

Updated: September 28, 2023

Part I - General Requirements

| Initiative | Requirement | Action | Status | Compliance Date |
|---|--|--|-----------|--|
| Establishment of Accessibility Policies | 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. | Policy has been developed and implemented. | Completed | January 1, 2014 Policy was reviewed in 2023 if changes were required |
| Accessibility Plans | Large organizations shall, 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; b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and c) review and update the accessibility plan at least once every five years. | Noble has established AODA Team. Team meets regularly to identify potential barriers and provide solutions to remove and prevent future barriers. Noble Accessibility Plan has been posted on our website. The Accessibility Plan is available in accessible format upon request. Noble will review and update accessibility plan at least once every five years. | Completed | January 1, 2014 Reviewed plan: September 2023 |



| Initiative | Requirement | Action | Status | Compliance Date |
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| Training | 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, (a) all employees, and volunteers; (b) all persons who participate in developing the organization's policies; and (c) all other persons who provide goods, services or facilities on behalf of the organization. | Noble will provide training to all employees, volunteers and others who interact with the public or third parties. Noble will ensure new employees complete training as part of their orientation, if they haven't already done so. Training will be provided online. Noble will provide computers for employees to complete their training. | Completed Ongoing for new employees and existing employees if required | January 1, 2015 September 2023: All new employees are required to complete AODA training as a part of their onboarding. |



Part II – Information and Communication Standards

| Initiative | Requirement | Action | Status | Compliance Date |
|---|---|--|-----------|--|
| Feedback | 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 communication support, upon request. | Noble will ensure that feedback processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications support, upon request. | Completed | January 1, 2015 Form is available on the website |
| Accessible Formats & Communication Supports | 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, | Upon request, Noble will provide or arrange for the provision of accessible formats and communications support for persons with disabilities, | Completed | January 1, 2016 |
| | a) in a timely manner that takes into account the person's accessibility needs due to disability; and | 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. The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support. Every obligated organization shall notify the public about the availability of accessible formats and communication supports. | b) at a cost that is no more than the regular cost charged to other persons. Noble will consult with the person making the request in determining the suitability of an accessible format or communications support. Noble will notify the public about the availability of accessible formats and communications support. | | |



| Initiative | Requirement | Action | Status | Compliance Date |
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| Accessible Websites & Web Content | Large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) | Noble will ensure its websites and web content confirm with the WCAG 2.0 Level | Level A Completed | January 1, 2014 |
| | 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. | Noble will ensure its websites and web content conform to WCAG 2.0 Level AA. | Level AA will be implemented by January 1, 2021 | Reviewed October 23, 2023 |
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Part III – Employment Standard

| Initiative | Requirement | Action | Status | Compliance Date |
|--|--|---|---------------------------------|--|
| Recruitment | Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes | Noble will incorporate language on job postings to bring awareness to employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes. | Completed January 1, 2017 | January 1, 2016 Reviewed 2023 |
| Recruitment, Assessment or Selection Process | (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. (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. | Noble will notify job applicants when they are 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. If a selected applicant requests an accommodation, Noble will 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. | Completed January 1, 2017 | January 1, 2016 Reviewed 2023 |
| Notice to Successful Applicants | Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities. | When making an offer of employment, Noble will notify the successful applicant of its policies for accommodating employees with disabilities. | Completed January 2016 | January 1, 2016 |



| Initiative | Requirement | Action | Status | Compliance Date |
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| Informing Employees of Supports | (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. (2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment (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. | Noble will 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. This is part of our Disability Management Program and our Accident Reporting. Noble will provide the required information to new employees as soon as practicable after they begin their employment. Noble will provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that takes into account an employee's accessibility needs due to disability. | Completed | January 1, 2016 Reviewed 2023 |



| Initiative | Requirement | Action | Status | Compliance Date |
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| Accessible Formats & Communication Supports for Employees | 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, (a) information that is needed in order to perform the employee's job; and (b) information that is generally available to employees in the workplace. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support | Where an employee with a disability so requests, Noble will consult with the employee to provide or arrange for the provision of accessible formats and communication support for, a) information that is needed in order to perform the employee's job and b) information that is generally available to employees in the workplace. Noble will consult with the employee making the request in determining the suitability of an accessible format or communication support. | Will be implemented by January 1, 2016 | January 1, 2016 Reviewed 2023 |



