

CUSTOMER SERVICE POLICY & ACCESSIBILITY FOR ONTARIANS WITH DISABILITY ACT (AODA) PROVIDING GOODS AND SERVICES TO INDIVIDUALS WITH DISABILITIES

The Company is committed to providing high quality service to all of its customers and clients, including customers and clients with disabilities. It is the Company's objective to provide customer service in a manner that respects the dignity and independence of individuals with disabilities. This means that the Company will take steps to ensure that its goods and services are provided in an accessible manner and, to the fullest extent possible, allow individuals with disabilities to access goods and services in the same way as all other customers and clients.

1. Communicating with Individuals with Disabilities

The Company understands that how we communicate to our clients and customers is key to our business. The Company is committed to communicating with individuals with disabilities in a manner that takes into account their disabilities, and we will train our staff who communicate with customers and clients accordingly. See Appendix A for some tips regarding how to communicate with individuals with particular disabilities.

We recognize that disabilities and any accommodations required by individuals with disabilities are not always obvious or apparent. The Company is committed to being guided by the principles of respect, dignity and independence in interacting with all individuals, including individuals with disabilities.

Our commitment to communicating effectively with individuals with disabilities applies to all aspects of our communications with clients and customers (and potential clients and customers), including face to face interactions, telephone and electronic communications, and written documents, including without limitation, presentations, contracts and billings.

2. Assistive Devices, Service Animals and Support Persons

The Company is committed to welcoming individuals with disabilities into our premises and ensuring that they can access our goods and services. Individuals who use assistive devices will be able to obtain, use and benefit from our goods and services. To the greatest extent possible, we will ensure that our staff are familiar with various assistive devices that may be used by customers and clients to access our services. If the Company maintains assistive devices that may be used by customers and clients, we will ensure our staff is trained with respect to their use. See Appendix B for some examples of assistive devices commonly used by individuals with particular disabilities.

Subject to applicable laws, individuals with disabilities who are required to be accompanied by a service animal on the parts of our premises open to the public and other third parties will be permitted to do so. It is the responsibility of the person with a service animal to control the animal at all times. In the event that an employee of the Company or a visitor at the Company is allergic

to animals, arrangements will be made to accommodate those affected. The Company is similarly committed to welcoming individuals with disabilities who are accompanied by a support person and may have access to that individual at all times while on our premises. See Appendix C for some examples of how service animals and support persons may assist individuals with particular disabilities. In appropriate circumstances, the consent from an individual with a disability or a confidentiality agreement may be required when communicating private issues or confidential information in the presence of a support person.

3. Notice of Temporary Disruptions

The Company will provide customers and clients with notice in the event of a planned or unexpected disruption of the facilities or services usually used by individuals with disabilities in accessing the Company's premises or goods and services. Our building will also provide notifications and communications regarding disruption of building facilities and services. The notice will include information regarding the reason for the disruption, its anticipated duration, and a description of any alternative facilities or services for use, if available. The notice will be brought to the attention of individuals with disabilities in a manner reasonable in the circumstances, for example, by posting the notice in the Company's premises. In order to make information accessible, the signs and printed notices will be clearly laid out in sufficient size and easily readable. In case of emergency, the Company may not be able to give adequate notice of disruption.

4. Feedback Process

The overall objective of the Company is to meet and surpass customer and client expectations in all respects, including our service to individuals with disabilities. Comments regarding how well those expectations are being met are vital, welcome and appreciated. We recognize that feedback can make the Company's customer service better.

Feedback regarding the way the Company provides goods and services to customers and clients (and potential customers and clients) with disabilities can be made verbally, by email, by letter or otherwise to your supervisor or department head for consideration. Complaints and other feedback requiring a response will be addressed promptly and in accordance with our regular procedures for handling such issues.

5. Training of Staff

The Company will ensure that employees, volunteers and others who deal with the public or other third parties on its behalf, and all those who are involved in the development and approval of customer services policies, practices and procedures, receive training in compliance with applicable laws, including the *Ontario Accessibility for Ontarians with Disabilities Act, 2005* ("AODA"). Training will also be provided to new employees as part of orientation training, and on a continued basis as required. A record of all training will be kept on file with Talent Development.

