

Updated: December 21, 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
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
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



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	<ul> <li>(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.</li> <li>(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.</li> </ul>	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
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
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
	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
Documented Individual Accommodation Plans	<ol> <li>(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</li> <li>(2) The process for the development of documented individual accommodation plans shall include the following elements:</li> <li>1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</li> <li>2. The means by which the employee is assessed on an individual basis.</li> <li>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.</li> </ol>	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
Documented Individual Accommodation Plans	<ul> <li>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.</li> <li>5. The steps taken to protect the privacy of the employee's personal information.</li> <li>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</li> <li>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</li> <li>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</li> </ul>	<ul> <li>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</li> <li>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</li> <li>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</li> </ul>	Completed	January 1, 2016 Reviewed 2023



Initiative	Requirement	Action	Status	Compliance Date
Return to Work Process	<ol> <li>Every employer, other than an employer that is a small organization,</li> <li>(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</li> <li>(b) shall document the process</li> <li>(2) The return to work process shall,</li> <li>(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</li> <li>(b) use individual documented accommodation plans, as described in section 28, as part of the process.</li> <li>(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.</li> </ol>	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



Initiative	Requirement	Action	Status	Compliance Date
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



Branch	1. To guarantee compliance with On-going Ongoing
Construction	AODA, all newly constructed
	branches will be designed to
	adhere to accessibility standards,
	promoting inclusivity for all
	individuals.
	2. All future renovations will be
	executed to align with AODA
	requirements, prioritizing
	accessibility for all Noble
	teammates and stakeholders
	3. Ensure both teammates and public
	have access to suitable
	accommodations to address any
	potential future disabilities or
	limitations