



Accessible Customer Service Policy

1. Background

The *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) was created with the goal of developing standards that would improve accessibility for people with disabilities across the province of Ontario. The Customer Service Standards, adopted under the Integrated Accessibility Standards (“IASR”), were established under the AODA to ensure goods, services and facilities are, where possible, equally accessible to every member of the public.

2. Policy Statement

Open Farm Inc. (the “Company”) strives to provide an accessible customer service experience. The Company is committed to ensuring its customer service practices respect the dignity and independence of persons with a Disability. The Company also strives to ensure a person with a Disability is able to access the Company’s goods, services and facilities and receive the same benefit from those goods, services and facilities as any other member of the public.

The objective of this policy (the “Policy”) is to identify and document how the Company seeks to achieve compliance with the requirements of the Customer Service Standards and how it will continue to work towards improving accessibility in customer service for persons with a Disability.

3. Policy Application

This Policy applies to the Company’s operations in Ontario including to:

- i. every employee of or volunteer with the Company;
- ii. every person who deals with customers/clients or other third parties on behalf of the Company whether they do so as employees, volunteers, agents or otherwise; and
- iii. every person who participates in developing the Company's policies.

The Policy applies to the Company’s office location in Ontario.

Sections of the Policy that address the use of Service Animals and Support Persons apply only at premises or facilities owned or operated by the Company.

4. Guiding Principles



This policy applies to the provision of goods, services and facilities, not the goods themselves.

As part of the Company's commitment to providing service excellence, the Company will strive to ensure that its policies pertaining to the provision of goods, services and facilities to customers/clients with disabilities are consistent with the following guiding principles.

- Provide goods, services and facilities in a manner that respects the principles of dignity and independence of customers/clients with disabilities.
- Provide opportunities to persons with disabilities equal to that offered to other customers/clients to obtain and use our goods, services and facilities.
- Allow persons with disabilities to benefit from the same services in the same place and in a similar way as other customers/clients (in other words equality of outcome).
- Strive to ensure goods, services and facilities provided to persons with disabilities are integrated with those provided to others unless an alternate measure is necessary to allow a person with a Disability to benefit from the goods, services or facilities. The alternate measure may be temporary or permanent.
- Communicate with a person with a Disability in a manner that takes the person's Disability into account. Information about a Disability is personal and private and confidentiality will be respected.

5. Definitions

Accessible Format - May include, but is not limited to, large print, recorded audio and electronic format, braille and any other format usable by a person with a Disability.

Assistive Device - Any device used to assist a person in performing a particular task or tasks or to aid the person in an activity of daily living.

Barrier - means anything that prevents a person with a Disability from fully participating in all aspects of society because of his or her Disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice.

Communication Support - May include, but is not limited to, captioning, alternative and an augmentative communication support, plain language, sign language and any other support that facilitates effective communication.

Disability – means:

- (a) 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 physical co-ordination, 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,

- (b) a condition of mental impairment or a developmental Disability,
- (c) a learning Disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- (d) a mental disorder, or
- (e) 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 - A guide dog as defined in section 1 of the *Blind Persons Rights' Act* is a dog trained as a guide for a person who is blind and having qualifications prescribed by the regulations under the *Blind Persons' Rights Act*.

Service Animal – means an animal:

- (a) That can be readily identified as one that is being used by the person for reasons relating to the person's Disability, as a result of visual indicators such as the vest or harness worn by the animal.
- (b) For which the person provides documentation from a member of the following regulated health professionals confirming the person requires the animal for reasons relating to the Disability:
 - i. College of Audiologists and Speech-Language Pathologists of Ontario.
 - ii. College of Chiropractors of Ontario.
 - iii. College of Nurses of Ontario.
 - iv. College of Occupational Therapists of Ontario.
 - v. College of Optometrists of Ontario.
 - vi. College of Physicians and Surgeons of Ontario.
 - vii. College of Physiotherapists of Ontario.
 - viii. College of Psychologists of Ontario.
 - ix. College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

Support Person – means, in relation to a person with a Disability, another person who accompanies him or her in order to help with communication, mobility, personal care or medical needs or with access to goods, services or facilities.

6. Providing Goods and Services to Persons with Disabilities Processes and Procedures



The Company is committed to serving all customers/clients including people with disabilities by removing Barriers that might arise in the course of doing business as follows:

a) Communication - We will communicate with people with various types of disabilities in ways that take into account their Disability. This means that we will communicate in a manner that enables persons with disabilities to communicate effectively for the purposes of using, receiving and requesting the Company's goods, services and facilities. We will ensure training is provided to our staff, volunteers, agents/contractors and any other individuals who interact with customers/clients or other third parties on behalf of the Company in accordance with section 9 of this Policy.

b) Telephone Services – We are committed to providing fully accessible telephone services. We will offer to communicate with customers/clients using the relay service or by email if telephone communication is not suitable for their needs or is not available. We will ensure training is provided to our staff, volunteers, agents/contractors and any other individuals who interact with customers/clients or other third parties on behalf of the Company to communicate over the telephone in clear and plain language and to speak clearly and slowly where required.

c) Assistive Devices

A person with a Disability may, where possible, use their own Assistive Devices in order to access goods, services and facilities provided by the Company. The Company will ensure that staff at our physical location (our office) is aware of and trained on the use of any assistive devices available at the applicable location.

