(Accessibility for Ontarians with Disabilities Act)



What is AODA?

The Accessibility for Ontarians with Disabilities Act (AODA) was passed in 2005 and was to create accessibility for all Ontarians with disabilities in respect to goods, services, facilities, accommodations, employment, and buildings by January 1st, 2025. The legislation applies to organizations that have one or more employee in Ontario which provide services either to the public directly or to other businesses or organizations in Ontario (the size of the organization will determine the requirements that need to be met).

Its purpose was to enforce accessibility standards that organizations (that provide goods and services) are required to meet regarding the accessibility standards in five key areas:

- Customer Service
- Integrated Accessibility Standards Regulations (IASR)
 - Information and Communication
 - Employment
 - Transportation
- Built Environment

Statement of Commitment

Dishon Limited is committed to meeting the needs of persons with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act. We are committed in ensuring that, persons with disabilities receive the same quality of service that others receive as specifically expressed in our Human Rights Policy Dignity and Respect Policy.

Ontario's Human Rights Code

The Ontario Human Rights Code (the Code) provides for equal rights and opportunities, and freedom from discrimination. The Code recognizes the dignity and worth of every person in Ontario. It applies to the areas of employment, housing, facilities and services, contracts, and membership in unions, trade or professional associations.

At work, employees with disabilities are entitled to the same opportunities and benefits as people without disabilities. In some cases, they may need special arrangements or "accommodations" so they can do their job duties.

Customers, clients and tenants with disabilities also have the right to equal treatment and equal access to facilities and services.

Customer Service Standard

Its goal is to ensure that all Ontarians have the same level of access and quality of customer service when managing basic activities and integrating into the workforce regardless of any disabilities. To ensure compliance, Dishon Limited, has developed and will continue to maintain accessible customer service policies, procedures and practices, provide staff training, implement a feedback method, arrange for alternate communication methods and provide appropriate notice of service disruptions.

Dishon Limited will provide positive customer service for people with disabilities based on principles of:

- 1. Respect
- 2. Dignity
- 3. Independence
- 4. Integration and
- 5. Equal opportunity

In accordance with the Accessibility Standard for Customer Service (Ontario Regulation 429/07), Dishon Limited commits to implementing the following policies and procedures:

- A. The Provision of Goods and Services to Persons with Disabilities;
- B. The Use of Assistive Devices
- C. The Use of Guide Dogs, Service Animals and Service Dogs
- D. The Use of Support Persons
- E. Notice of Service Disruptions
- F. Customer Feedback
- G. Training
- H. Notice of Availability and Format of Required Documents

Dishon Limited's AODA Standards for Customer Service Policy

Our policy is intended to meet the requirements of Accessibility Standards for Customer Service, Ontario Regulation 429/07 under the Accessibility for Ontarians with Disabilities Act, 2005, and to articulate what one may expect from our services.

Dishon Limited believes that whether a person's disability is apparent or not, everyone should be treated with courtesy and have their needs respected whenever they interact with a staff member, employee, volunteer and/or contractor who deal with the public or other

(Accessibility for Ontarians with Disabilities Act)



third parties that act on behalf of Dishon Limited All services provided by Dishon Limited shall follow the principles of respect, dignity, independence, integration and equal opportunity. We are committed in ensuring that, persons with disabilities receive the same quality of service that others receive as specifically expressed in our Human Rights, Dignity and Respect Policy.

Dishon Limited's Harassment, Dignity and Respect Policy

"In accordance with the Ontario Human Rights Code, every person has a right to be free from harassment in the workplace by reason of race, ancestry, place of birth, colour, ethnic origin, citizenship, creed, age, record of offenses for which a pardon has been received, marital status, family status, handicap, sex, or sexual orientation".

Scope

- a) This policy applies to the provision of services at premises owned and operated by DISHON LIMITED.
- b) This policy applies to all employees, clients, volunteers and/or contractors who deal with the public or other third parties that act on behalf of Dishon Limited, including when the provision of these services occurs off the premises of Dishon Limited such as in: delivery services, call centers, vendors, drivers and etc.
- c) The section of this policy that addresses the use of guide dogs, service animals and service dogs only applies to the provision of services that take place at premises owned and operated by DISHON LIMITED.
- d) This policy shall also apply to all individuals who participate in the development of the Dishon Limited policies, practices and procedures governing the provision of goods and services to members of the public or third parties.

The Provision of Goods and Services to Persons with Disabilities

Dishon Limited 's Accessible Service Provision Policy is to benefit the full range of individuals with disabilities, as defined in the Ontario Human Rights Code. The term disability as defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*, makes reference 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 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;
- 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".

Dishon Limited 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 that all applicants and employees receive the same value and quality;
- allowing applicants and employees with disabilities to do things in their own ways, at their own pace when accessing services as long as this does not present a safety risk to themselves or others;
- using alternative methods when possible to ensure that applicants and employees with disabilities have access to the same services, in the same place and in a similar manner;
- Providing services that cater to individual needs and communicating in a manner that takes into account the individual's specific disability.

The Use of Assistive Devices

Assistive Devices are any type of technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of persons with disabilities. Personal assistive devices are typically devices that individuals with disabilities utilize (i.e. wheelchair, walker or a personal oxygen tank) that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

Dishon Limited will ensure that their internal staff employees are trained and familiar with various assistive devices that may be used by customers with disabilities while visiting our office locations and accessing our services. Employees will be educated on how to use assistive devices available in providing services to individuals wishing to access Dishon Limited's services of the assistive devices that may be available. All required training and policy review will be conducted not less than once every two (2) years and as often as may be required.

