



## Accessibility Policy

Effective Date: July 29, 2016

Page: **1 of 10**

### Policy Intent:

This Accessibility Policy establishes practices and procedures to make our workplace more inclusive in compliance with the Accessibility for Ontarians with Disabilities Act (AODA), 2005. This legislation is not a replacement of, or a substitution for, the requirements established under the Ontario Human Rights Code.

Tepperman's is committed to excellence in serving all customers, including persons with disabilities, and treating all individuals in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity and are committed to meeting the needs of persons with disabilities, in a timely manner, by preventing and removing barriers to accessibility.

In addition, to this policy, Tepperman's has developed, and made available upon request, a multi-year accessibility plan which outlines the actions put in place to improve opportunities for individuals with disabilities.

Tepperman's commits to being "responsive" and delivering service in a timely manner with respect to the nature and the accommodation required; such as offering alternate formats within a reasonable timeframe.

### Policy Scope:

Tepperman's is committed to excellence in serving all customers with disabilities while accessing our products and services and providing an accessible workplace for our employees, volunteers and contractors working on our behalf. This policy and associated procedures will comply with the Accessibility for Ontarians with Disabilities Act, 2005, and its regulations. This policy applies to all employees at all of our stores, warehouses and offices, including contractors, students, volunteers, or any other individual performing work or providing services on behalf of Tepperman's. Accessibility will be considered and applied with regards to all policies, procedures and practices of Tepperman's.

## Policy Definitions:

“AODA” – refers to the Accessibility for Ontarians with Disabilities Act, 2005.

“Accessibility Standards” – refers to the requirements as set out in the AODA in five (5) distinct areas: customer service; information and communications; employment; transportation; and the built environment.

“Accessible Formats” – may include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

“Assistive Device” – is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of a person with a disability. Personal assistive devices 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.

“Communication Supports” – may include, but are not limited to, captioning, alternative communication supports, plain language, sign language and other supports that facilitate effective communications.

“Core Principles of Customer Service” – Tepperman’s will comply with all legislation affecting persons with a disability and ensure our policies and procedures are aligned with the following core principles:

- **Independence:** delivering services for persons with disabilities in a way that supports their independence, while respecting their right to safety and personal privacy.
- **Dignity:** providing services in a respectful manner consistent with the needs of the individual.
- **Integration:** offering services in a way that allows individuals with disabilities to fully benefit from the same services, in the same place, and in the same or similar manner as other customers.
- **Equal Opportunity:** ensuring service outcome is the same for all individuals.

“Disability” – refers to the definition used in the AODA, which is consistent with the definition under the Ontario Human Rights Code. The definition includes disabilities of different severity, including visible as well as non-visible disabilities and those with periodic affects. Disability is defined as:

- 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;
- a condition of mental impairment or a developmental disability;
  - a learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
  - a mental disorder; or
  - 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 a person with a seeing disability.

“Service Animal” – refers to an animal used by a person with a disability, for reasons relating to his or her disability. The person can provide a letter, upon request, from a regulated health professional confirming that the person requires the animal for reasons relating to the 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 regulated health professional confirming that the person requires a service dog.

“Support Person” – refers to a person who accompanies an individual with a disability, in order to help with communication, mobility, personal care, medical needs or access to goods and services.

#### Policy Guidelines:

Tepperman’s will comply with the regulations and standards as set out in the Accessibility for Ontarians with Disabilities Act (AODA), 2005. The Act was created with the intention of eliminating discrimination against individuals with disabilities, removing barriers and ultimately achieving an accessible Ontario, by 2025. Tepperman’s is committed to pursuing this goal and has developed and implemented workplace policies to achieve accessibility through meeting the requirements of the Act and its regulations.

Tepperman's is committed to meeting the accessibility needs of persons with disabilities and doing so in a timely manner, in a way that takes into consideration the accessibility needs of the individual based on the type of disability. Recognizing the dignity and independence of all employees, customers and visitors, we will ensure that persons with disabilities have genuine, open and unhindered access to services, facilities, employment, buildings, and premises.

To achieve our goal of attaining an accessible workplace, training on Ontario's accessibility laws and the Human Rights Code, as it relates to individuals with disabilities, will be provided to:

- all employees, volunteers, contractors or other individuals who are employed by, or act on behalf of, Tepperman's;
- individuals who participate in the development and approval of the organization's policies, practices and procedures; and
- all other persons who provide goods, services or facilities on our behalf.

Accessibility training will be provided, as soon as practicable, and in a way that best suits the requirements for specified positions and will be provided as a component of a new hire orientation for all individuals joining our company. Additional training will be provided in the event of changes to legislation or internal policies and procedures. Human Resources will maintain a record of training that includes the dates training was provided and the number of employees who attended the training.

