

AODA STATEMENT of POLICY and PROCEDURE

Customer Service Policy: Provision of Goods and Services

1 POLICY

- 1.1 The mission of Navacord is to be the broker of choice for quality conscious insurance buyers who appreciate thoroughly planned, cost effective strategies to risk management, to help them make smart insurance decisions and enhance their opportunities.
- 1.2 Our commitment in fulfilling our mission is to strive at all times to provide our goods and services in a way that respects the dignity and independence of people with disabilities. We are also committed to giving people with disabilities the same opportunity to access our goods and services and allowing them to benefit from the same services, in the same place, and in a similar way as other customers.
- 1.3 Reasonable efforts will be made to ensure that:
 - Persons with disabilities are provided equal opportunity to obtain, use and benefit from the Navacord goods and services;
 - Goods and services are provided in a manner that respects the dignity and independence of persons with disabilities;
 - The goods and services provided to persons with disabilities are integrated with the provision to others unless an alternative measure is necessary to allow a person with a disability to benefit: the alternative measure may be temporary or permanent;
 - Communications with a person with a disability are conducted in a manner that takes the person's disability into account;
 - Persons with disabilities may use assistive devices, service animals and support persons as is necessary to access Navacord goods and services, unless superseded by other legislation.
- 1.4 The requirements of the Integrated Accessibility Standards Regulation include the following four items:
 - Establishment, implementation, maintenance and documentation of a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under the Regulation;
 - Incorporation of accessibility criteria and features when procuring or acquiring goods, services, or facilities;
 - Training; and
 - Other specific requirements under the Information and Communications, Employment transportation Standards and Public Spaces.

2 PURPOSE

- 2.1 This policy and its procedures address the accessibility requirements of Regulation 429/07 Accessibility Standards for Customer Service under the Accessibility for Ontarians with Disabilities Act.

3 SCOPE

- 3.1 This policy applies to all employees and all facilities of Navacord in Ontario.

4 RESPONSIBILITY

- 4.1 It is the responsibility of the managers and/or immediate supervisors and/or department heads to ensure that all employees follow the guidelines set out in this policy.
- 4.2 Each manager and/or immediate supervisor and/or department head is responsible to ensure all employees are trained under Accessibility Standards for Customer Service and this policy, practices and procedure.

5 DEFINITIONS

- 5.1 "Assistive Devices" are auxiliary aids such as communication aids, cognition aids, personal mobility aids and medical aids (e.g., canes, crutches, wheelchairs or hearing aids).
- 5.2 "Disability", as per the Ontario Human Rights Code, means:
- 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 coordination, 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 a 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.
- 5.3 "Employees" means every person who deals with members of the public or other third parties on behalf of Navacord, whether the person does so as an employee, agent, volunteer or otherwise.
- 5.4 "Persons with Disabilities" are individuals who have a disability as defined under the Ontario Human Rights Code (and above).
- 5.5 "Service Animals" are animals individually trained to do work or perform tasks for the benefit of a person with a disability.
- 5.6 "Support Persons" are any persons, whether a paid professional, volunteer, family member, or friend, who accompany a person with a disability in order to help with communications, personal care or medical needs, or with access to goods or services.

6 REFERENCES and RELATED STATEMENTS of POLICY and PROCEDURE

Accessibility for Ontarians with Disabilities Act, 2005
Accessibility Standards for Customer Service, Ontario Regulation 429/07

7 PROCEDURES

Providing goods and services to people with disabilities Navacord is committed to excellence in serving all customers including people with disabilities and we will carry out our functions and responsibilities in the following areas:

7.1 Communication

We will communicate with people with disabilities in ways that take into account their disability. We will train staff who communicate with customers on how to interact and communicate with people with various types of disabilities.

7.2 Telephone services

We are committed to providing fully accessible telephone service to our customers. We will train staff to communicate with customers over the telephone in clear and plain language and to speak clearly and slowly. We will offer to communicate with customers by mail or in person if telephone communication is not suitable to their communication needs or is not available.

7.3 Assistive devices

We are committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our goods and services. Once we receive a request from a client, we will ensure that our staff are trained and familiar with various assistive devices that may requested by customers with disabilities while accessing our goods or services.

7.4 Billing

We are committed to providing accessible invoices to all of our customers. For this reason, invoices will be provided in the following formats upon request: hard copy, large print, email, etc., in which provider will provide invoices. We will answer any questions customers may have about the content of the invoice in person, by telephone or email.

7.5 Use of service animals and support persons

We are committed to welcoming people with disabilities who are accompanied by a service animal on the parts of our premises that are open to the public and other third parties. We will also ensure that all staff, volunteers and others dealing with the public are properly trained in how to interact with people with disabilities who are accompanied by a service animal.

We are committed to welcoming people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter Navacord's premises with his or her support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises.