Individual's Own Assistive Device(s)

(Accessibility for Ontarians with Disabilities Act)



Individuals with disabilities may use their own assistive devices as required when accessing our office locations and services provided by DISHON LIMITED.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services. For example, open flames and oxygen tanks cannot be near one another. Therefore, the accommodation of a customer with an oxygen tank may involve ensuring the customer is in a location that would be considered safe for both the customer and business. Or, where elevators are not present and where an individual requires assistive devices for the purposes of mobility, service will be provided in a location that meets the individual's needs.

The Use of Guide Dogs, Service Animals and Service Dogs

People disabilities may bring their service animal on the parts of Dishon Limited premises that are open to the public. Dishon Limited will ensure that all employees, volunteers and third parties dealing with the public are trained in how to interact with persons with disabilities who are accompanied by a service animal. All required training and policy review will be conducted not less than once every two (2) years and as often as may be required.

On rare occasions, a service animal may not be permitted to enter an area of the premises consistent with other laws. In these instances, management will provide alternative methods and assistance. A person with a disability that is accompanied by guide dog, service animal or service dog will be allowed access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to guide dogs, service animals and/or service dogs.

Food Service Areas:

A person with a disability that is accompanied by guide dog or service dog will be allowed access to food service areas that are open to the public unless otherwise excluded by law. Other types of service animals are not permitted into food service areas due to the Health Protection and Promotion Act, Ontario Regulation 562 Section 60.

Applicable Laws:

Food Safety and Quality Act 2001, Ontario Regulation 31/05: Animals not intended for slaughter or to be euthanized are not allowed in any area or room of a meat plant. It also makes an exception for service dogs to allow them in those areas of a meat plant where food is served, sold or offered for sale to customers and in those areas that do not contain animals or animal parts and are not used for the receiving, processing, packaging, labelling, shipping, handling or storing of animals or parts of animals.

The Health Protection and Promotion Act, Ontario Regulation 562 Section 60, does allow guide dogs and service dogs to go into places where food is served, sold or offered for sale. It does not however, in normal circumstance, allow animals in places where food is manufactured, prepared, processed, handled, served, displayed, stored, sold or offered for sale (other types of service animals are not included in this exception).

Dog Owners' Liability Act, Ontario: If there is a conflict between a provision of this Act or of a regulation under this or any other Act relating to banned breeds (such as pitbulls) and a provision of a by-law passed by a municipality relating to these breeds, the provision that is more restrictive in relation to controls or bans on these breeds prevails.

Exclusion Guidelines:

If a guide dog, service animal or service dog is excluded by law, Dishon Limited will offer alternative methods to enable the person with a disability to access services, whenever possible (for example, securing the animal in a safe location and offering the guidance of an employee).

Recognizing a Guide Dog, Service Dog and/or Service Animal:

Dishon Limited may request verification from the individual if it is not readily apparent that the animal is being used for reasons relating to his or her disability.

Verification may include:

- a letter from a regulated health professional confirming that the person requires the animal for reasons related to the disability;
- a valid identification card signed by the Attorney General of Canada; or,
- a certificate of training from a recognized guide dog or service animal training school.

Various Types of Service Animals

- a) Guide Dog is a highly-trained working dog 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.
- b) Service Animal as reflected in Ontario Regulation 429/07, an animal is a service animal for a person with a disability if:
 - i) it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
 - ii) if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

(Accessibility for Ontarians with Disabilities Act)



- <u>Service Dog</u> as reflected in *Health Protection and Promotion Act, Ontario Regulation 562* a dog other than a guide dog for the blind is a service dog if:
 - i) it is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability;
 - ii) or the person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.

Care and Control of the Animal:

The person that is accompanied by a guide / service dog or service animal is responsible for maintaining care and control of the animal at all time.

Allergies:

If a health and safety concern presents itself for example in the form of a severe allergy to the animal, Dishon Limited will make all reasonable efforts to meet the needs of all individuals.

The Use of Support Persons

As reflected in *Ontario Regulation 429/07*, a support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to goods and services. Dishon Limited will ensure that both, the individual with the disability and the support person, are allowed to enter the premises together and that the individual with the disability is not prevented from having access to the support person. There may be times where seating and availability prevent them sitting beside each other. In these situations, Dishon Limited will make every reasonable attempt to resolve the issue.

In situations where confidential information might need to be discussed, consent will be obtained from the individual with the disability prior to any conversation where confidential information might be discussed.

Admission Fees (if applicable):

If payment is required by a support person for admission to the premises, Dishon Limited will ensure that notice is given in advance by posting notice of admission fees for support persons where Dishon Limited fees are posted.

Notice of Service Disruption

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Dishon Limited. Reasonable efforts will be made to provide advance notice in circumstances where unplanned disruptions affect the accessibility to the facilities that individual with disabilities relies on to access or use Dishon Limited's services.

Dishon Limited will notify those who wish to use our services and facilities in a prompt fashion and the notice will include information about the reason for the disruption, its anticipated length of time and a description of any alternative facilities or services available (whenever applicable).

The notice will be posted in conspicuous places including at the point of disruption and at the main entrance. Depending on the nature of the disruption, notice may also be provided on email, outgoing telephone message and/or on even on Dishon Limited's website.

