

Accessible Customer Service Policy

Intent

All services provided by Commport will follow the principles of dignity, independence, integration, and equal opportunity.

This policy meets the requirements of the customer service standards included in the *Integrated Accessibility Standards Regulation* under the *Accessibility for Ontarians with Disabilities Act,* 2005. It applies to the provision of services to the public or other third parties, not to the goods themselves.

Definitions

<u>Assistive device</u>: A technical aid, communication device, or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that customers bring with them, such as a wheelchair, walker, or a personal oxygen tank, and that might assist in hearing, seeing, communicating, moving, breathing, remembering, or reading.

<u>Disability</u>: As defined by the *Accessibility for Ontarians with Disabilities Act,* 2005, and the *Ontario Human Rights Code,* refers to:

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

<u>Guide dog</u>: A highly trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons' Rights Act*, to provide mobility, safety, and increased independence for people who are blind.

Service animal: A service animal for a person with a disability if:

- 1. The animal can be readily identified as one that is being used by the person for reasons relating to the person's disability because of visual indicators such as the vest or harness worn by the animal; or
- 2. The person provides documentation from a member of one of the following regulated health professional colleges confirming they require the animal for reasons relating to the disability:

Commport Communications International, inc. | 155 Engelhard Dr, Aurora, Ontario, L4G 3V1 | 905 727 6782 | www.commport.com



- College of Audiologists and Speech-Language Pathologists of Ontario;
- College of Chiropractors of Ontario;
- College of Nurses of Ontario;
- College of Occupational Therapists of Ontario;
- College of Optometrists of Ontario;
- College of Physicians and Surgeons of Ontario;
- College of Physiotherapists of Ontario;
- College of Psychologists of Ontario; or
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

<u>Support person</u>: In relation to a person with a disability, another person who accompanies them to help with communication, mobility, personal care, medical needs, or access to goods and services.

Guidelines

The Provision of Services to Persons with Disabilities

Commport will make every reasonable effort to ensure that its policies, practices, and procedures are consistent with the principles of dignity, independence, integration, and equal opportunity by:

- Ensuring all customers receive the same value and quality;
- Allowing customers with disabilities to do things in their own ways, at their own pace when accessing services, as long as this does not present a health and safety risk;
- Using alternative methods when possible, to ensure customers with disabilities have access to the same services, in the same place and in a similar manner;
- Considering individual accommodation needs when providing services; and
- Communicating in a manner that considers the customer's disability.

The Use of Assistive Devices

Customer's Own Assistive Devices

Persons with disabilities may use their own assistive devices as required when accessing services provided by the Company.

In cases where the assistive device presents a health and safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of services, up to the point of undue hardship.

For example, open flames and oxygen tanks cannot be near one another. Therefore, the accommodation of a customer with an oxygen tank might involve ensuring the customer is in a location that would be considered safe for both the customer and business.



Guide Dogs and Service Animals

A customer with a disability who is accompanied by a guide dog or service animal will be allowed access to premises.

Employees may respectfully ask if an animal is a service animal and will not ask the nature of the person's disability or purpose of the animal.

Bistro/BBQ Patio Areas

A customer with a disability who is accompanied by guide dog or service animal will be allowed access to food service areas otherwise excluded by law.

Exclusion Guidelines

If a customer's guide dog or service animal is excluded under the *Dog Owners' Liability Act*, 2005 below, Commport will offer alternative methods to enable the person with a disability to access goods and services, when possible. For example, the Company might accommodate a customer's disability by securing the animal in a safe location and offering the assistance of an employee to facilitate the delivery of goods and services.

Recognizing a Guide Dog or Service Animal

If it is not readily apparent that the animal is being used by the customer for reasons relating to their disability, Commport may request verification from the customer.

Care and Control of the Animal

The customer who is accompanied by a guide dog or service animal is responsible for always maintaining care and control of the animal.

Allergies and Other Health and Safety Concerns

If a health and safety concern presents itself, for example, in the form of a severe allergy to the animal, Commport will make all reasonable efforts to meet the needs of all individuals. Pursuant to the Company's obligations under the *Human Rights Code* and *the Occupational Health and Safety Act*, each customer's accommodation needs will be considered on a case-by-case basis, up to the point of undue hardship.