The Company is committed to reviewing its policies and benefits on an ongoing basis. Accordingly, the policies and benefits outlined are subject to review and change by the Company at any time with reasonable notice.

Training will include, at minimum, the elements set out below.

- An explanation of the purposes of AODA and the customer service standards enacted under AODA.
- Requirements of the Customer Service Standard, and the Company's accessible Customer Service policy.
- Information regarding how to interact and communicate with individuals with various types of disabilities.
- Information regarding how to interact and communicate with individuals who use an assistive device or require the assistance of a service animal or a support person.
- Information regarding how to use any assistive device or other equipment or material available at the Company that may help with the provision of goods and services to individuals with disabilities.
- Instruction on what to do if an individual with a disability is having difficulty accessing the Company's goods or services.
- Information regarding the Company's policies, practices and procedures relating to customer service for individuals with disabilities, including this policy.

6. Modification of Policy and Questions

All of our other customer service-related policies and practices will be applied with reference to this policy regarding the provision of goods and services to individuals with disabilities. This policy will be updated from time to time to ensure compliance with applicable laws and the Company's objective of providing high quality service to customers and clients with disabilities. Should you have any questions regarding this policy, please contact your supervisor or department head. This policy will be available in accessible formats if requested.

APPENDIX A

Tips on Communicating with Persons with Disabilities

Vision Loss: Vision loss reduces a person's ability to see clearly. It does not necessarily mean the person is blind.

- Don't assume person can't see you
- Don't touch the person without asking permission
- Offer your elbow
- Identify landmarks or other details for the person
- Do not touch or speak to service animals
- Do not leave the person in the middle of a room
- If you need to leave the person, let them know
- Identify yourself when you approach the person
- Be clear and precise when giving directions. (e.g. two steps behind you, a meter to your left etc.)
- If you are uncertain about how to provide directions, ask them how to do so
- Offer to read or summarize printed information for them

Deaf, Deafened, Oral Deaf or Hard of Hearing:

Deaf: Profound hearing loss, with little or no hearing.

Deafened: Slowly lost hearing or suddenly in adulthood.

Oral Deaf: Born deaf and became deaf before learning to speak.

Hard of hearing: May use residual hearing (hearing that remains) and speech to communicate.

- Attract customer's attention before speaking. (e.g. A friendly wave or make eye contact)
- Ask "How May I Help?"
- Move to a well-lit area, if needed
- Do not put your hands in front of your face when speaking
- Ask if another method of communication would be easier. (e.g. using pen and paper)
- Be patient
- Look and speak directly to the person
- Be clear/precise when giving instructions. Confirm person understands
- Do not assume the person knows sign language or reads lips

Deaf/blind: Person can neither hear/see to a degree.

- Don't assume what a person can or cannot do
- Identify yourself to intervener, but speak directly to your customer
- Don't touch or address service animals—they are working
- Don't suddenly touch the customer or touch them without permission
- The customer is likely to explain to you how to communicate with them (e.g. give you an assistance card, or note)

Physical Disability: Acquired or congenital physical and/or motor impairment

- Speak naturally and directly to the customer
- If you're having a lengthy conversation with someone in a wheelchair, consider sitting to be eye level
- Ask before you help
- Respect the person's personal space
- Always extend your hand when greeting the individual
- If you have permission to move a person in a wheelchair, remember:
 - Wait for and follow the person's instructions
 - Confirm that your customer is ready to move
 - Describe what you are doing before you do it
 - Avoid uneven grounds
 - Don't leave the person in awkward, dangerous or undignified positions (i.e. Facing a wall)

Intellectual/developmental disability: Significant limitations in both intellectual functioning and in adaptive behavior, which covers many everyday social and practical skills.

- Don't assume what a person can or cannot do
- Use plain language and speak in short sentences
- To confirm if a person understands what you have said, consider asking the person to repeat the message back to you
- If you cannot understand what is being said, simply ask again
- Provide one piece of information at a time
- Be supportive and patient
- Speak directly to your customer, not to their companion or support person

Learning disability: Mildly or profoundly limits the person's ability to learn, communicate, socialize and take care of their everyday needs.