Integrated Accessibility Standards Regulation

Dishon Limited's AODA Standards for Integrated Accessibility Standards Regulation Policy

Our policy has been established in compliance with Regulation 191/11, "Integrated Accessibility Standards" (Regulations) under the Accessibility for Ontarians with Disabilities Act, 2005.

These standards have been developed to remove barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment.

Dishon Limited is governed by this policy as well as the Accessibility Standards for Customer Service Policy and the Accessibility for Ontarians with Disabilities Act, 2005 in meeting the accessibility needs of persons with disabilities.

Statement of Commitment

Dishon Limited is committed to meeting the needs of persons with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements where possible under the Accessibility for Ontarians with Disabilities Act. We are committed in ensuring that, persons with disabilities receive the same quality of service that others receive as specifically expressed in our Human Rights Policy Dignity and Respect Policy.

Accessibility Plan

Dishon Limited will develop, maintain and document an Accessibility Plan outlining our company's strategy to prevent and remove barriers from our workplace and to ensure accessibility for all.

(Accessibility for Ontarians with Disabilities Act)



The Accessibility Plan will be reviewed and updated at least once every five (5) years, and as often as may be required and will be posted on Dishon Limited's website. It will also be provided in an accessible format upon request.

Onsite Self-Serve Kiosks

Dishon Limited will incorporate accessibility features for people with disabilities when designing or procuring self-service kiosks unless it is impractical to do so.

Information and Communications Standard

The following policy applies to the provision of accessible employment services for people with disabilities and is intended to meet the requirements of the Integrated Accessibility Standards, Ontario Regulation 191/11. All employment services provided by Dishon Limited follows the principles of dignity, independence, integration and equal opportunity. The Information and Communications Standard policy addresses the following:

- (a) Feedback Process
- (b) Accessible Formats and Communication Supports
- (c) Accessible Websites and Web Content

(a) Feedback Process

Individuals who wish to provide feedback on Dishon Limited's services provided to people with disabilities can be submitted through various alternate methods.

All feedback can be submitted:

- By email to humanresources@dishoncnc.com
- By telephoning the Dishon Limited's office at 416-638-8900
- In person at the Dishon Limited's Support office location (40 Citation Drive, Vaughan, ON, L4K 2W9), Monday-Friday, 8:00am-4:00pm; or
- By mail to Dishon Limited, 40 Citation Drive, Vaughan, ON, L4K 2W9

Individuals that provide formal input will receive acknowledgement of their feedback, along with any resulting actions within 21 calendar days of receipt. Whenever possible, concerns and complaints will be addressed immediately however, some feedback may require more time to address, and must be reviewed for action, possibly involving a number of key people within the organization.

The acknowledgement of the formal feedback will indicate how the matter will be addressed and when the individual will be notified of the outcome. Dishon Limited designated employee will follow up on any actions arising from the feedback and the timeframe for implementation will be provided as part of the notification of outcome. Feedback/response will also be provided in a format that is accessible to the individual who submitted the concern or complaint.

The ultimate goal of our feedback procedures is to meet our service delivery expectations while responding to the requests of individuals with disabilities. Comments on how well the services provided by Dishon Limited are also are welcome and appreciated.

(b) Accessible Formats and Communication Supports

Dishon Limited will, upon request, provide or arrange for the provision of, accessible formats and communication supports for persons with disabilities in a timely manner, taking account the person's accessibility needs due to disability.

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

Dishon Limited will also notify the public about the availability of accessible formats and communication supports.

(c) Accessible Websites and Web Content

Dishon Limited will ensure that our new internet websites and new web content conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 – Level A as of January 1st, 2014 then to Level AA as of January 1st, 2021 except where this is impracticable. (*Accessible Websites and Web Content requirements only apply to organizations that employ more than 50 employees*)

Employment Standard

The following policy applies to the provision of accessible employment services for people with disabilities and is intended to meet the requirements of the Integrated Accessibility Standards, Ontario Regulation 191/11. All employment services provided by Dishon Limited follow the principles of dignity, independence, integration and equal opportunity. The Employment Standard policy addresses the following:

- (a) Recruitment
- (b) Recruitment, Assessment and Selection

(Accessibility for Ontarians with Disabilities Act)



- (c) Notice to Successful Applicants
- (d) Informing Employees of Support
- (e) Accessible Formats and Communication Supports for Employees
- (f) Workplace Emergency Response Information
- (g) Documented Individual Accommodation Plans
- (h) Return to Work Process
- (i) Performance Management or Career Development, Advancement and Redeployment Plan

(a) Recruitment

Dishon Limited will notify its applicants, employees and the general public about the availability of accommodation for applicants with disabilities in its recruitment process.

(b) Recruitment, Assessment and Selection

Dishon Limited 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, Dishon Limited 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.

(c) Notice to Successful Applicants

When making offers of employment, Dishon Limited will notify the success applicant of its policies for accommodating employees with disabilities.

(d) Informing Employees of Support

Dishon Limited will continue to inform its employees of its policies (and any updates to those 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. This information will be provided to new employees as soon as is practicable after commencing employment.

(e) Accessible Formats and Communication of Support for Employees

Upon request, Dishon Limited will, whenever possible, consult with the person to determine the best method of providing the information requested and will take the necessary steps to provide accessible formats and communications for the following:

- 1. Information needed in order to perform their job; and
- 2. General information that is made available to all employees in the workplace.

