

Accessible Customer Service Policy

1.0 Purpose

1.1 Empack strives to establish and uphold a climate of mutual respect, ensuring that all individuals accessing our services, goods, and facilities are able to do so irrespective of any disability they may have. This policy is created in accordance with the *Accessibility for Ontarians with Disabilities Act (AODA)* and specifically the Accessibility standards for customer service. Our business practices and policies will strive to ensure that all of our policies, practices, and procedures are consistent with the core principles as outlined in the AODA, which include:

1.1.1 Dignity

Goods and services and access to our facilities are to be provided to all persons with disabilities in a manner that is respectful to the person, and all such persons shall be treated as valued customers deserving of service.

1.1.2 Equality of Opportunity

Every person with a disability is entitled to be given an opportunity to obtain, use, and benefit from our goods, services, and facilities equal to that of any of our other customers.

1.1.3 Integration

Any person with a disability is entitled to benefit from our goods, services, and facilities in the same place and in the same or a similar manner as any other customer. This may require a different format and maintaining a flexible approach wherever possible, considering the person's individual needs. The objective is to attempt inclusiveness and full participation to the extent possible.

1.1.4 Independence

Goods and services and access to our facilities shall be provided in a manner that respects the independence of persons with disabilities and means respecting the person's right to independence, and their right to choose the manner in which they receive services. Any assistance offered must be accompanied with the consent of the person it is being offered to.

2.0 Scope

2.1 This policy applies to all employees, directors, and officers of our Company who deal with customers in Ontario, including persons who act as our agents (such as contractors and independent consultants), and to all persons who are responsible for developing and updating policies regarding business with customers in Ontario.

3.0 Definitions

3.1 Disability – means the same under the AODA as it does under the Ontario Human Rights code:

3.1.1 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 an assistance animal, wheelchair, or other remedial appliance or device

3.1.2 A condition of mental impairment or developmental disability

3.1.3 A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols as spoken language,

3.1.4 A mental disorder, or

3.1.5 An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act.

3.2 Customer - refers to anyone who is in receipt of the goods and services we provide, whether the person is a member of the general public, the end-user of our goods or services, a distributor, or a representative of another organization.

3.3 Employee - refers to all employees, officers, directors, students, volunteers, or contractors of Empack who deal with any of our customers (or potential customers) in Ontario, whether working on a full-time or part-time basis.

4.0 Communication and Assistance Devices

For the purposes of the policy, an “assistive device” is a tool, technology, or other mechanism that enables a person with a disability to maintain their independence in everyday life by performing tasks and activities such as moving, communicating, or lifting.

In order to promote understanding of the content and intent of the communication, all communication with people with disabilities will be done in a manner that considers the disability. To that end, persons using assistive devices will be permitted – where possible, and where permitted by law – to use those devices while on any part of our premises which are open to the public. It is understood, however, that the use and safety of any personal assistive device is the responsibility of the person with the disability.

Where an assistive device cannot be used due to an impeding factor, attempts will be made to remove the impeding factor, or the person with the disability will be asked how they can be accommodated, and/or what alternative methods may be available to assist the person in accessing our goods, services, or facilities. Some of the assistive devices which are currently available internally which may assist with communication issues include: telephones, email, video conferencing system, and pen and paper. Other assistive devices which may assist with removing other barriers to accessibility might include: elevators, ramps, wheelchair accessible washrooms, automatic doors, and low-height counters. All employees will be trained on how to communicate with persons with disabilities, as well as in how to effectively use each of the aforementioned assistive devices, as appropriate for their position.

5.0 Service Animals

For the purpose of this policy, an animal is a service animal for a person with a disability if:

1. It is readily apparent that the animal is used by a person with a disability for reasons relating to their disability; or
2. The person provides a letter from a physician or nurse confirming the need for the animal for reasons relating to a disability.

This includes any animal used by a person with a disability for reasons relating to the disability, such as guide dogs, hearing alert animals, seizure alert animals, and psychiatric service animals.

A person with a disability who is accompanied by a service animal is permitted access to all the parts of the company's premises that are open to the public, provided that the animal is not otherwise excluded by law. If for some reason the service animal is excluded by law, Empack will attempt to find an alternate means within a reasonable time frame to provide the person with an alternate method of accommodation.

If it is not readily apparent that the animal is a service animal, Empack reserves the right to ask the person with the disability to provide a letter from a physician or nurse confirming that the person requires the animal for reasons relating to their disability. However, the decision about whether to request such a letter shall be made by the most senior manager. Staff will receive training on how to interact with a person with a disability who is accompanied by a service animal.

6.0 Support Persons

For the purposes of this policy, a support person is any person who accompanies a person with a disability in order to assist that person with their disability, such as helping with mobility issues, communication, personal or medical needs, or with accessing goods or services. A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises. To preserve confidentiality, consent forms which authorize Empack to discuss confidential information in the presence of the support person may have to be signed by both the customer as well as the support person. Staff will receive training on how to interact with persons with disabilities who are accompanied by a support person, including:

- Communicating directly with the customer, rather than the support person
- Addressing potential issues of confidentiality.

