

ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE POLICY

1. PURPOSE

- 1.1 At 2360083 Ontario Limited, operating as Coppa's Fresh Market (the "**Company**"), nothing is more important to us than the physical and mental health, safety, security, dignity, self-respect and well-being of our employees, managers, and contractors (collectively, "**Workers**"), and that of our customers and other visitors, including vendors, suppliers, service providers and members of the general public.
- 1.2 This policy is intended to meet the requirements of the *Customer Service Standards*, as set out in *Ontario Regulation 191/11* under the *Accessibility for Ontarians with Disabilities Act, 2005* (the "**AODA**").
- 1.3 This policy applies to the provision of goods, services or facilities to persons with disabilities.
- 1.4 All goods, services or facilities provided by the Company shall take into account the principles of dignity, independence, integration and equal opportunity.

2. SCOPE

- 2.1 This policy applies to the provision of goods, services or facilities at premises owned and/or operated by the Company.
- 2.2 This policy applies to Workers and volunteers with the Company, as well as to every other person who provides goods, services or facilities on behalf of the Company, including when the provision of goods, services or facilities occurs off of the Company's premises.
- 2.3 The sections of this policy that address the use of guide dogs and service animals, as well as the use of support persons, only apply where goods, services or facilities are provided to members of the public or other third parties at premises owned and/or operated by the Company, and if the public or third parties have access to these premises.

3. DEFINITIONS

- 3.1 "**Accessible Formats**" may include, but are not limited to, large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.
- 3.2 "**Assistive Device**" means a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that customers bring with them such as a wheelchair, walker or a personal oxygen tank. These devices might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.
- 3.3 "**Communication Supports**" may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

3.4 **"Disability"** means:

- (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
- (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*.

3.5 **"Guide Dog"** is a highly-trained working dog that has been 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.

3.6 **"Service Animal"** is a "service animal" for a person with a disability if:

- (a) the animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the best or harness worn by the animal; or
- (b) the person provides documentation from one of the following regulated health professionals confirming that the person requires the animal for reasons related to the disability:
 - (i) A member of the College of Audiologists and Speech-Language Pathologists of Ontario.
 - (ii) A member of the College of Chiropractors of Ontario.
 - (iii) A member of the College of Nurses of Ontario.
 - (iv) A member of the College of Occupational Therapists of Ontario.
 - (v) A member of the College of Optometrists of Ontario.
 - (vi) A member of the College of Physicians and Surgeons of Ontario.
 - (vii) A member of the College of Physiotherapists of Ontario.
 - (viii) A member of the College of Psychologists of Ontario.

- (ix) A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

3.7 **"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, services or facilities.

4. GENERAL PRINCIPLES

4.1 In accordance with the *Customer Service Standards*, as set out in *Ontario Regulation 191/11* under the AODA, this policy addresses the following:

- (a) The Provision of Goods, Services or Facilities to Persons with Disabilities
- (b) The Use of Assistive Devices
- (c) The Use of Guide Dogs and Service Animals
- (d) The Use of Support Persons
- (e) Notice of Service Disruptions
- (f) Feedback
- (g) Training
- (h) Notice of Availability and Format of Required Documents

(a) The Provision of Goods, Services or Facilities to Persons with Disabilities

4.2 The Company 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:

- (a) ensuring that all customers receive the same value and quality;
- (b) allowing customers with disabilities to do things in their own ways, at their own pace, when accessing goods, services or facilities as long as this does not present a safety risk to the customers or others;
- (c) using alternative methods, when possible, to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner, as customers without disabilities;
- (d) taking into account individual needs when providing goods, services or facilities; and
- (e) communicating in a manner that takes into account the customer's disability.

(b) Assistive Devices

- 4.3 Persons with disabilities may use their own assistive devices, as required, when accessing goods, services or facilities provided by the Company.
- 4.4 In cases where the assistive devices present a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure access to the goods and services. For example, open flames and oxygen tanks cannot be near one another. Therefore, the accommodation for a customer with an oxygen tank may involve ensuring that the customer is in a location that would be considered safe for the customer, our Workers and the Company.

(c) Guide Dogs and Other Service Animals

- 4.5 If a person with a disability is accompanied by a guide dog or other service animal, they 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 or other service animals.

Exclusion Guidelines:

- 4.6 If a guide dog or other service animal is excluded by law from the premises, the Company will offer alternative methods to enable the person with a disability to access goods, services or facilities, when possible (e.g., securing the animal in a safe location and offering the guidance of an employee).
- 4.7 The *Health Protection and Promotion Act, Ontario Regulation 562*, Section 60, does not allow animals in places where food is manufactured, prepared, processed, handled, served, displayed, stored, sold or offered for sale. However, it does allow guide dogs and service dogs to go into places where food is served, sold or offered for sale. Other types of service animals are not included in this exception.

Recognizing a Guide Dog and/or Service Animal:

- 4.8 If it is not readily apparent that the animal is being used by the person for reasons relating to his or her disability, the Company may request verification.
- 4.9 Verification may include:
- (a) a letter from a regulated health professional (for instance, a physician or a nurse) confirming that the person requires the animal for reasons related to the disability; or
 - (b) a certificate of training from a recognized guide dog or service animal training school.

Care and Control of the Animal:

- 4.10 The person who is accompanied by a guide dog or other service animal is responsible for maintaining care and control of the animal at all times.

