

## **1.0 POLICY STATEMENT**

Rothmans, Benson & Hedges Inc. (the "Company") is committed to providing an accessible and inclusive environment in which all persons have equal access to its goods and services as required by the Accessibility Standards for Customer Service, O. Regulation 429/07 ("ASCS") made under the *Accessibility for Ontarians with Disabilities Act, 2005* ("AODA").

To that end, the Company will take steps to ensure that any person with a disability who visits the Company's premises or who accesses the Company's goods and services will be able to do so in a manner that respects their dignity and independence. The Company will make every reasonable effort to ensure that its policies, practices, and procedures respecting the provision of accessible customer service will be consistent with the principles of independence, dignity, integration, and equality of opportunity, as outlined in the ASCS.

The Company will take the appropriate steps to ensure that anyone with a disability, who visits the Company's premises, will be able to use their personal assistive devices, service animals and support persons within the limits of any applicable privacy, health and safety, or other relevant laws.

The Company will ensure that its employees are properly trained in how to communicate and interact with persons with disabilities. The Company will take appropriate steps to ensure that persons contracted by the Company to provide the goods and services to members of the public and/or third parties on the Company's behalf receive instruction on this Policy, as required and that they are in compliance with the AODA and ASCS.

## **2.0 PURPOSE**

To outline the Company's commitment and procedure for ensuring that members of the public and third parties will have access to the Company's services in a manner that respects their dignity and independence and in accordance with the requirements contained in the ASCS.

## **3.0 SCOPE & APPLICABILITY**

This Policy applies to all employees and/or agents who work for the Company and provide services to members of the public and/or third parties on the Company's behalf.

This Policy applies to all persons with disabilities who access the Company's services or premises.

The Company policy on service animals and support persons applies to:

- Premises, where services are provided, that are owned or operated by the Company; and
- All areas of the Company's premises where the public and/or third parties are allowed access. This includes but is not limited to reception areas, washrooms, and meeting and training rooms.

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The Company policy on support persons and service animals does not apply to areas where the public and/or third parties would typically not have access such as employee offices, loading docks, employee lunchrooms and work-out/exercise zones, unless the member of the public or third party is given access to one of these areas by an authorized representative of the Company employee/agent. In the event that a member of the public or third party is given access to these areas, the individual shall be entitled to be accompanied by their service animal or support person in accordance with this Policy, and must be accompanied by a representative of the Company at all times.

The Company's training policy is applicable to:

- The Company's employees and other parties (e.g. contractors) who, in the provision of the Company's services, deal with members of the public and third parties on the Company's behalf; and
- Every person who participates in developing the Company's policies, practices and procedures governing the provision of the Company's services to members of the public and third parties, including Management and other senior leaders of the Company if they direct, monitor or evaluate policies on how services are provided, even though they may not be directly involved in providing services to persons with disabilities.

**4.0 USE OF ASSISTIVE DEVICES**

Persons with assistive devices are entitled to use personal assistive devices while accessing any of the Company's services or premises.

Persons with disabilities are entitled to confidentiality and the protection of their privacy and are not required to disclose to employees of the Company information about their disability and/or the need for a personal assistive device unless such information is required by the Company's Management or other appropriate persons for the purposes of creating and implementing an individualized accommodation plan.

Employees and/or agents engaged in the delivery of a service on behalf of the Company are required to cooperate with the use of a personal assistive device for reasons of improving access to the Company's services for persons with a disability.

**Commonly Used Assistive Devices**

Persons may use a variety of personal assistive devices depending on their disability to access the Company's services.

**Persons who have vision loss:**

- a. Screen readers - a software application that attempts to identify and interpret what is being displayed on the screen (or, more accurately, sent to standard output, whether a video monitor is present or not). This interpretation is then re-presented to the user with text-to-speech, sound icons, or a Braille output device;

- b. Digital audio player – enables a person to listen to books, directions;
- c. Magnifier – makes print and images larger and easier to read;
- d. Portable global positioning systems (GPS) – helps orient a person to get to specific destinations; and
- e. White cane – helps a person find their way around obstacles.

**Persons who are deaf or otherwise hard of hearing:**

- a. FM transmitter system or other amplification devices – boosts sound closest to the listener while reducing background noise;
- b. Hearing aid – makes sound louder and clearer; and
- c. Teletypewriter (TTY) – helps a person who is unable to speak or hear to communicate by phone. The person types their messages on the TTY keyboard and messages are sent using telephone lines to someone who has a TTY, or to an operator (e.g. Bell Relay Service) who passes the message to someone who does not have a TTY.

