

## **Watts Water Technologies (Canada) Inc.**

### **Multi-Year Accessibility Plan**

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#### **STATEMENT OF COMMITMENT**

Watts Water Technologies (Canada) Inc. (“the Company”) is committed to providing a barrier-free environment for our clients/customers, employees and other stakeholders who enter our premises or access our information. As an organization, we are committed to treating all people in a way that allows them to maintain their dignity and independence. The Company believes in integration and equal opportunity, is committed to meeting the needs of people with disabilities in a timely manner, and is committed to meeting the accessibility requirements under the Accessibility for Ontarians with Disabilities Act, 2005.

Our organization has made a commitment to being increasingly accessible not only because it is a legal obligation, but also because it aligns with our values. We believe we have an important responsibility for ensuring a safe, dignified, and welcoming environment for everyone.

We are committed to ensuring our organization’s compliance with accessibility legislation by incorporating policies, procedures, and training for employees. Specifically, we are committed to:

- Ensuring that employees, who develop policies, hire/manage staff and/or provide goods and services to customers are aware of the Human Rights Code and the Accessibility for Ontarians with Disabilities Act, 2005;
- Ensuring that our employment practices including (but not limited to) recruitment, candidate evaluation, and selection provide accommodation as needed and that employees and applicants are aware that accommodation is available;
- Ensuring that our emergency response plan includes accommodations for any employee requiring it, and that these plans are available upon request;
- Ensuring that individual workplace accommodation plans are developed and implemented as required;
- Ensuring our compliance with the Customer Service Standard; and
- Ensuring our compliance with the Integrated Accessibility Standards Regulation, including the development and implementation of a multi-year plan addressing how our company intends to continually improve in terms of accessibility for all.

The multi-year accessibility plan outlines the specific steps Watts Canada is taking to improve opportunities for persons with disabilities and comply with the phased-in requirements of the Regulation beginning January 1, 2012.

**SECTION 1:  
REPORT ON MEASURES ALREADY IMPLEMENTED**

From 2012-2017, Watts Canada will continue to comply with the Accessibility Standards for Customer Service Regulation and continue to implement initiatives to enhance accessibility in other areas under the Integrated Accessibility Standards Regulation Standards for Employment, Information & Communications and the Built Environment.

This section includes a summary of the initiatives Watts Canada implemented on or before January 1, 2012 and will continue to implement from 2012-2025.

**1. Standards for Customer Service.**

Watts Canada met the compliance requirements set out in the Accessible Customer Service Standard Regulation by:

- Establishing policies, procedures and practices for providing goods and services to persons with disabilities, and posting these on the website;
- For all staff that interact, or may interact, with persons with disabilities on behalf of the company, training was provided on:
  - The AODA and Customer Service Standard
  - Policies, procedures and practices for providing goods and services to persons with disabilities
  - Accessibility Awareness training
  - Customer Feedback Process
- Registering compliance via the Accessibility Compliance Reporting tool at Service Ontario's ONe-Source for Business website.

<b>Required Legislative Compliance</b>	January 1, 2012
<b>Implementation Timeframe</b>	September 2012-December 2012
<b>Completion Date</b>	December 2012

## 2. Emergency response and evacuation plans under the IASR Standards for Information and Communications and Employment.

Watts Canada incorporated accessibility considerations into its Fire Safety Plan and procedures. The following measures have been taken:

- There are currently no known persons with disabilities that require accommodation and therefore disabilities will be addressed as they become known; and
- Employees have been trained on the Fire Safety Plan and have been advised to notify the Company regarding any disability that would require special assistance during an emergency.

<b>Required Legislative Compliance</b>	January 1, 2012
<b>Implementation Timeframe</b>	No changes to plan required, plan was last updated April 2013.
<b>Completion Date</b>	Additional Accessibility wording to be added by January 2014

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### SECTION 2:

#### REPORT ON PLANNED MEASURES TO IDENTIFY, REMOVE AND PREVENT BARRIERS IN 2012-2017

This year, Watts Canada's accessibility plan focuses on five areas. These initiatives will support compliance with the existing Accessibility Standards for Customer Service. They will also help us enhance accessibility in the areas of Information and Communications, Employment, and the Built Environment.

### 1. Standards for Customer Service

#### Commitment

Watts Canada is committed to ensuring that people with disabilities continue to receive accessible goods and services, with the same quality and standards, as fully abled customers beyond January 1, 2012.

#### Identification of Barriers

Watts Canada has not identified any customers with known disabilities. Our feedback process has not provided us with any business case for increased efforts beyond what we are currently doing with regards to providing quality customer service to *all* customers. We will continue to monitor our feedback, including any information provided by our front line staff. We are

committed to responding promptly and fully to remove barriers for any customer with a disability that prevents him/her from accessing our goods and services.