7. Use of Support Persons and Service Animals

a) Support Persons

A person with a Disability is permitted to be accompanied by their Support Person on premises owned or operated by the Company and to have access to their Support Person at all times while on the Company's premises.

The Company may require a person with a Disability to be accompanied by a Support Person when on the premises, but only if, after consulting with the person with a Disability and considering the available evidence, the Company determines:

- i. A Support Person is necessary to protect the health or safety of the person with a Disability or the health or safety of others on the premises; and
- ii. There is no other reasonable way to protect the health or safety of the person with a Disability and the health or safety of others on the premises.



7b) Service Animals

A person with a Disability is permitted to enter a premise owned and/or operated by the Company accompanied by their Guide Dog or Service Animal and keep that animal with them, unless the Guide Dog or Service Animal is otherwise excluded by law.

In the event that a Guide Dog or Service Animal is excluded from the premises by law, the Company will make efforts to identify other measures that are available to enable the person with a Disability to obtain, use or benefit from the Company's goods, services or facilities.

Service Animals and Guide Dogs must be supervised by their owners and kept in control when used to access the Company's goods, services or facilities.

8. Service Disruptions

In the event of a planned service disruption to facilities or services that are relied upon by people with disabilities to access the Company's goods, services or facilities, notice of the disruption shall be provided in advance.

In the event of an unexpected disruption, notice will be provided as soon as possible.

Notice will include information about the reason for the disruption, its anticipated duration and a description of alternative facilities and services that may be available.

Notice may be given by posting the information in a conspicuous place at the applicable premises, posted on the Company's website or by such other method as is reasonable under the circumstances. The Company may also consult with the person with a disability and make reasonable efforts to provide the good or service in an alternative manner

9. Accessibility Awareness Training

The Company will ensure the following individuals receive the training required under the Customer Service Standards:

- i. Every person who is an employee of, or a volunteer with, the Company.
- ii. Every person who participates in developing the Company's policies.
- iii. Every other person who provides goods, services or facilities on behalf of the Company.

The content of the training will include:



- i. a review of the purposes of the AODA and the requirements of Customer Service Standards;
- ii. how to interact and communicate with people with various types of disabilities;
- iii. how to interact with people with disabilities who use an Assistive Device, Service Animal, Guide Dog or a Support Person;
- iv. how to use the equipment or Assistive Devices available on the Company's premises;
- v. what action to take if a person with a particular type of Disability is having difficulty accessing goods, services or facilities; and,
- vi. instruction on the Company's customer service policies governing the provision of goods, services and facilities to people with disabilities.

Training will be provided as soon as is practicable after each person is assigned the applicable duties. Training will also occur on an ongoing basis as changes are made to the policies dealing with the provision of goods, services and facilities to persons with disabilities and as may be required by applicable law.

The Company will keep records of the training required by this Policy including the number of individuals trained and the dates on which training occurred. The names of individuals who are trained will be recorded for administrative purposes.

10. Feedback Process

The Company is committed to providing exceptional customer service. We appreciate feedback from our customers/clients on all issues, especially related to the way we provide goods, services and/or facilities to people with disabilities. Feedback should be directed to the Vice-President, People and Culture by any of the means listed below.

Where the feedback requires the Company to take an action or where a complaint is received, the Company will take the necessary action in response to the feedback or complaint and will document the action taken. This documentation will be available upon request.

Email: Karen@openfarmpet.com

Phone: 647-280-8696

Write: Open Farm Inc.

170 Bedford Road, Suite 300

Toronto, Ontario M5R 2K9

Attention: Karen Sampogna

The Company will make information about this feedback procedure readily available to the public and shall make it accessible to a person with a Disability by providing, or arranging for the provision of Accessible Formats and Communication Supports, on request.



11. Availability of Documents

The Company will prepare one or more documents, describing the following, and provide them upon request to any person:

- i. The Company's policies governing the provision of goods, services and/or facilities to people with disabilities;
- ii. The Company's policies governing the use of Service Animals, Guide Dogs and Support Persons;
- iii. the steps the Company will take in connection with a temporary disruption of facilities or services usually used by people with disabilities;
- iv. the Company's policy on providing training on accessible customer service; and,
- v. The Company's process for receiving and responding to feedback on the provision of goods, services and/or facilities to people with disabilities.

