



The Rostie Group

Policy, Practice and Procedure Pertaining to Serving Customers With Disabilities

POLICY

The Rostie Group is committed to providing its products and services in ways that respect the dignity and independence of people with disabilities, allowing them to benefit from the same products and services, in the same places and a similar way to other customers.

PURPOSE

This policy is intended to ensure that all customer service provided by The Rostie Group follows the ideals of dignity, independence, integration and equal opportunity. The Company will meet or exceed all applicable legislation (Accessibility for Ontarians with Disabilities Act, 2005 (AODA)) regarding the provision of customer service.

SCOPE

This policy applies to all management, brokers and to all employees of The Rostie Group who have contact with customers in Ontario. This policy applies to premises located in the province of Ontario.

RESPONSIBILITY

Cynthia Rostie will be responsible for reviewing this policy on an annual basis and revising as necessary; for ensuring that all staff members are appropriately trained regarding the customer service accessibility standard; ensuring that notice is provided for any disruption in service and following up on all customer feedback.

The Rostie Group will be responsible for providing customers and interested parties with a copy of this policy upon request; making the policy available in alternate formats, upon request, ensuring that notice is provided for any disruption of service and collecting and following up on all customer feedback.

The Rostie Group will be responsible for making this policy available in alternate formats upon request; ensuring that notice is provided for any disruption of service and following up on all customer feedback.

Employees with customer/client contact will be required to participate in and complete Customer Accessibility Training; provide consistently high levels of customer service to all customers, and ensure that they are served in a manner that allows access to all products and services offered; employ the skills and knowledge presented in the customer service accessibility training program to ensure that customers are served appropriately; inform the management team of any issues regarding accessibility or disruptions in service; adhere to this policy at all times and obtain consent from the customer in the event that confidential information must be shared with a support person.

DEFINITIONS

- Persons with Disabilities – as defined by the Accessibility for Ontarians with Disabilities Act 2005 and the Ontario Human Rights Code is someone with:
 - Any degree of physical disability, infirmity, malformation or disfigurement 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 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

- Service Animal – an animal used by a person with a disability for reasons relating to his or her disability. The person may provide a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability or it may be readily apparent.
- Support Person – a person who accompanies a person with a disability in order to help with communication, mobility, personal care or medical needs or with access to goods or services.
- Assistive Device – a technical aid, communication device, or medical aid that is a tool, technology or other mechanism that is used to increase, maintain or improve the functional abilities of people with disabilities to do everyday tasks and activities such as moving, communicating and lifting.
- Barrier – anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice.

PROCEDURE

A. Communication

The Rostie Group will communicate with people with disabilities in a way that takes into account their disability. We will train employees who communicate with customers on how to interact and communicate with people with various types of disabilities. 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.

Copies of documents or the information contained within a document provided to a person with a disability shall be provided in a format that takes into account the person's disability.

B. Use of Assistive Devices

The Rostie Group is committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our services. We will ensure that our employees are trained and familiar with various assistive devices that may be used by customers with disabilities while accessing our services.

People with disabilities may use their own personal assistive devices while obtaining services in our facilities within Ontario. Assistive devices include but are not limited to:

- Wheelchairs, walkers
- White canes
- Note taking devices
- Portable magnifiers
- Recording machines

- Assistive listening devices
- Personal oxygen tanks
- Devices for grasping

C. Service Animals

Should a customer with a service animal need to visit our office, the animal will be cared for in the office while the Company works with the customer to provide the best alternative to the service animal. This may include the use of a cane, the use of a support person, an employee guide or other alternatives.

In the event a staff member is allergic to animals, alternative arrangements will also be negotiated.

D. Support Persons

The Rostie Group is welcoming of 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 the 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.

Unless there is a genuine safety concern, support persons shall be allowed to accompany the customer at all times. If confidential information needs to be shared, consent will be obtained from the customer prior to any conversation.

E. Notice of Disruptions in Service

The Rostie Group will provide customers with as much advance notice as possible in the event of a planned or unexpected disruption in service usually used by people with disabilities. This notice will include information about the reason for the disruption, the anticipated duration, and a description of alternative services, if available.