7.6 Notice of temporary disruption

Navacord will provide customers with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available. The notice will be placed at all public entrances and service counters on our premises.

7.7 Training for staff

Navacord will provide training to all employees, volunteers and others who deal with the public or other third parties on their behalf, and all those who are involved in the development and approvals of customer service policies, practices and procedures.

All employees of Navacord and affiliate companies will receive online training to accommodate.

This training will be provided within one month of an employee being hired with Navacord. Training will include the following:

- The purposes of the Accessibility for Ontarians with Disabilities Act and the requirements of 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 Navacord's goods and services

Applicable staff will be trained on policies, practices and procedures that affect the way goods and services are provided to people with disabilities. Staff will also be trained on an ongoing basis when changes are made to these policies, practices and procedures.

7.8 Feedback process

The ultimate goal of Navacord is to meet and surpass customer expectations, while serving customers with disabilities. Comments on our services regarding how well those expectations are being met are welcomed and appreciated.

Feedback regarding the way Navacord provides goods and services to people with disabilities can be made by email, in person, or on the phone. Alternative methods to provide feedback may be made available, upon request. All feedback will be directed to the Human Resources Director. Customers can expect to hear back in 10 business days.

Complaints will be addressed according to complaint categories already established in our company's complaint management procedures.

Upon receipt, the Human Resources Director will investigate the matter with the appropriate personnel and provide a written response within thirty (30) days.

7.9 Modifications to this or other policies

We are committed to developing customer service policies that respect and promote the dignity and independence of people with disabilities. Therefore, no changes will be made to this policy before considering the impact on people with disabilities.

Any policy of Navacord that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

7.10 Questions about this policy:

This policy exists to achieve service excellence to customers with disabilities. If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation should be provided by, or referred to your Human Resources Department.

A copy of this policy is available upon request by contacting your Human Resources Department. In addition, a copy of this policy is available on the company's intranet site, ADP. The policy document will be provided in a format that takes into account the person's disability.

AODA STATEMENT of POLICY and PROCEDURE

Customer Service Policy: Use of Assistive Devices

1. POLICY

- 1.1 Navacord will welcome all customers and the broader public to our facilities by committing our staff and volunteers to providing our goods and services that respect the independence and dignity of people with disabilities. Such access to goods and services incorporate measures that include but are not limited to the use of assistive devices.

2 PURPOSE

- 2.1 The purpose of this Statement of Policy and Procedure is to ensure that each facility that is open to the public will, as applicable, post information in the front office or reception area or entrance that indicates the availability of assistive devices and encourages potential users to seek support from staff and volunteers as they require it.

3 SCOPE

- 3.1 This policy applies to all employees and all facilities of Navacord in Ontario.

4 RESPONSIBILITY

- 4.1 Managers, supervisors, department heads will ensure that staff are trained to support customers and the broader public who may use assistive devices while accessing our facilities so that we can provide our goods and services.
- 4.2 It is the responsibility of the managers and/or immediate supervisors and/or department heads to ensure that all employees follow the guidelines set out in this policy.

5 DEFINITIONS

"Assistive devices" are any devices used by persons with disabilities to help with daily living and tasks such as auxiliary aids, communication aids, cognition aids, personal mobility aids and medical aids. Assistive devices include a range of products such as wheelchairs, walkers, white canes, crutches, oxygen tanks, hearing aids and other electronic communication devices.

6 REFERENCES and RELATED STATEMENTS of POLICY and PROCEDURE

Accessibility for Ontarians with Disabilities Act, 2005
Accessibility Standards for Customer Service, Ontario Regulation 429/07

7 PROCEDURES

- 7.1 Training is focused on how to interact with people using assistive devices rather than on the technical use of the assistive devices.
- 7.2 Assistive devices carried by persons with disabilities: Navacord facilities that provide goods and services respect the independence of people with disabilities and offer services that include assistive devices.

7.3 Each of Navacord's facilities that is open to the public welcomes the use of assistive devices and encourages users to seek support from staff and volunteers as they require it.

7.4 Assistive devices/services made available by Navacord:

Navacord will provide services and access to goods to people with disabilities. These could include wheelchairs and lift accessibility. This could also include assistive services such as language interpretation, oral interpretation, real-time captioning and/or alternative service methods such as assistance of a staff person to complete a transaction.

7.6 Employees must not touch or move a person's assistive device without the person's permission. If you do have their permission, do not move the device out of the user's reach.

7.7 Navacord employees are expected to practice consideration and safety. Do not leave the person in an awkward, dangerous or undignified position such as facing a wall or in the path of opening doors.

7.8 Let the person know about accessible features in the immediate environment such as automatic doors, accessible washrooms or change room

8 RECORD KEEPING

Navacord will maintain accurate records of training delivered to our staff and volunteers and make these records available for inspection as may be required.