Accessible Formats – include but not limited to large print, recorded audio and electronic formats usable by persons with disabilities. Communication Supports – include but not limited to captioning, plain language, sign language and other supports that facilitate communications.

Dishon Limited will consult with the employee making the request in order to determine the suitability of an accessible format or communication support.

(f) Workplace Emergency Response Information

Dishon Limited will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if Dishon Limited is aware of the need for accommodation due to the employee's disability. Dishon Limited will provide this information as soon as practicable after becoming aware of the need for accommodation.

Where the employee requires assistance, Dishon Limited will, with the consent of the employee, provide the workplace emergency response information to the person designated by Dishon Limited to provide assistance to the employee.

Dishon Limited 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. (Emergency Response Plan can be found in Section 12 of the OHSP manual).

(g) Documented Individual Accommodation Plan

Dishon Limited has a written process for the development of an Individual Accommodation Plan for employees with disabilities. In accordance with IASR, the process includes:

- 1. The manner in which an employee requesting accommodating can participate in the development of the individual accommodation plan:
- 2. The means by which the employee is assessed on an individual basis;
- The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved.

(Accessibility for Ontarians with Disabilities Act)



- 4. The manner in which the employee can request the participation of a workplace representative in the development of the accommodation plan;
- 5. The steps taken to protect the privacy of the employee's personal information;
- 6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done:
- 7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employer;
- 8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

Individual accommodation plans will, if requested, include any information regarding accessible formats and communications supports provided. In addition, the plans will include individualized workplace emergency response information (where required), and will identify any other accommodation that is to be provided.

(h) Return to Work Process

An employee with a disability may sometimes need to take time off work for a treatment, recovery, or other reasons. In addition, a disability such as an injury or illness can happen at any time and to any of us.

That is why the standard requires all employers to develop a process that supports employees who have been absent due to a disability and who require disability-related accommodations when they return to work.

Dishon Limited maintains a documented return to work process for its employees 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 Dishon Limited will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

The return to work process will not replace or override any other return to work process created by or under any other statute.

(i) Performance Management or Career Development, Advancement and Redeployment Plan

Dishon Limited will take into account the accommodation needs and/or Individual Accommodation Plans of employees when:

- Using performance management processes;
- Providing career development and advancement information;
- Using redeployment procedures.

Dishon Limited will take the following steps to ensure that the accessibility needs of employees with disabilities are taken into account if we are using performance management, career development and redeployment processes:

- Review internal policies and procedures to ensure they are in compliance with the IASR:
- Take into account the accessibility needs of employees with disabilities and, as applicable, their Individualized Accommodation Plans when:
 - Assessing performance such as making performance management documents available in accessible formats, when asked
 - Managing career development and advancement, including notification of the ability to provide accommodations on internal job postings
 - Redeployment is required, including reviewing the IAP to ensure accommodations are provided.

Built Environment

Creating built environments and facilities that are accessible and user-friendly equally to all, with safety and with dignity, is a right protected by law. It is an indispensable pre-requisite for social inclusion, focusing on equal opportunity and diversity.

The Ministry of Community and Social Services amended the Integrated Accessibility Standard Regulation (IASR) under the Accessibility for Ontarians with Disabilities Act (AODA) to include new standards governing the design of public spaces in the built environment.

Beginning in 2017, organizations with over 50 employees in the private sector will have to incorporate accessibility requirements when designing, constructing and maintaining new or redeveloped elements of public spaces including:

- Recreational trails and beach access routes
- Outdoor public-use eating areas (e.g. rest stops or picnic areas)
- Outdoor play spaces (such as playgrounds)
- Exterior paths of travel (such as sidewalks, ramps, stairs, curb ramps)
- Accessible parking (on and off-street)
- Service counters and waiting areas

Organizations are not required to make changes to their existing public spaces. The standard only applies when an organization builds new or makes major changes to existing elements of public spaces.

(Accessibility for Ontarians with Disabilities Act)



Dishon Limited will ensure that accessibility requirements are taken into account when designing, constructing and maintaining new or redeveloped elements of public spaces as required.

Training for Dishon Limited's Employees

Dishon Limited 's will provide training to staff members, part-time, seasonal, contractors, co-op students, volunteers and others who deal with persons who wish to benefit from Dishon Limited's services. Re-training will be conducted not less than every three (3) years, and as often as may be required.

As reflected in Ontario Regulation 429/07 & 191/11, regardless of the format, training will occur on ongoing basis and will be provided to employees as soon as practicable. Training will include:

- An overview of the Accessibility for Ontarians with Disabilities Act, 2005
- Overview of Accessibility Standards for Customer Service, Ontario Regulation 429/07 and Integrated Accessibility Standard Regulations 191/11
- In addition, management and supervisory staff will be trained in our obligations under the Ontario Human Rights Code
- Dishon Limited 's policies and procedures in relation to providing accessible customer service to customers with disabilities.
- Procedures on to interact and communicate with people with various types of disabilities
- Instructions on how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person (including the handling of admission fees).
- Instruction on how to use the assistive devices available on that Dishon Limited may provide to assist people with disabilities (i.e. TTY, Wheelchair lifts, and etc.).
- What to do if a person with a disability is having difficulty in accessing Dishon Limited services.
- Instruction on interacting with people with disabilities who use assistive devices or require the assistance of a guide dog, other service animal or a support person
- Overview of the company's obligation to provide information in alternate formats and alternate communication supports upon request including:
 - Review of different types of alternate formats
 - Review of alternate communication supports (sign language, gestures, boards with symbols, voice-synthesizers, etc.)
 - Review of company's alternate format service provider (when identified) and process relating to securing information in alternate formats
 - o Review of tracking system used for alternate formats upon request
- Information contained within this document.

