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| ASP-025 Accessibility Standards Policy | Areas Involved: All Locations |
| Approved By: Terry O'Reilly | Review/Revision Date: 2023 |
| Associated PSF Forms/Information: PSF-019, PSF-053 | |

With the implementation of Regulation 191/11: Integrated Accessibility Standards under the *Accessibility for Ontarians with Disabilities Act, 2005* O'Reilly Brothers Ltd is committed to ensuring compliance for our employees with our Accessibility Policy for customer service and training. This means that O'Reilly Brothers Ltd. seeks to understand people's disabilities and their varying needs in a timely manner. We do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the *Accessibility for Ontarians with Disabilities Act* and Ontario's accessibility laws. We have written accessibility policies that are publicly available conforming to legislation whether we are directly serving the public or indirectly by means to other organizations in Ontario (third parties).

O'Reilly Brothers Ltd. is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination. O'Reilly Brothers Ltd. understands that obligations under the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) and its accessibility standards do not substitute or limit its obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law.

O'Reilly Brothers Ltd. is committed to excellence in serving and providing our services to all customers including people with disabilities. Our accessibility policies are consistent with the principles of independence, dignity, integration, and equal opportunity for people with disabilities.

“Disability” Defined

Any degree of physical, infirmity, amputation, malformation, disfiguration, lack of physical coordination, blindness, muteness or speech impediment caused by bodily injury, paralysis, birth defect or illness. This also includes diabetes mellitus, epilepsy, brain injuries or a physical reliance on a service assistant, wheelchair or other remedial appliance or device. Disabilities can be visible but are often not; they can also come and go which affects how a person functions at different times.

Communication

We communicate with people with disabilities taking into account their disability which includes in person, email, verbal and text via telephone/cell, letter, social media, and a bounce-back email if needed. We work together determining the best communication method(s) to use.

We notify the public, employment candidates, and employees about the availability of accessible formats and communication supports by posting our policy on our website, letting them know in person, email, verbal and text via telephone/cell, letter, and social media. We will also meet internationally-recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario's accessibility laws.

Feedback is Welcome

Feedback is the key to progress. We welcome all feedback, in particular, on how we provide accessible customer service. This helps us identify barriers and respond to concerns. We have a process for receiving and responding to feedback and the process is accessible to persons with disabilities upon request. We communicate with people with disabilities in ways that take into account their disability. When asked, we provide information about our organization and its services, including public safety information, in accessible formats or with communication supports:

- a) in a timely manner, taking into account the person's accessibility needs due to disability
- b) at a cost that is no more than the regular cost charged to other persons

We consult with the person making the request in determining the suitability of an accessible format or communication support. If the organization determines that information or communications are unconvertible, the organization shall provide the requestor with:

- a) an explanation as to why the information or communications are unconvertible
- b) a summary of the unconvertible information or communications

Feedback may be provided by email, verbal and text via telephone/cell, and letter.

Phone: 613-224-1677

Email: info@oreillybrothers.com

Mail: 55 Capital Drive, Nepean, ON K2G 0E7

All feedback, including complaints, is directed to management and customer can expect a response within five business days.

O'Reilly Brothers Ltd. ensures our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports on request.

Customer Service Standards

Ways we Provide Accessible Customer Service

We strive to interact and communicate with all people in the most convenient ways:

- We answer calls 24/7. During the day our office administrative staff answer calls and after hours and on weekends we have an on-call message centre.
- Our staff training includes *Accessibility for Ontarians with Disabilities Act*.
- We welcome feedback by phone, letter, email, and mail.
- We respond to online comments from social media.
- All our company vehicles have a note pad and paper for alternate communication.
- We accept payment in any form convenient to a client which includes going to their home to pick up a cheque.
- We aim to provide outstanding customer service by being sensitive and compassionate to people with various disabilities and the extent of a person's disability. We do this through open communication by responding to our customers' needs. When uncertain about how to approach a person we ask them respectfully how we can best meet their needs. This is further explained in the following sections.

