

	<p style="text-align: center;">Sector: All</p> 
<p style="text-align: center;">Subject: Accessible Customer Service and Employment Policy</p>	<p style="text-align: center;">Department: People & Culture</p>
<p style="text-align: center;">Approved By: Chief Executive Officer People & Culture Legal</p>	<p style="text-align: center;">Revised: November 2023</p>

Policy/Procedure:

This policy establishes the accessibility policy, outlines the requirements under the [Accessibility for Ontarians with Disabilities Act, 2005](#) (“AODA”) and [Ontario Regulation 191/11, the Integrated Accessibility Standards \(IASR\)](#) (“Integrated Standards”).

Individuals covered by the Policy:

This policy shall apply to every person who deals with members of the public or other third parties on behalf of Compass Group Canada Ltd. (“Compass”), whether the person does so as an associate, agent, volunteer or otherwise, and to all supervisors, managers, and associates in their interactions with one another.

Integrated Standards:

The [Ontario Regulation 191/11, the Integrated Accessibility Standards](#) became law on July 1, 2011, with compliance deadlines ranging from January 2012 to January 2021. It combines three Standards: [Employment](#), [Information and Communications](#), [Transportation](#), [Design of Public Spaces](#), [Customer Service](#) and outlines ‘General’ requirements.

Management Responsibilities:

It is the responsibility of managers and supervisors to ensure that all associates conduct themselves in an appropriate manner and abide by the Company’s policies, procedures and practices. Additionally, managers and supervisors have the responsibility to maintain a professional work environment, and to ensure that it is conducive to, and encourages, appropriate associate behaviors and conduct.

Associate Responsibilities:

It is the responsibility of all associates to at all times conduct themselves in an appropriate manner and abide by all of the Company policies, procedures and practices.

Responsibility for Administration:

All levels of Management are responsible for the effective administration, application, and management of the policy.

Compass Statement:

Compass is committed to implementing, maintaining and enhancing accessibility with respect to employment, and the use of all goods and services, for all persons with disabilities in a timely manner.

Compass shall use reasonable efforts to ensure that its policies, practices and procedures are consistent with the following principles:

- Goods and services will be provided in a manner that respects the dignity and independence of persons with disabilities;
- Persons with disabilities will be given equal opportunity in the employment cycle and to obtain, use and benefit from goods and services

Definitions:

Accessibility Coordinator (Diversity and Inclusion Specialist) - The person appointed by Compass to coordinate AODA compliance.

Assistive Devices - Any auxiliary aid such as communication aids, cognition aids, personal mobility aids and medical aids (i.e. canes, crutches, wheelchairs, or hearing aids).

Disability – The definition of disability under the AODA is the same as the definition of disability in the Ontario Human Rights Code. Under the Act, disability refers to:

- 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.

Integrated Accessibility Standard Regulation (“IASR”) - The IASR is a combination of three standards: [information and communications](#), [employment](#), and [transportation, design of public spaces](#) and [customer service](#), in addition to ‘[General](#)’ requirements.

Service Animals - an 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 vest 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 relating 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

Support Persons - in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care or medical needs or with access to goods, services or facilities.

Accessible Formats – Providing information in a way that takes into account the preferred and most effective method of communication for a person with a disability including large print and Braille. 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.

Communication Supports – Other supports that facilitate effective communication including captioning, assistive listening devices and American Sign Language. 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.

Customer Feedback:

Feedback from our customers provides Compass with opportunities to learn and improve. Compass recognizes the right of our customers to make a complaint, compliment or suggest ways to improve our services.

To ensure that the delivery of goods and services to persons with disabilities is provided in an effective and timely manner, customers are invited to provide their feedback in any preferred format including:

In person, by telephone, e-mail, or in writing, addressed to:

Accessibility Coordinator/Diversity and Inclusion Specialist

E-mail: diversity@compass-canada.com

1 Prologis Drive, Suite 400

Mississauga, Ontario L5W 0G2

Phone: 905-568-4636 or 1-800-465-2203 Ext 582

The Accessibility Coordinator will respond either in writing, in person, e-mail and/or by telephone, based on the format requested. They will acknowledge receipt and outline any actions that will be taken in response to the feedback.

Ontario Regulation 191/11 – Integrated Accessibility Standards:

General

Multi-Year Accessibility Plan

Compass's Multi-Year Accessibility Plan shall be posted on Navigator and available on Compass's [external website](#). It outlines the actions that Compass has put in place and will put in place to eliminate barriers for persons with disabilities to meet the requirements of the regulation.

The Multi-Year Accessibility Plan shall be updated at least once every five years.

Accessible Emergency Information

Upon request, Compass is committed to providing the customers and clients with publicly available emergency information in an accessible way. We will also provide associates with disabilities with individualized emergency response information as required.

