



Accessible Customer Service and Integrated Accessibility Standards Policy

Providing Goods and Services to Persons with Disabilities

PURPOSE AND SCOPE OF POLICY

This policy implements the requirements of Regulation 191/11, Integrated Accessibility Standards (“Regulation”) under the Accessibility for Ontario with Disabilities Act, 2015 (AODA). These standards are Information and Communication, Employment, Transportation and Customer Service.

This Policy applies to Ross WD Inc. (collectively referred to as the “Company”) and all Company personnel, including Company Personnel, temporary workers, volunteers and any authorized representatives, contractors, or agents (collectively referred to as “Company Personnel”) who provide goods or services on behalf of the organization.

STATEMENT OF COMMITMENT

The Company is committed to providing excellent customer service to all persons with disabilities. The Company is committed to compliance with AODA and its accessibility standards. The Company shall provide accessibility and accommodation for persons with disabilities through AODA’s customer service standard, integrated accessibility standard and all other standards as they are developed, and in accordance with the requirements of the Ontario Human Rights Code.

PRINCIPLES

Reasonable efforts will be made to ensure that the Company’s policies, practices, procedures and programs are consistent with the following principles:

- Persons with disabilities are provided equal opportunity to obtain, use and benefit from the Company goods and services.
- Goods and services are provided in a manner that respects the dignity and independence of persons with disabilities.
- Goods and services are provided to persons with disabilities with the same attention to quality and timeliness that are provided to others.
- The goods and services provided to persons with disabilities are integrated with the provision to users of the same goods and services unless an alternate measure is necessary to allow a person with a disability to fully benefit. The alternate measure may be temporary or permanent.

- Communications with a person with a disability are conducted in a manner that takes the person's disability into account.
- Persons with disabilities may use assistive devices, service animals and support persons as is necessary to access the Company goods and services unless superseded by other legislation.

DEFINITIONS

“Accessible Formats” means:

Formats that may include, without limitation, large print, clear text, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

“Assistive Devices” means:

Technical aids, communication devices, or medical aids that are used to increase, maintain, or improve how a person with a disability can function. Examples may include, but are not limited to, wheelchairs, walkers, note taking devices, portable magnifiers, recording machines, and assistive listening devices.

“Barrier” means:

Anything that keeps someone with a disability from participating in all aspects of society. Examples of barriers include architectural or structural barriers, information or communication barriers, technological barriers, and attitudinal barriers.

“Communications” means:

The Interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received.

“Communication Supports” means:

Supports that individuals with disabilities may need to access information. These may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language, and other supports that facilitate effective communications.

“Customer” means:

The direct user or recipient (sometimes involuntary recipient) of a service.

“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 coordination, blindness, or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other service 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;

The definition includes disabilities that are non-visible, are temporary, may be intermittent or have varying degrees of severity. Information about any person's disability is personal and private and must be treated confidentially.

"Information" means:

Data facts, and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.

"Service Animal" means:

An animal that is of service to a person with a disability where it is readily apparent that the animal is used by the person for reasons relating to his or her disability. Verification of a service animal's status can be provided by way of government certification or by a letter from a regulated healthcare professional confirming the animal is required for reasons relating to the person's disability.

"Support Person" means:

Any one person who accompanies a person with a disability in order to help with communication, mobility, personal care or medical needs or with access to goods or services.

"Temporary Disruption" means:

A short term planned or unplanned disruption to facilities or services that the public usually uses to obtain goods and services.

MULTI-YEAR ACCESSIBILITY PLAN AND ANNUAL PROGRESS REPORTS

The Company will develop, maintain and document an Accessibility Plan outlining the company's strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities.

The Accessibility Plan will be reviewed and updated at least once every five years, and will be posted on the company's website. Upon request, it will provide a copy of the Accessibility Plan in an accessible format.

INFORMATION AND COMMUNICATIONS STANDARDS

Feedback

The Company will continue to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communications supports, upon request.

Accessible Formats and Communication Supports

Upon request, the Company will provide, or will arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability.

The Company will consult with the person making the request in determining the suitability of an accessible format or communication support.

The Company will also notify the public about the availability of accessible formats and communication supports.

No cost shall be charged to the individual to produce an accessible format or to provide a Communication Support. If there is normally a charge for a document or service, the Company should charge the same cost for the document or service as would be charged to others, without passing along the cost of the conversion or support.

In certain circumstances, the Company may not be able to meet the request for an accessible format or Communication Support, such as when information is not convertible as it is technically not feasible to convert it or the technology or services needed to convert the information are not readily available. In these cases, the Company will provide an explanation to the individual making the request as to why the information is unconvertible and will also provide a summary of the unconvertible information to the Customer.

Accessible Websites and Web Content

The Company will ensure that our Internet websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA in accordance with the schedule set out in the Integrated Accessibility Standards Regulation, except where this is impracticable.

EMPLOYMENT STANDARDS

Recruitment

The Company will notify its Company Personnel and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

Recruitment, Assessment or Selection Process

The Company will notify job applicants, when they are individually selected to participate further 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 in a manner that takes into account the applicant's accessibility needs due to disability.

Notice to Successful Applicants

When making offers of employment, the Company will notify the successful applicant of its policies for accommodating Company Personnel with disabilities.

Informing Employees of Supports

The Company will continue to inform its Company Personnel of its policies (and any updates to those policies) used to support Company Personnel with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new Company Personnel as soon as practicable after commencing employment.