AODA STATEMENT of POLICY and PROCEDURE

Customer Service Policy: Use of Service Animals

1 POLICY

- 1.1 Navacord welcomes people with disabilities who are accompanied by a service animal on the parts of our premises that are open to the public. If a service animal is excluded by law from Navacord premises, we will ensure that alternative means are available to enable the person with a disability to access our goods and services.

2 PURPOSE

- 2.1 The purpose of this Statement of Policy and Procedure is to ensure persons with disabilities who are accompanied by a service animal are treated accordingly.

3 SCOPE

- 3.1 This policy applies to all employees and all facilities of Navacord in Ontario.

4 RESPONSIBILITY

- 4.1 It is the responsibility of the managers, immediate supervisors and/or department heads to ensure that all employees follow the guidelines set out in this policy.
- 4.2 Each manager, immediate supervisor and/or department head is responsible to ensure all employees are trained under Accessibility Standards for Customer Service and this policy, practices and procedure.

5 DEFINITIONS

- 5.1 "Service animal" is an animal that a person with a disability uses for support. Such use is either readily apparent or is supported by a letter from a physician or nurse.

It may be readily apparent that an animal is a service animal when its appearance or behaviour (e.g., wearing a harness or saddle bags) identifies it as a service animal or the owner has a certificate or identification card from a service animal training school. It may also be apparent if a person is using the animal to assist him or her, e.g., opening doors or retrieving items.

Service animals offer independence and security to many people with various disabilities. Some laws generally prohibit animals in certain areas, such as food preparation areas. However, service animals are permitted in most public situations. For example, a service animal would not be allowed in a restaurant kitchen, but is allowed in the restaurant itself.

6 REFERENCES and RELATED STATEMENTS of POLICY and PROCEDURE

Accessibility for Ontarians with Disabilities Act, 2005
Accessibility Standards for Customer Service, Ontario Regulation 429/07 Health Protection and Promotion Act, Ontario Regulation 562, sections 59 & 60 Food Safety and Quality Act, 2001

7 PROCEDURES

- 7.1 Unless otherwise excluded by law, the customer service standard requires that a person is permitted to be accompanied by his or her guide dog or other service animal in the areas that are open to the public or third parties. As such, Navacord employees should allow persons with disabilities to be accompanied by their guide dog or service animal unless the animal is excluded by law.
- 7.2 In the event that a law excludes a service animal, the reason why the animal is excluded should be explained to the individual, and other reasonable arrangements to provide goods and services should be explored with the assistance of the person with the disability.
- 7.3 Service animals are non-participants and therefore whenever possible should be granted free admission to the goods and/or services being accessed by the person with a disability they are accompanying.

AODA STATEMENT of POLICY and PROCEDURE

Customer Service Policy: Use of Support Persons

1 POLICY

- 1.1 Navacord is committed to welcoming people with disabilities who are accompanied by a support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises. In the event that a fee is charged in relation to a support person's presence on Navacord premises or to attend a Navacord-sponsored event, a support person will be considered a non-participant and the fee will be waived..

2 PURPOSE

- 2.1 The purpose of this Statement of Policy and Procedure is to ensure persons with disabilities who are accompanied by a support person are treated accordingly.

3 SCOPE

- 3.1 This policy applies to all employees and all facilities of Navacord in Ontario.

4 RESPONSIBILITY

- 4.1 It is the responsibility of the managers, immediate supervisors and department heads to ensure that all employees follow the guidelines set out in this policy.
- 4.2 Each manager, immediate supervisor and department head is responsible to ensure all employees are trained under Accessibility Standards for Customer Service and this policy, practices and procedure.

5 DEFINITIONS

"Support persons" assist people with disabilities in a variety of ways, by aiding with communication such as an intervenor, sign language interpreter or a personal support worker providing physical assistance. The support person could be a paid professional, a volunteer, a friend or a family member. He or she does not necessarily need to have special training or qualifications.

6 REFERENCES and RELATED STATEMENTS of POLICY and PROCEDURE

Accessibility for Ontarians with Disabilities Act, 2005
Accessibility Standards for Customer Service, Ontario Regulation 429/07

7 PROCEDURES

- 7.1 A person with a disability who is accompanied by a support person will be welcomed at Navacord premises and events with his or her support person.

- 7.2 Access will be in accordance with normal security procedures.
- 7.3 It is important to remember to direct all communications directly to the individual and not the support person.
- 7.4 In some cases a support person may have to agree to rules or requirements that are specific to the kinds of goods or services provided. For example, where confidentiality is important because of the kinds of information discussed, you may require the support person to sign a confidentiality agreement prior to the disclosure of information. A copy of the signed consent should be retained at the Navacord office.
- 7.5 It may also be necessary to first obtain consent of disclosure from the individual prior to discussing or releasing confidential personal information in the presence of a support person. If the individual uses a different support person for subsequent confidential meetings, a new signed consent may be required. Please refer to the confidentiality consent form for that purpose.

