

ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE		
Procedure No. HR-58.0	Revision: 3 Date: Dec 1, 2023	
Original Release Date: Jan 1, 2012 Approved By:	Review Date: December 1, 2023	
NS	TA	
PRESIDENT	CEO	

1.0 Purpose

The purpose of this policy is to develop, implement, and enforce accessibility standards in order to achieve accessibility for persons with disabilities with respect to goods, services, and facilities.

2.0 Scope

This policy has been developed in accordance with the Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11 and the Ontario Regulation, O. Reg. 191/11: INTEGRATED ACCESSIBILITY STANDARDS and the provisions of the Ontario Human Rights Code.

All legislated changes impacting this policy will be reflected in Arnott Construction's policies through updates, on an ongoing basis. The policy will be reviewed annually in accordance with applicable legislation. No changes will be made to this policy before considering the impact on people with disabilities.

This policy applies to all employees and any other members of our organization and all locations of Arnott Construction.

Our Commitment

Arnott Construction is committed to excellence in serving all people with disabilities. We strive to provide goods, services, and facilities in a respectful and accessible manner to all customers, including persons with disabilities. Persons with disabilities will benefit from the same services, in the same place, in a similar way, as other customers. It is the commitment of Arnott Construction to provide equitable treatment, with respect to providing our goods, services, and facilities without discrimination in accordance with the Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11 and the Ontario Regulation, O. Reg. 191/11: INTEGRATED ACCESSIBILITY STANDARDS and the provisions of the Ontario Human Rights Code.

When providing our goods, services, and facilities to a person with a disability, we are committed to the following four core principles:

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- Dignity Service is provided in a way that allows the person with a disability to
 maintain self-respect and the respect of other people. People with disabilities are
 not treated as an afterthought or forced to accept lesser service, quality, or
 convenience.
- **Independence** Allowing a person with a disability to do things on their own without unnecessary help, or interference from others.
- Integration Service is provided in a way that allows the person with a disability to benefit from the same services, in the same place, and in the same or similar way as other customers, unless an alternate measure is necessary to enable the person to access goods, services, or facilities.
- **Equal Opportunity** People with disabilities have an opportunity equal to that given to others to access our goods, services, and facilities.

3.0 Responsibilities

3.1 Managers are responsible for and must do the following:

- Be knowledgeable of all related legislation
- Provide training to all employees and other members of our organization
- Establish a process to provide feedback on how goods or services are provided to people with disabilities and outline how the Company will respond and take action. This feedback process must be accessible, and the Company will provide or arrange accessible formats and communication supports, upon request
- Ensure policies, practices, and procedures are consistent with core principles
 of the standard

3.2 Employees and other members of our organization are responsible for and must do the following:

- Comply with this policy
- Attend training

4.0 Definitions

- 4.1 *Disability* (as per the Ontario Human Rights Code)
 - a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical 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 in one or more of the processes involved in understanding or using symbols or spoken language,
 - (d) a mental disorder, or

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(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; ("handicap")

4.2 <u>Customers</u>

People who receive goods or services from Arnott Construction.

4.3 Persons with Disabilities

Individuals who have a disability as defined under the Ontario *Human Rights Code*.

4.4 Barrier

Anything that prevents a person with a disability from fully participating in all aspects of society because of their disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or practice.

4.5 Accessibility

Accessibility is the degree to which a product, device, service, environment, or facility is usable by every person, including persons with disabilities.

4.6 Goods, Services, and Facilities

The goods, services, and facilities provided by Arnott Construction.

4.7 Assistive Devices

A device used to assist a person with a disability in carrying out activities or in accessing the services of persons or organizations covered by the customer service standard. (i.e., canes, hearing aids, wheelchairs, etc.).

4.8 Service Animals

A service animal is an animal for a person with a disability:

- If it is readily apparent that the animal is used by the person for reasons relating to their disability; or
- If the person provides a letter from a physician or nurse, or regulated health professionals (including psychologists, psychotherapists, audiologists, speech-pathologist, chiropractors, occupational therapists, optometrists, registered psychotherapists and mental health therapists) confirming that the person requires the animal for reasons relating to the disability

4.9 Guide Dog

A dog trained as a guide for a blind person and has the qualifications prescribed by the regulations of the Blind Persons' Rights Act.

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4.10 Support Person

A support person is an individual hired or chosen by a person with a disability to accompany them in order to help with communication, mobility, personal care, medical needs or with access to goods or services.

4.11 Premises

Includes the buildings, land, or grounds where goods or services are provided.