- When you know someone with a learning disability needs help, ask how you can help
- Speak naturally, clearly, and directly to the person
- Allow extra time if necessary – people may take a little longer to understand and respond
- Remember to communicate in a way that takes into account the person's disability
- Be patient and be willing to explain something again, if needed

Mental Health disability: Disorders that affect your mood, thinking and behavior.

- Treat a person with mental health disability with the same respect and consideration you have for everyone else
- Be patient
- Be confident and reassuring

- If someone appears to be in a crisis, ask them to tell you the best way to help

Speech/Language disability:

Speech: Unable or has difficulty producing sounds correctly or fluently or problems with their voice.

Language: Trouble understanding others or expressing feelings.

- Don't assume that if a person has one disability, they also have another
- Ask the person to repeat information if you don't understand
- Ask questions that can be answered "yes" or "no" if possible
- Try to allow enough time to communicate with your customers as they may speak more slowly
- Don't interrupt or finish your customer's sentences. Wait for them to finish

Tips for communicating over the phone:

- Speak naturally, clearly and directly
- Don't worry about how the person's voice sounds – concentrate on what they are saying
- Don't interrupt or finish your customer's sentences
- If you don't understand, simply ask again
- If a telephone customer is using an interpreter or Relay Service, speak naturally to the customer, not the interpreter
- If you encounter a situation where, after numerous attempts, you and your customer cannot communicate with each other, consider making alternate arrangements

APPENDIX B

Assistive Devices

What is an assistive device: A tool, technology or other mechanism that enables a person with a disability to do everyday tasks.

Commonly used assistive devices

1. For Vision Loss

- Digital Audio player
- Magnifier
- Portable global positioning system (GPS)
- White cane

2. For Deaf/deafened/oral deaf/ hard of hearing

- FM transmitter system or other amplification devices
- Hearing aid
- Teletypewriter (TTY)

3. For Physical disabilities

- Mobility Device (ex) Wheelchair/scooter/walker/cane/crutches)
- Personal oxygen tank

4. For learning disabilities

- Electronic notebook or laptop computer
- Personal data manager
- Mini pocket recorders

5. For intellectual/developmental disabilities

- Communication boards
- Speech generating devices

APPENDIX C***Service Animals:***

Service Animal	Key Tasks	Users
Guide dog or seeing eye dog	<ul style="list-style-type: none"> - Follows directions of owner - Alerts owner to changes to obstacles 	People with vision loss
Sound alert or hearing alert dog/cat/animal	<ul style="list-style-type: none"> - Alerts owner to sounds often by a nudge or pawing and leads them to source of the sound - May use special signal to alert owner to fire alarm 	People who are deaf, or deaf, deafened or hard of hearing
Autism assistance or service dog	<ul style="list-style-type: none"> - Keeps a person away from danger - Provides assistance when sensory stimulus is heightened - A dog is often attached to child's waist by belt and leash is held by adult 	People with autism or other developmental/intellectual disabilities
Psychiatric service dog or special skills animal (i.e. A ferret or miniature horse)	<ul style="list-style-type: none"> - Retrieves and prompts person to take medicine - Retrieves or activates medical alert - Leads person out of crowds - Assist persons with anxiety disorders 	People with mental health disabilities
Mobility dog or special skills animal (i.e. A monkey)	<ul style="list-style-type: none"> - May pull wheelchairs, carry objects, pull items, turn handles or push buttons - Large dogs may provide balance support 	People with physical disabilities
Seizure alert dog	<ul style="list-style-type: none"> - Steers owner from danger during a seizure - Activates medical alert - Can alert owner to an oncoming seizure 	People who have epilepsy or other seizure disorders

Support Persons:

Disability	Support Person's Functions
Deaf blind	- Provide transportation & adaptive communication (i.e. Sign language, large print notes)
Deaf, Deafened, oral deaf	- Provide sign language or oral interpretation services - Translate conversation, not participate in it
Learning Disability	- Help with complex communication or note-taking
Intellectual / Developmental	- Help with travel, daily activities, complex tasks or keep them from dangerous situations
Mental Health	- Help with communication tasks - Help in crowds, noisy settings or high stress situations (i.e. Interviews)
Physical Disability	- Provide services related to traveling, personal care, medical monitoring
Seizure disorder	- Assist in the event of a seizure
Speech or Language	- To relay or interpret a person's communication
Vision Loss	- To read or to guide