STATEMENT of POLICY and PROCEDURE

Customer Service Policy: Disruption of Services

1 POLICY

- 1.1 Navacord will make reasonable efforts to provide notice in the event of a planned or unexpected disruption in the facilities or services where they have control over such facilities or services. This notice will include information about the reasons for the disruption, its anticipated duration and a description of alternative facilities or services, if available. Navacord will provide notice by posting information in visible places on our premises or on the Navacord website or by any other method that may be reasonable under the circumstances.

2 PURPOSE

- 2.1 The purpose of this Statement of Policy and Procedure is to ensure persons with disabilities know when there is a temporary disruption of service.

3 SCOPE

- 3.1 This policy applies to all employees and all facilities of Navacord in Ontario.

4 RESPONSIBILITY

- 4.1 It is the responsibility of managers, immediate supervisors, and department heads to ensure that all employees follow the guidelines set out in this policy.
- 4.2 Each manager, immediate supervisor and department head is responsible to ensure all employees are trained under Accessibility Standards for Customer Service and this policy, practices and procedure.

5 DEFINITIONS

None

6 REFERENCES and RELATED STATEMENTS of POLICY and PROCEDURE

Accessibility for Ontarians with Disabilities Act, 2005
Accessibility Standards for Customer Service, Ontario Regulation 429/07

7 PROCEDURES

- 7.1 If a disruption in service is planned and expected, Navacord should provide notice as far in advance of the disruption as possible as individuals may require considerable time to make alternative arrangements.

- 7.2 If a disruption is unexpected, Navacord should provide notice as soon as possible after the disruption has been identified.
- 7.3 The notice of disruption should include information about the service that is disrupted, reason(s) for the disruption, the anticipated duration and a description of alternative facilities, services or alternate mechanisms to access the good/services.
- 7.4 Depending on the nature of the disruption, notice may be given by posting the information at a conspicuous place (e.g., on or directly to the side of an elevator door or a washroom door) or in Navacord's facilities or venue area. Other options that may be use include: placing a message on voicemail, posting on the Navacord website or through direct communication with users of the services in accordance with Navacord's practices.
- 7.5 Generally, disruptions to or of an organization's services, such as during a power outage, do not require this special notice. However, if the disruption has a significant impact on people with disabilities, Navacord should provide the notice of disruption in an appropriate manner as soon as possible.
- 7.6 From time to time Navacord may not have direct control over facilities or services (e.g., one office within a building leased by many businesses). In these circumstances it is recommended that Navacord endeavour to work with the organization that does have control over the facility/service in order to ensure a notice of temporary disruption is posted.

AODA STATEMENT of POLICY and PROCEDURE

Customer Service Policy: Customer Feedback

1 POLICY

- 1.1 Navacord welcomes feedback as it encourages continuous service improvements. Feedback from a member of the public about the delivery of goods and services to persons with disabilities may be given by telephone, in writing, in electronic format or through other methods.

2 PURPOSE

- 2.1 The purpose of this Statement of Policy and Procedure is to implement a process for individuals to provide feedback on how Navacord provides goods and services to people with disabilities, respond to any feedback and take action on any complaints/suggestions, as required by the Accessibility Standards for Customer Service. Feedback from our customers gives the Navacord opportunities to learn, improve and acknowledge performance.

3 SCOPE

- 3.1 This policy applies to all employees and all facilities of Navacord in Ontario.

4 RESPONSIBILITY

- 4.1 It is the responsibility of the managers and/or immediate supervisors and/or department heads to ensure that all employees follow the guidelines set out in this policy.
- 4.2 Each managers and/or immediate supervisors and/or department heads is responsible to ensure all employees are trained under the Accessibility Standards for Customer Service and this policy, practices and procedure.

5 DEFINITIONS

None

6 REFERENCES and RELATED STATEMENTS of POLICY and PROCEDURE

Accessibility for Ontarians with Disabilities Act, 2005
Accessibility Standards for Customer Service, Ontario Regulation 429/07

7 PROCEDURES

- 7.1 Please use any of the following feedback methods: Call Navacord at 416.259.4625, email us at careers@Navacord.com or visit/write us at 2375 Skymark Avenue, Mississauga, ON L4W 4Y6, attention Human Resources.
- 7.2 Feedback can be communicated to Navacord via telephone, email, mail, verbally in person or any other means that effectively accommodates the person with the disability.
- 7.3 If an individual indicates that he or she would like a response, the Navacord is responsible for addressing that individual's comments/suggestions in a timely fashion. In some cases, comments may be very specific to one situation. In other cases, comments may be broader and provide an opportunity for enhancing Navacord's policies and practices.
- 7.4 Record feedback received and actions taken.

