

## **ACCESSIBLE CUSTOMER SERVICE POLICY**

### ***Providing Goods and Services to Customers with Disabilities***

#### **SCOPE**

This Policy applies to all employees, directors and officers of our Company who deal with our customers in Ontario, including persons who act as our agents (such as contractors and independent consultants), and to all persons who are responsible for developing and updating policies about how we deal with our customers in Ontario.

#### **PURPOSE**

It is the objective of The PIC Group to create and maintain a climate of mutual respect in which all persons who access our services, goods and facilities will be able to do so irrespective of any disability they may have. This Policy is created in accordance with the *Accessibility for Ontarians with Disabilities Act* (the "AODA") and specifically the Accessibility Standards for Customer Service.

Our business practices and policies will strive to ensure that all of our policies, practices and procedures are consistent with the core principles as outlined in the AODA, which include:

#### **Dignity**

Goods and services and access to our facilities are to be provided to all persons with disabilities in a manner that is respectful to the person and all such persons shall be treated as valued customers deserving of service

#### **Equality of Opportunity**

All persons with disabilities are entitled to be given an opportunity to obtain, use and benefit from our goods, services and facilities equal to that of any other of our customers.

#### **Integration**

All persons with disabilities are entitled to benefit from our goods, services and facilities in the same place and in the same or similar manner as any other customer. This may require a different format and maintaining a flexible approach wherever possible, taking into account the person's individual needs. The objective is to attempt inclusiveness and full participation to the extent possible.

#### **Independence**

Goods and services and access to our facilities shall be provided in a way that respects the independence of persons with disabilities and means respecting the person's right to do it themselves and to choose how they wish to receive services. Any assistance offered must be with the express permission of the person.

#### **DEFINITIONS**

The following definitions apply for the purposes of this Policy:

**"Disability"** means the same under the AODA as it does under the Ontario Human Rights Code:

- (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 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

**“Customer”** refers to anyone who is in receipt of the goods and services we provide, whether the person is a member of the general public, the end-user of our goods or services, a distributor, or a representative of another organization.

**“Employee”** refers all employees, officers, directors, students, volunteers, or contractors of the Company who deal with any of our customers (or potential customers) in Ontario, whether working on a full-time or part-time basis.

## **COMMUNICATION AND ASSISTIVE DEVICES**

For the purposes of this policy, an **“assistive device”** is a tool, technology or other mechanism that enables a person with a disability to maintain their independence in everyday life by performing tasks and activities such as moving, communicating or lifting.

In order to promote understanding of the content and intent of the communication, all communication with people with disabilities will be done in a manner that takes into account the disability. To that end, persons using assistive devices will be permitted – where possible and permitted by law – to use those devices while on any part of our premises which are open to the public. It is understood, however, that the use and safety of any personal assistive device is the responsibility of the person with the disability.

Where the use of an assistive device cannot be used because of some barrier, attempts will be made to remove the barrier or the person with the disability will be asked how he or she can be accommodated and / or what alternative methods may be available to assist the person in accessing our goods, services or facilities. Some of the assistive devices which are currently available internally which may assist with communication issues include: telephones, email, video conferencing system, pen & paper. Other assistive devices which may assist with removing other barriers to accessibility might include: elevators, ramps, wheelchair accessible washrooms, automatic doors, and low-height counters. All employees will be trained on how to communicate with persons with disabilities as well as on how to use each of the above assistive devices, as appropriate for their position.

## **SERVICE ANIMALS**

For the purpose of this policy, an animal is a service animal for a person with a disability if:

- (1) It is readily apparent that the animal is used by a person with a disability for reasons relating to his or her disability; or
- (2) The person provides a letter from a physician or nurse confirming the need for the animal for reasons relating to a disability.

This includes any animal used by a person with a disability for reasons relating to the disability, such as guide dogs, hearing alert animals (alerts owner to sounds), seizure alert animals (alerts owner to oncoming seizure; steers owner from danger during seizure), and psychiatric service animals (retrieves and prompts owner to take medicine; leads owner out of crowds; retrieves or activates medical alerts).

A person with a disability who is accompanied by a service animal is permitted access to all parts of the Company’s premises that are open to the public, provided that the animal is not otherwise excluded by law. If for some reason the service animal is excluded by law, we will attempt to find an alternate means within a reasonable time frame to provide the person with the disability access.

If it is not readily apparent that the animal is a service animal, The PIC Group reserves the right to ask the person with the disability to provide a letter from a physician or nurse confirming that the person requires the animal for reasons relating to his or her disability. However, the decision about whether to request such a letter shall be made by the most senior manager in each region. Staff will receive training on how to interact with a person with a disability who is accompanied by a service animal.