Allergies:

- 4.11 If a health and safety concern presents itself (e.g., in the form of a severe allergy to the animal), the Company will take all reasonable steps to meet the needs of all individuals concerned.

(d) Support Persons

- 4.12 If a person with a disability is accompanied by a support person, the Company will ensure that both persons are allowed to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the premises.
- 4.13 There may be times where seating and availability prevent the person with a disability and support person from sitting beside each other. In those situations, the Company will make every reasonable attempt to resolve the issue with a view to ensuring the provision of goods, services and/or facilities.
- 4.14 The Company may require a person with a disability to be accompanied by a support person when on the Company's premises, but only if, after consulting with the person with a disability and considering the available evidence, the Company determines that:
- (a) the support person is necessary to protect the health and safety of the person with a disability or the health and safety of others on the premises; and
 - (b) there is no other reasonable way to protect the health or safety of the person with a disability and the health and safety of others on the premises.

(e) Notice of Disruptions in Service

- 4.15 Service disruptions may occur due to reasons that may or may not be within the control or knowledge of the Company. In the event of any temporary disruptions, either to the Company's services or to access to its facilities, where persons with disabilities rely on the services or access to them, reasonable efforts will be made to provide advance notice of such disruptions. In some cases (e.g., unplanned temporary disruptions), advance notice may not be possible.

Notice:

- 4.16 In the event that a notification is posted, the following information will be included in the notice, unless it is not readily available or known:
- (a) goods or services that are disrupted or unavailable;
 - (b) reason(s) for the disruption;
 - (c) anticipated duration of the disruption; and
 - (d) description of alternative facilities, services or options.

Provision of Notice:

- 4.17 When disruptions occur, the Company will provide notice by:
- (a) posting notices on the Company website;
 - (b) contacting affected individuals who have appointments with the Company; and
 - (c) by any other method that may be reasonable under the circumstances.

(f) Feedback Process

- 4.18 The Company shall provide customers with the opportunity to provide feedback relating to:
- (a) the manner in which it provides goods, services or facilities to persons with disabilities; and
 - (b) whether the Company's feedback process referred to in paragraph (a) is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communication supports, on request.
- 4.19 Information about the Company's feedback process will be available on the Company's website.
- 4.20 Feedback forms, along with the provision of accessible formats and communication supports in respect of the Company's feedback process, will be available upon request.

Submitting Feedback:

- 4.21 Customers can submit feedback directly to the Vice-President.
- 4.22 If a person provides feedback to a Worker other than to the Vice-President, such information is to be provided to the Vice-President as soon as possible. The Vice-President will then investigate, if appropriate, and take all reasonable steps to correct the situation, if necessary, with a view to ensuring access to the goods, services or facilities.

(g) Training

- 4.23 Training will be provided to:
- (a) all of the Company's Workers and volunteers;
 - (b) all persons who participate in developing the Company's policies; and
 - (c) all other persons who provide goods, services or facilities on behalf of the Company.

Training Provisions:

- 4.24 Training will cover the following:

- (a) A review of the purpose of the AODA;
- (b) A review of the requirements set out in *Ontario Regulation 191/11*, including a review of the *Customer Service Standards*;
- (c) A review of the Ontario *Human Rights Code, 1990* as it pertains to persons with disabilities;
- (d) Instructions on how to interact and communicate with people with various types of disabilities;
- (e) Instructions on how to interact with people with disabilities who:
 - (i) use assistive devices;
 - (ii) require the assistance of a guide dog or other service animal; or
 - (iii) require the use of a support person;
- (f) Instructions on how to use equipment or devices that are available at the Company's premises that may help people with disabilities;
- (g) Instructions on what to do if a person with a disability is having difficulty accessing our services; and
- (h) The Company's policies, procedures and practices pertaining to providing accessible customer service to persons with disabilities.

Training Schedule:

- 4.25 The Company will provide training as soon as practicable. Updated training will be provided in the event of changes to legislation and/or changes to the Company's policies.

Record of Training:

- 4.26 The Company will keep a record of training that includes the dates training was provided and the number of persons who attended the training.

(h) Notice of Availability and Format of Documents

- 4.27 Upon request, the Company will provide a copy of this policy to any person. The Company will also notify those to whom it provides goods, services or facilities that a copy of this policy is available on request. Notification will be given by posting the information on the Company's website and/or any other reasonable method..

- 4.28 If the Company gives a copy of this policy to a person with a disability, or if the Company is otherwise required by this policy to give them a copy of any other document, the Company will, upon request, provide or arrange for the provision of the document, or the information contained in the document, to the person in an accessible format or with communication support. Same will be provided in a timely manner and at a cost that is

no more than the regular cost charged to other persons. The Company will consult with the person making the request in determining the suitability of an accessible format or communication support.

5. ADMINISTRATION

- 5.1 If you have any questions or concerns about this policy or its related procedures, please ask the Vice-President.
- 5.2 This policy and its related procedures will be reviewed as required in the event of legislative changes.

Referenced Documents:

- *Accessibility for Ontarians with Disabilities Act, 2005*
- *Integrated Accessibility Standards, Ontario Regulation 191/11, Customer Service Standards*
- *Blind Persons' Rights Act, 1990*
- *Health Protection and Promotion Act, Ontario Regulation 562*