



**BWXT Medical Ltd.**

**Accessibility Policies and Accessibility Plan  
(the “Accessibility Plan”)**

**General**

**Introduction**

This Accessibility Plan is in compliance with the Accessible Canada Regulations: SOR/2021-241 under the *Accessible Canada Act* (“**ACA**”).

The Accessible Canada Regulations under the ACA require that BWXT Medical Ltd. (“**BWXT**”) establish, implement, maintain and document its accessibility plan (the “**Accessibility Plan**”). The Accessibility Plan outlines BWXT’s strategy for preventing and removing barriers for persons with disabilities and meets our obligations under the Accessible Canada Regulations and the ACA.

The Accessibility Plan will be publicly available, including in an accessible format upon request. The Accessibility Plan will be reviewed and updated, if applicable, at least once every three years.

**Application**

The Accessibility Plan applies to all employees, as defined in the Accessible Canada Regulations, as well as the customers of BWXT in Canada.

**Our Commitment**

In fulfilling our mission, BWXT strives to treat all individuals in a manner that allows them to maintain their dignity and independence. BWXT promotes integration and equal opportunity and is committed to meeting the needs of people with disabilities in a timely manner. We will seek to achieve this by preventing and removing barriers to accessibility and by meeting accessibility requirements under the ACA. This Accessibility Plan sets out BWXT’s policy on how we will achieve accessibility in all areas of BWXT’s operations.

The following accessibility strategies set out the requirements that are applicable to BWXT:

1. Employment

2. The Built Environment
3. Information and Communication Technologies
4. Communication, Other than Information and Communication Technologies
5. The Procurement of Goods, Services and Facilities
6. The Design and Delivery of Programs and Services
7. Transportation

## **Feedback**

BWXT has a designated accessibility representative. The representative is designated to receive feedback relating to accessibility and accessibility barriers on behalf of BWXT.

BWXT's **Designated Accessibility Representative** is as follows:

Catherine Campbell  
HR Generalist

You can provide feedback and/or communicate with BWXT and the Designated Accessibility Representative in any of the following manners:

**Mail:** 447 March Road, Kanata, ON K2K 1X8

**Telephone:** 613-923-2590

**E-mail:** [ccampbell@bwxt.com](mailto:ccampbell@bwxt.com)

## **Consultation**

As part of developing BWXT's Accessibility Plan, BWXT engaged in consultations with its employees. In particular, BWXT sought feedback from employees who had identified as a person with disabilities regarding its operations in order to identify remove, and prevent accessibility barriers. Feedback was sought through a survey and consultative meetings were to follow as required. Feedback was also sought from business partners who were responsible in the management of the applicable areas of accessibility.

BWXT received minimal response to the survey receiving only one response. The Consulting Partner identified no accessibility barriers at BWXT based on their disability. Business partners were supportive of BWXT's commitment to comply with the ACA and as part of standard practice of their were taking into consideration the needs of persons with disabilities and on request.

## **Areas Described Under Section 5 of the ACA**

The following sets out how BWXT is committed to complying with the ACA:

## **1. Employment**

BWXT is committed to fair and accessible employment practices in all stages of the employment cycle that will respect the dignity and independence of current and prospective team members with disabilities.

### **Current Level of Accessibility in the Area of Employment:**

When requested, BWXT reviews and provides accommodation for persons with disabilities within the requirements and processes of the Canada Labour Code, the Canadian Human Rights Act, collective agreements and regulatory agencies throughout the employment process.

By demonstrating our commitment to preventing and removing barriers to accessibility under the ACA in the area of Employment, BWXT will be creating a more inclusive workplace. This will enable employees with disabilities to fully participate in the workplace resulting in greater job performance and overall productivity of BWXT. From a recruitment perspective, this commitment will attract a wider pool of candidates.

### **Barriers in Employment as Identified by Consultation Participants:**

There were no barriers identified by the Consultation Participants.

### **Accessibility Goals in the Area of Employment:**

BWXT to provide accessible employment practices in all stages of the employment cycle for current and prospective team members with disabilities.

### **Planned Action to Achieve Accessibility Goals:**

#### **(a) *Recruitment***

BWXT is committed to fair and accessible employment recruiting practices that attract and retain employees with disabilities.