The Company will provide the above documents to a person with a Disability in an Accessible Format or with a Communication Support, upon request.

Where a request is so made, the document(s) will be provided in a timely manner and in a manner that takes into account the person's accessibility needs due to Disability. The document will also be provided at a cost that is no more than the regular cost charged to other persons.

The Company will consult with the person making the request in determining the suitability of an Accessible Format or Communication Support.

Notification of the availability of the above documentation will be posted at a conspicuous place on the Company's premises, by posting it on the Company's website, or by such other method as is reasonable in the circumstances.

12. Reporting

The Company will meet the reporting requirements as identified in the IASR.

All full-time, part-time and contract employees, regardless of status, will be counted when determining the number of employees.

13. Performance Measurement

The Accessible Customer Service Policy will be reviewed and/or amended when additional accessibility related regulations are enacted by the Government of Ontario, or as required.

14. Questions/Compliments or Complaints



Anyone with a complaint, compliment, question or concern about the Policy, Training Materials or process may contact the Vice-President, People and Culture by any of the means listed in section 10 of the Policy.

Related Documents

- *Ontarians with Disabilities Act, 2001*
- *Accessibility for Ontarians with Disabilities Act, 2005*
- Ontario Regulation 191/11 – Integrated Accessibility Standards Regulation
- Ontario *Human Rights Code*



Open Farm Inc.

Integrated Accessibility Standards Regulation Policy

Purpose

The purpose of this Integrated Accessibility Standards Regulation Policy (the “Policy”) is to set out how Open Farm Inc. (the “Company”) achieves and will achieve accessibility through meeting the requirements of Ontario Regulation 191/11 - Integrated Accessibility Standards Regulation (the “IASR”).

The IASR establishes the accessibility standards and compliance timeframes for each of Information and Communications, Employment, Transportation and the Design of Public Spaces Standards, collectively referred to as (the “Standards”).

The requirements in the Standards are not a replacement or a substitution for the requirements established under the *Human Rights Code*.

This Policy is not intended to replace or supersede the Company’s Accessible Customer Service Policy.

This Policy will be reviewed and amended, as required, if and when additional accessibility related regulations are enacted by the Government of Ontario and if and when changes are made to the legislative framework governing accessibility.

This Policy is being made publicly available on the Company’s website and will be provided in an Accessible Format upon request.

Statement of Organizational Commitment

The Company is committed to meeting the objectives and requirements outlined in the IASR under the *Accessibility for Ontarians with Disabilities Act, 2005* (the “AODA”) and meeting the needs of people with disabilities, in a timely manner, through the implementation of the requirements of the AODA.

Application

This Policy applies to the Company’s operations in Ontario including to:

- i. every employee of or volunteer with the Company;
- ii. every person who deals with customers/clients or other third parties on behalf of the Company whether they do so as employees, volunteers, agents or otherwise; and
- iii. every person who participates in developing the Company’s policies.



The Policy applies to the Company's office location in Ontario.

Definitions

Accessible Format - May include, but is not limited to, large print, recorded audio and electronic format, braille and any other format usable by a person with a Disability.

Communication Support - May include, but is not limited to, captioning, alternative and an augmentative communication support, plain language, sign language and any other support that facilitates effective communication.

Disability – means:

- (a) 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 physical co-ordination, 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.
- (b) A condition of mental impairment or a developmental disability.
- (c) A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language.
- (d) A mental disorder.
- (e) An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

New Internet Website - means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.

Performance Management - means an activity related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.

Redeployment - means the reassignment of an employee to other department or job as an alternative to layoff, when a particular job or department has been eliminated.

Self-Service Kiosk – means an interactive electronic terminal, including a point-of-sale device, intended for public use that allows a user to access one or more services or products or both.



Unconvertible Information or Communication – means information or communication that it is not technically feasible to convert, or if it is technically feasible to convert, the technology required to do so is not readily available.

Policy

Part 1 General

1.1 Multi Year Accessibility Plan and Accessibility Reports

The Company shall establish, implement, maintain and document a Multi-Year Accessibility Plan by June 1, 2021. The Multi Year Accessibility Plan will outline the Company's strategy to prevent and remove barriers and meet the requirements under the IASR.

The Multi Year Accessibility Plan will be posted on the Company website and will be provided in an Accessible Format upon request.

The Multi Year Accessibility Plan will be reviewed and updated at least once every 5 years.

The Company shall file an accessibility report with the Province every 3 years or at such other times as may be specified. Accessibility reports shall be made publicly available.

1.2 Training

Open Farm Inc. will ensure training is provided to:

- a) Every person who is an employee of, or a volunteer with, the Company.
- b) Every person who participates in developing the Company's policies.
- c) Every other person who provides goods, services or facilities on behalf of the Company.

