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*Title:* **CONDUCT**

*Subject:* **Accessibility Standards for Customer Service**

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### **Purpose**

The purpose of this policy is to develop, implement, and enforce accessibility standards in order to achieve accessibility for persons with disabilities with respect to goods and services.

### **Scope**

This policy has been developed in accordance with the Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11 and the Ontario Regulation, O. Reg. 191/11: INTEGRATED ACCESSIBILITY STANDARDS and the provisions of the Ontario Human Rights Code.

All legislated changes impacting this policy will be reflected in Nelson's policy through updates, on an ongoing basis. The policy will be reviewed annually in accordance with applicable legislation. No changes will be made to this policy before considering the impact on people with disabilities.

This policy applies to all employees and any other member of the Company.

### **Our Commitment**

**Nelson is committed** to excellence in serving all customers, **including people with disabilities**. We strive to provide our goods, services, and facilities in a respectful and accessible manner to all customers, including persons with disabilities. Persons with disabilities will benefit from the same services, in the same place, in a similar way, as other clients. It is the commitment of the Company to provide equitable treatment, with respect to providing our goods and services without discrimination in accordance with The Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11 and the Ontario Regulation, O. Reg. 191/11: INTEGRATED ACCESSIBILITY STANDARDS and the provisions of the Ontario Human Rights Code.

When providing our goods and services to a person with a disability, we are committed to the following four core principles:

- **Dignity** – Service is provided in a way that allows the person with a disability to maintain self-respect and the respect of other people. People with disabilities are not treated as an afterthought or forced to accept lesser service, quality, or convenience.
- **Independence** – Allowing a person with a disability to do things on their own without unnecessary help, or interference from others.
- **Integration** – Service is provided in a way that allows the person with a disability to benefit from the same services, in the same place, and in the same or similar way as

other customers, unless an alternate measure is necessary to enable the person to access goods or services.

- **Equal Opportunity** – People with disabilities have an opportunity equal to that given to others to access our goods and services.

## **Responsibilities**

Management is responsible to:

- Be knowledgeable of all related legislation
- Provide training to all employees and other members of the organization
- Establish a process for individuals to provide feedback on how goods or services are provided to people with disabilities and outline how the Company will respond and take action. This feedback process must be accessible, and the Company will provide or arrange accessible formats and communication supports, upon request
- Ensure policies, practices, and procedures are consistent with core principles of the standard

Employees and other members of the Company are responsible for and must do the following:

- Comply with this policy
- Attend training

## **Definitions**

Disability defined (as per the Ontario Human Rights Code):

- 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; (“handicap”)*

### Customers

People who receive goods or services from the Company.

### Persons with Disabilities

Individuals who have a disability as defined under the *Ontario Human Rights Code*.

### Barrier

Anything that prevents a person with a disability from fully participating in all aspects of society because of their disability, including a physical barrier, an architectural

barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy, or practice.

### Accessibility

Accessibility is the degree to which a product, device, service, environment, or facility is usable by as many people as possible, including persons with disabilities.

### Goods and Services

The goods and services provided by the Company.

### Assistive Device

A device used to assist a person with a disability in carrying out activities or in accessing the services of persons or organizations covered by the customer service standard. (i.e., canes, hearing aids, wheelchairs, etc.)

### Support Person

A support person is an individual hired or chosen by a person with a disability to accompany them in order to help with communication, mobility, personal care, medical needs, or with access to goods or services.

### Service Animal

A service animal is an 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 a letter from a physician or nurse, or a regulated health professional (including psychologists, psychotherapists, audiologists, chiropractors, and optometrists) confirming that the person requires the animal for reasons relating to the disability

### Guide Dog

A dog trained as a guide for a blind person and has the qualifications prescribed by the regulations of the Blind Persons' Rights Act.

### Premises

Includes the buildings, land, and/or grounds where goods or services are provided by Nelson.

## **Procedures**

### Communication

We will communicate with people with disabilities, to the best of our ability, in ways that take into account their disability and offer communication methods that are suitable to their communication needs (i.e., e-mail, telephone, or in-person, etc.).

If a person with a disability requiring a wheelchair enters our premises and they require assistance, an employee is required to come out to greet them. If an extended visit is required, suitable meeting accommodation will be arranged and the employee scheduling the meeting is required to take into consideration the person's disability when making these arrangements.

