

POLICY: ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE

1. PURPOSE AND POLICY STATEMENT

The goal of the *Accessibility for Ontarians with Disabilities Act, 2005* (the “Act”) is to create a more accessible Ontario, by identifying, and to the extent possible, preventing, and eliminating barriers experienced by persons with a disability.

The customer service requirements under the Integrated Accessibility Standards Regulation, Ontario Regulation 191/11 (“the Standard”), have been established under the Act to ensure that goods, services and facilities are accessible to persons with disabilities.

Daniels is committed to making its goods, services and facilities accessible to persons with disabilities. The objective of this policy (the “Policy”) is to ensure that Daniels meets the requirements of the Standard and promotes its underlying core principles, described below.

2. APPLICATION

The Policy applies to all employees, volunteers, agents, independent contractors and other persons who, on behalf of Daniels and its subsidiaries, inclusive of Daniels Gateway and Daniels Realty, provide goods, services or facilities to members of the public or other third parties.

The Policy also applies to all persons responsible for the development, implementation or oversight of Daniels’ policies, practices and procedures governing the provision of customer service.

3. DEFINITIONS

- i. **Assistive Device** - means any device or equipment used by a person with a disability to assist with communication, mobility, personal care, medical needs or activities of daily living.
- ii. **Barrier** - means anything that prevents a person with a disability from fully participating in all aspects of society because of the disability. Barriers may take different forms. For example, barriers may result from:

- a) the physical, architectural, or structural design of a building;
- b) the manner in which information is received or conveyed;
- c) the presence or absence of technology;
- d) attitudes or stereotypes that a person with a disability may encounter in the community; or
- e) policies, practices and procedures that an organization may employ which, often unintentionally, restrict a person with a disability.

iii. **Disability** – Has the same definition as is provided under the Act and *Human Rights Code*, R.S.O. 1990, c. H.19.

- 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.

iv. **Guide Dog** - means a guide dog as defined in section 1 of the *Blind Persons' Rights Act*.

v. **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 their disability, or if the person provides documentation from a regulated health professional confirming that the person requires the animal for reasons relating to the disability.

- (a) if it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or

- (b) if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.
- vi. **Support Person** – A person who accompanies a person with a disability to assist with communication, mobility, personal care or medical needs or with access to goods or services.
- vii. **“We”, “Our” and “Staff”** means Daniels and its employees, independent contractors or any other person who provides services on behalf of Daniels.

4. CORE PRINCIPLES OF THE POLICY

We endeavor to ensure that the Policy and related practices, policies and procedures are consistent with the following four (4) core principles:

- i. **Dignity** - Persons with a disability should be treated as valued customers as deserving of service as any other customer.
- ii. **Equality of Opportunity** - Persons with a disability should, where possible, be given an opportunity equal to that given to others to obtain, use and benefit from our services.
- iii. **Integration** - Wherever possible, persons with a disability should benefit from our services in the same place and in the same or similar manner as any other customer. In circumstances where integration does not serve the needs of the person with a disability, services will, to the extent possible, be provided in another way that takes into account the person’s individual needs.
- iv. **Independence** – Goods and services should, where possible, be provided in a way that respects the independence of persons with a disability. To this end, we will be willing to assist a person with a disability but will not do so without the express permission of the person.

5. IMPLEMENTATION AND RESPONSIBILITY

The People and Culture team is responsible for administering this Policy, coordinating required accessibility training, maintaining training records and coordinating required accessibility compliance reporting.

The AODA Committee supports the implementation and ongoing review of Daniels' accessibility policies, practices and procedures.

The AODA Committee consists of:

- Rose Zonni, Vice President, Customer Care
- Sabrina Singh, Director, Sales Administration
- Simona Annibale, Vice President, Marketing and Communications
- Jon Kitencevski, Director, Health and Safety
- Stephanie Dimopoulos, Director, Design and Décor
- Ginette Battikha, COO

The Vice President of Customer Care, the Director of Sales Administration, the Vice President of Marketing and Communications, the Director of Design and Décor, the Director of Health and Safety (collectively the "AODA Committee") and the COO are responsible for overseeing the development and implementation of policies, practices and procedures aimed at making Daniels' services more accessible to persons with a disability.

- i. The development and implementation of an accessibility training program and maintaining training records as required by the Standard.
- ii. The development and implementation of a feedback procedure as required by the Standard.
- iii. Filing Accessibility Reports required under section 14 of the Act

6. PROVIDING GOODS AND SERVICES TO PEOPLE WITH DISABILITIES

I. Policies, Practices and Procedures

Daniels shall make reasonable efforts to ensure that its policies, practices and procedures which impact the delivery of its services to the public or to other third parties are consistent with the principles of dignity, equality of opportunity, integration and independence as defined above.