Service disruptions will be posted in any of the following ways: on the company website, through e-mail distribution, printed and posted memos at public entrances.

F. Feedback Process

We shall provide customers with the opportunity to provide feedback on the service provided to them. Our customer service teams will be accountable for receiving and following up on feedback provided.

Customers who wish to provide feedback on the way The Rostie Group provides goods and services to people with disabilities can verbally discuss their concerns or send an e-mail to

Cynthia Rostie crosstie@rostiegroup.com All feedback will also be directed to info@rostriegroup.com

Customers will receive acknowledgement of their feedback within 72 business hours. Any resulting actions based on concerns or complaints that were submitted through our customer service team will be reviewed and actioned accordingly.

G. Training

All Company employees who deal with the public or other third parties on their behalf will be required to attend and complete Customer Service Accessibility Training. The training provided will include best practices for interactions with customers with a disability. Training will include:

- An overview of the Accessibility for Ontarians with Disabilities Act, 2005, including its purpose and the requirements of the customer service standard.
- The Company's accessible customer service plan
- 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 particular type of disability is having difficulty in accessing The Rostie Group's goods and services

H. Notice of Availability of Documents

Upon request, we will make available a copy of the Accessible Customer Service Plan to persons with disability.

I. Modifications to this or other policies

Any policy of The Rostie Group that does not respect or promote the dignity, independence, integration or equal opportunity of people with disabilities will be modified or removed.

Employment

Intent

This policy is intended 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*. This policy applies to the provision of accessible employment services for people with disabilities.

The Employment Standards regulation will expand Ontario's labour pool by ensuring people with disabilities are welcome and supported within all workplaces. Employment standards

will assist organizations with employment recruitment, providing accessible information, plans for emergencies, individual accommodation, return to work, performance management, and career development and redeployment.

All employment services provided by The Rostie Group shall follow the principles of dignity, independence, integration and equal opportunity.

Scope

This policy shall apply to every person who deals with members of the public or their agents on behalf of The Rostie Group, whether the person is an employee, agent, volunteer or otherwise.

Definitions

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

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

Information – includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and conveys meaning.

Large Organization – an organization with 50 or more employees in Ontario.

Mobility Aid – a device used to facilitate the transport, in a seated posture, of a person with a disability.

Mobility Assistive Device – a cane, walker or similar aid.

Obligated Organization – Organizations may include workplaces, businesses or services. Refers to the Government of Ontario, the Legislative Assembly, a designated public sector organization, a large organization and a small organization to which the standards of this Regulation apply.

Performance Management – activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success.

Redeployment – the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.

Support Person – in relation to a person with a disability, another person who accompanies the person with a disability in order to help with communication, mobility, personal care or medical needs, or with access to goods, services or facilities.

Definitions

Conversion Ready – an electronic or digital format that facilitates conversion into an acceptable format.

Extranet Website – a controlled extension of the intranet, or internal network of an organization to outside users over the Internet.

Information – includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and conveys meaning.

Internet Website – a collection of related Web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier (URI) and are accessible to the public.

Intranet Website – an organization’s internal website that is used to privately and securely share any part of the organization’s information or operational systems within the organization and includes extranet websites.

Web Content Accessibility Guidelines – refers to the World Wide Web Consortium Recommendation, dated December 2008, entitled “Web Content Accessibility Guidelines (WCAG) 2.0.”

Establishment of Accessibility Policies and Plans

The Rostie Group will develop, implement and maintain policies governing how it will achieve accessibility through these requirements. The Rostie Group is responsible for including a statement of its commitment to meeting the accessibility needs of persons with disabilities in a timely manner in its policies. This should be achieved through documentation in The Rostie Group policies and making these documents publicly available, in an accessible format upon request.