**Planned Actions**

To meet ongoing compliance with the Accessibility Standards for Customer Service Regulation requirements and removal of barriers to persons with disabilities, Watts Canada will:

- Include AODA Customer Service Standard training as part of the New Hire Orientation process;
- Consider accessibility-related feedback received through all channels (i.e., online feedback form, correspondence, inquiries etc.) by assessing and responding to feedback as required; and
- Encourage staff to consider accessibility when planning meetings and events with customers, including vendors and suppliers.

<b>Required Legislative Compliance</b>	None
<b>Implementation Timeframe</b>	Ongoing

**2. Standards for Integrated Accessibility: *General Requirements***

**2.1 Accessibility Policy Statement of Commitment to IASR**

The goal of the Statement of Commitment is to explicitly state how Watts Canada will achieve accessibility through meeting the IASR’s requirements.

**Identification of Barriers**

People with disabilities face a range of physical and attitudinal barriers including stereotyping and prejudice.

**Planned Actions**

Watts Canada has drafted a Statement of Organizational Commitment as well as policies that address Employment and Information & Communication that will meet the IASR's requirements. The Statement of Commitment will be posted on the website, as part of the posted multiyear plan, and will be available in an accessible format upon request. The policies will be in our Employee Handbook Supplement and are currently under review by the Director of Employee Relations at our Corporate Head Office. These policies will also be subject to a legal review before being rolled out to employees.

<b>Required Legislative Compliance</b>	January 1, 2014
<b>Implementation Timeframe</b>	October 2013 to January 2014
<b>Completion Date</b>	November 28, 2013 (drafts)

## 2.2 Accessibility plan

### Commitment

Watts Canada will establish, implement and maintain a multi-year Accessibility Plan that outlines our strategy to prevent and remove barriers for persons with disabilities that are employed by, or engaged in any way with, our business. The Plan will be reviewed at least once every five years. We will post the Plan on our website and provide the plan in an accessible format upon request.

<b>Required legislative compliance</b>	January 1, 2014
<b>Implementation timeframe</b>	October 2013 to January 1, 2014
<b>Completion Date</b>	January 1, 2014

## 2.3 Procurement or Acquisition of Goods, Services, or Facilities

Not required for private sector.

## 2.4 Self-service Kiosks

Watts Canada does not utilize self-service kiosks at this time. If the Company ever were to implement kiosks, accessibility features will be taken into account.

## 2.5 Training

### Commitment

Watts Canada is committed to a process for ensuring that all employees receive the appropriate training that meets the requirements under the IASR.

### Planned Actions

Watts Canada has sent out an e-mail to all staff, communicating the requirements of the IASR and welcomed any questions. Information and compliance updates will be provided as needed with respect to any changes to policies/practices. The Company will additionally train all of its employees, volunteers and persons who develop the Company's policies on the requirements of the Ontario *Human Rights Code* as it relates to people with disabilities. The training will be tailored, where necessary, to the specific duties of the applicable positions.

<b>Required Legislative Compliance</b>	January 1, 2015
<b>Implementation Timeframe</b>	October 2013 to January 1, 2015
<b>Completion Date</b>	TBD

### 3. Standards for Information and Communications

#### **Commitment**

Watts Canada will ensure that its information and communications systems and platforms are accessible and provided in accessible formats that meet the needs of persons with disabilities. We will make every effort to provide necessary communication support in a timely manner.

#### **Identification of Barriers**

Watts Canada will assess its communication methods to identify and remove barriers to information and communications with people with disabilities.

Potential barriers include:

- Lack of website accessibility standards for the organizations websites;
- Lack of awareness among the organizations IT Department regarding Website Accessibility barriers; and
- Information overload and conflicting recommendations for Website accessibility Standards.

#### **Planned Actions**

To meet compliance with the Accessibility Standards for Information and Communications under the IASR requirements and remove barriers to persons with disabilities, Watts Canada will:

- By January 1, 2016, upon request, provide or arrange for the provision of accessible formats and communication supports to persons with disabilities in a timely manner, taking into account the persons accessibility needs;
- Post the accessibility plan on the company's website;
- Post a statement on the website about accessibility and the availability of accessible formats and communication supports;
- Empower the MARCOM Interactive Team to make our website accessible per WCAG2.0 standards, develop any necessary guidelines and remove barriers through implementation of the website accessibility guidelines and the generation of reports identifying accessibility barriers;

- Ensure new internet websites and web content on those sites conform to WCAG 2.0 Level A by January 1, 2014; and
- Ensure all websites and web content conform to WCAG 2.0 Level AA other than success criteria 1.2.4 Captions (Live) and success criteria 1.2.5 Audio Descriptions (Pre-recorded) by January 1, 2021.