Accessible Formats and Communication Supports for Employees

Upon the request of an employee with a disability, the Company will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his/her job, and information that is generally available to other Company Personnel. In determining the suitability of an accessible format or communication support, the Company will consult with the employee making the request.

Workplace Emergency Response Information

The Company will provide individualized workplace emergency response information to Company Personnel 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. The Company will provide this information as soon as practicable after becoming aware of the need for accommodation.

Where the employee requires assistance, the Company will, 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.

The Company will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodations needs or plans are reviewed.

Documented Individual Accommodation Plans

The Company will maintain a written process for the development of documented individual accommodation plans for Company Personnel with disabilities.

If requested, information regarding accessible formats and communications supports provided will also be included in individual accommodation plans.

In addition, the plans will include individualized workplace emergency response information (where required), and will identify any other accommodation that is to be provided.

Return to Work Process

The Company will maintain a documented return to work process for its Company Personnel who have been absent from work due to a disability and who require disability-related accommodations in order to return to work. The return to work process outlines

the steps the Company will take to facilitate the return to work and will include documented individual accommodation plans as part of the process. This return to work process will not replace or override any other return to work process created by or under any other statute (i.e. the Workplace Safety Insurance Act, 1997).

Performance Management, Career Development and Advancement & Redeployment

The Company will take into account the accessibility needs of Company Personnel with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to Company Personnel, or when redeploying Company Personnel.

CUSTOMER SERVICE STANDARDS

Providing goods and services to persons with disabilities

- a. Communication
We will communicate with persons with disabilities in ways that take into account their disability.
We will train Company Personnel who communicate with Customers on how to interact and communicate with people with various types of disabilities.
- b. Telephone Services
We are committed to providing fully accessible telephone service to our Customers. We will train Company Personnel to communicate with Customers over the telephone in clear and plain language and to speak clearly and slowly.
We will offer to communicate with Customers by (e-mail etc.), if telephone communication is not suitable to their communication needs or is not available
- c. Assistive Devices
We are committed to serving persons with disabilities who use assistive devices to obtain, use or benefit from our services. We will ensure that our Company Personnel is trained and familiar with various assistive devices that may be used by Customers with disabilities while accessing our services.
- d. Billing
We are committed to providing accessible invoices to all of our Customers. For this reason, invoices can be provided in various formats upon request.

Use of Service Animals and Support Persons

We are committed to welcoming persons with disabilities who are accompanied by a service animal on the parts of our premises that are open to the public and other third parties. We will also ensure that all Company Personnel, contractors and others dealing with the public are properly trained in how to interact with persons with disabilities who are accompanied by a service animal.
We are committed to welcoming persons with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will

be allowed to enter the Company's premises with his or her support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises.

At times, the Company may require a person with a disability to be accompanied by a support person for health and safety reasons. Before making that decision, the Company must:

- Consult with the person with a disability to understand their needs
- Consider health or safety reasons based on the available evidence
- Determine if there is any other reasonable way to protect the health or safety of the person or others on the premises.

Notice of Temporary Disruption

The Company will provide Customers with notice in the event of a planned or unexpected disruption in the facilities or services usually used by persons with disabilities. This notice will include information about the reason for the disruption, the anticipated duration, and a description of alternative facilities or services, if available.

The notice will be placed at all public entrances and reception areas on our premises.

Training for Company Personnel

The Company will ensure that training is provided on the requirements of the accessibility standards referred to in the Regulation and continue to provide training on the Human Rights Code as it pertains to persons with disabilities, to all its Company Personnel;

The training will provide instruction on:

- How to interact and communicate with persons with various types of disabilities;
- How to interact with persons with disabilities who use Assistive Devices or require the assistance of Service Animals or Support Persons;
- How to use Assistive Communication devices and other Assistive Devices available on the Company's premises; and
- What to do if a person with a disability is having difficulty accessing the Company's goods and services.

The training will be appropriate to the duties of the Company Personnel.

Company Personnel will be trained when changes are made to the accessibility policy. New Company Personnel will be trained throughout the orientation process.

The Company will keep a record of the training it provides within the Human Resources Department.

FEEDBACK PROCESS

The ultimate goal of the Company is to meet and surpass customer expectations while serving Customers with disabilities. Comments on our services regarding how well those expectations are being met are welcome and appreciated.

Feedback regarding the way the Company provides services to persons with disabilities can be made by e-mail, telephone, in writing, in person or by any other accessible format

and communication support, by request. All feedback or complaints will be directed to the following individuals within the Human Resources Department:

Human Resources

HR@Rosswd.ca

Phone: (705) 996-0729

Customers can expect to hear back within 5 business days of the Company receiving comments or questions.

AVAILABILITY OF DOCUMENTS

This policy and any other document deemed to be key in the delivery of goods and services will be made available upon request in a format that takes into account the person's disability. Notwithstanding the above, this policy will be made available on the Company's website, and made available to any person to whom it provides goods or services using any other method or format as are reasonable in the circumstances.

POLICY REVIEW PROCESS

At minimum, this policy will be reviewed annually by appropriate HR Company Personnel. However, the review process may be affected by AODA Regulations as they are announced. Therefore, this policy will also be reviewed upon announcement of any new Accessibility Standards of the AODA, 2005 to ensure integration and consistency with this policy. The policy may be modified to ensure full compliance with the AODA, 2005.