The Rostie Group will establish, implement, maintain and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR regulation. The Rostie Group will post its accessibility plans on their website, if any, and provide the plan in an accessible format upon request. The Rostie Group will review and update its accessibility plan once every five years and will establish, review and update its accessibility plans in consultation with persons with disabilities or an advisory committee. Annual status reports will be prepared to report on the progress of steps taken to implement The Rostie Group accessibility plan and post this status on its website. If requested, the report shall be created in an accessible format.

Procuring or Acquiring Goods and Services, or Facilities

The Rostie Group will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities. The only exception is in cases where it is impracticable to do so.

Training Requirements

The Rostie Group will provide training for its employees and volunteers regarding the IASR and the Ontario *Human Rights Code*. Training will be provided for individuals who are responsible for developing The Rostie Group policies, and all other persons who provide, goods, services or facilities on behalf of The Rostie Group.

Recruitment, Assessment and Selection

The Rostie Group must notify employees and the public about the availability of accommodation for job applicants who have disabilities. Applicants must be informed that these accommodations are available, upon request, for the interview process and other candidate selection methods. The Rostie Group must notify the successful applicant of their policies and supports for accommodating people with disabilities.

Accessible Formats and Communication Supports for Employees

If an employee with a disability requests it, The Rostie Group must provide or arrange for the provision of accessible formats and communication supports for the following:

- Information needed in order to perform their job; and
- Information that is generally available to all employees in the workplace.
- The Rostie Group should consult with the employee making the request to determine the best way to provide the accessible format or communication support.

Documented Individual Accommodation Plans

The Rostie Group must also develop and have in place written processes for documenting individual accommodation plans for employees with disabilities. The process for the development of these accommodation plans should include specific elements, including:

- The ways in which the employee can participate in the development of the plan;
- The means by which the employee is assessed on an individual basis;
- The ways an employee can request an evaluation by an outside medical expert, or other experts (at the employer's expense) to determine if accommodation can be achieved, or how it can be achieved;
- The steps taken to protect the privacy of the employee's personal information;

- The frequency with which the individual accommodation plan should be reviewed or updated determined, and how it should be done;
- The means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs

Return to Work and Redeployment

The Rostie Group must develop and have return to work processes in place for employees who are absent from work due to a disability—and require disability-related accommodations in order to return to work. The Rostie Group will need to document these processes. The return to work process must include an outline of the steps The Rostie Group will take to facilitate the employee's return to work and use documented individual accommodation plans (as described in section 28 of the regulation). If The Rostie Group uses redeployment processes, they must take into account the accessibility needs of its employees with disabilities. Redeployment may mean the reassignment of employees to other departments within the organization as an alternative to a "layoff", when a particular job or department has been eliminated.

Information and Communications

Intent

This policy is intended to meet the requirements of the *Integrated Accessibility Standards, Ontario Regulation 191/11* for the Information and Communications Standard set forth under the *Accessibility for Ontarians with Disabilities Act, 2005*. This policy applies to the provision of information and communication services and materials for people with disabilities.

All information and communications materials and services provided by The Rostie Group shall follow the principles of dignity, independence, integration and equal opportunity.

Scope

This policy shall apply to every person who deals with members of the public or their agents on behalf of The Rostie Group, whether the person is an employee, agent, volunteer or otherwise.

Establishment of Accessibility Policies and Plans

The Rostie Group will develop, implement and maintain policies governing how it will achieve accessibility through these requirements. The Rostie Group is responsible for including a statement of its commitment to meeting the accessibility needs of persons with disabilities in a timely manner in its policies. This should be achieved through documentation in The Rostie Group policies and making these documents publicly available, in an accessible format upon request.

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Training Requirements

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Accessible Formats and Communication Supports

The Rostie Group will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner and at no additional cost to the individual. The Rostie Group will take into account the person’s accessibility needs when customizing individual requests.

Accessible Websites and Web Content

All departments governed by The Rostie Group will make its web content conform to the Web Content Accessibility Guidelines (WCAG) 2.0 at Level AA. Web content includes any information which resides on an internet or intranet web site.

Revision No.	<i>Revision Record</i> Description of the Changes	Change Initiated By	Revision Date	Approval

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