

**The Integrated Accessibility Standards Policy -
Multi-Year Accessibility Plan**

7.1.	Multi-Year Accessibility Plan	Date Required	Status	Percent Completed
7.1.1.	Sterling Marking Products Inc. will work to improve accessibility by developing a multi-year accessibility plan that conforms to the Regulation which outlines a phased-in strategy to prevent and remove barriers and address the current and future requirements of the AODA and its standards.	1-Jan-14	Complete	100%
7.2.	Sterling Marking Products Inc. will report annually on the progress and implementation of the plan, posting this information in an obvious place on company premises and on the company website. The plan will also be provided in alternative formats upon request.	31-Dec-14	Complete	100%
7.3.	The multi-year plan must be reviewed and updated at a minimum of once every five years.	31-Dec-17	Complete	100%
7.4.	The plan will be publically posted on the website and will also be posted in a visible place.	1-Jan-14	Complete	100%
7.5.	Upon request, the plan will be provided in accessible formats.	31-Dec-17	Complete	100%
7.6.	When a person with a disability makes a request for an alternative accessible format or communication support, that person must be consulted as to their needs. The plan must be provided in a timely manner and the cost of providing the plan in an accessible format must not be more than the regular cost charged to other people.	31-Dec-17	Complete	100%

**The Integrated Accessibility Standards Policy -
Multi-Year Accessibility Plan**

7.1.	Multi-Year Accessibility Plan	Date Required	Status	Percent Completed
7.7.	Training			
7.7.1.	Sterling Marking Products Inc. will ensure that by January 1, 2015, training is provided to all employees, persons who deal with customers and the public on the company's behalf, and to persons participating in the development and approval of its policies, practices and procedures on the requirements of the Regulation and on the Human Rights Code as it pertains to persons with disabilities.	1-Jan-15	Complete	100%
7.7.2.	The type and intensity of training on the requirements of accessibility standards and the Human Rights Code will vary according to the duties of the employee or others.	1-Jan-15	Complete	100%
7.7.3.	Sterling Marking Products Inc. will maintain a record of the dates when training is provided and the number of individuals to whom it was provided.	1-Jan-15	Complete	100%
7.7.4.	Training will re-occur when there are changes to the accessibility policies.	1-Jan-15	Complete	100%
7.8.	Requirements under the Information and Communications Standard			
7.8.1.	Commitment to accessibility policies, practices and procedures			
7.8.1.1.	Sterling Marking Products Inc. will commit to making information and communication systems and platforms accessible to persons with disabilities and address how it will be achieved.	1-Jan-14	Complete	100%
7.8.1.2.	Sterling Marking Products Inc. will commit to making information and communications that take into account a person's disability when communicating or providing information. This includes:	1-Jan-14	Complete	100%

**The Integrated Accessibility Standards Policy -
Multi-Year Accessibility Plan**

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7.8.1.2.1.	Posting the policy in a visible place on the premises and on the company's website	1-Jan-14	Complete	100%
7.8.1.2.2.	Providing the policy in an alternative format upon request	1-Jan-14	Complete	100%
7.8.1.2.3.	Ensuring that the cost of providing this policy in an accessible format is not more than the regular cost charged to other people.	1-Jan-14	Complete	100%
7.8.2.	Multi-year plan			
7.8.2.1.	Sterling will include the requirements under the information and communications standard in its multi-year plan, which outlines the organization's strategy to provide accessible information and communications. This includes:			
7.8.2.1.1.	Assessing barriers to information and communications systems/platforms.	1-Jan-14	Complete	100%
7.8.2.1.2.	Determining the accessibility of the company's information components systems.	1-Jan-14	Complete	100%
7.8.2.1.3.	Establishing a practice that company documents be created in a structured electronic format to allow for easier conversion to accessible formats.	1-Jan-14	Complete	100%
7.8.2.1.4.	Establishing a company standard for documents that will be as accessible as possible without need for accessible formats (i.e., font style, font size, colour contrast, plain language).	1-Jan-14	Complete	100%
7.8.2.1.5.	Posting the plan on the company's website and providing the plan in accessible format upon request.	1-Jan-14	Complete	100%
7.8.2.1.6.	Reviewing and updating the plan at least once every five years.	1-Jan-14	Complete	100%