Notice of Availability of Documents

O'Reilly Brothers Ltd. posts publicly the Accessibility Policy related to customer service and employment in the following locations:

- a) on our website www.oreillybrothers.com
- b) at our Head Office on our Health and Safety Board
- c) each vehicle has a box with the Health and Safety Manual which includes the Health and Safety Board and our Health and Safety Policy
- d) employees can access the above documents on our Google Drive
- e) we are also happy to email the document or provide communication support

O'Reilly Brothers Ltd. provides these documents in an accessible format or with communication support on request. We consult with the person making the request the suitability of the format or communication support. We provide the accessible format in a timely manner at no additional cost.

Notice of Temporary Disruption

In the event of a planned or unexpected disruption to services for customers with disabilities, this organization notifies customers promptly. If a notice is posted it includes information about the reason for the disruption, its anticipated length of time, and a description of alternative services, if available. The notice will be made publicly available in the following ways: in person, email, verbal and text via telephone/cell, letter, social media, and a bounce-back email if applicable.

Assistive Devices

People with disabilities may use their personal assistive devices when accessing our services.

Support Persons

A person with a disability who is accompanied by a support person is allowed to have that person accompany them on our premises.

People with Physical Disabilities

Physical disabilities and injuries aren't always obvious so it is important to follow the below cues or ask how we could better serve someone when we see they are having difficulty walking, talking or moving in general:

- Sit down to make eye contact if you are having a long conversation with someone on crutches, in a wheelchair or scooter.
- Unless given permission do "not" touch the person or their equipment (i.e. cane, wheelchair and scooter).
- Following up on the above permission, common sense dictates to be sure the person is not left in an unwanted position (i.e. positions that are dangerous, awkward or undignified such as facing a wall or in the way of opening doors).

People with Vision Loss

Vision loss does not mean that a person cannot see so it is important to address the person directly and be sensitive to their ability see hazards, landmarks or to read by asking if they need help. Some customers may use a guide dog while others may not. Follow the below guidelines for someone who may have vision loss:

- People may still have some sight even though they have vision loss so it is important to "not" assume that person cannot see you.
- When speaking, identify yourself, speak directly to the person and ask if your help is needed.
- You can ask for their consent if they want to be guided by offering your arm/elbow.
- If a person has an animal with them and you're not sure if it's a service animal, ask the person to clarify.
- It is important not to touch or address a service animal (i.e. guide dog) since it is not a pet but a service animal.
- If the person is accommodated by someone address the person directly not who they are accommodated by.

People with Service Animals

Although our Head Office is not meant for public visits, when necessary, we welcome working with people with disabilities and their service animals on our premises while conforming to safety on site requirements.

- If an animal is not easily identified as a service animal our staff might ask a person for regulated health professional documentation confirming that person requires the service animal relating to their disability.
- Notice a service animal's identification by its harness, vest or how it helps the person with tasks.

People with Hearing Loss

As with all disabilities hearing loss has varying degrees (i.e. deaf, deafened and hard of hearing). Also, it is important to recognize that a person could be oral deaf, which is when the person is unable to hear and prefers to talk instead of using sign language.

- When a person identifies as having hearing loss be sure they can see your face and read your lips by moving to a well-lit area.
- If you want to speak to the person with hearing loss it may be necessary to get their attention prior. This can be done by attracting their attention first by waving your hand otherwise give a gentle tap to the shoulder.
- When a person uses a hearing aid be sure the area is quiet and without background noise.
- When there is difficulty communicating ask if another communication method would be better, i.e. pen and paper.

People with Deaf-Blind Disabilities

People with deaf-blind disabilities can still have some level of hearing and vision but may be accompanied by a professional support person who aids with communication:

- Communication with a person who is deaf-blind may be done using assistance card notes but the person will provide direction on the best communication mode.
- Unless instructed to speak to the professional support person always address the person who is deaf-blind.

People with Speech or Language Disabilities

Some diseases and disabilities cause difficulty with a person's speech (pronunciation, slurring, and stuttering). Communication boards and other assistive devices are used by some people with severe conditions.

