

Accessibility Plan and Policies for Nova Networks Inc. (“Nova”).

This 2014-21 accessibility plan outlines the policies and actions that **Nova** plans to put in place to improve opportunities for people with disabilities.

Statement of Commitment

Nova is committed to providing goods, services and facilities 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 both the Ontario Human Rights Code and the Accessibility for Ontarians with Disabilities Act (AODA).

Nova understands the obligations under the AODA and its accessibility standards do not substitute or limit its obligations under the Ontario Human Rights Code or obligation to people with disabilities under any other law

Accessible Emergency Information - Ongoing

Nova is committed to providing the customers and clients with publicly available emergency information in an accessible format or with communication support upon request. We will also provide employees with disabilities with individualized emergency response information when necessary.

Training – *Completed and incorporated into Nova’s onboarding process*

Nova will provide training to employees, volunteers and other staff members on Ontario’s accessibility laws and on the Human Rights Code as it relates to people with disabilities. Training will be provided in a way that best suits the duties of employees, volunteers and other staff members.

Nova will take the following steps to ensure employees are provided with the training needed to meet Ontario’s accessible laws by **January 1, 2015**:

- All Nova employees will undergo parts of the Integrated Accessibility Standards Regulation (IASR) training relevant to their role and responsibilities
- Current employees will undergo IASR training that is most suitable and timely, based on their position and availability
- All newly hired employees of Nova will undergo IASR training as part of their orientation

Information and Communications

Nova is committed to meeting the communication needs of people with disabilities. As required, we will consult with people with disabilities to determine their information and communication needs and will provide same in an accessible format or with communication support that addresses their needs.

Nova will take the following steps to make all new websites and content on those sites conform with WCAG 2.0, Level A by **January 1, 2014**: - *Completed*

- Any major revisions to the Nova website will conform with WCAG 2.0, Level A
- Any websites that Nova creates and/or revises for its clients will conform with WCAG 2.0, Level A
- Nova will ensure that any employees developing, designing and/or revising websites are knowledgeable in WCAG 2.0, Level A, in order to ensure compliance
- Where required, Nova will ensure training is provided to employees who are not sufficiently knowledgeable with WCAG 2.0, Level A

Nova will take the following steps to ensure existing feedback processes are accessible to people with disabilities upon request by **January 1, 2015**: - *Completed*

- Nova has created an email address, aoda@novanetworks.com, which will be posted on the Nova website
- A direct phone number will be listed on the Nova website to the employee who is responsible for AODA compliance

Nova will take the following steps to make sure all publicly available information is made accessible upon request by **January 1, 2016**: - *Completed*

- Nova has created an email address, aoda@novanetworks.com, which will be posted on the Nova website
- A direct phone number will be listed on the Nova website to the designated employee who is responsible for AODA compliance

Nova will take the following steps to make all websites and content conform with WCAG 2.0, Level AA by **January 1, 2021**: - *In Progress*

- Any major revisions to the Nova website will conform with WCAG 2.0, Level AA
- Any websites that Nova creates and/or revises for its clients will conform with WCAG 2.0, Level AA
- Nova will ensure that any employees developing, designing and/or revising websites are knowledgeable in WCAG 2.0, Level AA, in order to ensure compliance
- Where required, Nova will ensure training is provided to employees who are not sufficiently knowledgeable with WCAG 2.0, Level AA

Employment - Completed

Nova is committed to fair and accessible employment practices.

It is Nova's policy to see that the public and staff are notified about the availability of accommodations for applicant's with disabilities in its recruitment process; and that:

- All email correspondence with potential employees during the recruitment process will contain the phrase: "Nova Networks is committed to providing accessible employment practices that are in compliance with the Accessibility for Ontarians with Disabilities Act ('AODA'). If you require accommodation during any stage of the recruitment process, please do not hesitate to contact me." Nova will promptly respond to all requests and grant any reasonable accommodation.
- When making an offer of employment, Nova notifies the successful applicant of Nova's policies for accommodating employees with disabilities
- During orientation, all new employees will be given an opportunity to self-disclose any disabilities and any reasonable accommodation will be granted

Nova will take the following steps to develop and put in place a process for developing Individual Accommodation Plans (IAP) and return-to-work policies for employees that have been absent due to a disability:

- Nova will develop a return-to-work policy and program, and will make it available for all employees to review in Nova's portal, which is accessible to all employees
- The IAP will be taken into consideration for all return-to-work programs

We will take the following steps to ensure the accessibility needs of employees with disabilities are taken into account if **Nova** is using performance management, career development and redeployment processes:

- Nova will prepare a document outlining the process to ensure IAP is taken into consideration during performance management, career development and redeployment
- We will incorporate this document into Nova's corporate policy

Nova will take the following steps to prevent and remove other accessibility barriers identified:

- Nova will respond in a timely manner, to all requests and inquiries made to Human Resources related to potential accessibility barriers
- Nova will develop a formal procedure to reasonably address other accessibility barriers not already addressed in this multi-year accessibility plan

Design of Public Spaces - *Ongoing*

Nova will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces. Public spaces include:

- Recreational trails/beach access routes
- Outdoor public eating areas like rest stops or picnic areas
- Outdoor play spaces, like playgrounds in provincial parks and local communities
- Outdoor paths of travel, like sidewalks, ramps, stairs, curb ramps, rest areas and accessible pedestrian signals
- Accessible off street parking
- Service-related elements like service counters, fixed queuing lines and waiting areas
- In the event of a service disruption to its accessible parts of its public spaces, Nova will notify the public of the service disruption and alternatives available via our website and appropriate signage in the affected public space

For more information - *Completed*

For more information on this accessibility plan, please contact **Human Resources** at:

- Phone: 613 727 2536
- Email: aoda@novanetworks.com

For this document, accessible formats and communications support are available free upon request.

Feedback/Comments - *Completed*

Nova strives to provide goods, services and facilities all people in a way that allows them to maintain their dignity and independence. As stated, we believe in integration and equal opportunity.

Should you wish to provide us feedback, or comment, on our AODA multi-year plan, goods, services or facilities please do not hesitate to contact **Human Resources** at:

- Phone: 613 727 2536
- Email: aoda@novanetworks.com

We will acknowledge your feedback/comments within five (5) days of their receipt and as warranted, will contact you directly to discuss your feedback/comments in detail.

Our feedback process is accessible by providing or arranging for the provision of accessible formats and communications supports upon request.