Training Schedule:

Dishon Limited will provide training as soon as practicable. Training will be provided to employees, volunteers, agents and/or contractor and others who deal with the public or act on our behalf of Dishon Limited. Revised training will be provided in the event of changes to legislation, procedures and/or practices.

Training Records:

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

Modifications Made to Other Dishon Limited's Policies

Any policy of Dishon Limited's that does not respect and promote the dignity and independence of people with disabilities will be modified or removed. To the same extent, other existing policies and procedures that did not entirely comply with or meet the AODA requirements have been modified to comply with the legislation (i.e. JHSC Policies, Emergency Policies & Procedures and etc).

Notice of Availability and Format of Documents

Dishon Limited shall notify that all Accessibility Standards for Customer Service and Integrated Accessibility Standards Regulation documentation are available upon request and in a format that takes into account the person's disability. Notification will be given by posting the information in a conspicuous place owned and operated by Dishon Limited.

Administration

This policy and its related procedures will be reviewed as required in the event of legislative changes and at least every five (5) years and as often as is required in the absence of legislative changes. If you have any questions or concerns about this policy or its related procedures please contact:

(Accessibility for Ontarians with Disabilities Act)



Dishon Limited

Human Resources 416-638-8900 40 Citation Drive, Vaughan, ON, L4K 2W9 hr@dishoncnc.com

Referenced Documents:

- Accessibility for Ontarians with Disabilities Act, 2005
- Accessibility Standards for Customer Service, Ontario Regulation 429/07
- Ontario Human Rights Code, 1990
- HR Downloads AODA Customer Service Training 2011
- Blind Person's Rights Act, 1990
- Food Safety and Quality Act 2001, Ontario Regulation 31/05
- Health Protection and Promotion Act, Ontario Regulation 562
- Ontario Regulation 191/11 Integrated Accessibility Standards
- Ontarians with Disabilities Act, 2001

(Accessibility for Ontarians with Disabilities Act)



Customer Service Standard – General Information Barriers to Accessibility

Type of Barriers	Examples	
Attitudinal barriers are those that discriminate against people with disabilities.	 thinking that people with disabilities are inferior assuming that a person who has a speech impairment can't understand you 	
Information or Communications barriers happen when a person can't easily understand information.	 print is too small to read websites that can't be accessed by people who are not able to use a mouse signs that are not clear or easily understood. 	
Technology barriers occur when a technology can't be modified to support various assistive devices.	Website that doesn't support screen-reading software Telephone lines not equipped for the hearing impaired (TTY Lines)	
Organizational barriers are an organization's policies, practices or procedures that discriminate against people with disabilities.	a hiring process that is not open to people with disabilities	
Architectural and Physical barriers are features of buildings or spaces that cause problems for people with disabilities.	 hallways and doorways that are too narrow for a person using a wheelchair, electric scooter or walker counters that are too high for a person of short stature or in a wheelchair poor lighting for people with low vision doorknobs that are difficult for people with arthritis to grasp parking spaces that are too narrow for a driver who uses a wheelchair telephones that are not equipped with telecommunications devices for people who are deaf, deafened or hard of hearing 	

Key Principles

Respect & Dignity:

Respectful and dignified customer service mandates that Dishon Limited develops policies, procedures and practices that ensure customer with disabilities receive the same respect, values and services as any other individual. Customer service will need to consider how many individuals with disabilities can effectively access and use services.

Independence:

Independent component ensures that individuals with disabilities are given the freedom to make their own choices and do things their way. Customers who speak or do things slowly should not be denied an opportunity to participate. Customer service will need to ensure that employees do not interfere if the individual would prefer to do it themselves.

Integration:

Integrated customer service emphasizes the need to develop polices procedures and practices that ensure that individuals with disabilities can access the same services in the same place and in a similar manner as any other customer.

When integration is not feasible, Dishon Limited may have to look for alternative measures to provide the same goods and services. Alternative measures may look beyond integration to provide the customer with what they require.

Equal Opportunity:

Equal opportunity does not mean that the exact same service must be provided in the exact same way. Equal opportunity customer service is intended to ensure that individuals with disabilities do not have to make more effort or accept lesser quality in order to access the goods and services that Dishon Limited offers.

Types of Disabilities and How to Provide Customer Service

Deaf / Oral Deaf / Deafened / Hard of Hearing:

People who experience hearing loss may be deaf, oral deaf, deafened, or hard of hearing. People experiencing hearing loss may use assistive devices, like hearing aids, special telephones, sign language interpreters, various amplifiers or a pen and paper.

(Accessibility for Ontarians with Disabilities Act)



Customer Service Tips:

- · Attract the individual's attention before speaking. For example, try a gentle touch on the shoulder or wave of your hand.
- Don't shout or snap your fingers.
- Make sure you are in a well-lit area where your individual can see your face.
- If the person uses a hearing aid, reduce background noise or move him or her to a quieter area.

Deaf blind

A person who is deaf blind cannot see or hear to some degree. Many people who are deaf blind will be accompanied by a professional who helps with communicating. Interveners are trained in special sign language that involves touching the hands of the client in a two-hand, manual alphabet or finger spelling.

