100 Huron Avenue Komoka, ON NOL 1R0

### **Accessibility Policy**

### **Statement of Organizational Commitment**

2157330 Ontario Limited is committed to excellence in serving and providing goods, services, or facilities to all customers including people with disabilities. Our accessible customer service policies are consistent with the principles of independence, dignity, integration, and equality of opportunity for people with disabilities. This includes creating and fostering an inclusive environment that is considerate and accommodating for all individuals.

2157330 Ontario Limited supports the goals of the accessibility legislation in Canada and will establish policies, practices and procedures which are consistent with the established accessibility standards, including accessible customer service, information and communication, employment, the built environment, and transportation. 2157330 Ontario Limited is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination. 2157330 Ontario Limited understands that obligations under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and its accessibility standards do not substitute or limit its obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law.

In working towards its goals under this Statement, 2157330 Ontario Limited is committed to becoming a barrier free environment and meeting the requirements of all existing legislation and its own policies and goals related to identifying, removing, and preventing barriers to people with disabilities that might interfere with their ability to make full use of the services provided by 2157330 Ontario Limited.

#### Training

All members of 2157330 Ontario Limited including: employees, third parties, volunteers, all persons who participate in developing the organization's policies and all other persons who provide goods, services or facilities on behalf of the organization shall be trained on the requirements of the accessibility standards and on the Ontario Human Rights Code appropriate to the duties of the employees, volunteers, and other persons.

Human Resources is responsible to ensure that all parties named above receive the mandatory AODA trainings.

#### Training includes:

- A review of the purposes of the AODA and the requirements of the Integrated Accessibility Standards Regulation IASR (Ontario Regulation 191/11) and instruction about the following matters:
- Our policies related to the Customer Service Standards.
- 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 guide dogs or other service animals or the assistance of support persons;
- How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods or services to a person with a disability;
- What to do if a person with a particular type of disability is having difficulty accessing the provider's goods or services; and,
- A review of the requirements of other accessibility standards referred to in the AODA Integrated Accessibility

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Standards and the Human Rights Code as it pertains to persons with disabilities.

The training provided shall be appropriate to the duties of the employee, volunteer or third party, upon hire and in respect of any changes to the policies. Training shall take place as soon as is practicable; upon completion, 2157330 Ontario Limited will keep a record of the training provided which includes the dates and number of individuals to whom the training was provided.

#### **Assistive Devices**

2157330 Ontario Limited is committed to serving people with disabilities who use assistive devices to obtain, use, or benefit from our goods and services and as such, clients are free to use their personal assistive devices in any Cooperators environment.

In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with a disability can access our goods, services, or facilities. These other measures will be identified and implemented in consultation with the person with the disability.

We ensure that our staff are trained and familiar with various assistive devices we have on site that may be used by persons with disabilities while accessing our goods, services, or facilities including: elevators, escalators, wheelchair ramps, and automatic doors. Assistive devices for access to specific services shall be kept in good working order and the public shall be informed of their availability.

#### Communication

2157330 Ontario Limited communicates with people with disabilities in ways that take into account their disability. We will train staff who communicate with customers on how to interact and communicate with people with various types of disabilities. We commit to working with people with disabilities to determine what method of communication works best for them. 2157330 Ontario Limited will notify the public about its commitment to the availability of accessible formats and communication supports through its Accessibility website.

Methods of communication may include the following:

- <u>Telephone Services:</u> We are committed to providing fully accessible telephone interface to our clients and potential clients. We will train staff to communicate with customers over the telephone in clear and plain language and to speak clearly and slowly if required by the customer. We will offer to communicate with customers using email if telephone communication is not suitable to their communication needs or is not available. Training will be provided on how to use the Relay system and TTY (teletypewriter) when needed.
- <u>Billing:</u> We are committed to providing accessible invoices to all of our customers. We will answer any questions customers may have about the content of the invoice in person, by telephone or email.
- <u>Documentation</u>: All published documents can be available in hard copy, large print and email if requested. Accessible formats and communication support for persons with disabilities will be provided in a timely manner taking into account the person's accessibility needs. It will be provided at no additional cost than the cost charged

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to other persons. 2157330 Ontario Limited will provide emergency procedures, plans and public safety information in an accessible format and/or with appropriate communication supports, as soon as practicable, upon request.

#### **Service Animals**

2157330 Ontario Limited staff, volunteers and third-party contractors shall accommodate the use of service animals by people with disabilities who are accessing our services and facilities. Service animals are allowed on the parts of our premises that are open to the public and third parties.

To be considered a service animal under this Policy, it must be readily apparent that the animal is being used because of a person's disability or the person with a disability must provide a letter from a regulated health professional confirming that it is required because of his or her disability.

A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

A regulated health professional is defined as a member of one of the following colleges:

- 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
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

If service animals are prohibited by another law, we will do the following to ensure people with disabilities can access our goods, services or facilities:

- explain why the animal is excluded;
- discuss with the customer another way of providing goods, services or facilities.

### **Support Persons**

A support person is a person who accompanies the person with a disability in order to help with communication, mobility, personal care or medical needs or with access to goods or services. The support person can be a paid support worker, volunteer, a friend or a family member.

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Where a person with a disability is accompanied by a support person, 2157330 Ontario Limited staff, volunteers and third-party contractors shall ensure that both persons are permitted to enter the premises together and shall ensure that the person with a disability can access the support person while on the premises.