5.0 Procedure

Communication

- 5.1 We will communicate with people with disabilities, to the best of our ability, in ways that take into account their disability and offer communication methods that are suitable to their communication needs (i.e., e-mail, telephone, or in-person, etc.)
- 5.2 If a person with a disability requiring a wheelchair enters the lower office of Arnott Construction premises, they may ring the doorbell to request service. Upon hearing the doorbell, an employee is required to come out to greet the person. If an extended visit is required, suitable meeting accommodation will be arranged. Employees and other members of our organization are required to take into consideration the person's disability when making arrangements.
- 5.3 If any person with a disability is unable to access the second floor of Arnott Construction, employees are required to meet the person on the main floor, or in another suitable meeting location off the premises, if necessary.
- 5.4 Information provided on our company website and promotional marketing materials will be offered in alternative formats, upon request, (i.e., small print vs. large print, offering an in-person meeting to review and read materials or website information if requested, etc.).
- 5.5 All employees will be educated and trained on how to address and communicate effectively and appropriately with customers with disabilities.

Use of Guide Dogs and Service Animals

- 5.6 We are committed to welcoming persons with disabilities accompanied by their guide dog or service animal in those areas of the company premises that are open to the public and other third parties, unless the animal is otherwise excluded by another law. If a service animal is excluded by law, Arnott Construction will use other measures to provide services to the person with a disability.
- 5.7 Arnott Construction is permitted to ask for proof that the animal is a service animal. The person with a disability is required to provide a letter from a physician or nurse, or regulated health professionals (including psychologists, psychotherapists, audiologists, speech-pathologist, chiropractors, occupational therapists, optometrists, registered

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psychotherapists and mental health therapists) confirming that the person requires the animal for reasons relating to the disability.

5.8 All employees and other members of our organization will be trained on the different types of service animals, as well as how to properly interact with those using service animals.

Support Persons

- 5.9 We are committed to welcoming persons with disabilities who are accompanied by a support person. A person with a disability will be allowed to enter those areas of the company premises that are open to the public or third parties with their support person.
- 5.10 In certain cases, Arnott Construction may require a person with a disability to be accompanied by a support person for health and safety reasons. Before making this decision, Arnott Construction 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

In such a situation, admission fees or fares (if applicable) will be waived for the support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to their support person while on our premises.

Assistive Devices

- 5.11 We are committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our goods, services, and facilities. We will ensure employees and other members of our organization are trained on and familiar with various assistive devices that may be used by customers with disabilities while accessing our goods, services, and facilities.
- 5.12 Persons with disabilities shall be permitted to obtain, use, or benefit from our goods, services, and facilities through the use of their assistive devices.
- 5.13 It is the responsibility of the person with a disability to ensure that their own assistive device is operated in a safe manner at all times.
- 5.14 All employees and other members of the organization will be trained as required on assistive devices and Arnott Construction will maintain accurate records of training delivered. These records will be made available upon inspection as may be required.

Notice of Temporary Disruption of Service

5.15 We will provide notice when facilities or services on which people with disabilities rely on to access or use goods or services are temporarily disrupted. The notice will be placed in

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a conspicuous place in areas open to the public or third parties. The notice will include the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

Feedback Process

- 5.16 People with disabilities who wish to provide feedback on the way Arnott Construction provides accessibility to our premises and/or general communication are encouraged to do so. Comments and feedback can be submitted to the CEO:
 - In-person at 2 Bertram Industrial Parkway, Midhurst, Ontario
 - By email at: feedback@arnottgroup.com
 - By phone at: (705) 735-9121
 - By using the Contact Us Form found on our website at: http://www.arnottgroup.com/page/contact
- 5.17 All feedback, including complaints, will be handled by the CEO in collaboration with Human Resources, and will respond back within ten (10) business days of receiving the feedback. The CEO will ensure that our feedback process is accessible by providing or arranging for accessible formats and communication supports, if requested.

Billing

5.18 We are committed to providing accessible invoices to all of our customers. Arnott Construction will answer any questions customers may have about the content of their invoice in-person, by telephone or by e-mail.

Training

5.19 Upon hire, Arnott Construction will provide training to all employees and other members of the organization on providing accessible customer service and how to interact with people with various types of disabilities. Employees will complete refresher training every three (3) years. Arnott Construction will maintain accurate records of training delivered to our employees and other members of our organization. These records will be made available upon inspection as may be required.

Modifications to this policy and other policies

5.20 Arnott Construction will reassess how we provide goods, services, and facilities to persons with disabilities as often as is necessary to ensure our goods, services, and facilities are fully accessible. No changes will be made to this policy or other policies before considering the impact on persons with disabilities.

6.0 References and Associated Documents

Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11 O. Reg. 191/11: INTEGRATED ACCESSIBILITY STANDARDS Ontario Human Rights Code Refer to this policy via Site Docs

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