| Initiative | Requirement | Action | Status | Compliance Date |
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| | 1) Every employer shall provide individualized | Noble will provide individualized | Completed | January 1, |
| Workplace | workplace emergency response information | workplace emergency response | · | 2012 |
| Emergency | to employees who have a disability, if the | information to employees who have a | | |
| Response | disability is such that the individualized | disability, if the disability is such that the | | Reviewed |
| Information | information is necessary and the employer is | individualized information is necessary and | | 2023 |
| | aware of the need for accommodation due to | Noble is aware of the need for | | |
| | the employee's disability | accommodation due the employee's | | |
| | 2) If an employee who receives individualized | disability. | | |
| | workplace emergency response information | If an employee who receives individualized | | |
| | requires assistance and with the employee's | workplace emergency response | | |
| | consent, the employer shall provide the | information requires assistance and with | | |
| | workplace emergency response information | the employee's consent, Noble will provide | | |
| | to the person designated by the employer to | the workplace emergency response | | |
| | provide assistance to the employee. | information to the person designated by | | |
| | 3) Employers shall provide the information | Noble to provide assistance to the | | |
| | required under this section as soon as | employee. | | |
| | practicable after the employer becomes | Noble will provide the information | | |
| | aware of the need for accommodation due to | required under this section as soon as | | |
| | the employee's disability. | practicable after Noble becomes aware of | | |
| | (4) Every employer shall review the | the need for accommodation due to the | | |
| | individualized workplace emergency response | employee's disability. | | |
| | information, | Noble will review the individualized | | |
| | (a) when the employee moves to a different | workplace emergency response | | |
| | location in the organization; | information, when the employee moves to | | |
| | (b) when the employee's overall | a different location in the organization, | | |
| | accommodations needs or plans are | when the employee's overall | | |
| | reviewed; and | accommodations needs or plans are | | |
| | (c) when the employer reviews its general | reviewed, and when the Noble reviews its | | |
| | emergency response policies. | general emergency response policies. | | |



| Initiative | Requirement | Action | Status | Compliance Date |
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| Documented Individual Accommodation Plans | (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 (2) The process for the development of documented individual accommodation plans shall include the following elements: 1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. 2. The means by which the employee is assessed on an individual basis. 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. | written process for the development of documented individual accommodation plans for employees with disabilities. The process for the development of documented individual accommodation plans will include the following elements (EAP & CanadaLife): 1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. 2. The means by which the employee is assessed on an individual basis. 3. The manner in which Noble can request an evaluation by outside medical or other expert, at Noble's expense, to determine if and how accommodation can be achieved. 4. The manner in which the employee can request the participation of a representative from the workplace in the development of the accommodation plan. 5. The steps taken to protect the privacy of the employee's personal information. | Completed | January 1, 2016 |



| Initiative | Requirement | Action | Status | Compliance Date |
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| Documented Individual Accommodation Plans | 4. 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. 5. The steps taken to protect the privacy of the employee's personal information. 6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done. 7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee. 8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability. | 6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done. 7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee. 8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability. | Completed | January 1, 2016 Reviewed 2023 |



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|------------------------|---|--|-----------|--|
| Return to Work Process | Every employer, other than an employer that is a small organization, (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 (b) shall document the process (2) The return to work process shall, (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 (b) use individual documented accommodation plans, as described in section 28, as part of the process. (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. | Noble will 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. Noble will document the process. The return to work process will outline the steps Noble will take to facilitate the return to work of employees who were absent because their disability required them to be away from work and will use individual documented accommodation plans as part of the process. We work with CanadaLife to develop a return to work plan. | Completed | January 1, 2016 Reviewed 2023 |



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| Performance Management | (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 | Noble 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. For the purpose of this policy, "performance management" means activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success. | Will be completed by January 1, 2016 | January 1, 2016 Reviewed 2023 |
| Career Development & Advancement | (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. | When providing career development and advancement, Noble will take into account the accessibility needs of employees with disabilities as well as any individual accommodation plans. | Will be completed by January 1, 2016 | January 1, 2016 Reviewed 2023 |
| Redeployment | (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. | Noble will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities. | Will be completed by January 1, 2016 | January 1, 2016 Reviewed 2023 |