

## Policy Overview

BrandSafway is committed to providing accessible customer service to all its customers and to providing service in a manner that respects the dignity and independence of persons with disabilities. This policy describes the guidelines adopted by BrandSafway, and applicable to all companies affiliated with BrandSafway with regard to Accessibility for Ontarians with Disabilities and is in accordance with the Accessibility Standards for Customer Service (Ontario Regulation 429/07) made under the Accessibility for Ontarians with Disabilities Act, 2005 ("AODA").

This policy applies to all BrandSafway Ontario employees who deal with members of the public, including full-time, part-time and temporary employees, summer students and people acting on behalf of BrandSafway (e.g. consultants, third-party contractors, etc.). It also applies to all employees who participate in developing and approving BrandSafway's policies, practices and procedures governing the provision of goods, services and facilities.

As a BrandSafway employee, you are required to read, understand and adhere to the requirements of this policy in its entirety. However, for your convenience, you can click on the following section links if you need to refer to a specific component of this policy.

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If you have questions about this policy, please reach out to your manager, HR Representative or EHS Representative.

### Objectives:

The objectives of this policy are to:

- Provide equitable access to our services for people with disabilities in accordance with the AODA).
- Describe the procedures that ensure all reasonable measures are taken to provide accessible services to people with disabilities.
- Establish accessibility standards for Customer Service in accordance with the Code and the AODA.

### Definitions:

For the purposes of this policy:

Assistive device: is any device used by people with disabilities to help with daily living. Assistive devices include a range of products such as wheelchairs, walkers, white canes, oxygen tanks or electronic communication devices.

Customer: is any person who uses the goods, services, and facilities of BrandSafway.

Disability: as defined in the *Ontario Human Rights Code* means:

- 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 impediments, 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 a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language.
- A mental disorder.
- An injury or disability for which benefits were claimed or received under the insurance plan established or using the *Workplace Safety and Insurance Act, 1997*.

Third party contractor: is any person or company acting on behalf of or as an agent of BrandSafway.

Service animal: is an animal that is being used because of a person's disability and this is either readily apparent or is supported by a letter from a medical practitioner.

Support person: is a person whether a paid professional, volunteer, family member or friend who accompanies a person with a disability in order to help with communications, access to goods or services, person care or medical needs.

## **General Policy:**

### Communication with persons with disabilities

We will communicate with people with disabilities in a way that considers their disability. We will train our employees on how to interact and communicate with people with various types of disabilities.

We are committed to providing all written communication in a format that is accessible to all our customers, employees, and partners. We will answer any questions about the content of any written document in person, by telephone or email.

We will let the public and our employees know that we will make written information and other forms of communication accessible, upon request.

### Assistive devices

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 that our employees are trained and familiar with various assistive devices that may be used by people with disabilities while accessing our goods, services, and facilities.

It is the responsibility of the customer with a disability to ensure that his or her assistive device is always operating in a safe and controlled manner.

### Use of service animals

We are committed to welcoming people with disabilities who are accompanied by a service animal on the areas of our premises that are open to the public and other third parties. We will ensure that our employees dealing with the public are properly trained in how to interact with people with disabilities who are accompanied by a service animal.

It is always the responsibility of the customer with a disability to keep their service animal in control.

### Support persons

We are committed to welcoming people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter our premises that are open to the public or other third parties with his or her support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises.

### Notice of temporary disruption

BrandSafway will notify the public in the event of a planned or unexpected disruption in the facilities or services usually used by persons with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services if available. The notice will be posted at all public entrances on our premises.

### Training for staff

BrandSafway will provide training to all employees who deal with the public or other third parties in our behalf and all those who are involved in the development and approval of policies, practices and procedures governing the provision of goods, services and facilities. Staff will also be trained on an ongoing basis when changes are made to these policies, practices, and procedures.

This training will be provided to all new employees as soon as practicable following hiring, but no later than one-month post-hire.

Training will include:

- An overview of the AODA and the requirements of the Customer Service Standard.
- A review of this Policy.
- How to interact and communicate with persons with various disabilities and with those who use assistive devices or require the assistance of a service animal or support person.
- What to do if a person with a disability is having any difficulties in accessing our goods, services, and facilities.
- BrandSafway's policies, practices, and procedures relating to these customer service standards.

BrandSafway will maintain records of the required training. These records will include the number of individuals trained and the dates on which training occurred. The names of individuals trained will be recorded for administrative purposes.

## Emergency Response Plans

Where BrandSafway is aware of the need, BrandSafway will work with employees with disabilities to prepare, implement and facilitate Emergency Response Plans including individualized accommodations.

### **Feedback process**

Feedback regarding the way BrandSafway provides service to people with disabilities can be made by letter, email, or voicemail. All feedback should be directed to:

#### **Human Resources Department**

125 rue de l'Industrie

L'Assomption, Québec, J5W 2T9

[HRCompliance@BrandSafway.com](mailto:HRCompliance@BrandSafway.com). Toll Free: 1-888-484-9376

A response may be expected within 10 days.

### **Policy modifications**

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

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

Our policies will be reviewed on a regular basis to ensure ongoing compliance with the AODA.

### **Accessibility of documents**

This policy and all other documents required by the AODA pertaining to our policies, practices and procedures on the provision of goods, services and facilities to persons with disabilities can also be obtained by contacting our Human Resources Department. Upon request, reasonable attempts will be made to provide these documents to clients with disabilities in a format that takes into account the person's disability.

### **Policy Violations**

Any employee, supervisor or manager who violates this policy will be subject to disciplinary action, up to and/or including termination.

### **Related Documents**