Return to Work Process
 4. Performance Management, Career Development and Redeployment
 5. Design of Public Spaces Standards (Accessibility for the Built Environments)

Accessibility standards for Customer Service

Commitment:

Since 2010, the bmg. GLASS + ALUMINUM INC. has been in compliance with the Accessible Customer Service Regulation and will continue to comply with that regulation.

bmg. GLASS + ALUMINUM INC is committed to excellence in serving all customers, including persons with disabilities and it will carry out its functions in a manner which delivers an accessible customer service experience.

bmg. GLASS + ALUMINUM INC is committed to providing its services in a way that respects the dignity and independence of persons with disabilities. This commitment will be integrated wherever possible and will ensure that persons with disabilities will benefit from the same services, in the same place and in a similar way as other customers.

Action Taken:

The following measures have been implemented by bmg. GLASS + ALUMINUM INC:

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- Ensuring all persons who, on behalf of the bmg. GLASS + ALUMINUM INC, deal with the public or other third parties, and all those who are involved in the development and approvals of customer service policies, practices and procedures, as well as all others providing services to our customers, are trained to communicate and provide the best possible customer service to all customers, including persons with disabilities;
- Ensuring staff are trained and familiar with various assistive devices that may be used by customers with disabilities who are accessing the bmg. GLASS + ALUMINUM INC services;
- Ensuring completion of accessibility training is tracked and recorded;
- Providing fully-accessible telephone service to customers, offering to communicate with customers by TTY if telephone communication is not suitable to their needs;
- Ensuring customers accompanied by a guide dog or other service animal in areas of bmg. GLASS + ALUMINUM INC. open to the public and other third parties, are accommodated;
- Ensuring that if a person with a disability is accompanied by a support person, the support person is accommodated. If the support person is assisting the customer participating in an bmg. GLASS + ALUMINUM INC. event or program, but that person is not participating in the event/program on his or her own behalf, the support person is not charged a fee to attend the event/program;
- Providing customers with notice in the event of a planned or unexpected disruption of service or inaccessibility of facilities used by persons with disabilities, by placing such notices at all public entrances and service counters on the bmg. GLASS + ALUMINUM INC premises. If the disruption is long-term, bmg. GLASS + ALUMINUM INC posts an announcement on its website informing customers of the location, duration of the disruption and alternate solutions;
- Continuing to welcome and appreciate feedback from persons with disabilities through multiple communication channels;

Integrated Accessibility Standards Regulations Emergency Procedure, Plans or Public Safety Information

Commitment:

bmg. GLASS + ALUMINUM INC is committed to providing and maintaining premises that respects the dignity and independence of persons with disabilities.

Action Taken:

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The following measures were implemented by the bmg. GLASS + ALUMINUM INC.:

- Emergency procedures, plans and public safety information that are prepared by bmg. GLASS + ALUMINUM INC are made available to the public, will be made available in an accessible format or with appropriate communication supports, as soon as practicable, upon request;
- An Accessible Service Feedback Form was developed and is available on-line on the bmg. GLASS + ALUMINUM INC website (<https://bmgglass.com/AODA>), for completion by bmg. GLASS + ALUMINUM INC staff upon receipt of a request from the public for such documentation in an accessible format.

Workplace Emergency Response Information

Commitment:

Where bmg. GLASS + ALUMINUM INC 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 following measures were implemented by bmg. GLASS + ALUMINUM INC;

- Individualized workplace emergency response information procedures have been developed for employees with disabilities, as required;
- Workplace Emergency Response Information forms have been prepared for employees who have disclosed a disability and who are being accommodated according to their disabilities;
- Where required, bmg. GLASS + ALUMINUM INC 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. These plans for providing assistance have been set out in individualized emergency plans for the employees;
- These individualized emergency plans have been communicated to the employees' respective managers and Safety personnel, on an 'as needed' basis;
- On an ongoing and regular basis, and as per the applicable terms of the IASR, bmg. GLASS + ALUMINUM INC will review and assess general workplace emergency

response procedures and individualized emergency plans to ensure accessibility issues are addressed.

Procuring Services

Commitment:

bmg. GLASS + ALUMINUM INC is committed to incorporating accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not practicable to do so.

Action Taken:

The following measures have been implemented by bmg. GLASS + ALUMINUM INC.

Use accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not practicable to do so;

- Where bmg. GLASS + ALUMINUM INC has decided that it is not practicable to incorporate accessibility criteria and features, it will provide an explanation upon request;
- Provide educational awareness and tools to internal stakeholders and communication to external stakeholders, informing on changes to procurement procedures and purchasing criteria.

Training

Commitment:

bmg. GLASS + ALUMINUM INC is committed to implementing a process to ensure that all employees, volunteers, third-party contractors who provide goods, services and facilities on bmg. GLASS + ALUMINUM INC's behalf, and persons participating in the development and approval of the bmg. GLASS + ALUMINUM INC's policies, are provided with appropriate training on the requirements of the IASR and on the Ontario Human Rights Code as it pertains to persons with disabilities, and are provided with such training as soon as practicable.

Action Taken:

The following measures have been implemented by bmg. GLASS + ALUMINUM INC.:

Establish an internal committee with the responsibility for developing appropriate training;

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- 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, volunteers, third-party contractors who provide goods, services and facilities on the bmg. GLASS + ALUMINUM INC behalf, and persons participating in the development and approval of the bmg. GLASS + ALUMINUM INC 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;
- Ensure that training is provided on any changes to the prescribed policies on an ongoing basis.

Information and Communication Standards

Commitment:

bmg. GLASS + ALUMINUM INC is committed to making company information and communications accessible to persons with disabilities. bmg. GLASS + ALUMINUM INC. will incorporate new accessibility requirements under the information and communication standard to ensure that its information and communications systems and platforms are accessible and are provided in accessible formats that meet the needs of persons with disabilities.