Training

Compass shall provide training on the requirements of the Integrated Standards, including the accessible customer services standard as further described below, and on the Human Rights Code as it pertains to persons with disabilities. Training will be provided to associates, volunteers and other agents as appropriate.

Methods of training will take into account the role of the associate and may include a handout and/or a 'CHAT' presentation delivered by managers to associates. New associates hired after training has concluded will receive '24/7' online training upon hire. The requirements of the Customer Service Standard will also be included in the training for new hires.

Compass shall keep records of all training provided.

Kiosks

Compass shall ensure associates consider the needs of persons with disabilities when procuring or acquiring self-service kiosks (e.g. vending machines). Specific guidelines will be added to the Procurement process.

Information and Communications Standard:

Compass is committed to meeting the communication needs of persons with disabilities. Compass shall provide:

- a. all organizational information and communications made available to Compass's customers and the public, including this policy;
- b. any publicly available emergency procedures, plans or public safety information to its customers and the public; and
- c. access to any processes for receiving and responding to feedback, in an accessible format or via accessible communication support.

In connection with the above, Compass shall consult with persons with disabilities to determine their information and communication needs. This will be done in a timely manner and at a cost that is no more than the regular cost charged to other persons if applicable.

Compass will offer a variety of accessible formats (alternatives to standard print) and communication supports (methods to assist communication) as outlined in the Customer Service Standard and further defined under this Standard.

Accessible formats may include, but are not limited to, large print, recorded audio and electronic formats, braille, and other formats used by persons with disabilities. Communication supports include but are not limited to, captioning, alternative and augmentative supports such as the use of letter, word or picture boards, sign language, and other supports that facilitate effective communications.

Compass shall ensure that all websites and content conform with [WCAG 2.0, Level AA](#) (other than success criteria 1.2.4 and 1.2.5).

Employment Standard:

Compass has processes and procedures in place to ensure accommodation for persons with disabilities in the workplace.

As per the Integrated Standards, current practices and other relevant legislation, including the Human Right Code, Compass shall:

1. notify associates and the public about the availability of accommodation for applicants with disabilities in its recruitment processes;
2. notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used;
3. consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability;
4. notify the successful applicant of the policies for accommodating associates with disabilities;
5. inform its associates of its [policies](#) used to support people with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an associate's accessibility needs due to disability;
6. provide the information required under this section to new associates after they begin their employment; and
7. provide updated information to associates whenever there is a change to existing policies on the provision of job accommodations that take into account an associate's accessibility needs due to disability.

Accessible Formats and Communication Support for Associates

Where an associate with a disability requests it, Compass will consult with the associate to provide or arrange for the provision of accessible formats and communication supports for:

1. information that is needed in order to perform the associate's job; and
2. information that is generally available to associates in the workplace.

For a partial list of potential accessible formats and communication supports, see the 'Information and Communications Standard' of this Policy.

Documented Individual Accommodation Plans

Compass shall prepare individual accommodation plans for associates with disabilities, in accordance with the following:

1. the manner in which an associate requesting accommodation can participate in the development of the individual accommodation plan;

2. the means by which the associate is assessed on an individual basis;
3. the manner in which Compass can request an evaluation by an outside medical or other expert, to determine if accommodation can be achieved and, if so, how accommodation can be achieved;
4. the manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan;
5. the steps taken to protect the privacy of the associate's personal information;
6. the frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done;
7. the method by which we provide reasons for any individual accommodation plan being denied; and
8. the means of providing the individual accommodation plan in a format that takes into account the associate's accessibility needs due to disability.

Individual accommodation plans will include any information regarding accessible formats and communications supports. It will also include individualized workplace emergency response information and will identify any other accommodation that is to be provided. For more information on accommodation in the workplace review the [Duty to Accommodate Policy and Accommodation Request and Employer Response Form](#).

Return to Work Process

Compass will have in place and documented a return to work process for its associates who:

- a) Have been absent from work due to a disability.
- b) Require disability-related accommodations in order to return to work.

The documented return to work process will outline the steps to facilitate the return to work, including documented individual accommodation plans, as described.

Performance Management

Compass takes into account the accommodation needs of its employees, including any individual accommodation plans of employees, when: (a) using performance management; (b) providing career development and advancement opportunities; and (c) redeploying employees. Information on the accommodation needs will be included in individual accommodation plans.

Design of Public Spaces:

Compass shall satisfy the requirements of the Integrated Standards when building or making major changes to public spaces. Public spaces include:

- Outdoor public eating areas like rest stops or picnic areas; and
- Service-related elements like service counters, fixed queuing lines and waiting areas.

Compass shall put procedures in place to prevent service disruptions to our accessible parts of our public spaces and shall work with its clients to ensure accessible elements of public spaces are maintained.