BWXT will do the following:

#### **(i) *Recruitment General***

BWXT will notify employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process.

This will include:

- review and, as necessary, modification of existing recruitment policies, procedures and processes;
- specifying that accommodation is available for applicants with disabilities, on BWXT's website and on job postings; and

**(ii) Recruitment, Assessment and Selection**

BWXT will notify job applicants, when they are individually selected to participate in an assessment or selection process and inform them 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, as 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; and
- if a selected applicant requests an accommodation, a consultation with the applicant and arrangement for provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to the disability; and

**(iii) Notice to Successful Applicants**

When making offers of employment, BWXT 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; and
- inclusion of notification of BWXT's policies on accommodating employees with disabilities in offer of employment letters.

**Anticipated Compliance Date:** April 2024

***b. Informing Employees of Supports and General Provision of Accessible Formats and Communications Supports***

BWXT 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. This will include:

- informing current employees and new hires of BWXT's 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 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 disabilities;
- where an employee with a disability so requests it, BWXT 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;and
- in meeting the obligations to provide the information that is set out above, BWXT will consult with the requesting employee in determining the suitability of an accessible format or communication support.

**Anticipated Compliance Date:** September 2024

***c. Documented Individual Accommodation Plans/Return to Work Process***

BWXT will incorporate new accessibility requirements under the Accessible Canada Regulations 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.

BWXT's existing policies and practices include steps that BWXT will take to accommodate employees with disabilities and to facilitate employees' return to work after absence due to disability.

BWXT will review and assess existing policies to ensure that they include steps that BWXT will take to accommodate employees with disabilities and to facilitate employees' return to work after absence due to disability. BWXT will also ensure that they include a process for the development of documented individual accommodation plans for employees with disabilities, if such plans are required.

BWXT will ensure that the process for the development of documented individual accommodation plans includes the following elements:

- information regarding the manner in which the employee requesting accommodation can participate in the development of the plan;
- information regarding the means by which the employee is assessed on an individual basis;

- information regarding the manner in which BWXT can request an evaluation by an outside medical or other expert, at BWXT's expense, to assist BWXT in determining if and how accommodation can be achieved;
- information regarding the manner in which the employee can request the 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;
- steps to protect the privacy of the employee's personal information;
- information regarding the frequency with which individual accommodation plans will be reviewed and updated and the manner in which this will be done;
- the reasons for a denial if an individual accommodation plan is denied;
- information regarding the means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs;
- the following will be included if individual accommodation plans are established:
  - 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; and
- identify any other accommodation that is to be provided to the employee.

BWXT will ensure that the return to work process as set out in its existing policies outlines:

- the steps BWXT will take to facilitate the employee's return to work after a disability-related absence;
- the development of a written individualized return to work plan for such employees; and
- the use of individual accommodation plans, as discussed above, in the return to work process.

**Anticipated Compliance Date:** April 2024

### ***Performance Management, Career Development and Redeployment***

BWXT 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 employees with disabilities; and
- when redeploying employees with disabilities.

BWXT will:

- review, assess and, as necessary, modify existing policies, procedures and practices to ensure compliance with the Accessible Canada Regulations and ACA;
- 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; and
  - redeployment is required.
- review, assess and, as necessary, include in performance management workshops, accessibility criteria;
- 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; and
- take into account the accessibility needs of employees with disabilities when redeploying employees, including review and, as necessary, modification of employee transfer checklist.

**Anticipated Compliance Date:** April 2024

## **2. The Built Environment**

BWXT is committed to removing barriers in public spaces and buildings that will uphold the dignity and independence of persons with disabilities.

### **Current Level of Accessibility in the Area of the Built Environment:**

The facility that BWXT Medical operates from is leased. An inspection of the building confirms accessibility are available to employees and visitors in forms that included: handicapped parking spots, wheelchair ramps, automatic door-entry buttons, wider doors, accessible washrooms, and elevator.

As a nuclear facility, building accessibility measures may be limited in operating areas, for example clean rooms based on regulations.

