



A HOLLYFRONTIER BUSINESS

Petro Canada Lubricants Inc. A HollyFrontier Business

Multi-Year Accessibility Plan and Policies

Introduction

Petro-Canada Lubricants Inc. (PCLI), a HollyFrontier business, is committed to being responsive to the needs of every individual who works in or visits our facilities and those who use Petro-Canada-Lubricants branded products and services.

We recognize the diverse needs of Ontarians and respond by striving to provide services, opportunities and facilities that are accessible. The following Accessibility Policy for PCLI promotes accessibility through the development of policies, procedures and practices that address dignity, integration, independence and equal opportunity.

The multi-year Accessibility Plan was prepared to meet the obligations of the Ontarians with Disabilities Act, 2001 (ODA) and the Accessibility for Ontarians with Disabilities Act, 2005 (AODA). This Plan describes the actions PCLI must take to meet provincial targets and demonstrates the activities we will take from 2014-2021 in order to identify, remove and prevent barriers for persons with disabilities.

The multi-year Plan emphasizes requirements under the AODA, including standards in the following areas:

- Customer Service
- Employment
- Information and Communications
- Transportation

Companies must implement the Built Environment Standard through revisions to the Ontario Building Code. New build sites and sites undergoing major renovations will comply with the standards in place at the time of construction.

The Customer Service Standard came into effect in 2008. The Integrated Accessibility Regulation (IAR) combined other standards under this regulation in 2011.

The Transportation Standard and some elements of the other standards are not applicable to PCLI operations in Ontario.

PCLI's policies, procedures and practices largely align with the requirements of the AODA and compliance in many instances is already in place.

Compliance Plan

Customer Service Standard	
Customer service standard training provided to PCLI staff	Complete
Develop plan for ongoing training	Complete
Employment Standard	
Provide individualized emergency response information to employees with disabilities	Complete; addressed through employee education & PCLI's Leave and Disability Policy
Information & Communication Standard	
Emergency Information	PCLI offices and manufacturing facilities do not provide public emergency information as described under the standard.
January 1, 2014	
Accessibility Policies	Complete. An accessibility policy is in place for PCLI
Multi-Year Accessibility Plans	Complete, this document. The plan will be reviewed on a 5-year basis.
Year-End Reports	An annual review process is in place.
Accessible web sites and web content	Current websites will be compliant with WCAG 2.0 Level A or better. Future web content will be developed to WCAG 2.0 Level AA or better.
January 1, 2015	
Training	Initial training for Ontario employees was conducted in 2014. For new employees, the training is built into the new employee orientation process.
Customer/Client Feedback: provided in accessible format upon request	Process is in place
January 1, 2016	
Accessible formats and communications support	Process is in place
Recruitment	Complete, and communicated to all Human Resources employees who work these processes.
Information to Employees (Policies and provisions for job accommodation)	Complete, and communicated to all Human Resources employees who work these processes.
Process to Accommodate Employees	Complete, compliant per existing PCLI Leave and Disability Policy
Return to Work Process	Complete, compliant per existing PCLI Leave and Disability Policy

Performance Management, Career Development/Advancement & Redeployment	Complete, and communicated to all Human Resources employees who work these processes.
January 1, 2021	
Accessible web sites & content	Web content being developed to WCAG 2.0 Level AA or better.

Accessible Customer Service Policy

Purpose

The goal of the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”) is to create a more accessible Ontario by identifying, and to the extent possible, preventing and eliminating barriers experienced by persons with disabilities. There are five standards set out under the AODA, all of which will be implemented by the year 2025. These standards include customer service, transportation, information and communications, built environment and employment.

The first of the above standards being implemented is the Customer Service Standard (the “CSS”). The purpose of the CSS is to make sure that goods and services are provided in a manner that respects the dignity and independence of persons with disabilities and that persons with disabilities are given an equal opportunity to obtain, use and benefit from the goods and services.

PCLI (the “Company”) is committed to providing an equal opportunity to all of our customers. The objective of this policy is to certify that we meet the requirements of CSS and promote its underlying core principles.

Scope

All employees, contract workers, consultants and agents, who work on behalf of the Company and deal with members of the public or other third parties, are expected to conduct themselves in accordance with this policy.

Definitions

- **Assistive Device:** any device used to assist a person in performing a particular task(s) or to aid that person in activities of daily living. This can include a wheelchair, screen reader, listening device or cane.
- **Disability:** the term disability as defined by the AODA and *Ontario Human Rights Code* refers to:
 - Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of coordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal, or on a wheelchair or other remedial appliance or device;
 - A condition of mental impairment or developmental disability;
 - A learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;

- A mental disorder; or
- An injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.
- **Guide Dog:** is a highly trained working dog that has been trained at one of the facilities listed in *Ontario Regulation 58* under the *Blind Persons' Rights Act, 1990* to provide mobility, safety and increased independence for people who are blind.
- **Service Animal:** an animal is a "service animal" for a person with a disability if:
 - It is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
 - The person provides documentation from a regulated health care professional confirming that the person requires the animal for reasons relating to the disability.
- **Support Person:** an individual hired or chosen by a person with a disability to provide services or assistance with communication, mobility, personal care, medical needs or with access to goods or services. Medical needs may include, but are not limited to, monitoring an individual's health or providing medical support by being available in the event of a seizure.