II. Communication

Daniels strives to communicate with persons with a disability in a manner that takes into account the disability. Approaches for accessible communication are set out in our

accessibility training program and our manual entitled “Accessible Practices for Customer Service”.

III. Assistive Devices

Persons with a disability are permitted, where possible, to use their own Assistive Device when on our premises for the purposes of obtaining, using or benefiting from our services.

If there is a physical, technological or other type of barrier that prevents the use of an Assistive Device on our premises we will first endeavour to remove that barrier. If we are not able to remove the barrier, we will ask the person how they can be accommodated and what alternative methods of service would be more accessible to them. We will make reasonable efforts to provide an alternative service to the person with a disability.

IV. Service Animals & Guide Dogs

Persons with a disability may enter premises owned and/or operated by Daniels accompanied by a Service Animal or Guide Dog, and keep the Service Animal or Guide with them, if the public has access to such premises and the Service Animal or Guide Dog is not otherwise excluded by law.

If a Service Animal or Guide Dog must be excluded by law, we explain to our customer why this is the case and explore alternative ways to meet the customer’s needs.

VI. Support Persons

A person with a disability may enter premises owned and/or operated by Daniels with a Support Person and have access to the Support Person at all times while on the premises.

Daniels may require a person with a disability 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 or safety of others on the premises.

VII. Notice of Temporary Disruptions

Daniels will notify customers if there is a planned or unexpected disruption of a facility or service persons with a disability use to access our services. The notification will be made: (i) by posting a notice on our premises; (ii) by posting a notice on our website; (iii) by notifying affected customers individually; or (iv) in another manner that may be appropriate in the circumstances.

The notice will include the following information:

- i. That a facility or service is unavailable.

- ii. The anticipated duration of the disruption.
- iii. The reason for the disruption.
- iv. Alternative facilities or services, if available.

7. TRAINING AND RECORDS

Daniels will provide training, and ongoing training as required under the Standard to:

- i. Employees who provide service to the public or other third party businesses on behalf of Daniels; and
- ii. all persons responsible for the development, implementation or oversight of Daniels' policies, practices and procedures governing the provision of customer service.

Daniels will take appropriate steps to notify independent contractors and other third party entities who provide service on behalf of Daniels of the training requirements of the Standard and will ensure that these individuals receive a copy of this Policy and our "Accessible Practices for Customer Service".

A. Content of Training

Training will include:

- i. A review of the purpose of the Act and requirements of the Standard.
- ii. A review of Daniels' policies, practices and procedures governing the delivery of customer service to persons with disabilities.
- iii. How to interact and communicate with persons with various types of disabilities.
- iv. How to interact with persons with a disability who use an Assistive Device or require the assistance of a Service Animal or Support Person.
- v. How to use equipment or devices made available by Daniels to assist persons with a disability to obtain, use or benefit from our services.
- vi. What to do if a person with a disability is having difficulty accessing our premises and/or services.

B. Timing of Training

Training will be provided as soon as practicable after the employee or freelancer is assigned the applicable duties. Updated training will be provided where there is a change to Daniels' policies, practices and procedures governing the provision of goods and services to persons with disabilities.

C. Documenting Training

Records of the training provided, including the training protocol, the dates on which the training is provided and the number of individuals to whom the training is provided shall be maintained in accordance the requirements of the Standard

8. FEEDBACK PROCEDURE

A. Receiving Feedback

Daniels welcomes and appreciates feedback regarding how it delivers goods and services to persons with disabilities. Feedback can be provided in the following ways:

- i. In person;
- ii. By telephone;
- iii. In writing; and
- iv. Electronically by email or on an electronic storage device.

Further details about how to provide feedback can be found in Daniels' "Accessible Practices for Customer Service".

B. Responding to Complaints

Where possible, Daniels will make reasonable efforts to respond to complaints at the time that the complaint is made. Where an immediate response is not available Daniels will make reasonable efforts to ensure that the individual who has made the complaint receives a response.

Further information regarding Daniels' process for receiving and responding to complaints can be found in Daniels' "Accessible Practices for Customer Service".

9. DOCUMENTATION TO BE MADE AVAILABLE

This Policy, and Daniels' "Accessible Practices for Customer Service", shall be made available to any member of the public upon request.

Notification of same shall be posted on Daniels' website.

10. FORMAT OF DOCUMENTS

Daniels will provide documents, or the information contained in documents, required to be provided under the Standard, to a person with a disability in an accessible format or with communication support that takes the person's disability into account.

11. QUESTIONS ABOUT THIS POLICY

For more information about the Policy or for questions regarding Daniels' "Accessible Practices for Customer Service" please contact:

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