



Human Resources Policies and Procedures

Policy: Accessibility for Ontarians with Disabilities Act (AODA)	Policy: #
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Approved by: Darcy Charron	Page: 1 of 6

Purpose

The accessibility for Ontarians with disabilities act, 2005 (AODA) was created with the goal of developing standards that would improve accessibility for people with disabilities across the province. The AODA complements the requirements under the Human Rights Code and other laws that protect disabled persons from discrimination or harassment. Ontario Regulation 429/07 establishes accessibility standards for customer service and it applies to every designated public sector organization and to every other person or organization that provides goods or services to members of the public or other third parties and that has at least one employee in Ontario.

SCOPE

- a) This policy applies to the provision of goods and services at premises owned and operated by Kromet International.
- b) This policy applies to employees, volunteers, agents, and/or contractors who deal with the public or other third parties that act on behalf of Kromet International, including when the provision of goods and services occurs off the premises of Kromet International such as in: delivery services, vendors, and drivers.
- c) The section of this policy that addresses the use of guide dogs, service animals and service dogs only applies to the provision of goods and services that take place at premises owned and operated by Kromet International.
- d) This policy shall also apply to all persons who participate in the development of Kromet Internationals policies, practices and procedures governing the provision of goods and services to members of the public or third parties.

Definitions

Assistive Device: a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal Assistive Decides are typically devices that customers bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

Disability, as defined by the AODA 2005 and the Ontario Human Rights Code, includes but is not limited 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, amputations, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impairment, muteness or speech impediment, or physical reliance on a guide dog or 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 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.

Guide Dog: is 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*, to provide mobility, safety and increased independence for people who are blind.

Service animal: as reflected in Ontario Regulation 429/07, an animal is a service animal of a person for a disability if:

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

Service Dog: as reflected in the *Health Protection and Promotion Act*, Ontario Regulation 562 a dog other than a guide dog for the blind is a service dog if:

- It is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability;
- Or the person who requires the dog can provide on request a letter from a physician or a nurse confirming that the person requires a service dog.

Support Person: as reflected in Ontario Regulation 429/07, a support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to goods and services.

GENERAL PRINCIPLES

In accordance with the *Accessibility Standards for Customer Service, Ontario Regulation 429/07*, this policy addresses the following:

- A. The Provision of Goods and Services to Persons with Disabilities;
- B. The use of Assistive Devices
- C. The use of Guide dogs, Service Animals, and Service dogs
- D. The use of Support Persons
- E. Notice of Service Disruptions
- F. Customer Feedback
- G. Training
- H. Notice of Availability and Format of Required Documents



A. The Provision of Goods and Services to Persons with Disabilities

Kromet International will make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- Ensuring that all customers receive the same value and quality;
- Allowing customers with disabilities to do things in their own ways, at their own pace when accessing goods and services as long as this does not present a safety risk;
- Use alternative methods when possible to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner;
- Taking into account individual needs when providing goods and services; and
- Communicating in a manner that takes into account the customers disability.

B. Assistive Devices

Customers Own Assistive Device(s):

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by Kromet International.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services. For example, open flames and oxygen tanks cannot be near one another. Therefore, the accommodating of a customer with an oxygen tank may involve ensuring the customer is in a location that would be considered both safe for the customer and the business. Or, where elevators are not present and where an individual requires assistive device for the purposes of mobility, service will be provided in a location that meets the needs of the customer.

C. Guide Dogs, Service Animals and Service Dogs

A customer with a disability that is accompanied by a guide dog, service animal or service dog will be allowed access to premises that are open to the public unless otherwise excluded by law. "No Pet" policies do not apply to guide dogs, service animals and/or service dogs.

Exclusion Guidelines:

If a guide dog, service animal or service dog is excluded by law Kromet international will offer alternative methods to enable a person with a disability to access goods and services, where possible.

Recognizing a Guide Dog, Service dog and/or Service Animal:

If it is not readily apparent that the animal is being used by the customer for reasons relating to his/her disability, Kromet International may request verification from the customer. Verification may include:

- A letter from a physician or nurse confirming that the person requires the animal for reasons related to a disability;
- A valid identification card signed by the Attorney General of Canada; or
- A certificate of training from a recognized guide dog or service animal training school.

Care and Control of the Animal:

The customer that is accompanied by a guide dog, service dog and/or service animal is responsible for maintaining care and control of the animal all the time.



Allergies:

If a health and safety concern presents itself, for example, in the form of a severe allergy to the animal, Kromet International will make all reasonable efforts to meet the needs of all individuals.

D. Support Persons

If a customer with a disability is accompanied by a support person, Kromet International will ensure that both persons are allowed to enter the premises together and that the customer is not prevented from having access to the support person.

There may be times where seating and availability prevent the customer and support person from sitting beside each other. In these situations, Kromet International will make every reasonable attempt to resolve the issue.

