AODA Policy 2025

Intent

National Engineered Fasteners Inc. ("NEF" or "the Company") is committed to meeting its obligations under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and ensuring equal access and participation for people with disabilities. This policy outlines our commitment to identifying, removing, and preventing barriers to accessibility and ensuring dignity, independence, integration, and equal opportunity for all individuals.

Scope

This policy applies to all employees, management, contractors, volunteers, and any individuals who interact with the public or third parties on behalf of NEF.

Commitment to Accessibility

NEF is committed to:

- Providing goods, services, and employment opportunities in a way that respects the dignity and independence of people with disabilities.
- Allowing people with disabilities to fully benefit from and participate in all aspects of our business.
- Meeting the requirements of applicable accessibility standards under the AODA.

NEF expects all employees to respect their team members' personal relationships and will not tolerate any hostility, retaliation or harassment, gossip or unwelcome comments. Should you experience or witness any of these behaviors, please report it to HR.

Accessibility Standards

Customer Service Standard

NEF will:

- Communicate with individuals with disabilities in a manner that considers their needs.
- Allow assistive devices, service animals, and support persons on our premises where permitted by law.
- Provide notice of temporary disruptions to facilities or services used by people with disabilities.
- Ensure employees receive AODA Customer Service training.

Information & Communications Standard

NEF will:

- Upon request, provide or arrange for accessible formats and communication supports for people with disabilities.
- Ensure that publicly available information is made accessible in a timely manner.
- Make our website and web content compliant with WCAG 2.0 Level AA standards, as required by law.

Employment Standard

NEF will incorporate accessibility across the employment life cycle, including:

- Recruitment and selection
- Workplace accommodation processes
- Return-to-work and disability management
- Performance management, development, and career advancement
- Emergency response planning for employees with disabilities

NEF will notify employees and the public that accommodations are available throughout the hiring process upon request.

Assistive Devices, Service Animals & Support Persons

- Individuals with disabilities may use assistive devices to access our services.
- Service animals are permitted unless excluded by law; alternative arrangements will be offered when required.
- Support persons may accompany a person with a disability, and NEF will communicate with the individual directly unless otherwise directed.

Training

NEF will provide training to:

- All employees, leaders, volunteers, and contractors
- All individuals involved in developing organizational policies
- All individuals who provide goods, services, or facilities on behalf of NEF

Training will include:

- Accessibility requirements under the AODA
- Human Rights Code obligations relating to disabilities

- NEF’s accessibility policies and procedures

Training will be delivered during onboarding and refreshed as policies change.

Feedback Process

NEF welcomes feedback about how we provide accessible services.
Feedback may be submitted in person, by phone, email, or in an accessible format upon request.

Employees may submit feedback to:

Human Resources Manager

Email: mmobarak@nationalengfasteners.com

Phone: 519-886-0919 Ext. 204

Responses will be provided in a timely manner and in an accessible format upon request.

Temporary Disruptions

NEF will provide notice in the event of a planned or unexpected disruption to services or facilities used by people with disabilities. Notices will include:

- Reason for the disruption
- Expected duration
- Alternative facilities or services available

Notices will be posted at relevant locations and communicated internally.

Accessibility Plan

NEF will maintain a multi-year accessibility plan outlining our strategy to meet accessibility standards and remove barriers.

- The plan will be reviewed and updated at least once every five (5) years.
- The plan will be made available to the public in an accessible format upon request.

Policy Review

This policy will be reviewed regularly and updated as required to ensure ongoing compliance with the AODA and its regulations.

Approval

General Manager

National Engineered Fasteners Inc.

Date: November 21, 2025