**Persons who have physical disabilities:**

- a. Mobility device (e.g., a wheelchair, scooter, walker, cane, crutches) – helps a person who have difficulty walking; and
- b. Personal oxygen tank – helps with breathing.

**Persons who have learning disabilities:**

- a. Electronic notebook or laptop computer – used to take notes and to communicate;
- b. Personal data managers – stores, organizes and retrieves personal information; and
- c. Mini pocket recorders – records information for future playback.

**Persons who have intellectual/developmental disabilities:**

- a. Communication boards (e.g., a Bliss board) – used to pass on a message by pointing to symbols, words or pictures; and
- b. Speech generating devices – used to pass on a message using a device that “speaks” when a symbol, word or picture is pressed.

**Assistive Devices and Alternate Measures provided by the Company**

The Company provides several assistive devices and alternate measures on-site to enable persons with disabilities to benefit from the same level of service, in the same place and in a similar way as other persons while accessing the Company’s services.

The following assistive measures are available on the Company’s premises:

1. Automatic door openers at base of office buildings/premises;
2. Elevators;

3. Staff Assistance; and
4. Video conferencing (i.e. microphones) in training and conference rooms.

Employees will be trained to know how to find and use all assistive measures available for members of the public and third parties within their functional departments.

### **Interacting with a Person who uses an Assistive Device**

If a person uses a communication aid or assistive device, it is important to remember that these aids are an extension of the individual's personal space and should be respected as such by not touching such a device without the individual's permission. Do not move items or equipment, such as canes and walkers, out of a person's reach. Respect the person's personal space.

Employees and/or agents are not required to operate assistive devices owned and operated by members of the public or third parties. Employees and/or agents shall refrain from operating or touching an assistive device without prior express instruction from the person using the assistive device.

## **5.0 SERVICE ANIMALS**

The Company will allow service animals onto its premises and allow a person with a disability to be accompanied by a service animal.

The Company recognizes that service animals may assist persons with disabilities in many different ways, including:

- a. A person with vision loss may use guide dogs, or seeing eye dogs to alert them of changes in elevation such as curbs and stairs and other obstacles;
- b. A person who is deaf, oral deaf, deafened or hard of hearing may use a hearing ear, hearing, sound alert or hearing alert dog, cat or other animal to alert them to sounds, often by a nudge or pawing and lead him/her to the source of the sound;
- c. A person with mental health disabilities may use a psychiatric service dog to retrieve and prompt the person to take medicine, retrieve or activate medical alert or leads the person out of crowds;
- d. A person with physical disabilities may use a service or mobility dog or animal or a special skills dog or animal to pull wheelchairs, carry objects, pull items, turn handles or push buttons such as door openers; and
- e. Persons who have epilepsy or other seizure disorders may use a seizure, seizure alert, seizure assist or seizure response dog or animal to alert them to an oncoming seizure, steer owner from danger during a seizure or activate medical alert.

### **Prerequisites for Service Animals**

No animal will be permitted on the Company's premises as a service animal unless:

1. it is readily apparent that the animal is being used because of a person's disability;  
or

2. the person with a disability shows a letter from a medical practitioner confirming that the animal is required for reasons relating to his or her disability.

It will be “readily apparent” that an animal is a service animal when:

1. The animal is wearing a harness or saddle bags;
2. The animal is wearing a sign that identifies it as a service animal;
3. The person using the service animal has a certificate or identification card from a service animal training school or an identification card from the Attorney General of Ontario; or
4. It is apparent that the person is using the animal to assist him or her in doing things, such as opening doors or retrieving items.

Where an animal is not a trained guide dog and it is not readily apparent that the animal is a service animal, the Company may ask the person using the service animal for a letter from a medical practitioner that says the animal is needed because of a disability. The letter does not need to identify the disability, why the animal is needed or how it is used. The letter need only explain that the animal is required because of a disability.

### **Interacting with a Person who uses a Service Animal**

- A service animal is not a pet. It is a working animal;
- Avoid touching or addressing a service animal;
- Avoid making assumptions about the animal. Not all service animals wear special collars or harnesses; and
- Do not provide food or care for the service animal. Provide water only if the owner requests it for the animal.