**The Integrated Accessibility Standards Policy -
Multi-Year Accessibility Plan**

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7.8.3.	Emergency procedures, plans, or public safety information			
7.8.3.1.	Sterling Marking Products Inc., in cooperation with the manufacturing director, will:		Complete	100%
7.8.3.1.1.	Assess the existing emergency response plan and procedures and any public safety information for barriers to persons with disabilities during an emergency.	1-Jan-14	Complete	100%
7.8.3.1.2.	Update its emergency procedures to ensure that they can be followed by persons with disabilities and to ensure they meet the needs of persons with disabilities.	1-Jan-14	Complete	100%
7.8.3.1.3.	Upon request, provide the information in an accessible format or with communication supports as soon as practicable.	1-Jan-14	Complete	100%
7.8.3.1.4.	Consult with the person with the disability in the case of a request for an alternative accessible format and communication supports.	1-Jan-14	Complete	100%
7.8.3.1.5.	Provide such information at not more than the regular cost charged to other people	1-Jan-14	Complete	100%
7.8.3.1.6.	Review and update these procedures at least once every five years.	1-Jan-14	Complete	100%
7.8.4.	Feedback			
7.8.4.1.	Sterling Marking Products Inc. will ensure that its feedback processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request. This includes:			

**The Integrated Accessibility Standards Policy -
Multi-Year Accessibility Plan**

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7.8.4.1.1.	When an accessible format is requested, the person making the request is consulted to determine suitability of format.	1-Jan-16	Complete	100%
7.8.4.1.2.	The public is notified about the availability of accessible formats and communication supports.	1-Jan-16	Complete	100%
7.8.5.	Providing information and communications in accessible formats and with communications support	1-Jan-16	Complete	100%
7.8.5.1.	Sterling Marking Products Inc. will, upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability. This includes:			
7.8.5.1.1.	Assessing and reviewing the communication needs of people with visual, hearing, learning, and cognitive disabilities and the barriers to communication that exist within the organization.	1-Jan-16	Complete	100%
7.8.5.1.2.	Explaining how the company plan to produce and deliver alternately formatted material essential to the company and its customers, and what those materials are.	1-Jan-16	Complete	100%
7.8.5.1.3.	Notifying the public about the availability of accessible formats and communication supports.	1-Jan-16	Complete	100%
7.8.5.1.4.	Consulting with a person with a disability when alternative accessible formats and communication supports are requested.	1-Jan-16	Complete	100%
7.8.5.1.5.	Having a process in place for customers to request and to be provided with information and communication in an accessible format and explaining when an accessible format is not feasible.	1-Jan-16	Complete	100%
7.8.5.1.6.	Posting this information on the company website or in a conspicuous place on the premises.	1-Jan-16	Complete	100%

**The Integrated Accessibility Standards Policy -
Multi-Year Accessibility Plan**

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7.8.5.1.7.	If the information or communications are unconvertible, upon request, the organization will provide an explanation of why it is unconvertible, and provide a summary of the unconvertible information or communications.	1-Jan-16	Complete	100%
7.8.6.	Accessible websites and web content			
7.8.6.1.	Sterling Marking Products Inc. will ensure that all new websites and web content comply with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 at Level A and increasing to Level AA (for all websites and content) by 2021. This includes:			
7.8.6.1.1.	Conducting an assessment of the organization's website and testing for accessibility.	1-Jan-16	Complete	100%
7.8.6.1.2.	Committing and planning to make the website accessible and outline the course of actions and timelines needed to achieve web accessibility based on the results of the assessment and compliance with the law.	1-Jan-16	Complete	100%
7.8.6.1.3.	Developing a web accessibility business case to obtain budget and resources.	1-Jan-16	Complete	100%
7.8.6.1.4.	Obtaining tools and resources to build or make the website accessible and train the people who will use the software to make the website accessible.	1-Jan-16	Complete	100%
7.8.6.1.5.	Developing accessible website and web content that conforms with WCAG 2.0 level A and eventually that conforms to the WCAG 2.0 level AA.	1-Jan-16	Preliminary investigation has begun.	10%
7.8.6.1.6.	Monitoring website accessibility and compliance with the guidelines and the law.	31-Dec-21	Complete	100%