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 persons with various types of disabilities.
- Tepperman's policies, procedures and practices relating to the provision of service to persons with disabilities.
- Instructions on how to interact with individuals with disabilities who:
  - use assistive devices;
  - require the assistance of a guide dog, service dog or other service animal;
  - or
  - require the use of a support person.
- Instructions on what to do if a person with a disability is having difficulty accessing our products or services.
- A review of the requirements of the Integrated Accessibility Standards, Ontario Regulation 191/11.

- Instructions on how to comply with the Ontario Human Rights Code, as it pertains to persons with disabilities.

### **Customer Service Standard**

To comply with the Customer Service Standard, Tepperman's 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 of service;
- allowing persons 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;
- using alternative methods, when possible, to ensure that persons with disabilities have access to the same products and services, in the same place, and in a similar manner as our other customers;
- permitting persons with disabilities to use assistive devices, support persons and guide/service dogs or service animals as required when accessing goods and services;
- taking into account individual needs when providing goods and services;
- communicating in a manner that takes into account the person's disability;
- providing notice in the event of a planned or unexpected disruption in the facilities or services usually used by persons with disabilities to access Tepperman's products and services; and
- implementing a Customer Feedback Process and procedures for follow-up.

### **Assistive Devices**

We will ensure that our staff and volunteers are trained and are familiar with any assistive devices available in our workplace that may be used by customers with disabilities while accessing our products and services. In the event a person with a disability is hindered from accessing our products or services, Tepperman's will accommodate the customer by using any other assistive measures available.

### **Communication**

We will ensure that our staff and volunteers are trained to communicate with persons with disabilities in respectful ways that take into account their disability. When employees are unsure about the best approach, they are encouraged to ask the person politely and not assume how they can best communicate with them.

## **Guide Dogs, Service Animals and Service Dogs**

Individuals with disabilities accompanied by their service animals are permitted access to the premises of our facilities that are open to the public. Service animals, however, are not permitted in areas where food preparation is being undertaken or where otherwise disallowed by the law. Where a service animal is to be denied access to any of Tepperman's facilities, other accommodation may be afforded.

Owners of Service Animals may receive information from staff as to a location to obtain fresh water for the service animal and where it may be walked to relieve itself. The individual that is accompanied by a guide dog, service dog and/or service animal is responsible for maintaining care and control of the animal at all times.

If it is not readily apparent that the animal is being used by the individual for reasons relating to his or her disability, staff may request verification from the customer.

Verification may include:

- a letter from a regulated health professional confirming that the person requires the animal for reasons related to the 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.

## **Support Persons**

A Support Person accompanying an individual with a disability will be allowed to escort them on our premises and in the public areas of our facilities. The customer may be accompanied by a Support Person when it is necessary to protect the health and safety of the individual with a disability or the health and safety of others on the premises. If a staff member believes that a Support Person should be in attendance to protect the health and safety of the customer and others, the customer will be consulted regarding the following criteria:

- When a significant risk to the health and safety of the individual with the disability or others has been determined;
- When the risk cannot be eliminated or reduced by other means;
- When the assessment of the risk is based upon the duration of the risk, the nature and severity of the potential harm, the likelihood of the occurrence or imminence of potential harm; and
- When the assessment of the risk is based upon the individual's actual characteristics, not merely on generalizations, misconceptions, or fears related to the disability.

## **Notice of Disruptions in Service**

In the event of a planned disruption to services for individuals with disabilities visiting our premises, Tepperman's will notify these individuals, in a timely manner, through notices posted near the affected areas. This communication will be provided in the most appropriate method and manner depending on the disruption situation or circumstance. The communication will include information regarding the reason for the disruption, its anticipated duration, and a description of alternative facilities, accommodation, or services, if available or applicable.

There may be times that unexpected service disruptions occur and advance notice could not be provided. In these situations, Tepperman's will provide notification as quickly as possible in the method(s) most appropriate based on the circumstances.

## **Customer Feedback Process**

Customers, employees and other visitors to our premises who wish to provide feedback on the way Tepperman's provides products and services to individuals with disabilities can do so in a manner deemed most convenient to them, such as:

- In person, by verbally discussing their concerns with staff or management
- By telephone, contacting the Human Resources Department
- In writing, by completing a Customer Feedback Form
- Using other electronic method(s), such as emailing a Customer Feedback Form

Feedback should be directed to the:

Director of Human Resources

2595 Ouellette Avenue, Windsor, Ontario, N8X 4V8

Phone: (519) 969-9700 ext.1488 or Toll-free: 1 (800) 265-5062

Email: [hr@teppermans.com](mailto:hr@teppermans.com)

Website: [www.teppermans.com](http://www.teppermans.com)

Customers that provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted, and can expect to be contacted within three (3) business days. Complaints will be addressed according to Tepperman's regular complaint management procedures. Tepperman's will log all feedback from customers and address concerns promptly.

