

WHIRLPOOL CANADA LP 200 – 6750 Century Ave Mississauga ON L5N 0B7

Accessibility Policy & Multi Year Accessibility Plan

(For "Customer Service and Accessibility Policy", please go to page 7)

Statement of Commitment

Whirlpool Canada is committed to excellence in serving its customers, vendors, contractors and others who access its goods and services, including people with disabilities. Our enduring values of *Respect, Diversity and Inclusion* are consistent with the core principles of independence, dignity, integration and equality of opportunity. We are committed to providing access to our goods and services in a manner that is consistent with these values and in compliance with the *Accessibility for Ontarians with Disabilities Act, 2005* ("AODA") and associated regulations in order to ensure that people with disabilities may obtain, use or benefit from our goods and services equally.

We are committed to meeting the needs of persons with disabilities in a timely manner. We will work towards identifying, preventing and removing barriers to accessibility in customer service, information and communication, employment, the built environment and transportation as applicable and in accordance with the requirements set out in the AODA and associated regulations.

Application and Scope

This Accessibility Policy and Multi-Year Accessibility Plan are made pursuant to the requirements of the *AODA*, and the Integrated Accessibility Standards Regulation ("IAS Regulation"). It addresses how Whirlpool Canada will achieve accessibility in accordance with all legislative compliance requirements and timelines. The Multi-Year Accessibility Plan will be reviewed once every five years and updated as necessary.

Definitions

- **1. Accessible Formats:** May include, but are not limited to, large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.
- **2. Communication Supports:** May include, but are not limited to, captioning, alternative and augmentative Communication Supports, plain language, sign language and other supports that facilitate effective communications.
- **3. Disability:** Disability is defined as:
 - (a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,

- **(b)** a condition of mental impairment or a developmental disability,
- (c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- (d) a mental disorder, or
- (e) an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.
- **Kiosk:** An interactive electronic terminal, including a point-of-sale device, intended for public use that allows users to access one or more services or products or both.
- **5. Web Content Accessibility Guidelines** (**WCAG**): World Wide Web Consortium Recommendation, dated December 2008, entitled "Web Content Accessibility Guidelines (WCAG) 2.0".

Training

By January 1, 2015, Whirlpool Canada will ensure that training is made available as required by the IAS Regulation. The content of the training will include a review of the requirements of the accessibility standards referred to in the IAS Regulation and the *Human Rights Code* as it pertains to persons with disabilities. The training provided shall be appropriate to the duties and needs of those being trained.

Training will be provided as soon as practicable, as well as on an ongoing basis if changes to this Policy occur. Training will be provided to all employees, volunteers, contracted staff, individuals who participate in the development of Whirlpool Canada's policies and those who provide services and goods on our behalf.

Information and Communications Standards

Accessible Formats and Communication Supports

Whirlpool Canada is committed to meeting the communication needs of persons with disabilities in accordance with the IAS Regulation and will notify the public about the availability of Accessible Formats and Communication Supports as required. Upon request, Whirlpool Canada will provide or arrange for the provision of Accessible Formats and Communication Supports for persons with disabilities in a timely manner and at a cost that is not greater than the cost charged to other persons, if any. Whirlpool Canada will consult with the person making the request to determine the suitability of an Accessible Format and/or Communication Support.

Feedback

In accordance with the requirements of the IAS Regulation, and upon request, Whirlpool Canada will ensure that its feedback 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.

The feedback process is set out in our Customer Service Accessibility Policy. Feedback can be received in various forms and formats. Whirlpool Canada will review complaints received within a reasonable period and will respond directly to the complainant (if contact information is available). All appropriate measures will be taken to address the matter.

Emergency Information

In the event that Whirlpool Canada prepares emergency procedures, plans or public safety information and makes such information available to the public, it will provide the information in an Accessible Format or with appropriate Communication Supports, as soon as practicable, upon request and in accordance with the compliance schedule set out in the IAS Regulation.

Accessible Website and Web Content

In accordance with the compliance requirements set out in the IAS Regulation and subject to applicable exceptions, Whirlpool Canada will ensure that its Internet website(s) and the applicable web content in conformity with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG 2.0) by January 1, 2021.

Employment Standards

Whirlpool Canada is committed to fair and accessible employment practices and policies. We are in the process of reviewing and updating our employment practices and policies to ensure that we are compliant with all requirements of the IAS Regulation by January 1, 2016 or sooner.