**Barriers in the Built Environment as Identified by Consultation Participants:**

There were no Built Environment barriers identified by Consultation Participants.

**Accessibility Goals in the Area of the Built Environment:**

BWXT will review accessible options to meet the requirements of persons with disabilities when requested, and provide as per regulations.

**Planned Action to Achieve Accessibility Goals:**

While BWXT has no current plans to engage in new construction or significant redevelopment of its facilities at present, BWXT will meet the ACA for all built environment obligations should any such construction take place in the future.

BWXT will put procedures in place to prevent service disruption to its accessible parts of public spaces. In the event of a service disruption, BWXT will notify the public of the service disruption and alternatives available.

**Anticipated Compliance Date:** June 2023

**3. Information and Communication Technologies**

BWXT is committed to making company information and communications accessible to persons with disabilities.

**Current Level of Accessibility in the Area of Information and Communication Technologies:**

BWXT uses various platforms in the area of Information and Communication, that includes web-based information and applications for learning, computers – desktop and laptop, email, telephone / mobile phone, social media, web conferencing, SMS, shared calendars and collaborative documents.

**Barriers in Information and Communication Technologies as Identified by Consultation Participants:**

There were no barriers in the area of Information and Communication Technologies identified by the Consultation Participants.

**Accessibility Goals in the Area of Information and Communication Technologies:**

BWXT will take into consideration the needs of persons with disabilities in the area of information and communication systems. BWXT will provide information and communication systems in platforms that are in accessible format to meet the needs of persons with disabilities on request.

**Planned Action to Achieve Accessibility Goals:**

BWXT will incorporate new accessibility requirements under the information and communication standards to ensure that its information and communications systems and platforms are accessible and are provided, upon request, in accessible formats that meet the needs of persons with disabilities.

**(a) *Feedback, Accessible Formats and Communication Supports***

BWXT will:

- ensure 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 account the person's accessibility needs due to disability, and at a cost no more than the regular cost charged to other persons; and
- notify the public about the availability of accessible formats and communication supports.

**Anticipated Compliance Date:** June 2023

**(b) *Accessible Websites and Web Content***

BWXT will work toward making any Canadian-based websites and web content conform with the World Wide Consortium Web Content Accessibility Guidelines (WCAG 2.0) Level AA. Furthermore, BWXT will take reasonable steps to ensure that all new Canadian-based websites controlled by BWXT, and web content on those sites, will conform with the World Wide Consortium Web Content Accessibility Guidelines (WCAG 2.0) Level AA, except where meeting the requirement is not practicable.

**Anticipated Compliance Date:** June 2023

**4. Communication, Other than Information and Communication Technologies**

BWXT is committed to making company information and communications accessible to deaf persons in Canada.

Communication, other than information and communication technologies (“ICT”) includes the use of American Sign Language, Quebec Sign Language and Indigenous sign languages. American Sign Language, Quebec Sign Language and Indigenous sign languages are recognized as the primary languages for communication by deaf persons in Canada.

**Current Level of Accessibility in the Area of Communication, Other than ICT:**

On request, BWXT will provide assessible communication and information in the area of Communication Other than ICT.

**Barriers in Communication, Other than ICT as Identified by Consultation Participants:**

No barriers were identified by the Consultation Participants

**Accessibility Goals in the Area of Communication, Other than ICT:**

BWXT will comply with the ACA standard when it comes to accessibility in the area Communication, Other than ICT.

**Planned Action to Achieve Accessibility Goals:**

BWXT will incorporate new accessibility requirements under the communication, other than ICT standard to ensure that its information and communications systems and platforms are accessible and are provided, upon request, in accessible formats that meet the needs of deaf persons in Canada.

**(a) *Feedback, Accessible Formats and Communication Supports***

BWXT will:

- ensure that existing and new processes for receiving and responding to feedback are accessible to deaf persons in Canada 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 deaf persons in Canada 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 account the person’s accessibility needs due to disability, and at a cost no more than the regular cost charged to other persons; and

- notify the public about the availability of accessible formats and communication supports.

**Anticipated Compliance Date:** June 2023

## **5. The Procurement of Goods, Services and Facilities**

BWXT is committed to removing barriers with regard to the procurement of goods, services and facilities that will respect the dignity and independence of persons with disabilities.