<b>Required Legislative Compliance</b>	January 1, 2014 (WCAG 2.0 Level A), January 1, 2016 (accessible formats and communication supports) and January 1, 2021 (WCAG Level 2.0 Level AA)
<b>Implementation Timeframe</b>	January 2014 to January 1, 2016
<b>Completion Date</b>	TBD

## 4. Standards for Employment

### 4.1 Recruitment

#### Commitment

Watts Canada supports the expansion of its labour pool and is committed to ensuring that hiring practices allow applicants with disabilities to apply for any jobs for which they are qualified. Internal and external job postings explicitly notify any potential applicant that accommodation during the application and interview process are available.

#### Identification of Barriers

Watts Canada will assess recruitment policies, practices and procedures, methods and attitudes to identify and remove barriers to employment of people with disabilities.

#### Planned Actions

To meet compliance with the Accessibility Standards for Employment under the Integrated Regulation requirements and to remove barriers to persons with disabilities in recruitment, Watts Canada will:

- Continue the practice of advising applicants that accommodation is available;
- If the selected applicant requests an accommodation, consult with the applicant and arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs; and
- Ensure that Hiring Managers are aware of the rights of applicants with disabilities under the Human Rights Code.

<b>Required Legislative Compliance</b>	January 1, 2016
<b>Implementation timeframe</b>	October 2013 to December 2015
<b>Completion Date</b>	TBD

## **4.2 Support Information for Employees**

### **Commitment**

Watts Canada will ensure that information provided to employees is accessible and takes into account any individual's specific needs.

### **Planned Actions**

To meet compliance with the Accessibility Standards for Employment under the Integrated Regulation requirements and to remove barriers to persons with disabilities, Watts Canada will:

- Keep employees up to date on changes to policies;
- Provide accessible formats and communication supports to any employee upon request; and
- Consult with the employee to provide an accessible format and communication support for information that is needed in order to perform the employee's job and information that is generally available to employees in the workplace.

<b>Required Legislative Compliance</b>	January 1, 2016
<b>Implementation Timeframe</b>	October 2013-December 2015
<b>Completion Date</b>	TBD

## **4.3 Documented Individualized Plans**

### **Commitment**

Watts Canada is committed to the development and implementation of individualized plans (e.g., Accommodation Plan, Return to Work Plan) in order to accommodate a disability of any type, permanent or temporary.

### **Planned Actions**

To meet compliance with the Accessibility Standards for Employment under the Integrated Regulation requirements and remove barriers to persons with disabilities Watts Canada will:



- Allow the employee requesting accommodation to participate in the development of the plan;
- Include in the process the means by which the employee is assessed on an individual basis;
- Provide an individualized accommodation plan in writing to any employee with a disability;
- Include in the process the manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if and how accommodation can be achieved;
- Provide an individualized Return to Work Plan in writing for any employee who has been absent from work due to a disability and requires disability related accommodations to return to work;
- Take steps to protect the privacy of the employee's personal information;
- Outline the frequency in which individual accommodation plans will be reviewed and updated and the manner in which it will be done;
- Provide the employee with the reasons for the denial if the individual accommodation plan is denied; and
- Include any individualized workplace emergency response information.

<b>Required Legislative Compliance</b>	January 1, 2016
<b>Implementation Timeframe</b>	October 2013-December 2015
<b>Completion Date</b>	TBD

#### **4.4 Performance Assessment, Career Development & Advancement, and Redeployment**

##### **Commitment**

Watts Canada will incorporate new accessibility requirements under the employment standard to ensure that barriers in performance assessment, career development and advancement, and redeployment are eliminated.

##### **Identification of Barriers**

Watts Canada will assess its performance reviews, career development and advancement, redeployment programs, practices and procedures, methods and attitudes to identify and remove barriers to employment of people with disabilities.

## Planned Actions

Watts Canada will take the accessibility needs of employees with disabilities and their individualized accommodation plans into account when assessing performance, managing career development and if redeploying.

<b>Required Legislative Compliance</b>	January 1, 2016
<b>Implementation Timeframe</b>	October 2013-December 2015
<b>Completion Date</b>	TBD

### 5. Standards for transportation

This standard does not apply to Watts Canada.

### 6. Standards for the Built environment

At the present time, Watts Canada does not plan on developing or redeveloping any of its public spaces, as defined in the Design of Public Spaces Standard. However, should it choose to do so, this policy and plan will be revised to include the requirements thereunder and how we will achieve compliance.