Customer Service Standards:

Compass is committed to providing access to goods and services to its customers in a manner that is consistent with the principles of independence, dignity, integration and equality of opportunity, and that is in compliance with the AODA. To that end, Compass recognizes the importance of:

- Providing integrated access to goods and services for individuals with disabilities;

- Openly communicating and responding to the needs of customers with disabilities in order to provide them with excellent customer service; and
- Complying with the mandatory Customer Service Standard addressed under the AODA.
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Use of Assistive Devices

A person with a disability is permitted to enter the premises with the device and to utilize the device, unless excluded by law.

Where excluded by law, an explanation must be provided, and other arrangements explored in order to provide service.

Communication

When communicating with persons with disabilities, all associates shall do so in a manner that takes into account the person's disability (see the 'Information and Communications Standard' of this Policy).

Service Animals and Support Persons

The following shall apply at premises owned or operated by Compass:

- Compass associates shall use reasonable efforts to allow persons with disabilities to use their own assistive devices to access goods and/or services.
- Compass associates shall allow persons with disabilities to be accompanied by their guide dogs or service animals unless the animal is excluded by law.
- Where an animal is excluded by law from the premises, the reason why the animal is excluded shall be explained to persons with disabilities, and other reasonable arrangements to provide goods and services shall be explored with the assistance of the person with disability.
- When a service animal is unruly or disruptive (jumping on people, biting, or other harmful behaviour) an associate may ask the person with disability to remove the animal from the area or refuse access to goods or services. In this event, other reasonable arrangements to provide goods or services shall be explored with the assistance of the person with disability.
- Persons with disabilities may be accompanied by their support persons while accessing goods and/or services.
- In the event that admission fees are charged for an event, advance notice concerning what admission, if any, would be charged to a support person shall be posted in a conspicuous place.

Service Disruption – Notice

- It is possible that from time to time there will be disruptions in service (e.g. an entrance way that is under repair, renovations that limit access to an area, or technology that is temporarily unavailable).
- In the event that a disruption in service is planned, and expected, notice of the disruption will be provided, including the reason for the disruption, its anticipated duration and a description of any alternatives available.

- In the event of an unexpected disruption in service, notice may be provided in a variety of ways, and will be done as quickly as possible. Notice may be provided on the website, over the phone, via e-mail and/or in writing.
- In the event of a service disruption, alternative methods of service may be considered and those impacted by service interruption shall be informed of any alternative methods.
- [Sample Notice & Blank Notice Posted on Navigator](#)

Accessible Customer Service Training Requirements

- Every employee and persons who participates in the development of Compass’s policies, practices and procedures or who deals with the public on behalf of Compass, including 3rd parties (e.g. associates, agents, volunteers and management), must complete training in relation to this Policy under Ontario Regulation [191/11 Integrated Accessibility Standards](#)
- New associates, agents, volunteers, management, etc. (“**Compass Representatives**”) will receive training on accessible customer service; In connection with such training, Compass Representatives will be:
 - provided with an overview of the AODA and the Customer Service standard under the Regulations;
 - trained on how to interact, communicate and assist people with disabilities, and in particular, people with assistive devices, and those who require the assistance of a guide dog, service animal or support person;
 - made aware of the policies and procedures created by Compass in accordance with the Customer Service Standard; and
 - trained on how to help a person with a disability who is having difficulty accessing Compass’s goods or services.
- Training records shall be kept, including the dates when the training is completed, and the number of individuals to whom the training was provided.
- Training will also be provided on an ongoing basis when changes are made to these policies, practices and procedures.

Materials/Documentation Available Upon Request

Compass shall supply a copy of the policies, including this Policy, practices and procedures required under the Integrated Accessibility Standards [Ontario Regulation 191/11](#), to any person in alternate formats as requested. A copy of this Policy shall be posted on Compass’s website [**NTD: include link once posted**].

Compliance Reporting and Reviews

The AODA allows for the enforcement of the regulations through inspections, compliance orders and administrative penalties.

How will the government be enforcing the AODA and its standards?

The accessibility reports that are required to be submitted to the government will be the primary tool for monitoring enforcement of the AODA.

What is an offence under the AODA?

Among other things, a person is guilty of an offence who:

- provides false or misleading information in an accessibility report or otherwise provides a director with false or misleading information;
- fails to comply with any order made by a director or the Tribunal under the AODA;
- obstructs an inspector carrying out an inspection under a warrant, or intimidates, coerces; or
- penalizes or discriminates against someone who is seeking to enforce the AODA or a director's order.

What is the maximum penalty for non-compliance?

Certain actions or inaction (such as failure to comply with a director's order) constitute an offence under the AODA.

If a person is found guilty of an offence, a fine of up to \$50,000 per day may be levied for each day or part of a day that the offence occurs or continues to occur.

A corporation may be liable for a fine of up to \$100,000 per day for each day or part of a day that the offence occurs or continues to occur.

For More Information:

To review the Accessibility for Ontarians with Disabilities Act, visit <http://www.mcscs.gov.on.ca/en/mcscs/programs/accessibility/index.aspx>