7.0 Notice of Temporary Disruption

In the event of a planned or unexpected disruption to our services or facilities, such as access to our building, we will notify customers promptly of any such planned or unexpected disruption as follows.

- Where a meeting is scheduled with a customer, the customer shall be notified of the temporary disruption by email in advance of the meeting so that appropriate alternative arrangements can be made.
- The information will be posted in a conspicuous place on the website

- A copy of the notice will be posted at the entrance of all affected buildings operated by the company to which the public have access

Where possible, the notice will be posted a minimum of one (1) week in advance of any planned or expected shutdowns. The posted notice will include information about:

- The date, time, and location of the disruption
- The reason for the disruption
- The anticipated length of time, and
- A description of alternative facilities or services available, if any.

8.0 Training for Staff

Training will be provided to everyone covered by this Policy and will include ongoing training when changes are made to this Policy, or any related change to other policies, practices or procedures. This training will be provided to all new employees as soon as possible following hiring, but no later than one month after hiring. Records of this training will be kept on file. Training will include:

- An overview of the *AODA*
- The specific requirements of the Customer Service Standard
- A review of this Policy
- How to interact and communicate with people with various disabilities and with those who use assistive devices or require the assistance of a service animal or support person
- How to use the assistive devices we already have
- What to do if a person with a disability is having difficulty accessing our goods, services or facilities

CONTROLLED DOCUMENT

FEEDBACK PROCESS

Customers, other members of the public as well as employees are all invited to provide feedback about the way in which we provide our goods and services to people with disabilities. This may include areas that require changes or improvements.

All feedback can be provided via telephone, email or in writing and directed to:

- Email: hr@empack.com
- Phone: 905-792-6571
- Address: 98 Walker Drive

If a person's disability prevents them from providing feedback by email or in writing, alternative arrangements will be made which take into account the person's disability. All feedback relating to accessibility of our services will be directed to the Vice President of Human Resources. We will attempt to respond in the same format as the feedback is received. When complaints or concerns are received, every effort will be made to respond within two (2) weeks of the receipt of the complaint or concern, or earlier where circumstances dictate.

MODIFICATIONS TO THIS OR OTHER POLICIES

All of our policies, practices and procedures will be reviewed on an ongoing basis to ensure compliance with the *AODA*. Any policy, practice or procedure that does not comply with and promote the dignity and independence of people with disabilities will be modified or removed.

ACCESSIBILITY OF DOCUMENTS

This Policy and all other documents required by the *AODA* pertaining to our policies, practices and procedures on the provision of services to persons with disabilities can also be obtained by contacting the Vice President of Human Resources using the contact information set out above. Upon request, reasonable attempts will be made to provide these documents to clients with disabilities in a format that takes into account the person's disability.

Notice of availability of these documents will be posted on our website and posted in a conspicuous place at each of the Company's locations where this Policy applies.

CONTROLLED DOCUMENT

ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

Dear Valued Customers:

The PIC Group is committed to improving accessibility for individuals with disabilities and complying with the *Accessibility Standards for Customer Service* addressed in Ontario Regulation 429/07 (“Customer Service Standard”) under the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”).

FEEDBACK

We would like to hear your comments, questions and suggestions about the provision of our goods or services to people with disabilities. Any feedback should be addressed to our Vice President of Human Resources, and can be in writing or email to the following address:

- Email: hr@empack.com
- Phone: 905-792-6571
- Address: 98 Walker Drive

Customers who wish to provide feedback verbally can do so to any of our managerial employees or by requesting a copy of our Accessibility Feedback Form.

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

AVAILABILITY OF DOCUMENTS

You may request a copy of our Company’s Accessible Customer Service Policy, or any other document required under the *AODA* or the Customer Service Standard by contacting the Vice President of Human Resources using the above-noted contact information.

CONTROLLED DOCUMENT

Our Company has established a process for receiving and responding to feedback about the manner in which we provide our goods and services to persons with disabilities. Feedback may be provided in person, by telephone, in writing or by delivering electronic text by email or on diskette to the Accessibility Coordinator. This form is intended to provide a consistent format for receiving feedback information, but is not meant to be the exclusive format for receiving feedback.

Date: _____ Format Received: _____

Personal Information:

Name: _____

Address: _____

Telephone: _____

Email: _____

Subject: _____

Details:

The personal information provided enables us to respond to your feedback or complaint and will only be used for that purpose. You will not be placed on any mailing lists, nor will your information be released to any third party, except as may be required by law. Questions about this collection should be directed to the attention of the Vice President of Human Resources:

- Email: hr@empack.ca
- Phone: 905-792-6571
- Address: 98 Walker Drive