To meet the requirements set out in the IAS Regulation, our plan at each step is outlined below:

Recruitment

Whirlpool Canada shall notify employees and the public about the availability of accommodation for applicants (including existing employees who apply for openings internally) with disabilities in its recruitment processes.

Specifically, Whirlpool Canada shall:

- notify job applicants when they are individually selected to participate in an assessment
 or selection process that accommodations, including Accessible Formats and
 Communication Supports, are available upon request in relation to the materials or
 processes to be used;
- if a selected applicant requests an accommodation, 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; and
- notify successful applicants of the policies for accommodating employees with disabilities when making offers of employment.

<u>Informing Employees of Supports</u>

In accordance with the requirements and timelines set out in the IAS Regulation, Whirlpool Canada 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 a disability. This information shall be provided to new employees as soon as practicable after they begin their employment and shall be updated for all employees whenever there is a change to the existing policies.

Accessible Formats and Communication Supports for Employees

Upon request by an employee with a disability, Whirlpool Canada shall consult with the employee to provide or arrange for the provision of suitable Accessible Formats and Communication Supports for:

- information that is needed in order to perform the employee's job; and
- information that is generally available to employees in the workplace.

Workplace Emergency Response Information

Whirlpool Canada provides 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. Whirlpool Canada shall provide the information as soon as practicable after becoming aware of the need for accommodation.

If an employee who receives individualized workplace emergency response information requires assistance, with the employee's consent, Whirlpool Canada shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.

Whirlpool Canada shall review the individualized workplace emergency response information:

- when the employee moves to a different location in the organization,
- when overall accommodation needs or plans are reviewed, and
- when the employer reviews its general emergency response policies.

Documented Individual Accommodation Plans

Whirlpool Canada shall develop and implement a written process for the development of documented individual accommodation plans for employees with disabilities. The process shall include the following elements:

- 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 Whirlpool Canada may request an evaluation by an outside medical or other expert, at Whirlpool Canada's expense, to assist with determining if accommodation can be achieved and, if so, how to achieve accommodation;
- the manner in which the employee can request the participation of a representative from their bargaining agent, where represented, or other representative from the workplace where the employee is not represented by a bargaining agent;

- the steps taken to protect the privacy of the employee's personal information;
- 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 are to be provided to the employee;
- the means of providing the accommodation plan in a format that takes into account the employee's accessibility needs;

Individual accommodation plans shall, if requested, include any information regarding Accessible Formats and Communication Supports provided; if requested, include individualized workplace emergency response information; and identify any other accommodation that is to be provided

Return-to-Work Process

Whirlpool Canada has in place documented return-to-work process for employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work. We will review and update our current policies to ensure that the policies specifically outline the steps Whirlpool Canada will take to facilitate the return-to-work of employees absent due to disability and to ensure that the process provides that documented individual accommodation plans be included in that process.

Performance Management, Career Development and Advancement, Redeployment

Whirlpool Canada shall take into account the accessibility needs and/or individual accommodation plans of employees when:

- Using performance management processes;
- Providing career development and advancement; and
- Using redeployment.

Design of Public Spaces Standards (Accessibility Standards for the Built Environment) & Kiosks

Whirlpool Canada is committed to reviewing the workplace environment and pro-actively identifying changes that should be made to public spaces to remove barriers to access. Where reasonable and required for purposes of the IAS Regulation, we will put plans in place to design public spaces that are free from barriers and are accessible to all persons we serve.

Whirlpool Canada will incorporate accessibility features when designing, procuring or acquiring self-serve kiosks.

Feedback and Questions?

If you have any questions about this Accessibility Policy & Multi Year Accessibility Plan, please let us know. Feedback on this Accessibility Policy & Multi Year Accessibility Plan and the Company's accessibility measures is welcomed by Whirlpool Canada. Feedback can be provided through various means and in various forms, including:

• Verbally to a representative of the Company

• E-mail: wcan_communications@whirlpool.com

• Mail: 200 – 6750 Century Avenue, Mississauga ON L5N 0B7

Phone: 905-821-6521Fax: 905-821-3462

All feedback received will be reviewed within a reasonable time period and Whirlpool Canada will take all appropriate steps to address any issues raised. All complaints will be processed in accordance with Whirlpool Canada's complaints process.

Copies

Copies of this Policy and any associated procedures are available upon request and in various Accessible Formats.