AODA STATEMENT of POLICY and PROCEDURE

Customer Service Policy: Training

1 POLICY

- 1.1 Navacord will provide training to all employees, volunteers and others who deal with the public on their behalf, and all those who are involved in the development and approvals of customer service policies, practices and procedures. Training will be provided as soon as practicable after an individual assumes responsibilities related to the public and will include the following:
- The purposes of the Accessibility for Ontarians with Disabilities Act and the requirements of the Accessibility Standards for Customer Service;
 - Information regarding Navacord policies, practices and procedures relating to the customer service standards;
 - How to interact and communicate with people with various types of disabilities; What to do if a person with a particular type of disability is having difficulty accessing your goods or services;
 - How to interact with people with disabilities who use an assistive device, service animal or support person;
 - How to use the equipment or assistive devices that may be available at the Navacord. The amount and format of training will be tailored to suit each person's interactions with the public or his/her involvement in the development of policies, procedures and practices pertaining to the provision of goods and services.
 - Staff will also be trained on an ongoing basis when changes are made to these policies, practices and procedures.

2 PURPOSE

- 2.1 The purpose of this Statement of Policy and Procedure is that Navacord is required to provide training to all employees, volunteers, contractors, and others who deal with the public on Navacord's behalf. Navacord must also train all others who are involved in the development of policies, practices and procedures.

3 SCOPE

- 3.1 This policy applies to all employees and all facilities of Navacord in Ontario.

4 RESPONSIBILITY

- 4.1 It is the responsibility of managers, immediate supervisors and department heads to ensure that all employees follow the guidelines set out in this policy.
- 4.2 Each manager, immediate supervisor and department head is responsible to ensure all employees are trained under the Accessibility Standards for Customer Service and this policy, practices and procedure.

5 DEFINITIONS

For the purpose of this policy, employees encompass all of the groups indicated in section 2.01.

6 REFERENCES and RELATED STATEMENTS of POLICY and PROCEDURE

Accessibility for Ontarians with Disabilities Act, 2005
Accessibility Standards for Customer Service, Ontario Regulation 429/07

7 PROCEDURES

7.1 Training includes the following elements:

- Review of the purposes of the Accessibility for Ontarians with Disabilities Act and the requirements of the customer service standard;
- How to interact and communicate with people with various types of disabilities;
- How to interact and communicate with people with various types of disabilities;
- How to interact with people with disabilities who use an assistive device, service animal or support person;
- How to use the equipment or assistive devices available at Navacord, if applicable;
- What to do if a person with a particular type of disability is having difficulty accessing your goods or services;
- Information regarding Navacord's policies, practices and procedures relating to the customer service standards.

7.2 Timing of training: All current employees who work with the public should be trained immediately.

7.3 All new employees who work with the public should be trained as soon as practicable. It is recommended that training take place within 60 days after commencing employment.

7.4 Current employees who assume new job responsibilities that include interaction with the public should be trained as soon as practicable. It is recommended that training take place within 60 days after commencing these new job responsibilities.

7.5 Employees should also be trained on an ongoing basis when changes are made to the policies, practices and procedures.

7.6 Methods of training: All Navacord staff should be provided the mandatory training as follows: e- learning training module

7.7 Keep a copy of the training certificate received at the end of the training in the employee's file. Also record when and how the training was done for each employee.

7.8 Part of training includes reviewing all Navacord policies, procedures and practices under the customer service standard (e.g., customer service, assistive devices, communication, service animal, support person, disruption of service, feedback process, etc.)

7.9 The training may not be exactly the same for all staff and need not be delivered in the same manner as long as it meets the requirements as outlined above.

8 RECORD KEEPING

8.1 Navacord is required by the customer service regulation to keep a record of all training provided under the AODA and Regulation 429/07. The training records to be maintained include, the date on which training was provided, the type of training and participants.

AODA STATEMENT of POLICY and PROCEDURE

Customer Service Policy: Availability and Format of Documentation

1 POLICY

- 1.1 Documents required by the Accessibility Standards for Customer Service are available upon request. When providing a document to a person with a disability, Navacord will work with the individual to determine options in order to provide the document or the information contained in the document in a format that takes the person's disability into account.

2 PURPOSE

- 2.1 The purpose of this Statement of Policy and Procedure is that, per regulations, Navacord is required to post a notice that documents required by the customer service standard are available upon request and in a format that takes a person's disability into account.

3 SCOPE

- 3.1 This policy applies to all employees and all facilities of Navacord in Ontario.

4 RESPONSIBILITY

- 4.1 It is the responsibility of managers, immediate supervisors and department heads to ensure that all employees follow the guidelines set out in this policy.
- 4.2 Each manager, immediate supervisor, and department head is responsible to ensure all employees are trained under the customer service standard and these policy, practices and procedure.