The training will include the requirements of the Standards and the Ontario *Human Rights Code* as it relates to persons with disabilities. Training will be provided as soon as practicable. Training will be provided in a manner that best suits the duties of employees, volunteers and other staff members. The Company will maintain a record of the dates training is provided and the number of individuals to whom it was provided.

1.3 Self-Service Kiosks

The Company will have regard to accessibility for persons with disabilities when designing, procuring or acquiring Self-Service Kiosks.

Part 2 Accessible Information and Communications Standards



2.1 Accessible Emergency Information

Emergency procedures, plans or public safety information, that is publicly available, shall be provided in an Accessible Format or with appropriate Communication Supports, as soon as practicable upon request.

2.2 Feedback Process

The Company has a process in place to receive and respond to customer feedback and will take steps to ensure those processes are accessible to persons with disabilities. The Company will provide or arrange for the provision of Accessible Formats and Communication Supports as soon as practicable upon request. Customers are notified regarding the availability of Accessible Formats and Communication Supports on the Company's website.

Nothing in this section detracts from the commitments and feedback procedure outlined in the Company's Accessible Customer Service Policy.

2.3 Accessible Formats and Communication Supports

The Company will upon request provide or arrange for the provision of Accessible Formats and Communication Supports to make its communications or information about its goods, services and/or facilities accessible to a person with a Disability. The Accessible Formats and/or Communication Supports shall be provided at a cost that is no more than the regular cost charged to other persons and shall be provided in a timely manner.

The Company will consult with the person making the request in determining the suitability of an Accessible Formats or Communication Support.

Customers are notified on the Company website about the availability of Accessible Formats and Communication Supports.

Note the IASR does not apply to product and product labels, Unconvertible Information and Communications and information that the Company does not control directly or indirectly through a contractual relationship. In the event the Company determines information or communication is Unconvertible, the Company will provide the person that requires the information an explanation as to why the information or communications are Unconvertible and will provide a summary of the Unconvertible Information or Communications.

2.4 Accessible Websites and Web Content

The Company will ensure, where practicable, any New Internet Website and web content on such site(s) conforms with WCAG 2.0 Level A.



By January 1, 2021, the Company shall ensure that where practicable, any Company website or content on that site(s) published after January 1, 2012 conforms with WCAG 2.0 Level AA with the exception of criteria 1.2.4 (captions) and 1.2.5 (pre-recorded audio descriptions).

Note that WCAG 2.0 requirements only apply to websites, web content and web-based applications that an organization can control either directly or through a contractual relationship and where meeting the requirements are technically feasible, including considering the availability of commercial software or tools or both.

Part 3 Accessible Employment Standards

The Accessible Employment Standards apply to all paid employees. The Company will inform employees of the policies and changes in policies used to support employees with disabilities throughout the employment life cycle.

3.1 Recruitment, Assessment, Selection

The Company will notify the public and employees that accommodation is available for applicants with disabilities in its recruitment processes on the website and on job postings.

The Company will inform internal and external 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.

If a selected applicant requests an accommodation, the Company will consult with the applicant and provide or arrange for the provision of a suitable accommodation, having regard for the applicant's accessibility needs.

When making an offer of employment, the Company will notify the successful applicant of the policies for accommodating employees with disabilities at the time of the offer and as soon as practicable after the new employee begins work (specifically, during orientation).

3.2 Informing Employees of Supports

The Company informs employees of policies used to support employees with disabilities including policies on the provision of job accommodation that take into an account the employee's accessibility needs.

The information will be provided to new employees as soon as practicable after they begin their employment.



Updated information will be provided to employees whenever there is a change to existing policies on the provision of job accommodations.

3.3 Accessible Formats and Communication Supports for Employees

When requested by an employee, the Company will provide or arrange for the provision of Accessible Formats and Communication Supports for information that is needed by the employee in order to perform his/her job and also for information generally available to employees in the workplace. The Company will consult with the employee making the request in determining the suitability of an Accessible Format or Communication Support.

3.4 Individualized Workplace Emergency Response Information

The Company will provide individualized workplace emergency response information to employees who have a Disability, if the Disability is such that individualized information is necessary and the Company is aware of the need for accommodation due to the Disability.

If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the Company will provide the workplace emergency response information to the person designated by the Company to provide assistance to the employee.

Individualized workplace emergency response information will be reviewed when an employee moves to a different location within the organization, when the employee's overall accommodation needs or plans are reviewed and when the Company reviews its general emergency response policies.

3.5 Documented individual accommodation plans

The Company has a written process for the development of an Individual Accommodation Plan (IAP) for employees with disabilities. In accordance with the IASR, the process includes:

- a) the manner in which an employee requesting accommodating can participate in the development of the individual accommodation plan;
- b) the means by which the employee is assessed on an individual basis;
- c) the manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved;



- d) the manner in which the employee can request the participation of a workplace representative in the development of the accommodation plan;
- e) the steps taken to protect the privacy of the employee's personal information;
- f) the frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done;
- g) if an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee;
- h) the means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to Disability.

