

Policy Name: Integrated Accessibility Standards Policy & Multi-Year Plan**Original Date: January 1, 2014****Page: 1****Revised Date: February 1, 2023****Introduction**

This policy has been established in compliance with Regulation 191/11, “Integrated Accessibility Standards” (“Regulation”) under the Accessibility for Ontarians with Disabilities Act, 2005. These standards are developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment. This policy aligns with Leggett & Platt Canada’s and its subsidiaries’ commitment to treat all persons in a way that respects their dignity and independence.

Commitment

Leggett & Platt Canada Co. and its subsidiaries (collectively “Leggett & Platt Canada”) are committed to treating all employees 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 persons with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements in accordance with the Accessibility for Ontarians with Disabilities Act. This policy will be implemented in accordance with the time frames established by the Regulation.

Multi-Year Accessibility Plan

Leggett & Platt Canada will develop, maintain, and document a Multi-Year Accessibility Plan outlining the company’s strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities. The Multi-Year Accessibility Plan will be reviewed and updated at least once every five years and posted on Leggett & Platt Canada’s website. Upon request, Leggett & Platt Canada will provide a copy of the Multi-Year Accessibility Plan in an accessible format.

Training Employees

Leggett & Platt Canada will ensure that training is provided on the requirements of the accessibility standards referred to in the Integrated Accessibility Standards Regulation and continue to provide training on the Human Rights Code as it pertains to persons with disabilities to:

- all our Personnel.
- all persons who participate in developing Leggett & Platt Canada’s policies; and,
- all other persons who provide goods, services, or facilities on behalf of Leggett & Platt Canada

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The training will be appropriate to the duties of the employees. New Personnel and such other persons will be trained as soon as practicable. Training will be also provided when any changes are made to Leggett & Platt Canada's accessibility policies. Leggett & Platt Canada will keep a record of the training it provides.

INFORMATION AND COMMUNICATIONS STANDARDS

Feedback

Leggett & Platt Canada will continue to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communications supports, upon request.

Accessible Formats and Communication Support

Upon request, Leggett & Platt Canada will provide, or arrange for the provision of, accessible formats and communication supports for persons with disabilities in a timely manner, considering the person's accessibility needs due to disability.

Leggett & Platt Canada will consult with the person making the request in determining the suitability of an accessible format or communication support.

Leggett & Platt Canada will also notify the public about the availability of accessible formats and communication supports.

Accessible Websites and Web Content

Leggett & Platt Canada will ensure that our Internet websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 – Level AA except where this is impracticable.

EMPLOYMENT STANDARDS

Recruitment, Assessment or Selection Process

Leggett & Platt Canada will notify its Employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

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Leggett & Platt Canada will notify job applicants when they are individually selected to participate further in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.

If a selected applicant requests an accommodation, Leggett & Platt Canada will consult with the applicant and provide, or arrange for the provision of, a suitable accommodation in a manner that considers the applicant's accessibility needs due to disability.

Notice to Successful Applicants

When making offers of employment, Leggett & Platt Canada will notify the successful applicant of its policies for accommodating Employees with disabilities.

Informing Employees of Support

Leggett & Platt Canada will continue to inform its Employees of its policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that consider an employee's accessibility needs due to disability. This information will be provided to new employees as soon as is practicable after commencing employment.

Accessible Formats and Communication Supports for Employees

Upon the request of an employee with a disability, Leggett & Platt Canada will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his/her job, and information that is generally available to other employees. In determining the suitability of an accessible format or communication support, Leggett & Platt Canada will consult with the employee making the request.

Workplace Emergency Response Information

Leggett & Platt Canada will provide individualized workplace emergency response information to Employees who have a disability, if the disability is such that the individualized information is necessary, and if Leggett & Platt Canada is aware of the need for accommodation due to the employee's disability. Leggett & Platt Canada will provide this information as soon as practicable after becoming aware of the need for accommodation.

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Where the employee requires assistance, Leggett & Platt Canada will, with the consent of the employee, provide the workplace emergency response information to the person designated by Leggett & Platt Canada to provide assistance to the employee.

Leggett & Platt Canada will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodations needs, or plans are reviewed.

Documented Individual Accommodation Plans

Leggett & Platt Canada will maintain a written process for the development of documented individual accommodation plans for employees with disabilities.

If requested, information regarding accessible formats and communications supports provided will also be included in individual accommodation plans.

In addition, the plans will include individualized workplace emergency response information (where required) and will identify any other accommodation that is to be provided.

Return to Work Process

Leggett & Platt Canada maintains a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations to return to work.