Core Principles

The Company will make every effort to confirm that this policy and related practices and procedures are consistent with the following four core principles:

- **Dignity:** persons with disabilities must be treated as valued customers as deserving of service as any other customer.
- **Equality of Opportunity:** persons with disabilities should be given an equal opportunity to obtain, use and benefit from the Company's goods and services.
- **Integration:** wherever possible, persons with disabilities should benefit from the Company's goods and services in the same place and in the same or in a similar manner as any other customer. In circumstances where integration does not serve the needs of persons with disabilities, goods and services will, to the extent possible, be provided in another way that takes into account the person's individual needs.
- **Independence:** goods and services must be provided in a way that respects the independence of persons with disabilities. To this end, the Company will always be willing to assist persons with disabilities but will not do so without express permission.

Providing Goods & Services to Persons with Disabilities

- **Communication** - the Company strives to communicate with persons with disabilities in a manner that takes into account the person's disability. Communication strategies are set out in the Company's Guide to Providing Accessible Service.
- **Assistive Devices** - persons with disabilities are permitted to use their own assistive devices when on Company premises for the purposes of obtaining, using or benefiting from the Company's goods and services.

If there is a physical, technological or other type of barrier that prevents the use of an assistive device on Company premises, the Company will make its best effort to remove that barrier. If the Company is not able to remove the barrier, we will ask the individual with the disability how he/she can be accommodated, what alternative measures would enable equal access to the Company's goods and services and the Company will make its best effort to provide the individual with alternative means of assistance.

Employees receive training on the various types' assistive devices that may be used by persons with disabilities while accessing the Company's goods and services.

- **Guide Dogs and Service Animals** - persons with disabilities that are accompanied by a guide dog or service animal will be allowed to access Company premises that are open to the public and keep the animal with him or her unless otherwise excluded by law. If a service animal must be excluded from the premises, the Company will provide the individual with the reasons for the exclusion and explore alternative ways to meet the individual's needs.

If it is not readily apparent that the animal is a service animal, the Company may request documentation from a regulated health care professional confirming that the person requires the animal for reasons relating to his/her disability.

Employees receive training on how to interact with persons with disabilities accompanied by a guide dog or service animal.

- **Support Persons** - persons with disabilities may enter premises owned and/or operated by the Company with a support person and have unobstructed access to the support person while on the premises.

The Company may require persons with disabilities to be accompanied by a support person where it is necessary to protect the health or safety of the person with a disability or the health and safety of others on the premises.

Employees receive training on how to interact with persons with disabilities who are accompanied by a support person.

- **Notice of Temporary Disruption** - the Company will notify customers if there is a planned or unexpected disruption of facilities or services typically used by persons with disabilities in order to access the Company's goods and services. The notice will be posted at the entrance of the affected premises or such other place as is deemed reasonable.

The notice will include the following information:

- The facility or service that is unavailable;
- The anticipated duration of the disruption;
- The reason for the disruption; and
- Alternative facilities or services, if available.

Training & Records

The Company provides training as required under the AODA, to all persons to whom this policy applies as well as to the individuals charged with developing this policy and related procedures and practices.

Training includes:

- A review of the purpose of the AODA and requirements of the CSS;
- How to interact and communicate with persons with various types of both visible and non-visible disabilities;
- How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog, service animal or support person.
- How to use equipment and/or devices made available on Company premises to assist persons with disabilities with obtaining, using or benefiting from Company goods and services.
- What to do if a person with a disability is having difficulty accessing Company premises and/or goods and services.

The training will be provided to all employees to whom this policy applies as soon as practicable after he or she is assigned the applicable duties and training will be provided on an ongoing basis in accordance with changes to this policy and its related practices and procedures.

Documenting Training

Records of the training provided, including the training protocol, the dates on which the training is provided and the number of individuals who attended the training are maintained in accordance the requirements of the AODA.

Feedback Procedure

The Company welcomes and appreciates feedback regarding this policy and its implementation. Feedback can be provided in the following ways:

- Be telephone at **905-491-0301**
- In writing to **Human Resource | 2310 Lakeshore Rd West, Mississauga, Ontario, L5J 1K2**

Once Human Resources receives the feedback, the team will identify the appropriate internal contact and make sure that the complaint is responded to in a timely manner.

Documentation to be Made Available

This policy is available to any member of the public upon request.

Format of Documents

Upon request, the Company will provide documents, or the information contained in documents, required under the CSS, to persons with disabilities in a format that takes into account the person's disability.