Individual accommodation plans shall: if requested, include any information regarding Accessible Formats and Communication Supports provided; if required, include individualized workplace emergency response information; and identify any other accommodation that is to be provided.

3.6 Return to work

The Company has a written return to work process for employees who have been absent from work due to a Disability and require Disability-related accommodation to return to work. The return-to-work process:

- a) outlines the steps the Company 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) uses documented IAPs as described above.

3.7 Performance Management, Career Development, Advancement & Redeployment

The Company shall take into account the accessibility needs of employees with disabilities and IAPs in its Performance Management processes, when providing career development and advancement opportunities and when considering Redeployment of employees with disabilities.

Part 4 Design of Public Spaces Standards

4.1 Applicable Public Spaces

The Company will ensure any newly constructed or redeveloped public spaces meet the accessibility requirements of the Design of Public Spaces Standards.



The following are the public spaces owned or operated by the Company which are impacted by the accessibility requirements of the Design of Public Standards:

- a) Public Use Eating Areas
- b) Exterior Paths of Travel
- c) Off-Street Parking
- d) Obtaining Services including service counters, fixed queuing lines and waiting areas

4.2 Maintenance

The Company shall ensure that its Multi-Year Accessibility Plan includes:

- a) procedures for preventative and emergency maintenance of the accessible elements in public spaces; and
- b) procedures for dealing with temporary disruptions when accessible elements of public spaces are not in working order.

Questions

For questions about this policy contact the Vice-President, People and Culture by any of the means identified below:

Email: Karen@openfarmpet.com
Phone: 647-280-8696
Write: Open Farm Inc.
170 Bedford Avenue, Suite 300
Toronto, Ontario M5R 2K9

Attention: Karen Sampogna

Appendix

Related Documents

Ontarians with Disabilities Act, 2001

Accessibility for Ontarians with Disabilities, 2005

Ontario Regulation 191/11 – Integrated Accessibility Standards Regulation

Accessible Customer Service Policy

Ontario Human Rights Code



Open Farm Multi Year Accessibility Plan

Accessibility Standards - Statement of Commitment

Open Farm Inc. (the “Company”) is committed to meeting the objectives and requirements outlined in the Integrated Accessibility Standards Regulation (“IASR”) under the *Accessibility for Ontarians with Disabilities Act, 2005* (the “AODA”) and to meeting the accessibility needs of persons with disabilities in a timely manner, through the implementation of the requirements of the AODA.

Multi-Year Accessibility Plan - Development Process

An Accessibility Project Team reviewed the requirements of the IASR. An IASR Policy was drafted to address how the Company achieves or will achieve accessibility through meeting the IASR’s requirements. The Multi Year Accessibility Plan was developed in accordance with the IASR. It outlines a strategy to prevent and remove barriers and address the current and future requirements of the AODA.

Multi-Year Accessibility Plan – Review Process

This Multi-Year Accessibility Plan was reviewed in June 2021. This review included an assessment of the actions the Company is currently taking to comply with the AODA and the IASR and to improve accessibility for persons with disabilities. The review also included an assessment of ways the Company can improve its accessibility policies and procedures.

Application

The Policy applies to the Company’s office location in Ontario.

Definitions

The definitions used in the Company’s Accessible Customer Service Policy and Integrated Accessibility Standards Regulation Policy have the same meaning in this Multi-Year Accessibility Plan.



Multi-Year Accessibility Plan

Part IV.2 – Customer Service Standards

This section of the IASR requires the Company to:

- Develop, implement & maintain an accessibility policy governing the provisions of goods, services and facilities to persons with disabilities
- Have a policy on the use of Assistive Devices by persons with a Disability
- Permit persons with a Disability to be accompanied by a Support Person and/or Service Animal while accessing the Company’s goods, services and facilities
- Provide notice of temporary disruptions to facilities and services used by persons with a Disability to access the Company’s goods, services or facilities
- Ensure training is provided on the provision of accessible customer service
- Create a feedback procedure to receive and respond to feedback about the manner in which the Company provides goods, services and facilities to persons with a Disability
- Notify the public about the availability of documents required to be prepared under the Customer Service Standards and provide these documents in an Accessible Format or with Communication Supports upon request.

