Accessibility for Ontarians with Disabilities Act, 2005 ("AODA")

Schedule B
Accessible Customer Service Policy
Explanation and Implementation

November 01, 2011
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1.0 Background Information

The AODA was designed to make Ontario more accessible by identifying, removing and preventing barriers for persons with disabilities. As a result five standards were set out that will place mandatory requirements on Emco. These include: Customer Service, Information and Communication, Employment, Transportation; and Built Environment.

Each standard has rules we must comply with a goal of making Ontario barrier free by 2025.

1.1 Overview of the Accessibility Standards for Customer Service

The Customer Service Standard is the first of the five standards to be introduced and is to be in place by January 01, 2012. The standard applies to all people, businesses and organizations that provide goods and services to the public, other organizations or third parties.

The goal is to ensure people with disabilities receive the same access to goods and services as everyone else. It requires that goods and services will be provided under the principles of dignity, independence, integration and equal opportunity. The Standard also mandates communication, assistive devices, guide dogs, service animals, support persons, service disruptions, feedback and training.

2.0 Requirements

- Establish a policy that complies with the Customer Service Standard.
- Develop procedures and practices that follow guidelines and that are consistent with the core principles of dignity, independence, integration and equal opportunity.
- Communicate with a person that takes into account their specific disability. Ask the person how they wish to be communicated with.
- Allow customers to use their personal assistive devices.
- Allow customers to be accompanied by their guide dogs.
- Allow customers who are accompanied by support persons to bring that person with them while they are conducting business.
- Provide notice when services that customers with disabilities rely on are unavailable including when the expected length of the disruption, the reason and any alternatives available.
- Develop a feedback process relating to the services and goods received by persons with a disability in a manner that is easiest for that person.
- Train employees on the policy and the customer service standard.
- Train anyone who is involved in the development and approval of customer services policies, practices and procedures.
• Document in writing all of the policies, procedures and practices related to the Customer Service Standard
• Notify customers these documents are available at any time in any location in a format that takes into account their disability.
• Keep a record of all training
• File an online report of compliance by January 01, 2012

3.0 Training and Implementation

A major requirement in order to be compliant with Service Regulation 429/07 of the Accessibility for Ontarians with Disabilities Act, 2005 is that all employees be trained and informed on the policies, practices and procedures put in place by the employer. Due to the nature of Emco’s business and the distance between its Profit Centres and National Support Centre, the training will initially be led by NSC.

• Training on the Accessible Customer Service Policy will be done every 3 years or whenever new changes to the policy occur. Training on the Accessible Customer Service Policy will be given to all new employees. New employees will have the policy and program explained to them by their manager. They will also have to review the PowerPoint presentation and sign a waiver stating that the policy and program have been explained to them and they have read and understood the contents of the policy.

How will we train our employees at National Support Centre?

• Human Resources will conduct training at the National Support Centre. Training will be in the form of a PowerPoint Presentation to all Managers, Vice Presidents, Directors and employees at the National Support Centre. The presentation will be approximately an hour long and will consist of a review of the policy and a quiz. The presentation will be made available online for future reference.

How will we train our employees at the Profit Centres across Ontario?

• Training at the Profit Centers will be conducted initially by NSC. Human Resources will present the policy and program content to all Managers on a webinar. The training will be followed by question and answer session. Managers will receive the full AODA package, which includes the policy, program contents and applicable forms. Managers will then be responsible for training each of their own Profit Centres. Training on this policy is mandatory and must be done by December 31, 2011.

• Depending on the layout and scheduling of each Profit Centre, Managers will train their employees with the same material they were trained with. They will conduct their training with all employees. They will go through the slides with the employees and emphasize our duties under the Act. Managers will then post
the policy and program contents along with applicable forms in a conspicuous place available to all employees and customers.

Where will the policy and its accompanying documents be available?
- The Policy, general program contents and all applicable forms will be available on the Emco Health and Safety Website as well as on Emco’s external website.

4.0 Offenses and Penalties for lack of compliance

Under the AODA, the government has the authority to conduct inspections to ensure compliance. Failure to comply could result in fines as high as $50,000 per day for individuals and $100,000 per day for corporations. Regulation C11 S39 (2)

Similar to any other Emco policies employees are expected to be in compliance. Failure to comply will result in discipline, up to and including termination for cause.