5 DEFINITIONS

None

6 REFERENCES and RELATED STATEMENTS of POLICY and PROCEDURE

Accessibility for Ontarians with Disabilities Act, 2005
Accessibility Standards for Customer Service, Ontario Regulation 429/07

7 PROCEDURES

- 7.1 Navacord has a template that includes sample text of notification of availability of documentation. It is recommended that the notification be placed on Navacord website and in a conspicuous place in Navacord's facilities

- 7.2 In determining a suitable format that takes the individual's disability into account, it is recommended that Navacord work with the individual to determine options in order to provide the document(s) or the information contained in the document(s) in a format that is reasonable and takes the person's disability into account.
- 7.3 More information about alternative formats is available in our policy communicating with persons with disabilities.
- 7.4 Note that the release of information may be subject to applicable privacy legislation.

AODA STATEMENT of POLICY and PROCEDURE

Information and Communications Policy

1 POLICY

- 1.1 We are committed to communicating with people with disabilities in ways that take into account their disability and in keeping with the principles of dignity, independence, integration and equal opportunity.
- 1.2 This policy provides guidance in considering how to improve communication with people with a disability through general communications, involvement of people with a disability in consultation, or in meetings, during a transaction and producing publications in accessible formats.
- 1.3 This policy applies to all Navacord communications with the public, including in relation to consultation, and the development of pamphlets, flyers, letters, memos, emails, websites, brochures, invoices, papers and reports, among others.
- 1.4 All oral and written communication should seek to be inclusive of and positive toward people with a disability. Avoid phrases that demean people with disabilities (such as unfit, defective or incapacitated), avoid words such as "handicapped," "crippled" and "wheelchair-bound". Do not refer to people by categories such as "the blind" or "the disabled".

2 PURPOSE

- 2.1 The purpose of this Statement of Policy and Procedure is to ensure that persons with disabilities have communication access that is effective as that provided to persons without disabilities. To be equally effective, an aid, benefit or service need not produce the identical result or level of achievement for disabled and non-disabled persons; it must afford the person to whom it is provided equal opportunity to achieve equal results, gain equal benefit and reach the same level of achievement.

3 SCOPE

- 3.1 This policy applies to all employees and all facilities of Navacord in Ontario.

4 RESPONSIBILITY

- 4.1 It is the responsibility of managers, immediate supervisors and/or department heads to ensure that all employees follow the guidelines set out in this policy.
 - 4.2 Each manager, immediate supervisor and/or department head is responsible to ensure all employees are trained under Accessibility Standards for Customer Service and this policy, practices and procedure.
-

5 DEFINITIONS

None

6 REFERENCES and RELATED STATEMENTS of POLICY and PROCEDURE

Accessibility for Ontarians with Disabilities Act, 2005
Accessibility Standards for Customer Service, Ontario Regulation 429/07

7 PROCEDURES

7.1 Terminology: the terminology we use can influence the way we see people and may unintentionally create a negative perception. The words we use can be very powerful. However unintentional, many words used to describe the nature of a disability can be demeaning and disrespectful. Please refer to the terminology chart to assist you in making your communication with or without people with disabilities more successful.

7.2 The words "disability" and "disabled" are more appropriate than "handicap" or "handicapped."

7.3 Remember to put people first. It is preferable to say "person with a disability" instead of "disabled person."

7.4 Considering an individual's disability in communication: A key aspect of communication is taking into consideration the specific needs of an individual. Employees may need to utilize a variety of different techniques to best interact with a person with a disability in order to effectively provide goods and services to that individual.

7.5 To assist people with disabilities access our services, employees should utilize the following general guidelines:

7.6 Treat people with disabilities with the same respect and consideration you offer everyone else.

7.7 If you're not sure what to do, ask the individual, "May I help you?" Ask before you offer to help; don't just jump in. People often have their own way of doing things. Individuals with disabilities know if they need help and how you can provide it.

7.8 If you don't know someone, or if you are unfamiliar with the disability, it's better to wait until the individual describes his or her situation to you, rather than to make your own assumptions. Many types of disabilities have similar characteristics and your assumptions may be wrong. Some disabilities are not visible.

Take the time to get to know the individual's needs. Speak normally, clearly and directly. Speak directly to a person with a disability, not to their interpreter or someone who is with them.

Be patient; give the individual time to explain him or herself.

7.9 Utilize the materials provided in the Overview of the policy manual to assist you with individual/specific situations, techniques, best practices and alternative communication methods to assist with the provision of goods and services based on the needs of the individual.

7.10 We will give careful consideration to whether consultations, meetings, and transaction methods are inclusive of people with disabilities.