- Never assume a person with any type of speech impairment has other disabilities.
- Ideally ask closed questions; questions which can be answered with a "Yes" or "No".
- Never interrupt or finish the person's sentence – patience is required and is appreciated.

People with Learning Disabilities

"Learning disabilities" are diverse and even within a disability there can be a variety of types (i.e. dyslexia have many types including visual, auditory, and attention which affects how information is understood and remembered). Some things to remember are as follows:

- Patience goes a long way when communicating as a person with a learning disability may not respond because they don't understand or need more time to process information.
- It may not be obvious that a person has a learning disability but look for cues like difficulty reading.

- A person may need help reading and/or understanding information.
- When communicating keep it simple to prevent confusion and further complicating information.

People with Intellectual/Developmental Disabilities

As with other disabilities “intellectual/developmental disabilities” are not always obvious. A person with these disabilities will have limitations on learning, communicating, doing daily physical activities, and may prevent the person from living independently. Down syndrome is one such example and the following are guidelines to keep in mind:

- Treat the person with respect in both communications and body language.
- Use plain and simple language.
- Don’t presume what a person can do, ask them if you have any doubt.

People with Mental Health Disabilities

Mental health disabilities also cover a diverse number of disorders, span a large range of severity, and can affect a person’s ability to communicate, concentrate, and think clearly. Anxiety can be a side effect caused by panic disorders, phobias, mood swings, and hallucinations. It may not be obvious a person has a disability so the following things can be done to ease interactions:

- Treat the person with respect and be considerate.
- Communicate in a calm, reassuring, and confident manner.
- Ask what you can do to help when a person seems to be having a crisis.

Treating everyone with dignity and respect by being aware and prepared are great first steps in Accessible Customer Service; done in conjunction with the above guidelines allows everyone to be treated and served appropriately.

Employee Standards

Employment

We notify employees, job applicants, and the public that accommodations can be made during recruitment and hiring. We ask that job applicants identify their accessibility needs when they apply so we can provide appropriate accommodations.

New employees with disabilities are asked how we can best support them and how they would like to be communicated with as well as what we should be sharing with their co-workers:

- a) the onboarding materials ask if accommodations are needed and, if yes, what they are
- b) information that is needed in order to perform the employee’s job
- c) information that is generally available to employees in the workplace

Emergencies

Where needed, we will also provide customized emergency information to help an employee with a disability during an emergency. This information is provided by the employee on their initial onboarding paperwork. With the employee’s consent, we will provide workplace emergency information to a designated person who is providing assistance to that employee during an emergency. We will provide the information as soon as practicable after we become aware of the

need for accommodation due to the employee's disability. We will review the individualized workplace emergency response information:

- a) when the employee moves to a different location in the organization
- b) when the employee's overall accommodations needs or plans are reviewed
- c) when the employer reviews its general emergency response policies.

We have a written process to develop individual accommodation plans for employees. We have a written process for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work. Our performance management, career development, and redeployment processes take into account the accessibility needs of all employees.

Training

We are committed to training all staff in accessible customer service, Ontario's accessibility standards, and aspects of the Ontario Human Rights Code that relate to persons with disabilities. In addition, we will train:

- a) all persons who participate in developing the organization's policies
- b) all other persons who provide services on our behalf

Training includes the following:

- purpose of the *Accessibility for Ontarians with Disabilities Act, 2005* and the requirements of the Customer Service Standards
- our policies related to the Customer Service Standards
- 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 support person
- how to use the equipment or devices available on-site or otherwise that may help with providing goods and services to people with disabilities. These include: paper, pens, and cell phones.
- what to do if a person with a disability is having difficulty in accessing our organization's services.

We train every person as soon as practicable after being hired and provide training in respect of any changes to the policies. We maintain records of the training provided including the dates on which the training was provided. Upon being hired each employee signs off on our Accessibility Policy providing them with immediate information on people with disabilities. Changes to the policy are communicated by email, text, phone call or letter depending on the nature of the change.

Changes to Existing Policies

Any policies of this organization that do not respect and promote the principles of dignity, independence, integration and equal opportunity for people with disabilities will be modified or removed. This document is publicly available. Accessible formats are available upon request.