Customer Service and Accessibility Policy

Purpose:

Whirlpool Canada is committed to excellence in serving its customers, vendors, contractors and others who access its goods and services, including people with disabilities. Our enduring values of *Respect, Diversity and Inclusion* are consistent with the core principles of independence, dignity, integration and equality of opportunity. We are committed to providing access to our goods and services in a manner that is consistent with these values in order to ensure that people with disabilities may obtain, use or benefit from our goods and services equally.

For the purpose of this policy, "disability" is defined as:

- (a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
- (b) a condition of mental impairment or a developmental disability,
- (c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- (d) a mental disorder, or
- (e) an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

Process:

Assistive Devices

Whirlpool Canada will ensure that personnel facilitate the use of personal assistive devices. We will ensure that personnel are trained to assist individuals using personal assistive devices. Assistive devices can include communication aids, cognition aids and personal mobility aids.

How we Communicate

Communication is an important part of achieving accessibility. We are committed to ensuring that personnel communicate in a manner that takes in to account a person's disability, using clear and plain language and alternative forms of non-verbal communication as appropriate.

Service Animals and Support Persons

Unless otherwise excluded by law, Whirlpool Canada will ensure that all persons using a service animal are permitted access to their premises with their service animal and to keep the animal with him or her at all times. Where excluded by law, Whirlpool Canada will take a reasonable measures to ensure that

other methods of access are available to a person wishing to access its premises. For purposes of this policy, an animal is a "service animal": if it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or (b) if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability. A service animal includes a guide dog as that term is defined in the *Blind Persons' Rights Act*.

Persons accompanied by a "support person" as defined herein shall be permitted to have that individual with them at all times. For purposes of this policy, a "support person" is, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care or medical needs or with access to goods or services.

Whirlpool Canada may, where there is a concern for the health and safety of the person with a disability or others, require a person with a disability to be accompanied by a support person.

Notice of Temporary Disruption

In the event of a planned or unexpected disruption to any of the services outlined in this policy and which people with disabilities use to access our goods and services, Whirlpool Canada will provide advance notice if possible or, notification as soon the disruption occurs.

Whirlpool Canada will post a notice of the disruption in the affected location and the notice will include the reasons for the disruption, anticipated duration of the disruption, and a description of alternative facilities or services, if available. Whirlpool Canada will undertake all reasonable measures to rectify the situation.

Our Commitment to Training

All appropriate personnel and new hires will receive training on the requirements set out in this policy and specifically:

- ➤ The principles set out in the *Accessibility for Ontarians with Disabilities Act, 2005* and the Accessibility Standards for Customer Service Regulation;
- How to interact and communicate with people with various types of disabilities;
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or support person;
- ➤ How to use equipment or devices available on-site or otherwise that may help with providing goods or services to people with disabilities; and
- ➤ What to do if a person with a disability is having difficulty in accessing Whirlpool Canada's goods and services.

To every person dealing with members of the public or third parties and those developing your policies, practices and procedures

policies, praetices and procedures

> To all staff on an ongoing basis in connection with changes to your policies, practices and

procedures.

Whirlpool also commits to providing training to appropriate personnel on an ongoing basis.

Feedback and Questions?

If you have any feedback and/or questions about this policy, and our accessibility measures, please let us know. Feedback is welcomed by Whirlpool Canada. Feedback can be provided through various means and in various forms, including but not limited to:

In person to a representative of the Company

➤ E-mail: wcan_communications@whirlpool.com

Mail: 200 – 6750 Century Avenue, Mississauga ON L5N 0B7

Phone: 905-821-6521

Fax: 905-821-3462

Whirlpool Canada will review complaints received within a reasonable period and will respond directly to the complainant (if contact information is available). All appropriate measures will be taken to address the matter. Complaints will be process in accordance with the Company's complaint process.

Upon request, Whirlpool Canada can provide or arrange for accessible formats and communication supports, as may be appropriate, to ensure that its feedback processes are accessible to persons with disabilities.

Copies

Copies of this policy are available upon request and in an appropriate format. This policy is also posted on our web site at www.whirlpoolcanada.com.

This policy and the associated practices and procedures and training will be updated and amended as necessary to ensure ongoing compliance with the objectives of the *Accessibility for Ontarians with Disabilities Act, 2005* and the Accessibility Standards for Customer Service Regulation.

Reference

Accessibility for Ontarians with Disabilities Act, 2005

The Accessibility Standards for Customer Service Regulation