Customer Service Tips:

- An individual who is deaf blind is likely to explain to you how to communicate with them or give you an assistance card or a note explaining how to communicate with them.
- Speak directly to the individual, not to the intervener and identify yourself to the intervener when you approach your individual who is deaf blind.

Intellectual/ Developmental Disabilities

Developmental or intellectual disabilities can mildly or profoundly limit a person's ability to learn, communicate, do every day physical activities and live independently. You may not be able to know that someone has this disability unless you are told, or you notice the way the person acts, asks questions or uses his or her body language. However, they may understand you more than you realize. An example of a developmental disability would be Down Syndrome.

Customer Service Tips:

- Don't assume what a person can or cannot do.
- · Make sure the individual understands what you've said. You can be direct and ask: "Do you understand this?"
- Provide one piece of information at a time. Use plain language. You can break down the information into simpler concepts, without exaggerating speech or gestures or being patronizing. You may want to ask if the information needs to be repeated.

Learning Disabilities

Learning disabilities refers to a variety of disorders that affect how a person takes in and retains information. People with learning disabilities just learn differently. Learning disabilities affect people from all backgrounds and are not caused by culture, language or a lack of motivation. Learning disabilities are specific impairments that can result in problems with reading and language-based learning (dyslexia), problems with mathematics (dyscalculia), or problems with writing and fine motor skills (dysgraphia). This disability may become apparent in your customer service interaction when the person has difficulty reading material or taking in and processing the information you are providing.

Customer Service Tips:

- Take some time people with some learning disabilities may take a little longer to process, understand and respond.
- Provide information in a way that works for the individual. For example, keep a pen and paper handy. That way, you can explain, and then review and repeat the information using your notes. If you're discussing confidential information, consider giving the notes to the individual or offering to destroy them.
- Be prepared to explain any materials you provide for your customers.

Mental Health Disabilities

The important thing to remember is to focus on completing the transaction in a calm, patient way and meeting the individual's needs. Mental health issues can affect a person's ability to think clearly, concentrate or remember. Mental health disability is a broad classification for many disorders that can range in severity. Customers may experience anxiety due to phobias or panic disorder. Hallucinations, mood swings, and a deep lack of motivation may be signs of a mental health disability. A person may have a clinical depression or bipolar disorder. The major barrier for people with mental health disabilities is the stigma associated with it and the lack of understanding.

Customer Service Tips:

- Be confident and reassuring. As with all customers, listen carefully and focus on meeting the individual's needs.
- If the person appears to be in a crisis, ask them to tell you the best way to help.
- If a customer appears to show signs of a mental health disability, it may be helpful to keep in mind that the customer's reactions are not connected to you personally, as a service provider. The customer may simply be showing symptoms of mental illness.

Physical or Disabilities Affecting Mobility

The common image of someone with a physical disability who uses a wheelchair is a stereotype. For example, physical disabilities can result from arthritis, heart or lung conditions or amputations.

(Accessibility for Ontarians with Disabilities Act)



Customer Service Tips:

- People with physical disabilities often have their own ways of doing things, so it's a good idea to ask before you help.
- Respect your individual's personal space. Don't lean over them or on an assistive device.
- Don't move items or equipment, such as canes or walkers, out of the individual's reach.
- If you have permission to move a person in a wheelchair remember to make sure your customer is ready to be moved and that you describe what you are going to do beforehand. Don't leave the individual in an awkward, dangerous or undignified position such as facing a wall or in the path of opening doors.
- In some situations, inform your customer of the accessible features in the immediate environment (automatic doors, accessible washrooms, elevators, ramps, etc.).

Speech or Language Impairments

Some individuals may have problems communicating because of their disability. Cerebral palsy, stuttering, hearing loss or other conditions may make it difficult for the person to pronounce words or may cause slurring or stuttering. A person with this type of disability may use a communication board or other assistive devices.

Customer Service Tips:

- Don't assume that just because a person has this disability they also have another.
- Give your customer whatever time they need to get their point across. If appropriate, offer to move to a more comfortable location.
- Ask questions that can be answered "yes" or "no," if possible.
- Don't interrupt or finish your customer's sentences. Give them time to finish.

Customers with Vision Loss

There are different types of vision disabilities that can reduce a person's ability to see clearly. Some people may experience reduced side vision or, a lack of central vision meaning they cannot see straight ahead but very few people are completely blind. Depending on the severity of the vision loss, you may not be able to identify a person with limited vision. Some may require the assistance of a service animal or use a white cane, but others may not show any signs of their limitations.

Vision loss can restrict someone's ability to read signs, locate landmarks, or see hazards. Some customers may use a guide dog or white cane; others may not. Some customers simply need to view written materials—like documents, receipts, menus, brochures, instructions or labels—in brail or in large print, or with the help of a magnifier.

Customer Service Tips:

- · Don't assume the individual can't see you.
- Identify yourself when you approach your customer and speak directly to him or her.
- Offer your elbow to guide the person. If they accept, walk slowly, but wait for permission before doing so.
- · Identify landmarks or other details to orient your customer to the environment around them.
- If you're giving directions or providing any information, be precise and descriptive. For example, if you're approaching a door or an obstacle, say so.
- Don't leave your customer in the middle of a room. Guide them to a chair or a comfortable location.