1. Feedback, Accessible Formats and Communication Supports

Action Taken:

The following measures were implemented by bmg. GLASS + ALUMINUM INC.;

- Ensured 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 an account the person's accessibility

- needs due to disability, and at a cost no more than the regular cost charged to other persons;
- o Notify the public about the availability of accessible formats and communication supports.

2. Accessible Websites and Web Content

In accordance with the IASR, bmg. GLASS + ALUMINUM INC will:

- Partner with Corporate Communications and, in collaboration with operating divisions, provide guidelines to all staff to ensure public documents and media are readily available in alternate accessible formats;
- Develop and communicate corporate e-mail best practices; and
- Expand corporate awareness of requirements for compliance with Information and Communication Standards of AODA.

Employment Standards

1. Recruitment

Commitment:

bmg. GLASS + ALUMINUM INC. is committed to fair and accessible employment practices that attract and retain employees with disabilities. This includes providing accessibility across all stages of the employment cycle.

Action Taken:

The following measures were implemented by bmg. GLASS + ALUMINUM INC.

Recruitment General

bmg. GLASS + ALUMINUM INC. will notify employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process. This will include:

- A review and, as necessary, modification of existing recruitment policies, procedures and processes;

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- Specifying that accommodation is available for applicants with disabilities, on bmg. GLASS + ALUMINUM INC website and on job postings;
- Working with suppliers to ensure external Web pages are compliant with the Information and Communication Standards under the IASR's requirements.

Recruitment, Assessment and Selection

bmg. GLASS + ALUMINUM INC will 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 processes to be used in the assessment/selection process. This will include:

- A review and, a 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;
- If a selected applicant requests an accommodation, consult with the applicant and arrange for provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to disability.

Notice to Successful Applicants

When making offers of employment, bmg. GLASS + ALUMINUM INC 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;
- Inclusion of notification bmg. GLASS + ALUMINUM INC policies on accommodating employees with disabilities in offer of employment letters.

2. Informing Employees of Supports

In accordance with the IASR, bmg. GLASS + ALUMINUM INC 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.

Action Taken:

The following measures were implemented by bmg. GLASS + ALUMINUM INC.:

- Informing current employees and new hires bmg. GLASS + ALUMINUM INC 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 under this section 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 disability;
- Where an employee with a disability so requests it, bmg. GLASS + ALUMINUM INC 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.
- In meeting the obligations to provide the information that is set out in the paragraph above, bmg. GLASS + ALUMINUM INC. will consult with the requesting employee in determining the suitability of an accessible format or communication support.

3. Documented Individual Accommodation Plans/Return to Work Process**Commitment:**

bmg. GLASS + ALUMINUM INC .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.

Action Taken:

The following measures have been implemented by bmg. GLASS + ALUMINUM INC;

bmg. GLASS + ALUMINUM INC. existing policies include steps that bmg. GLASS + ALUMINUM INC will take to accommodate an employee with a disability and to facilitate an employee's return to work after absenteeism due to disability.

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bmg. GLASS + ALUMINUM INC. 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 a disability, if such plans are required.

bmg. GLASS + ALUMINUM INC. will ensure that the process for the development of documented individual accommodation plans includes the following elements, in accordance with the provisions of the IASR:

- Include in the process the manner in which the employee requesting accommodation can participate in the development of the plan;
- Include in the process the means by which the employee is assessed on an individual basis;
- Include in the process the manner in which bmg. GLASS + ALUMINUM INC. can request an evaluation by an outside medical or other expert, at bmg. GLASS +

ALUMINUM INC. expense, to assist bmg. GLASS + ALUMINUM INC. in determining if and how accommodation can be achieved;

- Include in the process the manner in which the employee can request participation of a representative from his or her bargaining agent where an employee is in the bargaining unit, or the participation of another representative from the workplace where an employee is not in the bargaining unit;
- Steps are in place to protect the privacy of the employee's personal information;
- Outline the frequency in which individual accommodation plans will be reviewed and updated and the manner in which this will be done;
- Provide the employee with the reasons for the denial if an individual accommodation plan is denied;
- Include in the process the means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs;
- If individual accommodation plans are established, ensure that they include:
 - 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.
- Identify any other accommodation that is to be provided to the employee.

bmg. GLASS + ALUMINUM INC. will ensure that the return to work process as set out in its existing policies outlines the steps bmg. GLASS + ALUMINUM INC will take to facilitate the employee's return to work after a disability-related absence, outlines the development of a

written individualized return to work plan for such employees, and requires the use of individual accommodation plans, as discussed above, in the return to work process.

4. Performance Management, Career Development and Redeployment

Commitment:

bmg. GLASS + ALUMINUM INC. 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 its employees with disabilities;
- When redeploying employees with disabilities.

Action Taken:

The following measures have been implemented by bmg. GLASS + ALUMINUM INC.:

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
 - Redeployment is required
- Review, assess and, as necessary, include in Performance Management workshops, accessibility criteria;

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- 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;
- Take into account the accessibility needs of employees with disabilities when redeploying employees, including review and, as necessary, modification of employee transfer checklist.

Design of Public Spaces Standards (Accessibility for the Built Environments)

Commitment:

bmg. GLASS + ALUMINUM INC. is committed to designing public spaces that are free from barriers and accessible to all persons we serve.

Planned Action:

In accordance with the IASR, bmg. GLASS + ALUMINUM INC. will implement the following:

- bmg. GLASS + ALUMINUM INC shall comply with the AODA Design of Public Spaces Standards (Accessibility Standards for the Built Environment) when undertaking new construction or planned significant alterations of public spaces.