| Requirement | Action | Responsibility | Status |
|---|---|--|-----------------|
| <p>Accessibility Policies</p> <p>Policies aimed at providing accessible service must be developed. These policies must address the use of Assistive Devices by persons.</p> <p>Policies and procedures must be consistent with the following principles:</p> | <p>Policy has been completed.</p> <p>Policy is posted on the Company’s website.</p> | <p>Vice-President, People and Culture, Health & Safety</p> | <p>Complete</p> |



| | | | |
|---|--|---|-----------------------------|
| <p>1) Respect of dignity 2) Integration 3) Independence 4) Equal opportunity</p> <p>The Policy must be made available to the public upon request and a notification of its availability must be posted.</p> | | | |
| <p>Use of Service Animals and Support persons</p> <p>Develop a policy with respect to Guide Dogs, Service Animals and Support Persons that is consistent with the legislative requirements.</p> | <p>Policy has been completed.</p> <p>Policy is posted on the Company's website.</p> <p>Communicate compliance requirements at Corporate and Department level</p> <p>Include in Customer Service Policy Update in Employee Handbook</p> | <p>Vice-President, People and Culture, Health & Safety</p> | <p>Complete</p> |
| <p>Notice of Temporary Disruptions</p> <p>If there is a temporary disruption in services a person with a Disability is likely to use in order to access the organization's goods, facilities and services, the organization shall give notice to the public including:</p> | <p>Responsible employees have been trained on the obligation to provide this notification.</p> <p>Create a template notice document to be maintained by Office Manager</p> | <p>Vice-President, People and Culture, Health & Safety, Office Manager</p> <p>Corporate/Building Maintenance Services</p> | <p>Complete and ongoing</p> |



| | | | |
|--|---|--|-----------------------------|
| <ul style="list-style-type: none"> • Reason for disruption • Anticipated duration • Alternative facilities | | | |
| <p>Training</p> <p>All employees, volunteers, any person who participates in the development of the Company's policies or otherwise provides service on behalf of the Company must receive training required by the Customer Service Standards.</p> | <p>The Company utilizes the online training program provided by Access Forward and keeps records of this training through HRIS system</p> <p>HR monitors training roll-out and audit completion records</p> | <p>Vice President, People and Culture</p> | <p>Complete and ongoing</p> |
| <p>Feedback</p> <p>Establish a process for receiving and responding to feedback about the manner in which the organization provides goods, services and facilities to persons with disabilities.</p> <p>The feedback process must specify the actions the organization will take if a complaint is received about the manner in which it provides goods, services or facilities to persons with disabilities.</p> | <p>The Company has prepared this feedback process and it is posted on the Company's website</p> <p>HR will create and maintain a database of any and all feedback received</p> | <p>Vice-President, People and Culture, Health & Safety</p> | <p>Complete</p> |
| <p>Notice of Availability of Documents</p> | <p>This notice is provided in the</p> | <p>Vice-President, People and Culture</p> | <p>Complete and ongoing</p> |



| | | | |
|---|--|--|--|
| Documents required by Customer Service Standards must be available to the public upon request. This information must be posted at a conspicuous place in person or online | Company's policies posted on its website | | |
|---|--|--|--|

| | | | |
|--|--|------------------------------------|----------------------|
| <p>Format of Documents</p> <p>Documents required under the Customer Service Standards must be made available in an Accessible Format or with a Communication Support upon request. Accessible Formats and/or Communication Supports must be made available in a timely manner and at no greater cost than that which would ordinarily be charged.</p> | <p>Employees have been trained on the obligation to provide these documents and the obligation to provide Accessible Formats and/or Communication Supports upon request</p> <p>Company will respond to employees, customers and other stakeholders as required</p> | Vice-President, People and Culture | Complete and ongoing |
|--|--|------------------------------------|----------------------|

Part I - General

This section of the IASR requires the Company to:

- Develop & maintain an accessibility policy and a multi-year accessibility plan
- Self-service kiosks - consider accessibility features that best meet the needs of customers
- Ensure staff and volunteers are trained on the IASR and the Ontario *Human Rights Code*

| Requirement | Action | Responsibility | Status |
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| Accessibility Policies | An Integrated Accessibility Standards | Vice-President, People and Culture | Complete |



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| <p>Develop and implement Integrated Accessibility Standards Policy and include a statement of organizational commitment to meeting the needs of persons with disabilities in a timely manner.</p> <p>Make the Policy publicly available and provide in an Accessible Format, upon request.</p> <p>Review & update as required</p> | <p>Regulation Policy has been created and is posted on the Company's website</p> | | |
| <p>Develop a multi-year accessibility plan</p> <p>Establish, implement, maintain and document a Multi-Year Accessibility Plan.</p> <p>Post multi-year accessibility plan on website and provide in an Accessible Format, upon request.</p> <p>Review and update the plan at least once every five years.</p> | <p>A Multi-Year Accessibility Plan was created and is posted on the Company's website.</p> <p>The Multi-Year Accessibility Plan was reviewed and updated in 2021</p> | <p>Vice-President, People and Culture</p> | <p>Complete</p> <p>Plan to be reviewed and updated by Jan 1, 2024</p> |
| <p>Training</p> <p>Ensure that training is developed on the IASR and the <i>Human Rights Code</i> as it pertains to persons with disabilities and is provided to employees, volunteers,</p> | <p>The Company uses online training modules to complete the required training including the Access Forward training modules and the Ontario Human Rights Commission's</p> | <p>Vice-President, People and Culture</p> | <p>Complete and ongoing</p> |