Top 10 Essential Customer Service Skills

When providing excellent customer service to any customer, regardless of any disability, it is essential to remember abide by the following 10 guidelines:

- 1. Introduce yourself to the customer and anyone that may be assisting them.
- 2. Speak clearly and directly to the customer.
- 3. Make eye contact with the customer.
- Use plain language to explain details when answering questions or providing information to ensure you can be easily understood.
- 5. Ask one question at a time and allow time for customers to respond.
- 6. Don't cover your mouth when you speak so that your lips can be read if needed and to ensure your message is as clear as possible.
- 7. Be polite and respectful.
- 8. Readapt your approach if the customer cannot understand your message.
- 9. Take your time answering questions and listening to responses.
- 10. Ask what you can do to help if you are ever unsure how to assist.

Assistive Devices

Assistive devices enable customers to do everyday tasks such as moving around, communicating reading or lifting by reducing or eliminating barriers. These can include such devices as wheelchairs, listening devices, portable oxygen tanks, laptops with screen reading software and communication programs, canes or smartphones.

(Accessibility for Ontarians with Disabilities Act)



Provide appropriate amount of space

Do not stare at or gawk at the device

When working with assistive devices it is important to:

- Never refuse to work with a device
- Do not block, knock or bump into the device
- Never move/touch device without asking for permission
- Offer assistance if the customer is having trouble working their device

Service Animals

When dealing with services animals it is important to never separate the customer and their service animal. Service animals are also not to be touched, petted or talked to, when the animal is out with the customer it is working and should not be distracted. Finally, do not feed or offer treats to the animal.

Service animals are usually dogs but can also be monkeys, parrots and other animals. The function of a service animal can vary from one individual to another assisting in tasks such as acting as a travel guide, carrying cargo, fetching products, opening doors, ringing doorbells, providing additional support to avoid falls, warning customers of impending seizures or needed medication, protecting the customers in medical situations, calling 911, turning on lights, getting help and reducing panic and fear.

Facts & Questions on Service Animals

- 1. What if I cannot clearly identify that the animal is a service animal? For example, no special harness is present.

 Answer: If you are not sure if the animal is in facet a service animal, ask the owner. Customers that need service animals should have paperwork to support the need. It is okay to ask for this information.
- 2. What if the animal becomes disruptive or out of control?

Answer: It is the owner's responsibility to maintain control. If the animal is becoming disruptive ask the customer if you can do anything to assist them (i.e. Go to a quiet place to calm the animal or call for medical help. Remember to not touch the animal).

- 3. What if the customer asks me to provide water to their animal? **Answer:** You may provide water, ask the owner if they have a water dish or provide one of your own.
- 4. What if other customers are approaching the animal to pet it?

Answer: The owner might not realize that this is happening. Politely stop the approaching customer and explain that they should ask for permission before petting the animal and never yell or scream at the approaching customer.

- 5. Are there locations or areas that service animals should not be permitted?
 - **Answer:** Service animals are not permitted in locations where food is manufactured, prepared or processed. However, due to the nature of their work, service animals are permitted in locations where food is served, sold and offered for sale.
- 6. What if another customer is severely allergic to the animal?

Answer: Consider talking to both customers to determine if they can be in separate areas of your business while still receiving the same service and access- this will require an accommodation plan.

Support Persons

A support person can be a paid worker, volunteer, family member or a friend that does not necessarily require any special training or certification. They often assist by taking notes, reading, guiding or directing the customer, offering transportation, personal care and communicating.

When working with a support person it is important to remember to:

- Introduce yourself to both individuals
 Talk directly to the individual with the disability.
- Address the customer appropriately
 Do not try to have side conversations with support person.
- Provide any written material to both individuals Never separate the customer and their support person.

Facts & Questions on for Support Persons

1. What if I don't know that the person is there to offer support?

Answer: If you not introduced at the beginning of the conversation to the support person, it is okay to ask: "is this your support person?" However only ask after you have attempted to provide service. Approach the customer and provide services as per usual, chances are this will become apparent after a while.

2. Can I charge the support person to attend the event?

Answer: It is recommended that companies offer the support person a free ticket as there are there to assist the customer. However, if there is a fee for the support persons, it should be posted and communicated prior to the event.

3. What if I need to discuss confidential information?

(Accessibility for Ontarians with Disabilities Act)



Answer: Always obtain permission from the customer before discussing information, especially financial information, in front of the support person. Some customers may wish for the support person to step away during the discussion.

Integrated Accessibility Standards Regulation – General Information Key Principles

<u>Accessible Formats</u> – include but not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.

<u>Communication Supports</u> – include but not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Conversion Ready - an electronic or digital format that facilitates conversion into an acceptable format.

<u>Information</u> – includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and conveys meaning.

<u>Kiosk</u> – an interactive electronic terminal, including a point-of-sale device, for public use that allows users to access one or more services or products.

Mobility Aid – a device used to facilitate the transport, in a seated posture, of a person with a disability.

Mobility Assistive Device – a cane, walker or similar aid.

<u>Obligated Organization</u> – Organizations may include workplaces, businesses or services. Refers to the Government of Ontario, the Legislative Assembly, a designated public sector organization, a large organization and a small organization to which the standards of this Regulation apply.

<u>Performance Management</u> – activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success.

<u>Redeployment</u> – the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.

<u>Support Person</u> – in relation to a person with a disability, another 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, services or facilities.

<u>Web Content Accessibility Guidelines</u> – refers to the World Wide Web Consortium Recommendation, dated December 2008, entitled "Web Content Accessibility Guidelines (WCAG) 2.0."