The return-to-work process outlines the steps Leggett & Platt Canada will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

This return-to-work process will not replace or override any other return to work process created by or under any other statute (e.g., the Ontario Workplace Safety Insurance Act, 1997).

Performance Management, Career Development and Advancement, and Redeployment

Leggett & Platt Canada will consider the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.

Questions about this policy



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This Integrated Accessibility Standards Policy and Multi-Year Plan exists to ensure accessible service excellence to Customers and Employees with disabilities. Enquiries, questions, feedback, or complaints regarding this policy may be communicated to Leggett & Platt Canada by email, telephone, in writing or in person to:

Branch Name	Location	Phone	Email
L&P Lakeshore	360 Silver Creek Drive, Lakeshore ON N8N 4Y3	(519) 727-7000	0369Accessibility@leggett.com
L&P London	459 Industrial Rd., London ON N5V 3E5	(519) 455-0440	5901Accessibility@leggett.com
L&C Cables Windsor	2005 Blackacre Drive, Oldcastle ON N0R 1L0	(519) 737-1497	0576Accessibility@leggett.com
Northfield Metal Products	195 Bathurst Drive, Waterloo ON N2B2B2	(519) 887-1860	1200accessability@leggett.com

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Leggett & Platt Canada - AODA Multi -Year Plan

Compliance date	Initiative	IASR Requirement	Action
January 1, 2014	Establishment of Accessibility Policies	<p>3.(1) Every obligated organization shall develop, implement and maintain policies, governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this Regulation</p> <p>3. (2) Obligated organizations, other than small organizations, shall include a statement of organizational commitment to meet the accessibility needs of persons with disabilities in a timely manner in their policies.</p> <p>3.(3) Large organizations shall,</p> <p>a) prepare one or more written documents describing its policies; and</p> <p>b) make the documents publicly available, and shall provide them in an accessible format upon request.</p>	<ul style="list-style-type: none">• Integrated Accessibility Standards Policy developed and implemented.• Statement of organizational commitment included in the Integrated Accessibility Standards Policy.• Integrated Accessibility Standards Policy posted on Leggett & Platt Canada website and copies provided in an accessible format, upon request.
	Accessibility Plans	<p>4. (1) Large organizations shall,</p> <p>a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under this Regulation;</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>c) review and update the accessibility plan at least once every five years.</p>	<ul style="list-style-type: none">• Multi-year plan created.• Review at least every 5 years.• Integrated Accessibility Standards Policy and Multi-Year Plan posted on Leggett & Platt website.

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	Accessible Websites & Web Content	14.(2) Designated public sector organizations and 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 this section.	<ul style="list-style-type: none">• No planned changes to Leggett & Platt website• Any future website update will conform to WCAG2.0 guidelines by Jan 1, 2021, except where this is impracticable.
January 1, 2015	Training	<p>7. (1) Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to,</p> <p>a) all employees, and volunteers;</p> <p>b) all persons who participate in developing the organization's policies; and</p> <p>c) all other persons who provide goods, services or facilities on behalf of the organization.</p> <p>7. (5) Every large organization shall keep a record of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided.</p>	<ul style="list-style-type: none">• Leggett & Platt Canada will ensure that all current employees, employees who develop organizations policies, volunteers, and other individuals, receive training on the requirements of the IASR and the Ontario Human Rights Code as it pertains to people with disabilities.• Leggett & Platt Canada will keep a record of the training conducted under section 7 (1).
January 1, 2015	Feedback	<p>11.(1) Every obligated organization that has processes 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> <p>(3) The organization shall notify the public of the availability of accessible formats and communication supports with respect to the feedback process.</p>	<ul style="list-style-type: none">• Individuals may provide feedback by, email, phone, in writing or in person.• Information how an individual may provide feedback to Leggett & Platt Canada is provided in our Integrated Accessibility Standards Policy and Multi-

January 1, 2016

Accessible Formats & Communication Supports

12. (1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities,

a) in a timely manner that takes into account the person's accessibility needs due to disability; and

b) at a cost that is no more than the regular cost charged to other persons.

12. (2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.

12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports

Year Plan.

- Leggett & Platt Canada can communicate with members of the public in writing, via telephone, email or meetings, in a timely manner that takes into account the persons accessibility needs and at a cost that is no more than the regular cost to the members of the public.
- Leggett & Platt Canada will consult with individuals to determine the suitability of an accessible format and the availability of such formats are listed in our Integrated Accessibility Standards Policy & Multi-Year Plan.

Recruitment Job Postings

22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.

- Leggett & Platt Canada notifies employees and the public about the availability of accommodations for applicants with disabilities in its recruitment process in internal and external job postings.