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| <p>persons who participate in developing policies and others who provide goods, services or facilities on behalf of the Company.</p> <p>Ensure training is appropriate to individual's duties.</p> <p>Update training as required.</p> <p>Keep a record of the dates of training and the individuals who received the training.</p> | <p>training module on the <i>Human Rights Code</i>.</p> <p>The Company tracks and monitors training completion</p> | | |
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Part II - Information and Communications Standards

This section of the IASR includes requirements related to:

- Accessible feedback processes
- Accessible Formats and Communication Supports
- Publicly available emergency procedures, plans, public safety information
- Accessible websites and web content

| Requirement | Action | Responsibility | Status |
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| <p>Feedback processes</p> <p>Ensure that processes for receiving and responding to feedback are accessible by providing or arranging for the provisions of Accessible Formats and</p> | <p>The notification about the availability of Accessible Formats and Communication supports in respect of the Company's feedback procedures is included in the Company's policy which is posted on</p> | <p>Vice-President, People and Culture</p> | <p>Complete and ongoing</p> |



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| <p>Communication Supports, upon request.</p> <p>Notify the public that Accessible Formats and Communication supports are available in respect of its feedback procedures</p> | <p>its website and necessary employees have been trained on the obligations to provide Accessible Formats and Communication Supports upon request</p> | | |
| <p>Accessible formats and Communication Supports</p> <p>Upon request, provide or arrange for the provision of Accessible Formats and Communication Supports in order to make its communications or information about the goods, services and/or facilities the Company offers accessible to persons with disabilities.</p> <p>Provide Accessible Formats and Communication Supports in a timely manner at a cost that is no more than the regular cost charged to other persons and in a manner that takes account the person's accessibility needs due to disability.</p> <p>Consult with the person making the request when determining the suitability of an</p> | <p>The notification about the availability of Accessible Formats and Communication is included in the Company's policy and is posted on its website and necessary employees have been trained on the obligations to provide Accessible Formats and Communication Supports upon request</p> | <p>Vice-President, People and Culture</p> | <p>Complete and ongoing</p> |



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| <p>Accessible Format or Communication Support and notify the public of the availability of same for persons with disabilities at a cost no more than regular cost charged to other persons.</p> | | | |
| <p>Emergency procedures, plans or public safety information</p> <p>Emergency procedures, plans or public safety information, that is publicly available, shall be provided in an Accessible Format or with appropriate Communication Supports, upon request as soon as practicable.</p> | <p>Necessary employees have been trained on the requirement to provide emergency procedures or public safety information in an Accessible Format or with a Communication Support upon request</p> | <p>Vice-President, People and Culture</p> | <p>Complete and ongoing</p> |
| <p>Accessible websites and web content</p> <p>Websites and web content published after 2012 to conform to WCAG 2.0 Level A initially and increasing to WCAG 2.0 Level AA by Jan 1, 2021 to the extent practicable other than criteria 1.2.4 (captions) and 1.2.5 (pre-recorded audio descriptions).</p> <p>Note – All WCAG2.0 requirements only apply to websites, web</p> | <p>The Company has identified requirements for accessible website content and has complied with current standards</p> | <p>E-Commerce</p> | <p>Ongoing</p> |



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| <p>content and web-based applications that an organization can control either directly or through a contractual relationship and where meeting the requirements are technically feasible.</p> | | | |
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Part III – Employment Standards

This section of the IASR includes requirements related to:

- Recruitment, assessment and selection of candidates for employment
- Accessible Formats and Communication Supports for employees
- Workplace emergency response
- Individual accommodation plans and return to work processes
- Performance Management, career development and Redeployment

| Requirement | Action | Responsibility | Status |
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| <p>Recruitment</p> <p>Notify the public and employees about the availability of accommodation for applicants with disabilities in its recruitment processes.</p> | <p>Required notification is included in job postings</p> | <p>Vice-President, People and Culture</p> | <p>Complete and ongoing</p> |
| <p>Assessment, Selection</p> <p>Notify job applicants, when they are individually selected to participate in an assessment or selection</p> | <p>Required notification is included in the signature of every employee in the Human Resources Department and managers involved in hiring are trained on</p> | <p>Vice-President, People and Culture</p> | <p>Complete and ongoing</p> |