### **Current Level of Accessibility in the Area of the Procurement of Goods, Services and Facilities**

BWXT utilises standard procurement practices taking into account government regulations and the actual product sought. The procurement process currently takes into consideration accessible options for regular purchase, for example, ergonomic chairs for all workstations and will consult with a person with disability to procure items that meet their accessibility needs. Accessibility will also be taken into consideration when procuring items of new-build product design.

### **Barriers in the Procurement of Goods, Services and Facilities as Identified by Consultation Participants:**

No barriers were identified by the Consultation Participants.

### **Accessibility Goals in the Area of the Procurement of Goods, Services and Facilities:**

BWXT will comply with the ACA standard as it applies to the Procurement of Goods, Services and Facilities.

### **Planned Action to Achieve Accessibility Goals:**

BWXT will continue to follow standard procurement practices in procurement of all its goods, services and facilities, which includes meeting general accessibility standards. On request and in consultation, BWXT will procure goods specific to persons with disabilities within government regulations.

**Anticipated Compliance Date:** June 2023

## **6. The Design and Delivery of Programs and Services**

BWXT is committed to removing barriers in the design and delivery of programs and services that will uphold the dignity and independence of persons with disabilities. We are also committed to giving people with disabilities the same opportunity to get

involved with BWXT and allowing people with disabilities to benefit from BWXT in the same place and in a similar way as other clients.

**Current Level of Accessibility in the Area of the Design and Delivery of Programs and Services:**

BWXT as radiopharmaceutical facility, operates under numerous federal, provincial and local government agencies that regulate the design and delivery of its programs and services.

**Barriers in the Design and Delivery of Programs and Services as Identified by Consultation Participants:**

No barriers were identified by Consultation Participants.

**Accessibility Goals in the Area of the Design and Delivery of Programs and Services:**

All employees to complete accessibility awareness training.

**Planned Action to Achieve Accessibility Goals:**

BWXT will develop accessibility training course for all employees in accordance to the ACA to support accessibility awareness and BWXT's commitment in identifying, removing and preventing barriers to persons with disabilities. Completion of this training will be tracked and audited for compliance. All current employees will be required to complete ACA training and new employees will be assigned this training for completion as part of their training requirements when hired.

**(a) Communication**

When communicating with people with disabilities, we will do so in ways that take into account their disability. Accordingly, we will train our staff who deliver programs and services on how to interact and communicate with people with various types of disabilities.

**Anticipated Compliance Date:** September 2024

**Assistive Devices**

People with disabilities are welcome to use their own personal assistive devices (e.g., white cane, wheelchair, hearing and visual aids) in order to access or use BWXT's programs and services. We will train our staff to become familiar with various assistive devices that may be used by customers and clients with disabilities while accessing our services. We will also ensure that staff know how to use assistive devices that are available for clients on our premises.

**Anticipated Compliance Date:** September 2024

**(b) *Service Animals and Support Persons***

People with disabilities who are accompanied by a service animal are welcome on all parts of BWXT's facilities that are open to the public and other third parties and to participate in BWXT's programs. Clients may keep the animal with them unless excluded by law and nuclear compliance regulations, in which case, we will consider alternative measures to access our services. Our staff and others dealing with the public on our behalf will be trained on how to interact with people with disabilities who are accompanied by a service animal.

Any person with a disability who is accompanied by a support person will be allowed to enter BWXT's facilities with their support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to their support person while on our premises or when participating in a BWXT program.

**Anticipated Compliance Date:** September 2024

**(c) *Notice of Temporary Disruption***

In the event of a planned or unexpected disruption in facilities or services usually used by people with disabilities, BWXT will post a notice about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available. The notice will be placed at or near the affected facility or service and/or through other means (e.g., website) where necessary.

**Anticipated Compliance Date:** June 2024

**7. Transportation**

The area of Transportation is not applicable to BWXT.

**Accessible Formats**

Accessible formats of this document are available upon request. Requests can be made to the Designated Accessibility Representative in any of the following manners:

**Telephone:** 705-536-2443

**E-mail:** mamiller@bwxt.com