**The Integrated Accessibility Standards Policy -
Multi-Year Accessibility Plan**

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7.8.6.1.7.	Providing staff training to all employees and persons participating in the development and approval of the company's policies, practices and procedures on website accessibility.	31-Dec-21	Complete	100%
7.9.	Requirements under the employment standard			
7.9.1.	Sterling Marking Products Inc. will include the requirements under the employment standards in its multi-year plan, including the following:			
7.9.1.1.	Workplace emergency response information			
7.9.1.1.1.	Sterling Marking Products Inc. will provide individualized workplace emergency response information to employees who have disclosed a disability.	1/1/2012	Complete	100%
7.9.1.1.2.	With the employees consent, provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.	1/1/2012	Complete	100%
7.9.1.1.3.	The individualized workplace emergency response information will be reviewed:	1/1/2012		
7.9.1.1.3.1.	When the employee moves to a different location in the organization	1/1/2012	Complete	100%
7.9.1.1.3.2.	When the employee's overall accommodations needs or plans are reviewed, and	1/1/2012	Complete	100%
7.9.1.1.3.3.	When the employer reviews its general emergency response policies	1/1/2012	Complete	100%
7.9.1.2.	Assessment of barriers in employment - Sterling Marking Products Inc. will identify, remove and prevent barriers in employment by evaluating existing policies and procedures as well as the overall workplace.	1/1/2012	Complete	100%

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Multi-Year Accessibility Plan**

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7.9.1.3.	Recruitment			
7.9.1.3.1.	Sterling Marking Products Inc. will promote employment opportunities for the designated groups including persons with disabilities.	1/1/2016	Complete	100%
7.9.1.3.2.	On the company's website and in job advertisements, specify that accommodation is available for job applicants with disabilities.	1/1/2016	Complete	100%
7.9.1.3.3.	Sterling Marking Products Inc. will inform candidates about the availability of accommodations:	1/1/2016		
7.9.1.3.3.1.	When called for an interview	1/1/2016	Complete	100%
7.9.1.3.3.2.	During selection process	1/1/2016	Complete	100%
7.9.1.3.3.3.	At the time of job offer	1/1/2016	Complete	100%
7.9.1.3.3.4.	At orientation	1/1/2016	Complete	100%
7.9.1.4.	Support information for new employees	1/1/2016		
7.9.1.4.1.	Sterling Marking Products Inc. will inform employees of policies and supports for employees with disabilities as soon as practicable after new employees begin employment.	1/1/2016	Complete	100%
7.9.1.4.2.	Sterling Marking Products Inc. will update information provided to employees as policies change.	1/1/2016	Complete	100%
7.9.1.5.	Accessible formats and communication			
	Sterling Marking Products Inc. will, upon request by an employee with a disability, provide accessible formats and communication supports for information in the workplace in consultation with the employee making request.	1/1/2016	Complete	100%

**The Integrated Accessibility Standards Policy -
Multi-Year Accessibility Plan**

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7.9.1.6.	Documenting individualized plans			
7.9.1.6.1.	Sterling Marking Products Inc. will develop a written process for developing individual accommodation plans for employees with disabilities.	1/1/2016		
7.9.1.6.2.	Sterling Marking Products Inc. will develop and implement a return-to-work process for employees absent due to disabilities who require accommodation to return to work.	1/1/2016	Complete	100%
7.9.1.7.	Performance assessment, career development, advancement, and redeployment			
	By January 1, 2016, Sterling Marking Products Inc. will ensure that its procedures take into account the accessibility needs of employees with disabilities and their individual accommodation plans:	1-Jan-16	Complete	100%
7.9.1.7.1.	When assessing their performance	1-Jan-16	Complete	100%
7.9.1.7.2.	In managing their career development and advancement	1-Jan-16	Complete	100%
7.9.1.7.3.	When redeploying them	1-Jan-16	Complete	100%

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Multi-Year Accessibility Plan

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