- 7.11 When organizing meetings, we will make attempts to use facilities that cater for people with disability; e.g., ramps, handrails and lifts for people with mobility disabilities, inductive loop or radio systems to assist the hearing impaired. We will consider whether it is appropriate to hire an interpreter to assist in presentations at meetings. Where such facilities are available, they should be advertised as part of the information about the location of the meeting.
- 7.12 Emergency procedures, plans and safety information will be provided in accessible format, or with appropriate communication supports, upon request.
- 7.13 Navacord will ensure that our website, and where applicable web content, conforms to the Web Content Accessibility Guidelines (WCAG) as outlined in the IASR, and will refer to the legislation for specific compliance deadlines and requirements.
- 7.14 When organizing consultation meetings, consider the environment available for any person with a disability attending the meeting; e.g., physical access to the building and meeting room, access to toilets, lighting in the room, external noise.
- 7.15 Publications: When preparing material intended to be distributed to the public, we will consider the format of the material and its accessibility to the target audience. In particular, we will consider whether alternative formats are required in order to facilitate access by a person with a disability.
- 7.16 Excessive cost can be avoided by carefully targeting the audience. Options for making accessible formats available may include:
- Distributing standard formats, and developing and providing alternative formats only upon request.
 - Providing a pamphlet or booklet in accessible format, and supplementary documents upon request.
 - Advertising the availability of certain alternative formats. Where only standard formats are distributed, consideration should be given to advertising the availability of alternative formats upon request.

Reception and publications staff should be made aware of the availability of alternative formats, and particular formats Navacord is willing to provide upon request.

- 7.17 One or more of the following formats may be appropriate for development to improve accessibility:

Internet: The Internet is a highly suitable medium for many people with hearing, vision, and mobility impairments. To make the publication most compatible to software that assists people with a disability, it should be posted on the Internet in HTML or ASCII format.

CD or DVD: Providing information in a portable electronic format may be suitable for people with hearing, vision, mobility and/or manipulatory impairments. The publication should be converted to ASCII format to make it most compatible with accessibility computer software.

Audio cassette, digital audio file, podcast: Audio is used by a wide range of people although it is often targeted to people with vision impairment. These formats are relatively easy and cost-effective to produce and post.

Braille: This format is used by people with severe vision impairment who have learned the Braille alphabet.

Large and illustrated print: Large print is mainly targeted to those with low vision. It refers to any printed matter that uses a font that is 14 point or larger. Illustrated print is designed to provide a quick visual outline of a message. It is often preferred by people with an intellectual disability, people with some visual impairment and can also assist people from culturally and linguistically diverse backgrounds.

Easy English: This format is useful if specifically providing information to people with intellectual disabilities or limited reading skills. The information is summarized and expressed in short sentences that each conveys a single idea or concept.

- 7.18 Provide information about events and services in a variety of media (for example, publicize telephone and fax numbers, provide print information and radio notices).
- 7.19 Provide sufficient notice of events to ensure there is time to arrange transport or other requirements.
- 7.20 Navacord will provide targeted information for people with disabilities, their families, and support person, and service providers, for no additional charge.
- 7.21 If it is determined, in consultation with the requesting party, that information or communications are unconvertible, Navacord will ensure that the individual who made the request is provided with an explanation and a summary of the information.

AODA STATEMENT of POLICY and PROCEDURE

Employment Standard Policy

1 POLICY

- 1.1 Navacord is committed to implementing fair and accessible employment practices throughout its entire employment cycle. The policy will be reviewed once every 5 years to ensure that is reflective of Navacord's current practices, as well as, legislative requirements.

2 PURPOSE

- 2.1 The purpose of this Statement of Policy and Procedure is to meet the requirements of the Integrated Accessibility Standards, Ontario Regulation 191/11 for the Employment Standard set forth under the Accessibility for Ontarians with Disabilities Act, 2005. Navacord will ensure that employees and the public are aware of the availability of accommodations for applicants with disabilities.

3 SCOPE

- 3.1 This policy applies to all employees and all facilities of Navacord in Ontario.

4 RESPONSIBILITY

- 4.1 It is the responsibility of managers, immediate supervisors and department heads to ensure that all employees follow the guidelines set out in this policy.
- 4.2 Each manager, immediate supervisor and department head is responsible to ensure all employees are trained under the Accessibility Standards for Customer Service and this policy, practices and procedure.

5 DEFINITIONS

None.

6 REFERENCES and RELATED STATEMENTS of POLICY and PROCEDURE

Accessibility for Ontarians with Disabilities Act, 2005
Integrated Accessibility Standards, Ontario Regulation 191/11

7 PROCEDURES

- 7.1 Internal and external job postings will provide information to applicants regarding the availability of accommodation, and how to request and access this accommodation.
- 7.2 If a selected applicant requests accommodation, Navacord will consult with the applicant and will arrange for suitable accommodation that takes into account the applicant's disability.