## **SUPPORT PERSONS**

For the purposes of this policy, a support person is any person who accompanies a person with a disability in order to assist that person with their disability, such as providing assistance with mobility issues, communication, personal or medical needs, or with accessing goods or services. A person with a disability who is accompanied by a support person will be allowed to have that person accompany him or

her on our premises. To preserve confidentiality, consent forms may have to be signed by both the customer as well as the support person which authorizes us to discuss confidential information in the presence of the support person. Staff will receive training on how to interact with persons with disabilities who are accompanied by a support person, including:

- Communicating directly with the customer, rather than the support person
- Addressing potential issues of confidentiality

### **NOTICE OF TEMPORARY DISRUPTION**

In the event of a planned or unexpected disruption to our services or facilities, such as access to our building, we will notify customers promptly of any such planned or unexpected disruption as follows:

- Where a meeting is scheduled with a customer, the customer shall be notified of the temporary disruption by email in advance of the meeting so that appropriate alternative arrangements can be made
- The information will be posted in a conspicuous place on the website
- A copy of the notice will be posted at the entrance of all affected buildings operated by the Company to which public have access

Where possible, the notice will be posted a minimum of one (1) week in advance of any planned or expected shutdowns. The posted notice will include information about:

- The date, time and location of the disruption
- The reason for the disruption
- The anticipated length of time, and
- A description of alternative facilities or services available, if any

### **TRAINING FOR STAFF**

Training will be provided to everyone covered by this Policy, and will include ongoing training when changes are made to this Policy or any related change to other policies, practices or procedures. This training will be provided to all new employees as soon as possible following hiring, but no later than one month post-hiring. Records of this training will be kept on file. Training will include:

- An overview of the AODA
- The specific requirements of the Customer Service Standard
- A review of this Policy
- How to interact and communicate with people with various disabilities and with those who use assistive devices or require the assistance of a service animal or support person
- How to use the assistive devices we already have
- What to do if a person with a disability is having difficulty accessing our goods, services or facilities

**FEEDBACK PROCESS**

Customers, other members of the public as well as employees are all invited to provide feedback about the way in which we provide our goods and services to people with disabilities. This may include areas that require changes or improvements.

All feedback can be provided via telephone, email or in writing and directed to:

**Name:** \_\_\_\_\_

**Position:** \_\_\_\_\_

**Address:** \_\_\_\_\_

**Email:** \_\_\_\_\_

**Phone / Fax:** \_\_\_\_\_

If a person's disability prevents them from providing feedback by email or in writing, alternative arrangements will be made which take into account the person's disability. All feedback relating to accessibility of our services will be directed to the Vice President of Human Resources. We will attempt to respond in the same format as the feedback is received. When complaints or concerns are received, every effort will be made to respond within two (2) weeks of the receipt of the complaint or concern, or earlier where circumstances dictate.

**MODIFICATIONS TO THIS OR OTHER POLICIES**

All of our policies, practices and procedures will be reviewed on an ongoing basis to ensure compliance with the *AODA*. Any policy, practice or procedure that does not comply with and promote the dignity and independence of people with disabilities will be modified or removed.

**ACCESSIBILITY OF DOCUMENTS**

This Policy and all other documents required by the *AODA* pertaining to our policies, practices and procedures on the provision of services to persons with disabilities can also be obtained by contacting the Vice President of Human Resources using the contact information set out above. Upon request, reasonable attempts will be made to provide these documents to clients with disabilities in a format that takes into account the person's disability.

Notice of availability of these documents will be posted on our website and posted in a conspicuous place at each of the Company's locations where this Policy applies.

## **ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES**

Dear Valued Customers:

The PIC Group is committed to improving accessibility for individuals with disabilities and complying with the *Accessibility Standards for Customer Service* addressed in Ontario Regulation 429/07 ("Customer Service Standard") under the *Accessibility for Ontarians with Disabilities Act, 2005* ("AODA").

### **FEEDBACK**

We would like to hear your comments, questions and suggestions about the provision of our goods or services to people with disabilities. Any feedback should be addressed to our Vice President of Human Resources, and can be in writing or email to the following address:

**Name:** \_\_\_\_\_

**Position:** \_\_\_\_\_

**Address:** \_\_\_\_\_

**Email:** \_\_\_\_\_

**Phone / Fax:** \_\_\_\_\_

Customers who wish to provide feedback verbally can do so to any of our managerial employees or by requesting a copy of our Accessibility Feedback Form.

Customers that provide feedback will receive an acknowledgement of their feedback along with any resulting actions based on concerns or complaints that were submitted.

### **AVAILABILITY OF DOCUMENTS**

You may request a copy of our Company's Accessible Customer Service Policy, or any other document required under the AODA or the Customer Service Standard by contacting the Vice President of Human Resources using the above-noted contact information.

**ACCESSIBILITY FEEDBACK FORM**

Our Company has established a process for receiving and responding to feedback about the manner in which we provide our goods and services to persons with disabilities. Feedback may be provided in person, by telephone, in writing or by delivering electronic text by email or on diskette to the Accessibility Coordinator. This form is intended to provide a consistent format for receiving feedback information, but is not meant to be the exclusive format for receiving feedback.

Date: \_\_\_\_\_ Format Received: \_\_\_\_\_

**Personal Information:**

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone: \_\_\_\_\_

Email: \_\_\_\_\_

**Subject:** \_\_\_\_\_

**Details:**

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The personal information provided enables us to respond to your feedback or complaint and will only be used for that purpose. You will not be placed on any mailing lists, nor will your information be released to any third party, except as may be required by law. Questions about this collection should be directed to the attention of the Vice President of Human Resources:

**Name:** \_\_\_\_\_

**Position:** \_\_\_\_\_

**Address:** \_\_\_\_\_

**Email:** \_\_\_\_\_

**Phone / Fax:** \_\_\_\_\_