Information provided on our company website and promotional marketing materials will be offered in alternative formats, upon request, (i.e., small print vs. large print, offering an in-person meeting to review and read materials or website information if requested, etc.).

All employees will be educated and trained on how to address and communicate effectively and appropriately with customers with disabilities.

### Guide Dogs and Service Animals

We welcome people with disabilities accompanied by their guide dog or service animal, who are permitted on all areas of our premises that are normally open to the public or third parties, unless the animal is otherwise excluded by another law. If a service animal is excluded by law, we will use other measures to provide services to the person with a disability. Service animals are permitted in the plant within the pedestrian walkways only.

The Company is permitted to ask for proof that the animal is a service animal. The person with a disability is required to provide a letter from a physician or nurse, or a regulated health professional (including psychologists, psychotherapists, audiologists, speech pathologists, chiropractors, occupational therapists, optometrists, registered psychotherapists, and mental health therapists) confirming that the person requires the animal for reasons relating to the disability.

All employees and other members of the organization will be trained on the different types of service animals, as well as how to properly interact with those using service animals.

### Support Person

A support person is an individual hired or chosen by a person with a disability to accompany them in order to help with communication, mobility, personal care, medical needs or with access to goods or services. A person with a disability who is accompanied by a support person is permitted to have that person accompany them on all areas of our premises that are normally

open to the public or third parties. Support persons are permitted in the plant within the pedestrian walkways only.

In certain cases, the Company may require a person with a disability to be accompanied by a support person for health and safety reasons. Before making this decision, the Company will:

- *Consult with the person with a disability to understand their needs*
- *Consider health or safety reasons based on available evidence*
- *Determine if there is no other reasonable way to protect the health or safety of the person or others on the premises*

In such a situation, admission fees or fares (if applicable) will be waived for the support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to their support person while on our premises.

#### Assistive Devices

We are committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our goods and services. We will ensure employees are trained on and familiar with various assistive devices that may be used by customers with disabilities while accessing our premises, or using our goods or services.

Persons with disabilities shall be permitted to obtain, use, or benefit from our goods and services through the use of their assistive devices. It is the responsibility of the person with a disability to ensure that their own assistive device is operated in a safe manner at all times.

All employees and other members of the organization will be trained as required about assistive devices and the Company will maintain accurate records of training delivered. These records will be made available upon inspection as may be required.

#### Notice of Temporary Disruption to Services or Facilities

In the event of a planned or unexpected disruption to our facilities or services, a notice of temporary disruption will be posted at the main entrance reception area. The notice will include as much information as possible such as the reason for the disruption, length and description of alternative facilities or services, if available.

All visitors to Nelson are required to check in at reception and receive a visitor badge which includes safety awareness. All visitors must be accompanied by a Nelson representative who will inform them of any disruption in facility accessibility and advise them of an alternate location.

#### Feedback Process

The Company welcomes feedback on how we can provide accessible customer service. Feedback provided to Nelson regarding the way the Company provides our goods, services, and

facilities to people with disabilities can be made ~~on this policy~~ by either email, via telephone, or in person.

- Email: [bflynn@nelsonindust.com](mailto:bflynn@nelsonindust.com)
- Phone: 905-428-2240
- In person: 1155 Squires Beach Road, Pickering, Ontario, L1W 3T9.

All feedback will be directed to HR and a response shall be provided within seven days. The Company will make sure our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request.

### Training for staff

Nelson will provide the necessary training to all employees. Training provided will include:

- An overview of the Accessibility of Ontarians with Disabilities Act, 2005, the Integrated Accessibility Standards Regulation (IASR), and the 5 Standards under the Regulation, including the requirements of the Customer Service Standard.
- The Ontario Human Rights Code as it pertains to persons with disabilities.
- Nelson's policy related to the customer service standard.
- How to interact and communicate with people with various types of disabilities.
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal, or a support person.
- What to do if a person with a disability is having difficulty in accessing our company.

Training is provided upon hire, and refresher training is completed every two (2) years. The Company will maintain accurate records of training delivered. These records will be made available upon inspection as may be required.

### **References**

Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11  
O. Reg. 191/11: INTEGRATED ACCESSIBILITY STANDARDS  
Ontario Human Rights Code

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