Due diligence needs to be paid to address health and safety requirements. For example, if a person's health and safety could be seriously affected by the presence of a service animal on the premises, management must fully analyze all options for safely accommodating the service animal. Options could include creating distance between the two individuals to eliminate in-person contact, changing the time the two individuals receive service, or using air purifiers and other measures that could allow the person to use their service animal on the premises.



In very exceptional circumstances where a service animal becomes out of control, causing a clear disruption or a threat to the health and safety of others, and the animal's behaviour is not corrected by the owner, a person with a disability can be asked to remove their service animal from the premises.

As a courtesy, particularly if the person and service animal have been in attendance on the premises for a long time, staff may ask whether the animal requires water, may designate an area in which the service animal can relieve itself, or ask whether the staff can be of assistance pertaining to the service animal.

The Use of Support Persons

If a customer with a disability is accompanied by a support person, Commport will ensure that both persons may enter the premises together and that the customer is not prevented from having access to the support person.

Notice of Disruptions in Service

Service disruptions may occur for reasons that may or may not be within the control or knowledge of Commport. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use services, reasonable efforts will be made to provide advance notice. In some circumstances, such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

If a notification needs to be posted, the following information will be included unless it is not readily available or known:

- Services that are disrupted or unavailable;
- Reason for the disruption;
- Anticipated duration; and
- A description of alternative services or options.

Notification Options

When disruptions occur, Commport will provide notice by:

- Posting notices on the Company website;
- Distributing a Customer Notification via email; and/or
- By any other method that may be reasonable under the circumstances.

Customer Feedback

Commport shall provide customers with the opportunity to provide feedback on the service provided to customers with disabilities. Information about the feedback process will be readily available to all customers. Feedback forms, along with alternate methods of providing feedback verbally (in person or by telephone) or written (handwritten, delivered, website, or e-mail), will be available upon request.



Submitting Feedback

Customers can submit feedback to:

Lisa Cavuoti, Human Resources Manager 155 Engelhard Drive Aurora, ON L4G 3V1 <u>LisaC@commport.com</u> 905-727-6782 x2254

Customers who wish to provide feedback by completing an onsite customer feedback form or verbally can do so to any Commport employee.

Customers who provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted within five (5) business days of receipt of the feedback form.

Training

Training will be provided to all Commport employees.

Training Provisions

Regardless of the format, training will cover the following:

- A review of the purpose of the Accessibility for Ontarians with Disabilities Act, 2005;
- A review of the requirements of the customer service standards;
- Instructions on how to interact and communicate with people with various types of disabilities;
- Instructions on how to interact with people with disabilities who:
 - Use assistive devices;
 - Require the assistance of a guide dog or other service animal; or
 - Require the use of a support person (including the handling of admission fees);
- Instructions on how to use equipment or devices that are available at our premises or that we provide that may help people with disabilities;
- Instructions on what to do if a person with a disability is having difficulty accessing our services; and
- Policies, procedures, and practices of the Company pertaining to providing accessible customer service to customers with disabilities.

Training Schedule

Commport will provide training as soon as practicable. Training will be provided to new employees, during the new hire onboarding program (within 30 days of first day of employment). Revised training will be provided in the event of changes to legislation, procedures, policies, or practices.



Record of Training

Commport will keep a record of training that includes the dates training was provided and the number of employees who attended the training.

Notice of Availability and Format of Documents to Customers

Commport shall notify customers that the documents related to the customer service standards are available upon request and in a format that considers the customer's disability. Notification will be given by posting the information on the website of Commport and any other reasonable method.

Administration

If you have any questions or concerns about this policy or its related procedures, please contact:

Lisa Cavuoti, HR Manager 155 Engelhard Drive Aurora, ON L4G 3V1 LisaC@commport.com 905-727-6782 x2254

This policy and its related procedures will be reviewed as required in the event of legislative changes or changes to company procedures.