



E.S. FOX LIMITED

AODA CUSTOMER SERVICE POLICY

1.0 STATEMENT OF COMMITMENT

E.S. Fox Limited (ESFL) strives to provide its goods and services in a way that respects the dignity and independence of people with disabilities. ESFL is committed to providing people with *disabilities the same opportunity to access goods and services and allowing them to benefit from the same services, in the same place and in a similar way to all customers. This will be achieved by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act (AODA).

2.0 PURPOSE

This policy is intended to meet the requirements of the AODA and aims to ensure that people with disabilities are provided equal opportunities to obtain, use, and benefit from ESFL-provided goods and services.

3.0 SCOPE

This policy applies to the provision of goods and services by all ESFL locations including employees, agents and contractors who represent ESFL.

4.0 DEFINITIONS

Assistive Device A technical aid, communication device, or medical aid (modified or customized) that is used to increase, maintain, or improve the functional abilities of people with disabilities.

Disability 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 on one or more of the processed 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.

Document

A piece of written, printed, or electronic matter that provides information or evidence or that serves as an official record.

Service Animal

An animal that is used by the person for reasons relating to his/her disability; or, if the person provides a letter from a registered health professional confirming that the person requires the animal for reasons relating to the disability.

Support Person

In relation to a person with a disability, is another person who accompanies him/her in order to help with communication, mobility, personal care or medical needs, or with access to goods or services.

5.0 RESPONSIBILITIES

5.1 The Senior Vice President/Chief Operating Officer (Sr. VP/COO) and Vice Presidents are responsible for:

- a) Approval of this policy and ensuring it is properly administered within their area(s) of responsibility, and
- b) Ensuring that accessibility is considered when reviewing or creating Company policies, procedures or when making decisions on office purchases/renovations.

5.2 The Area and Department Managers are responsible for:

- a) Ensuring they are aware of and compliant with this policy and associated procedures,
- b) Ensuring their staff are appropriately trained on AODA standards, and
- c) Communicating accessibility matters with appropriate parties such as the Sr. VP/COO or Human Resources Manager.

5.3 The Human Resource Manager is responsible for:

- a) Overall administration of the AODA policies and procedures, and
- b) Accessibility reporting.

5.4 The Employees/Contractors representing ESFL are responsible for:

- a) Ensuring awareness and understanding of this policy and procedures, and
- b) Completing mandatory AODA training.

6.0 AODA CUSTOMER SERVICE STANDARD

The customer service standard under the AODA outlines requirements for service providers to make their goods, services, and facilities accessible for customers with disabilities.

6.1 Background

The AODA was created with the goal of developing standards that would improve accessibility for people with disabilities across Ontario. The AODA allows the Provincial government to develop specific standards of accessibility and to enforce them. These standards are made into regulations pursuant to the AODA. The five (5) key areas of focus are:

1. Customer Service
2. Information and Communications
3. Employment
4. Transportation
5. Design of Public Spaces

6.2 Guiding Principles

All goods and services at ESFL shall be provided in a manner that respects the dignity, independence, integration, and equal opportunity of people with disabilities. ESFL has made reasonable efforts to ensure that its policies, procedures, and practices are consistent with the following principles:

- **Dignity:** service is provided in a way that allows the person with a disability to maintain self-respect and the respect of other people.
- **Independence:** a person with a disability is allowed to do things on their own, without unnecessary help or interference from others.
- **Integration and Equal Opportunity:** service is provided in a way that allows the person with a disability to benefit from the same services, in the same place, in the same or similar way as other individuals, unless an alternate measure is necessary to enable a person with a disability to access ESFL's goods or services.

ESFL is committed to excellence in serving all customers, including people with disabilities and will carry out functions and responsibilities in the following areas:

6.3 Communication

ESFL will communicate with people with disabilities in ways that take into account their disability. When practicable, ESFL employees may ask the individual the best way to communicate with them.