In situations where confidential information might be discussed, consent will be obtained from the customer, prior to any conversation where confidential information might be discussed.

E. Notice of Disruptions of Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Kromet International. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use Kromet International's goods or services, reasonable efforts will be made to provide advance notice. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

Notifications will include:

In the event that a notification needs to be posted the following information will be included unless it is not readily available or known:

- goods or services that are disrupted or unavailable
- reason for the disruption
- anticipated duration
- a description of alternative services or options

Notification Options:

When disruptions occur Kromet International will provide notice by:

- posting notices in conspicuous places including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption and/or on the Kromet International website;
- contacting customers with appointments;
- verbally notifying customers when they are making a reservation or appointment; or
- by any other method that may be reasonable under the circumstances

F. Feedback Process

Kromet International shall provide customers with the opportunity to provide feedback on the service provided to customers with disabilities. Information about the feedback process will be readily available to all customers and notice of the process will be made available on the website. Feedback forms along with alternate methods of providing feedback such as verbally (in person or telephone) or written (hand written, delivered, website, email), will be available upon request



Submitting Feedback:

The ultimate goal of Kromet International is to meet and surpass current and prospective employee's expectations when accommodating disabilities. Comments on our services regarding how well those expectations are being met are welcome and appreciated.

Customers can submit feedback by:

- Verbally providing feedback to any Kromet International employee; or
- Sending feedback to:

Nicole Borges
Kromet International Inc.
200 Sheldon Drive
Cambridge, Ontario, N1R7K1

Customers that provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

G. Training

Training will be provided to:

- a) all employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of Kromet International; for example: salespersons, drivers, vendors, third party marketing agents; and,
- b) Those who are involved in the development and approval of customer service policies, practices and procedures.

Training Provisions:

As reflected in *Ontario Regulation 429/07*, regardless of the format, training will cover the following:

- a review of the purpose of the Accessibility for Ontarians with Disabilities Act, 2005
- A review of the requirements of the Accessibility Standards for Customer Service, Ontario Regulation 429/07
- Instructions on how to interact and communicate with people with various types of disabilities
- Instructions on how to interact with people with disabilities who use assistive devices, require the assistance of a guide dog or support person
- Instructions on how to use equipment or devices that are available at our premises that we provide that may help [people with disabilities]
- Instruction on what to do if a person with a disability is having difficulty accessing your services.
- Kromet International's policies, procedures and practices pertaining to providing accessible customer service to customer with disabilities.

Training Schedule:

Kromet International will provide training as soon as practicable. Training will be provided to new employees, volunteers, agents and/or contractors who deal with the public or act on our behalf.

Revised training will be provided in the event of changes to legislation, procedures, and or practices.



Record of Training:

Kromet international will keep a record of training that includes the dates training was provided and the number of employees who attended the training.

H. Notice of Availability and Format of Documents

Kromet International shall notify customers that the documents related to the Accessibility Standard for Customer Service are available upon request and in a format that takes into account the customers disability. Notification will be given by posting the information in a conspicuous place owned and operated by Kromet International.

ACCESSIBLE RECRUITMENT PRACTICES

Kromet International is committed to a recruitment process that is both accessible and fair for all prospective and current employees. We will ensure that all employees, applicants and members of the public are aware of Kromet Internationals commitment to accommodate through the following disclaimer which is to be used on all internal and external job advertisements.

Kromet International Ltd is an equal opportunity employer and will provide accommodations for disabilities upon request. Kromet International has approval under the federal contractor's program and encourages applications from all designated groups.

To ensure that all successful applicants are aware of their rights to ask for accommodation the following clause is to be added to all conditional offer letters.

Kromet International Ltd is committed to ensuring its workplace is safe and accessible for all its employees. Kromet International has a policy in place to accommodate employees with disabilities. If you are in need of an accommodation for a disability, please advise your HR contact as soon as possible so that we can make arrangements to accommodate your disability prior to your first day of employment.



MULTI-YEAR ACCESSIBILITY PLAN

The multi-year accessibility plan outlines Kromet International's strategy to prevent and remove barriers and to meet the requirements under the Integrated Accessibility Standards, Ontario Regulation 191/11.

Our multi-year accessibility plan will be posted on our website, and available in an accessible format upon request. The multi-year accessibility plan will be reviewed and updated at least once every five years.

The plan will ensure that Kromet International is appropriately:

- Meeting our accessibility requirements within required timelines specified in the Regulation
- Addressing any current accessibility barriers
- Preventing and removing future barriers

The plan will address accessibility strategies in the following areas:

- General Accessibility
- Information and Communication
- Employment
- Built Environment- Design of Public Spaces.

Referenced Documents

- Accessibility for Ontarians with Disabilities Act, 2005
- Accessibility Standards for Customer Service, Ontario Regulation 429/07
- Blind Persons Rights Act, 1990
- Health Protection and Promotion Act, Ontario Regulation 562
- Ontario Human Rights Code, 1990