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| <p>process that accommodations are available upon request in relation to the materials or processes to be used.</p> <p>Consult with an applicant requesting accommodation to 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.</p> | <p>the requirement to provide accommodation upon request.</p> | | |
| <p>Notice to Successful Applicants</p> <p>Notify successful applicants of the Company's policies for accommodating employees with disabilities.</p> | <p>Required notification to be provided in onboarding information and employment contracts</p> | <p>Vice-President, People and Culture</p> | <p>Complete and ongoing</p> |
| <p>Informing Employees of Supports</p> <p>Inform employees of policies used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.</p> <p>Provided to new employees as soon as practicable after</p> | <p>Required information provided in employee handbook and updated as necessary.</p> | <p>Vice-President, People and Culture</p> | <p>Complete and ongoing</p> |



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| <p>commencing employment</p> <p>Provide employees with updated information whenever there is a material change to its policies on the provision of job accommodations for employees with disabilities</p> | | | |
| <p>Accessible Formats and Communication Supports for employees</p> <p>Upon the request of an employee with a disability, provide or arrange for the provision of Accessible Formats and Communication Supports in order to ensure that (i) information required by the employee to perform his/her job; and (ii) information generally available to employees in the workplace, is accessible to the employee with a disability.</p> <p>Consult with the employee making the request to determine the suitability of any Accessible Format or Communication Support. However, where the needs of an employee with a</p> | <p>Managers are trained on the need to provide this information and to consult Human Resources in the event of a request from an employee.</p> | <p>Vice-President, People and Culture</p> | <p>Complete and ongoing</p> |



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| <p>disability may be accommodated in various different ways, Organization Name reserves the right to determine the type Accessible Format or Communication Support that will be provided in the circumstances.</p> | | | |
| <p>Individualized Workplace emergency response information</p> <p>Provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if the Company is aware of the need for accommodation due to the employee's disability.</p> <p>Provide this information as soon as practicable after becoming aware of the need for accommodation.</p> <p>With the consent of the employee, provide the workplace emergency response information to the person designated by the Company to provide assistance to the employee if the employee needs</p> | <p>A notice about the availability of individualized workplace emergency response information is posted in the Company's office location and on the health and safety bulletin board.</p> <p>Where an employee reports the need for individualized workplace emergency response information, same is provided and updated in accordance with the requirements of the IASR.</p> | <p>Vice-President, People and Culture</p> | <p>Complete and ongoing</p> |



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| <p>assistance by reason of disability.</p> <p>Review individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodation needs or plans are reviewed and when the company reviews its general emergency response policies.</p> | | | |
| <p>Documented individual accommodation plans and Return to work Process</p> <p>Create a written process for the development of documented individual accommodation plans and return to work plans for employees with disabilities.</p> <p>Include in the process and plans all of the required elements in accordance with the provisions of the IASR.</p> | <p>These written policies have been created and are administered by Human Resources in consultation with the applicable manager.</p> | <p>Human Resources and applicable</p> | <p>Complete and ongoing</p> |
| <p>Performance Management, career development, advancement and Redeployment</p> | <p>Human Resources and managers have received training on compliance with this requirement.</p> | <p>Human Resources and applicable managers</p> | <p>Complete and ongoing</p> |



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| <p>Take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when engaging in Performance Management, career development and advancement and Redeployment in respect of employees with disabilities.</p> | | | |
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Part IV.1 – Design of Public Spaces Standards

This section of the IASR includes requirements a number of public spaces. The ones relevant to the Company include:

- Outdoor public use eating areas
- Exterior paths of travel
- Off-Street parking
- Obtaining service
- Maintenance

| Requirement | Action | Responsibility | Status |
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| <p>Obtaining service</p> <p>All indoor or outdoor newly constructed or redeveloped service counters and fixed queuing guides and all newly constructed or redeveloped waiting areas will conform to all of the required elements in accordance with the</p> | <p>This section does not apply to the Company</p> | <p align="center">N/A</p> | <p align="center">N/A</p> |



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| provisions of the Design of Public Spaces Standards. | | | |
| Make parking accessible Ensure new and redeveloped off-street parking facilities meet the technical requirements set out in the Design of Public Spaces Standards. | This section does not apply to the Company | N/A | N/A |
| Exterior paths of travel accessible Ensure new and redeveloped exterior paths of travel that are outdoor sidewalks or walkways designed and constructed for pedestrian travel and are intended to serve a functional purpose (includes stairs, ramps, curb ramps, depressed curbs, pedestrian signals, rest areas) meet the technical requirements set out in the Design of Public Spaces Standards.. | This section does not apply to the Company | N/A | N/A |
| Outdoor public eating areas accessible Ensure newly constructed or redeveloped outdoor public eating areas meet the technical requirements set out in | This section does not apply to the Company | N/A | N/A |



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| the Design of Public Spaces Standards. | | | |
| Maintenance Ensure Multi-Year Accessibility Plans include (i) procedures for preventative and emergency maintenance of the accessible elements in public spaces and (ii) procedures for dealing with temporary disruptions when accessible elements required are not in working order. | This section does not apply to the Company | N/A | N/A |