Alternate Accessible Formats

Alternate formats are other ways of publishing information besides regular print. Some of these formats can be used by everyone while others are designed to address the specific needs of a user.

(Accessibility for Ontarians with Disabilities Act)



Why do we need to provide information in other formats?

Some people cannot read because of their disability. This can include people who:

- · Are blind or have low vision
- · Have an intellectual or other cognitive disability
- · Cannot hold publications or turn pages because of a physical disability
- · Have difficulties accessing information on the Internet, or
- · Have difficulties watching or hearing video presentations.

By providing alternate formats, everyone can access your information.

Examples of alternative formats

Large Print

This helps people who have low vision. Large print materials should be prepared with a font (print) size that is 16 to 20 points or larger. **Screen readers**

This software converts text that is displayed on a computer monitor to voice (using a speech-synthesizer) or to Braille.

Braille

This is an alternative format for people who are blind or deaf-blind. Braille is a tactile system of raised dots representing letters or a combination of letters of the alphabet. Braille is produced using Braille transcription software.

Audio Format

This is an alternative format for people with a vision, intellectual or developmental, or learning disability who are unable to read print.

Captioning

Captioning translates the audio portion of a video presentation by way of subtitles or captions. They usually appear on the bottom of the screen. Captioning may be closed or open. Closed captions can only be seen on a television screen that has a device called a closed caption decoder. Open captions are "burned on" a video and appear whenever the video is shown.

Captioning makes television programs, films and other visual media with sound accessible to people who are deaf or hard of hearing.

Windowing

Windowing lets people who are Deaf to read by means of an interpreter who explains using sign language what other people are hearing during a video presentation or broadcast.

The interpreter appears in a corner or "window" in the screen translating spoken word to sign language. Windowing may include open or closed captioning.

Descriptive Video Service (DVS)

DVS provides descriptive narration of key visual elements — the action, characters, locations, costumes and sets — without interfering with dialogue or sound effects. This makes television programs, films, home videos and other visual media accessible for people with vision disabilities.

Assistive Technologies

People with disabilities may use one or more of the following assistive technologies in communicating with others or in getting information:

- · Speech input and synthesized speech output
- · Screen readers, screen magnifiers, screen projectors
- Audio recorded information
- Text telephones
- Adjustable signal level and tone on audio devices
- Volume control
- Hands-free data entry and response selection
- Intelligent word prediction software
- · Alternative pointing devices, such as mouth sticks
- Keyboard controllers
- Book holders and page turners
- Touchscreens, and
- Standardized icons

Telecommunications

Although many people who are Deaf or hard of hearing use wireless or hand-held communications devices to send and receive text messages, TTY (teletypewriter) is still widely used.

Bell Canada Relay Service lets TTY users and hearing people talk to one another by phone with the help of specially-trained operators. Here is how it works:

The TTY user dictates the conversation to the operator.

The operator relays the conversation to the TTY phone.

(Accessibility for Ontarians with Disabilities Act)



The TTY conversation is then relayed to the regular phone user.

This service is confidential and the only cost is any long-distance charges that would regularly apply. Local calls are free.

Accessible websites

Providing easy access to information through accessible websites benefits helps everyone, including:

- · People with disabilities
- Seniors
- · Consumers living in areas that do not have access to high-speed Internet
- · People who have difficulty reading and writing
- People whose first language is not English

Alternate Communication Supports

Examples of communication supports that individuals with disabilities may need to access information include:

- plain language
- sign language interpreter
- reading the information out loud to a person with vision loss
- adding captioning to videos or using written notes to communicate with someone who is hard of hearing
- Sign Language
- Gestures
- Boards with symbols
- · Voice synthesizers

Process for Requesting Alternate Format

Should you require an alternate format please fill out the Accessibility Form – Request for Document in Alternate Format and submit to Dishon Limited. This can be submitted via email, fax, or directly at the Dishon Limited office. Once submitted, your requested will be responded to in a timely manner.

Tracking System for Requests for Alternate Format

Once a request is received it will be recorded and tracked until the document in alternate format has been supplied to the individual who requested it.

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT

Dishon AODA Accessibility Plan (Accessibility for Ontarians with Disabilities Act)



(AODA) Assessment

	Customer Service Assessment	
1	Under the AODA, different standards on accessibility are being developed that will set requirements for the identification, removal, and prevention of barriers for people with disabilities key areas of daily living by January 1st 2025.	☐ True ☐ False
2	The customer service standard is a voluntary standard. Your organization can decide whether or not to put it into practice.	☐ True ☐ False
3	The five principals of positive customer service are: Respect, dignity, independence, integration and equal opportunity.	☐ True ☐ False
4	Your organization must accept feedback about the manner in which it provides services to people with disabilities.	☐ True ☐ False
5	Assistive devices enable a person with a disability to do everyday tasks and activities.	☐ True ☐ False
	AODA Integrated Accessibility Standards Regulation Assessment	
6	The Information and Communications Standards policy addresses the feedback process, accessibility plan and accessible websites.	☐ True ☐ False
7	The goal of our feedback procedures is to penalize everyone who has a complaint.	☐ True ☐ False
8	Applicants should be notified about the availability of accommodation for applicants with disabilities during the recruitment process.	☐ True ☐ False
9	Individualized workplace emergency response information is never reviewed.	☐ True ☐ False
10	The return to work process outlines the steps the employer will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.	☐ True ☐ False