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Recruitment, Assessment or Selection Process	<p>23.(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 processes to be used.</p> <p>(2) If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.</p>	<ul style="list-style-type: none">• Leggett & Platt Canada notifies selected job applicants that accommodations are available upon request.• If a selected applicant requests an accommodation a consultation with the applicant to arrange for a suitable accommodation.
Notice to Successful Applicants	<p>24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.</p>	<ul style="list-style-type: none">• When making offers of employment the successful candidate will be notified of policies for accommodating employees.
Informing Employees of Supports	<p>25.(1) 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 take into account an employee's accessibility needs due to disability.</p> <p>25. (2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.</p> <p>25. (3) Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.</p>	<ul style="list-style-type: none">• Leggett & Platt Canada will inform employees of policies used to support employees with disabilities.• Leggett & Platt Canada will provide copies of policies used as soon as practicable after commencing employment.

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January 1, 2016	Accessible Formats & Communication Supports for Employees	<p>26.(1) In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for,</p> <p>a) information that is needed to perform the employee's job; and</p> <p>b) information that is generally available to employees in the workplace.</p> <p>26.(2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>	<ul style="list-style-type: none">• Leggett & Platt Canada will consult with the employee to provide accessible formats and communication that is required to perform the employees job and information that is generally available to other employees.• Leggett & Platt Canada will consult with the employee in determining a suitable accessible format or communication support.
	Workplace Emergency Response Information	<p>27.(1) Every employer shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and the employer is aware of the need for accommodation due to the employee's disability.</p> <p>(2) If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.</p> <p>(3) 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</p>	<ul style="list-style-type: none">• Leggett & Platt Canada will provide individualized workplace emergency response information to employees who have a disability, where the information is necessary and where the employer is aware of the employees need for accommodation.• If the employee requires such assistance, with the employees' consent, the employer shall provide the workplace emergency information to the person designated to provide assistance.• Information shall be provided as soon as practicable.

	<p>employee's disability.</p> <p>(4) Every employer shall review the individualized workplace emergency response information,</p> <p>(a) when the employee moves to a different location in the organization.</p> <p>(b) when the employee's overall accommodations 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">• The individualized workplace emergency response information shall be reviewed when the employee moves to a different location, when the employees' needs are reviewed, when general emergency response policies are reviewed.
Documented Individual Accommodation Plans	<p>28.(1) Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.</p> <p>28. (2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <p>1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</p> <p>2. The means by which the employee is assessed on an individual basis.</p> <p>3. 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 and how accommodation can be achieved.</p> <p>4. The manner in which the employee can request the</p>	<ul style="list-style-type: none">• Leggett & Platt Canada written process for the development of individual accommodation plans will address:• The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.• The means by which the employee is assessed on an individual basis.• 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 and how accommodation can be achieved.• The manner in which the employee can request the participation of a representative from their

		<p>participation of a representative from their bargaining agent, where the 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 the accommodation plan.</p> <p>5. The steps taken to protect the privacy of the employee's personal.</p> <p>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> <p>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</p>	<p>bargaining agent, where the 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 the accommodation plan.</p> <ul style="list-style-type: none">• The steps taken to protect the privacy of the employee's personal.• The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.• If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.• The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.
Return to Work Process		<p>29.(1) Every employer, other than an employer that is a small organization,</p> <p>(a) shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and</p> <p>(b) shall document the process</p>	<ul style="list-style-type: none">• Leggett & Platt Canada maintains a return-to-work process for employees who have been absent from work due to a disability and require disability related accommodations in order to return to work.• The return-to-work process will be documented.• The process outlines the

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		<p>29. (2) The return-to-work process shall,</p> <p>(a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and</p> <p>(b) use individual documented accommodation plans, as described in section 28, as part of the process.</p> <p>29. (3) The return-to-work process referenced in this section does not replace or override any other return to work process created by or under any other statute.</p>	<p>steps that will be taken to facilitate the employees return to work and includes documented individual accommodation plans as part of the process.</p> <ul style="list-style-type: none">• The return-to-work process will not replace or override any other return to work process created by or any other statute.
January 1, 2016	Performance Management	<p>30.(1) An employer that uses performance management in respect of its employees shall 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.</p>	<ul style="list-style-type: none">• Leggett & Platt Canada will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management.
	Career Development & Advancement	<p>31.(1) An employer that provides career development and advancement to its employees shall take into account 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">• Leggett & Platt Canada will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when providing career development and advancement to employees.
	Redeployment	<p>32.(1) An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.</p>	<ul style="list-style-type: none">• Leggett & Platt Canada will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when redeploying employees.

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