In certain cases, this organization might require a person with a disability to be accompanied by a support person for the health or safety reasons of:

- the person with a disability;
- others on the premises.

Before making a decision, 2157330 Ontario Limited will:

- consult with the person with a disability to understand their needs;
- consider health or safety reasons based on available evidence;
- determine if there is no other reasonable way to protect the health or safety of the person or others on the premises.

### **Notice of Temporary Disruption**

In the event that there is a temporary service disruption in the availability of facilities, services, or goods used by persons with disabilities, 2157330 Ontario Limited shall give notice to the public of the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if any, that are available. Such notices are provided by a variety of methods, depending on the circumstances. They may include postings in conspicuous places at the affected premises and on the Company's website.

#### Feedback Process

Comments on our services and how well those expectations are being met are welcome and appreciated. 2157330 Ontario Limited ensures our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication support, on request. We will thoroughly review all client feedback, investigate its relevance to our Customer Service Policy and to our accessibility commitments, and determine actions or steps to rectify to the client's satisfaction. Feedback regarding the way in which 2157330 Ontario Limited provides goods and services to persons with disabilities can be shared with the public through our website, by email, verbally, or in written format.

Client feedback will help us identify barriers and respond to concerns, to improve customer service. In addition, the author of the feedback will be provided with a response in the format in which the feedback was received. The feedback may outline any actions taken if deemed appropriate. Clients can expect to hear back in 3 to 5 business days.

#### **Notice of Availability of Documents**

Documentation that describes our accessibility commitments will be maintained on the 2157330 Ontario Limited website. 2157330 Ontario Limited will provide these documents in an accessible format or with communication support, on

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request. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and, at no additional cost.

#### **Self-Service Kiosks**

In the event that self-service kiosks are designed, procured, or acquired by 2157330 Ontario Limited, we will incorporate accessibility features/consider accessibility for people with disabilities.

#### **Information and Communications**

2157330 Ontario Limited is committed to meeting the communication needs of people with disabilities; we utilize a process for receiving and responding to feedback and the process is accessible to persons with disabilities upon request.

We communicate with people with disabilities in ways that take into account their disability. Those individuals with disabilities can consult with their advisor to determine how we can best meet their information and communication needs.

When asked, we will provide information about our organization and its services, including public safety information, in accessible formats or with communication supports. This will be done in a timely manner, taking into account the person's accessibility needs due to disability and at a cost that is no more than the regular cost charged to other persons.

2157330 Ontario Limited ensures all new websites conform to internationally recognized Web Content Accessibility Guidelines (WCAG) 2.0., Level A (effective: January 1, 2014). All new websites controlled directly by 2157330 Ontario Limited or through a contractual relationship that allows for modification of the product shall conform to the (WCAG) 2.0 Level AA website requirements in accordance with Ontario's accessibility laws (effective January 1, 2021). We notify the public about the availability of accessible formats and communication supports through our Company website. We periodically review and monitor the navigational experience for those with disabilities needs and make adjustments accordingly.

If 2157330 Ontario Limited determines that information or communications are unconvertible upon consultation with the individual, the organization shall provide the requestor with:

- a) an explanation as to why the information or communications are unconvertible; and
- b) a summary of the unconvertible information or communications.

#### **Employment**

2157330 Ontario Limited notifies the public and employees that, when requested, suitable accommodation will be provided during the recruitment, assessment, and selection processes. The Company shall consult with the person

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making the request and gain agreement in determining the suitability of an accommodation request. All applicants will be informed of the Company's policies, practices, and procedures, for supporting employees with disabilities. This commitment is included in job postings, when arranging interviews with qualified applicants, as well as in offer letters of employment.

2157330 Ontario Limited shall inform employees of the 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. The Company will provide this information to new employees as soon as practicable after they begin their employment and provide updated information to all employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.

Upon an employee's request, 2157330 Ontario Limited shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:

- 1. Information that is needed in order to perform the employee's job; and
- 2. Information that is generally available to employees in the workplace.

2157330 Ontario Limited will consult with the employee making the request in determining the suitability of an accessible format or communication support.

If an employee's disability is such that workplace emergency response information is necessary and 2157330 Ontario Limited is aware of the need for accommodation, this information shall be provided to employees as soon as practicable. In addition, this information shall be provided, with the employee's consent, to the person designated to provide assistance. The information shall undergo review when:

- o The employee moves to a different location;
- o The employee's overall accommodation needs or plans are reviewed; and,
- o When our general emergency response policies are reviewed.

This information will be provided as soon as practicable after the Company becomes aware of the need for accommodation due to the employee's disability.

2157330 Ontario Limited has in place a Workplace Accommodation Policy and a Medical Leave Policy, both of which support the development of individual accommodation plans and return-to work policies for employees with accessibility needs.

2157330 Ontario Limited has in place a Workplace Accommodation Policy which supports the development of individual accommodation plans and for employees with accessibility needs through performance reports, career development, and redeployment process.

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#### **Design of Public Spaces**

2157330 Ontario Limited will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces, including:

- Sidewalks, ramps, stairs, curb ramps, etc.;
- Accessible off-street parking; and
- Service counters and waiting areas.

We put procedures in place to prevent service disruptions to the accessible parts of our public spaces.

#### **Changes to Existing Policies**

Any policies of this organization that do not respect and promote the principles of dignity, independence, integration, and equal opportunity for people with disabilities will be modified or removed. This document is publicly available. Accessible formats are available upon request.