

TITLE: AODA COMPLIANCE POLICY**PURPOSE**

The first accessibility standard was created under the authority of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA). The purpose of this policy is to outline practices and procedures in place at Graham Group Ltd. to help identify and remove barriers that impede a person's ability to access services at all Graham locations while respecting their dignity, independence and integration.

Statement of commitment

Graham Group Ltd. is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of people 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.

POLICY**Communication and Information**

We will communicate with people with disabilities in ways that take into account their disability. When asked, we will provide information about our organization and its services, including public safety information, in accessible formats or with communication supports.

We will also meet internationally-recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario's accessibility laws.

Service Animals

We welcome people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public.

Support Persons

A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises. Fees will not be charged for support persons.

In the event of a planned or unexpected disruption to our wheelchair-accessible doors, Graham Group Ltd. will notify customers promptly. This clearly posted notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available. The notice will be placed at the front door of our office locations.

Employment

Graham Group Ltd. will notify employees, potential hires, and the public that accommodations can be made throughout our recruitment and hiring processes. We will notify staff that supports are available

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for those with disabilities and we have a process to develop individual accommodation plans for employees. Where needed, we will provide customized emergency information to support an employee with a disability during an emergency.

Training for staff

Graham Group Ltd. will provide training to employees, volunteers and others who deal with the public or other third parties on their behalf. This training will be provided to staff within two weeks of their hire date. Staff will also be trained when changes are made to our plan.

Design of Public Spaces

When building or making major changes to public spaces, Graham Group Ltd. will meet accessibility laws as it relates to the following public spaces:

- Outdoor paths of travel, such as sidewalks, ramps, stairs, and curb ramps
- Accessible off-street and on-street parking
- Service-related elements like service counters and waiting areas

We will put procedures in place to prevent service disruptions to our accessible parts of our public spaces.

Feedback process

Customers who wish to provide feedback on the way Graham Group Ltd. provides goods and services to people with disabilities can do so via the following methods:

- Phone: 905-694-4028
- E-mail: doreen.ridley@graham.ca
- Mail: 6108 Edwards Blvd.
Mississauga, ON
L5T 2V7
- Verbally to a Graham representative

All feedback will be directed to the HR department. Customers can expect to hear back in 15 to 20 business days.

Modifications to this or other Policies

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

DEFINITIONS**Accessibility:**

Assistive devices and measures are supports made available by providers to improve access to care for patients with disabilities. For example, wheelchairs, volunteers, real-time captioning services (on-screen typing of what speakers are saying), sign language interpreters or deaf-blind interveners. Other examples include, Telephone Teletypes (TTY) to communicate with clients who are deaf, hard of hearing, have speech impairments or are deaf-blind (*Guide to the Accessibility Standards for Customer Service, Ontario Regulation*).

Disability:

Under the Human Rights Code, "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 of 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

This definition includes disabilities of different severity, visible as well as non-visible disabilities, and disabilities the effects of which may come and go.

Personal Assistive Devices:

Assistive devices help an individual with a disability conduct everyday tasks and activities; examples include laptops, pocket recorders, hearing aids, teletypewriters (TTY), digital audio players, walkers, scooters, canes, oxygen tanks, note-taking devices, etc.

Service Animals:

Service animals are used by people with many kinds of disabilities. Examples of service animals include dogs used by people who are blind, hearing alert animals for people who are deaf, deafened or hard of hearing, and animals trained to alert an individual to an oncoming seizure and lead them to safety (*Guide to the Accessibility Standards for Customer Service, Ontario Regulation*).

Support Person:

A “Support Person” accompanies a person with a disability, in order to help with communication, mobility, personal care or medical needs or with access to goods or services. Medical needs may include, but are not limited to, monitoring an individual’s health or providing medical support by being available in the event of a seizure. A Support Person may be a paid professional, a volunteer, family member or friend of the person with a disability (*Guide to the Accessibility Standards of Customer Service, Ontario Regulation*).

Dignity:

A customer with a disability is valued and deserving of effective and full service.

Independence:

Freedom from control or influence of others – freedom to make one’s own choices.

Integration:

Customers with disabilities fully benefit from the same services, in the same place and in the same or similar way as other customers.

CONTEXT

Graham will ensure that we identify and remove barriers to access for people with disabilities by outlining the following:

- Encouraging persons with disabilities to use their own personal assistive devices to access our services
- Communicating with persons with disabilities in a manner that takes into account his or her disability
- Allowing persons with disabilities to be accompanied by a guide dog or service animal in premises that is owned by Graham and is open to the public, unless the animal is excluded by another law. If a service animal is excluded by law, other measures will be used to provide services to the person with a disability
- Permitting persons with disabilities who use a support person to bring that person with them while accessing services in premises open to the public or third parties
- Providing notice when facilities or services that people with disabilities rely on to access or use Graham’s services are temporarily disrupted
- Training staff, volunteers, contractors and any other people who interact with the public or other third parties on a number of topics outlined in the customer service standard
- Establishing a process for people to provide feedback on how services to people with disabilities are delivered, how Graham will respond to any feedback, and take action on any complaints
- The information regarding the feedback process will be readily available to the public
- Documenting in writing all of Graham’s policies, practices, and procedures for providing accessible customer service



Date Issued: June 30, 2021

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- Notifying customers that documents required under the customer service standard are available upon request
- Providing the documents required under the customer service standard to a person with a disability in a format that takes into account the person's disability

ADMINISTRATION:

Printed copies of this policy should be considered unofficial in nature only. Please consult Graham's Intranet for all current and official policy versions.

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| APPROVED BY: Egon Thauberger Human Resources Director Advisory, TA & Benefits | OWNED BY: Doreen Ridley HR Advisor, Regional East |
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REVISION HISTORY

| DATE | VERSION | DESCRIPTION |
|-------------------|---------|---------------------------|
| December 21, 2012 | First | Original policy statement |
| June 30, 2021 | Second | Updated policy statement |