## **Information and Communications Standard**

To comply with the Accessible Information and Communications Standard, Tepperman's will:

- provide alternate formats and communication supports to employees and customers upon request;
- provide notice to employees and the public that these alternate formats and supports are available; and
- follow the guidelines for accessible websites and web content, to be phased in over time.

## **Notice of Availability and Format of Documents**

Tepperman's will notify customers that this policy and any other documents deemed to be important for the delivery of goods and services will be made available upon request, in a format that takes into account the person's disability. Notification will be given by posting the information in a conspicuous place on Tepperman's premises, the corporate website and/or any other reasonable method.

## **Employment Standard**

The Employment Accessibility Standard applies only to the employment of individuals and not to the engagement of volunteers or other non-paid individuals. This section of the policy will, therefore, pertain only to Tepperman's employees.

To comply with the Employment Accessibility Standard, we will:

- incorporate accessibility practices and supports in the hiring process, and consider the disability of an employee when conducting performance management, career development and advancement, and redeployment programs;
- provide all job information in accessible formats, upon request;
- develop individual accommodation plans, as required; and
- develop a documented process for a return to work program.

Information about policies, and any updates to policies, regarding supports for employees with disabilities, including information about accommodation, will be provided to all employees and new hires.

## **Workplace Emergency Response**

Tepperman's will provide individualized workplace emergency response information to employees with disabilities, if necessary, based on the type of disability, if aware of the



need for such accommodation. This will be provided as soon as practicable after becoming aware of the employee's needs. Upon the consent of the employee with the disability, this individualized plan will be shared with a designated person that will assist the employee in the case of a workplace emergency.

Individualized workplace emergency response plans should be reviewed at the time an employee is transferred to a new work location within the organization, when the individual's overall accommodation needs are reviewed, and when Tepperman's reviews its general emergency response policies.

### **Individual Accommodation Plans**

Tepperman's will develop written individual accommodation plans for disabled employees. The development of such plans will be accomplished as a team approach including consultation between Human Resources, the employee requesting accommodation, the employee's immediate Supervisor, and any third parties (such as healthcare professionals) that may need to be consulted. All employees requesting accommodation will be assessed on an individual basis to determine the supports that would be best suited to the needs of the individual. This may require an evaluation of the employee by an outside medical or other expert, to be paid for by Tepperman's, in order to determine how, and if, accommodation can be achieved.

### **Return to Work Process**

Tepperman's fully supports the Return to Work of any employee who requires disability-related accommodations in order to return to the workplace. Human Resources will work with the employee, his or her Supervisor and any third parties as required to develop a suitable individual accommodation plan.

If you have any questions or concerns about this policy, its related procedures, or the multi-year accessibility plan, please contact:

Director of Human Resources

2595 Ouellette Avenue, Windsor, Ontario, N8X 4V8

Phone: (519) 969-9700 ext.1488 or Toll-free: 1 (800) 265-5062

Email: [hr@teppermans.com](mailto:hr@teppermans.com)

Accessible formats of this document and the accessibility plan are available free upon request from the Human Resources Department.

## Associated Documents

- *Feedback Form (AODA2)*
- *Temporarily Out of Service Notice (AODA3)*
- *Accessibility Training Module*

## References

- *AODA (the Act) at: [http://www.e-laws.gov.on.ca/html/statutes/english/elaws\\_statutes\\_05a11\\_e.htm](http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_05a11_e.htm)*
- *Customer Service Standards at: [http://www.e-laws.gov.on.ca/html/source/regs/english/2007/elaws\\_src\\_regs\\_r07429\\_e.htm](http://www.e-laws.gov.on.ca/html/source/regs/english/2007/elaws_src_regs_r07429_e.htm)*
- *Integrated Standards at: [http://www.e-laws.gov.on.ca/html/source/regs/english/2011/elaws\\_src\\_regs\\_r11191\\_e.htm](http://www.e-laws.gov.on.ca/html/source/regs/english/2011/elaws_src_regs_r11191_e.htm)*
- *Ontario Human Rights Code*

This policy was approved this 29th day of July, 2016. This policy and its related procedures will be reviewed as required in the event of legislative changes.

---

Andrew Tepperman, President  
N. Tepperman Limited

## Revision Control Log

| Revision | Revision Date | Change           | Revised By      |
|----------|---------------|------------------|-----------------|
| 0        | July 29, 2016 | Initial Release* | Human Resources |
| 1        |               |                  |                 |
| 2        |               |                  |                 |
|          |               |                  |                 |

\* *Initial release of the combined Accessibility Standards for Customer Service Policy (released November 18, 2011) and Employee Integrated Standard Policy (released June 26, 2014).*