ESFL employees may use a variety of ways to make communications more accessible by:

- a) Considering the needs of people with disabilities during the planning stage of services and communication development,
- b) Using plain language to make a *document easier to read,
- c) Offering information in alternate formats, on request,
- d) Hand-writing or typing information back and forth,
- e) Braille, where required and on request,
- f) Printing hand-outs of commonly used information,
- g) Providing documents in large print,
- h) Using e-mail as an alternate channel to provide accessible communication, and/or
- i) Other forms of communication, as required.

6.4 Assistive Devices

ESFL is committed to serving people with disabilities, who use *assistive devices to obtain, use or benefit from our goods and services and shall ensure that, through daily practices, those patrons who use assistive devices are accommodated in a manner that respects their dignity, independence, integration and equal opportunity.

6.5 Support Persons

ESFL is committed to welcoming people with disabilities who are accompanied by a *support person access to any office or location. At no time will a person with a disability requiring a support person be prevented from having access to his/her support person while on the premises.

Note: *A personal support person may be required to sign a confidentiality agreement.*

6.6 Service Animals

ESFL is committed to welcoming people with disabilities who are accompanied by a trained, accredited *service animal to all parts of our premises that are open to the public. The person with a disability may be asked to provide documentation from a registered health professional confirming that it is required because of his/her disability.

6.7 Temporary Service Disruptions

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

The notice is made available through the following networks, as appropriate:

- a) Posting on all visitor entrances and/or access points,
- b) Website,
- c) Telephone recordings, and/or
- d) Temporary signage.

In the event of an unexpected disruption, advance notice is not possible. In such cases, ESFL provides notice, as soon as possible, through its communication networks.

6.8 Training

ESFL will provide training to all employees, agents, and contractors who represent ESFL, and specifically those who are involved in the development and approval of customer service policies and procedures.

Training will be provided as soon as reasonably possible after employment commences.

Training will include the following:

- a) A review of the purposes of the AODA, 2005 and the requirements of the customer service standard,
- b) How to interact and communicate with people with various types of disabilities,
- c) How to interact with people with disabilities who use an assistive device, require the assistance of a service animal or a support person,
- d) How to use assistive devices available at ESFL premises,
- e) What action to take if a person with a disability is having difficulty accessing ESFL goods and services, and
- f) ESFL policies, practices and procedures relating to the customer service standard.

As required by the customer service standard, ESFL will maintain records of the training provided.

Additional training will be conducted, should significant changes be made to the AODA policy as determined by ESFL.

6.9 Feedback Process

The goal of ESFL is to meet and surpass customer expectations while serving customers with disabilities. ESFL's process for receiving and responding to feedback about how goods and services are provided to customers with disabilities is as follows:

- a) Email to the ESFL general mailbox at hr@esfox.com,
- b) Telephone to ESFL head office at (905) 354-3700 and the call will be redirected to the appropriate representative in Human Resources,
- c) In writing to the Niagara Falls head office at P.O. Box 1010, 9127 Montrose Road, L2E 7J9, or
- d) In person, with an appointment, to the appropriate representative.

The feedback must include a contact name, email, and/or phone number, date, location of visit and details of the feedback.

Once feedback has been received, the following actions shall be taken:

- a) The feedback is directed to the appropriate person for action,
- b) The feedback is reviewed for appropriate action, and
- c) A response (provided within five [5] business days) is provided to individuals who provide feedback.

Should a complaint be received, the same process and actions outlined in this section would apply.

The feedback process is readily available to the public through:

- a) The ESFL website,
- b) A document describing the feedback process, available on request in different formats, and
- c) Other communication networks, as appropriate.

6.10 Notice of Availability of Documents

ESFL will notify persons and customers to whom it provides goods and services that the documents required under AODA legislation are available upon request. This notice may be given by posting the information at a conspicuous space owned and operated by ESFL, the website, and/or any other reasonable method.

If ESFL is required to provide a copy of a document to a person with a disability, they will take into consideration a person's disability and provide that document in an appropriate format. ESFL and the person with the disability will agree on what format will be used.

6.11 Policy Modifications

ESFL is committed to developing customer services policies that respect and promote the dignity and independence of people with disabilities; therefore, no changes will be made to this policy before considering the impact on people with disabilities.

Any policy of ESFL that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.