

Accessibility For Ontarians with Disabilities Act

Accessible Customer Service Policy

PURPOSE

The goal of the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”) is to create a more accessible Ontario by identifying, and to the extent possible, preventing and eliminating barriers experienced by persons with disabilities. There are five standards set out under AODA, all of which will be implemented by the year 2025. These standards include: customer service, transportation, information and communications, built environment and employment.

The first of the above standards being implemented is the Customer Service Standard (“CSS”). This standard must be implemented in the private sector by January 1, 2012. The purpose of CSS is to ensure that goods and services are provided in a manner that respects the dignity and independence of persons with disabilities and that persons with disabilities are given an equal opportunity to obtain, use and benefit from the goods and services.

Neelands Refrigeration Limited.

(“Neelands”) is committed to providing an equal opportunity to all of our visitors. The objective of this policy is to ensure we meet the requirements of CSS and promote its underlying core principles.

SCOPE

All employees, contractors, agents and volunteers who work on behalf of Neelands Refrigeration Limited and deal with members of the public or other third parties are expected to conduct themselves in accordance with this policy.

DEFINITIONS

Assistive Device:

Any device used to assist a person in performing a particular task(s) or to aid that person in activities of daily living. This can include a wheelchair, screen reader, listening device or cane.

Disability:

The term disability as defined by AODA and Ontario Human Rights Code, 1990 refers to:

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

Guide Dog:

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, 1990 to provide mobility, safety and increased independence for people who are blind.

Service Animal:

An animal is a "service animal" for a person with a disability if:

- It is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- The person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

Support Person:

An individual hired or chosen by a person with a disability to provide services or assistance with communication, mobility, personal care, 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.

CORE PRINCIPLES

Neelands Refrigeration Limited will make every effort to ensure that this policy and related practices and procedures are consistent with the following four core principles:

Dignity:

Persons with disabilities must be treated as valued visitors as deserving of service as any other visitor.

Equality of Opportunity:

Persons with disabilities should be given an equal opportunity to obtain, use and benefit from Neelands goods and services.

Integration:

Wherever possible, persons with disabilities should benefit from Neelands goods and services in the same place and in the same or in a similar manner as any other visitor. In circumstances where integration does not serve the needs of persons with disabilities, goods and services will, to the extent possible, be provided in another way that takes into account the person's individual needs.

Independence:

Goods and services must be provided in a way that respects the independence of persons with disabilities. To this end, Neelands will always be willing to assist persons with disabilities but will not do so without express permission.

PROVIDING GOODS AND SERVICES TO PERSONS WITH DISABILITIES

Communication

Neelands strives to communicate with persons with disabilities in a manner that takes into account the person's disability. Communication strategies are set out in Neelands accessibility training program.

Assistive Devices

Persons with disabilities are permitted to use their own assistive devices when on Neelands premises for the purposes of obtaining using or benefiting from Neelands goods and services or as a visitor to Neelands.

If there is a physical, technological or other type of barrier that prevents the use of an assistive device on Neelands premises, Neelands will make its best effort to remove that barrier. If Neelands is not able to remove the barrier, we will ask the individual with the disability how he/she can be accommodated, what alternative measures would enable equal access to Neelands goods and services and Neelands will make its best effort to provide the individual with alternative means of assistance.

Appropriate employees will receive training on the various types of assistive devices that may be used by persons with disabilities while accessing Neelands goods and services.

Accessibility to Company Premises

Neelands has equipped its facilities with the following services in order to provide persons with disabilities with an equal opportunity to obtain, use and benefit from Target's goods and services:

- An accessible entrance
- Wide doorways.

Neelands employees will receive training on how to use these services in order to ensure that all persons with disabilities are provided with sufficient accommodation.

Guide Dogs and Service Animals

Persons with disabilities that are accompanied by a guide dog or service animal will be allowed to access Neelands premises and keep the animal with him or her unless otherwise excluded by law.

Neelands employees will receive training on how to interact with persons with disabilities accompanied by a guide dog or service animal.

Support Persons

Persons with disabilities may enter premises owned and/or operated by Neelands with a support person and have unobstructed access to the support person while on the premises.

Neelands may require persons with disabilities to be accompanied by a support person where it is necessary to protect the health or safety of the person with a disability or the health and safety of others on the premises.

Neelands employees will receive training on how to interact with persons with disabilities who are accompanied by a support person.

Notice of Temporary Disruptions

Neelands will notify visitors if there is a planned or unexpected disruption of facilities or services typically used by persons with disabilities in order to access Neelands goods and services. The notice will be posted at the entrance of the affected premises or such other place as is deemed reasonable.

The notice will include the following information:

- The facility or service that is unavailable;
- The anticipated duration of the disruption;
- The reason for the disruption; and
- Alternative facilities or services, if available.

TRAINING AND RECORDS

Neelands will provide training as required under AODA, to all persons to whom this policy applies as well as to the individuals charged with developing this policy and related procedures and practices.

Content of Training

Training will include:

- A review of the purpose of AODA and requirements of CSS;
- How to interact and communicate with persons with various types of both visible and non-visible disabilities;
- How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog, service animal or support person;
- How to use equipment and/or devices made available on Neelands premises to assist persons with disabilities with obtaining, using or benefiting from Neelands goods and services; and
- What to do if a person with a disability is having difficulty accessing Neelands premises and/or goods and services.

The training will be provided to all employees to whom this policy applies as soon as practicable after he or she is assigned the applicable duties and training will be provided on an ongoing basis in accordance with changes to this policy and its related practices and procedures.

Documenting Training

Records of the training provided, including the training protocol, the dates on which the training is provided and the number of individuals who attended the training will be maintained in accordance with the requirements of AODA.

FEEDBACK PROCEDURE

Feedback can be made by sending an email or calling. All feedback will be directed to the Human Resource Manager and Neelands Refrigeration Limited will make all reasonable efforts to address concerns or complaints immediately.

Neelands welcomes and appreciates feedback regarding this policy and its implementation. Feedback can be provided in the following ways:

- In person;
- By telephone at 1-905-332-4555
- Through email office@neelands.com

DOCUMENTATION TO BE MADE AVAILABLE

This policy is made available to any member of the public upon request. This policy will also be posted on Neelands internet website.

FORMAT OF DOCUMENTS

Neelands will provide the information required to be provided under CSS to persons with disabilities in a format that takes into account the person's disability.