- 7.3 Employment tests that occur during the recruitment process will be made available to the applicant in an accessible format, that takes into account the applicant's disability, upon request.
- 7.4 Successful applicants, who requested accommodation, will be provided with existing policies in an accessible format, that takes into account the employee's disability.
- 7.5 Navacord will take into account an individual's accommodation needs or Individual Accommodation Plans when providing career development information, performance reviews and implementing redeployment procedures.
- 7.6 Navacord will generate individual workplace emergency response procedures for employees with disabilities, that take into account the unique challenges created by the individual's disability, the physical nature of the workplace, and will be created in consultation with the employee.
- 7.7 Navacord will generate a process for developing Individual Accommodation Plans and return to work plans for employees who have been absent due to a disability.

The Individual Accommodation Plan will include the following:

- Consultation with the employee in the development of the IAP
- Assessment on an individual basis;
- Navacord may request an evaluation by a medical or other expert, at our expense, to assist with determining how accommodation can be achieved;
- The employee may request that a representative from the workplace be present during the consultation;
- Steps taken to protect the privacy of the employee's personal information;
- Frequency with which the individual accommodation plan should be reviewed or updated and how it should be done;
- If denied, the reasons for denial will be provided to the employee
- The IAP will be provided in an accessible format;
- Identification of any other accommodation that is to be provided.

AODA STATEMENT of POLICY and PROCEDURE

IASR Design of Public Spaces Policy

1 POLICY

- 1.1 Navacord shall incorporate accessibility into public spaces on its premises that are newly constructed or redeveloped, on or after January 1, 2017. Navacord will ensure that barriers pertaining to buildings and public spaces are removed.
- 1.2 The policy will be reviewed once every 5 years to ensure that is reflective of Navacord's current practices, as well as, legislative requirements. Navacord shall ensure that our multi-year accessibility plan addresses procedures for temporary disruption and maintenance procedures for accessible elements in public spaces.

2 PURPOSE

- 2.1 The purpose of this Statement of Policy and Procedure is to meet the requirements of the Integrated Accessibility Standards, Ontario Regulation 191/11 for the Design of Public Spaces Standard set forth under the Accessibility for Ontarians with Disabilities Act, 2005.

3 SCOPE

- 3.1 This policy applies to all employees and all facilities of Navacord in Ontario.

4 RESPONSIBILITY

- 4.1 It is the responsibility of managers, immediate supervisors and department heads to ensure that all employees follow the guidelines set out in this policy.
- 4.2 Each manager, immediate supervisor and department head is responsible to ensure all employees are trained under the Accessibility Standards for Customer Service and this policy, practices and procedure.

5 DEFINITIONS

- 5.1 Exterior Paths of Travel – Refers to sidewalks and walkways designed and constructed for pedestrian travel and intended to provide a functional route from Point A to Point B, rather than a recreational experience.
- 5.2 Redeveloped – A planned significant alteration to a public space. It does not include maintenance activities, environmental mitigation or environmental restoration.

6 REFERENCES and RELATED STATEMENTS of POLICY and PROCEDURE

Accessibility for Ontarians with Disabilities Act, 2005
Integrated Accessibility Standards, Ontario Regulation 191/11

7 PROCEDURES

- 7.1 Navacord is committed to ensuring that any newly constructed and/or redeveloped outdoor public use eating areas have a minimum 20% of tables that are made accessible in accordance with the Integrated Accessibility Standards, section 80.17.
- 7.2 To ensure the health and safety of all pedestrians, any newly constructed or redeveloped exterior paths of travel will meet, and where possible exceed, the technical requirements of the Integrated Accessibility Standards, section 80.23, and where applicable, sections 80.24 – 80.28.
- 7.3 Navacord will ensure that any newly constructed or redeveloped off-street parking facilities provide the following two (2) types of parking spaces available for persons with disabilities:
Type A – Parking space with a minimum width of 3.4 m; and
Type B – Standard parking space with a minimum width of 2.4 mm.
Access aisles will be provided for all accessible parking spaces and will meet the requirements of the Integrated Accessibility Standards, section 80.35.
- 7.4 Navacord will ensure that any newly constructed or redeveloped off-street parking facility meets, and where possible exceeds, the required number of accessible parking spaces based on the size of the lot. The number of accessible spaces will be aligned with the requirements specified in the Integrated Accessibility Standards, section 80.36.
- 7.5 When constructing or replacing any service counters, Navacord will ensure that at least one (1) counter is made accessible in accordance with the *Integrated Accessibility Standards*, section 80.41.
- 7.6 When constructing or redeveloping an existing waiting area, JDIMI Inc. will ensure that a minimum of 3% of the seating is made accessible. JDIMI Inc. will ensure that there will be at least one (1) accessible seat.