### **Health and Safety Requirements**

- The Company recognizes there may be rare situations where another person’s health and safety could be seriously impacted by the presence of a service animal on the Company’s premises (e.g. persons with allergies to animals);
- The Company will analyze all options for safely allowing the service animal to accompany the person with a disability onto the Company’s premises, while maintaining workplace health and safety; and
- The options that the Company will consider include but are not limited to creating distance between two individuals, eliminating in-person contact, using air purifiers, notifying the person with the allergy of the presence of the service animal if the Company has knowledge of the person’s allergy, and any other measures that would allow the person to use their service animal on the Company’s premises.

### **Standards Applicable to Service Animals within the Workplace Setting**

All service animals are expected to meet the following standards:

1. the health and care of the animal is the sole responsibility of the person using the service animal;
2. the animal must be within the person's control at all times, either by means of a leash, containment (e.g. crate) or voice command;
3. the animal must behave in a non-aggressive manner at all times (e.g. no jumping, growling, snarling, biting or snapping); and
4. the animal must not be disruptive in the workplace (e.g. barking or destructive behaviour).

Failure to meet any of the above standards may result in the removal of the service animal from the Company's premises.

### **Removal of Service Animal from Premises**

In the event that a service animal's behavior poses a direct threat to the health or safety of others or if the service animal is acting out of control and the owner does not take action to correct its behavior, the Company has the right to exclude the animal from its premises.

Barking alone is not a direct threat. In addition, a direct threat does not exist if the service animal's owner takes prompt, effective action to control the animal.

The Company will not exclude a particular service animal based on past experience with other animals or based on fear that is not related to a service animal's actual behavior. Each situation will be considered individually.

In the event the Company excludes a service animal, the Company would then take steps to ensure that other measures are available to enable the person with a disability to obtain, use or benefit from its services up to and including the provision of a dedicated staff member to assist the person with the disability for the duration of their visit.

Fear of animals is not a valid reason for denying service to a person with a disability who is accompanied by a service animal.

### **Questions/Inquiries/Complaints**

Complaints about the improper treatment of persons with service animals can be initiated by contacting:

Rothmans Benson & Hedges Inc.  
People & Culture Department  
Telephone: +1 (416) 442 3627  
E-mail: AODA.RBH@rbhinc.ca

Persons with disabilities have the right to be accompanied by service animals on the Company's premises under the ASCS. The Company considers interference with or denial of this right to be a serious violation of this Policy.

The Company will promptly investigate all complaints raising this issue and will take appropriate disciplinary action when employees fail to comply with this Policy.

## **6.0 SUPPORT PERSONS**

The Company will allow members of the public and/or third parties to use their support persons while accessing the Company's services on the parts of its premises open to the public or third parties.

A support person may be a paid personal support worker or a volunteer, friend or family member. He or she does not necessarily need to have special training or qualifications.

The Company recognizes that support persons may assist persons in many different ways, such as:

- a. A person who is deaf or blind may use a support person to guide, to provide transportation or to provide adaptive communication such as tactile or adapted American Sign language, large print notes, print on palm or two-handed manual signing;
- b. A person who is deaf may use a support person to provide sign language or oral interpretation services;
- c. A person with a learning disability may use a support person to help with complex communication or note-taking;
- d. A person with an intellectual or developmental disability may use a support person to help with travel, daily activities, prompting medication, complex tasks, or to keep them from dangerous situations;
- e. A person with a mental disability may use a support person to help with communication tasks such as completing complex forms or to assist in high-stress situations;
- f. A person with a physical disability may use a support person to provide services related to travelling, personal care such as toileting or eating, or monitoring medical conditions;
- g. A person with a seizure disorder may use a support person to assist in the event of a seizure;
- h. A person with a speech impairment who uses an augmentative or alternative communication system may use a support person to relay or interpret a person's communications; and
- i. A person with vision loss may use a support person to read information or guide.

### **Fees for Support Persons**

The Company recognizes that persons with disabilities who use a support person are often unable to attend places or participate in activities without that support person.

The Company will provide advance notice to members of the public and/or third parties as to whether or not a fee will be charged for support persons to attend at Company events.

### **Interacting with a Support Person**

- A person with a disability may not introduce their support person. If you are not sure, it is appropriate to ask, "Is this your interpreter or support person?";
- Speak directly to the person, not to their support person, even though the message may be coming from the support person;

- Address the person appropriately: "What can I help you with?" as opposed to "Can you ask him what I can help him with?";
- Avoid engaging in "side" conversations with an interpreter;
- Speak in your normal tone of voice and at a consistent pace. Provide pauses after each thought to ensure that your communication has been successful. Be patient when awaiting a response; and
- There may be situations where an employee is aware ahead of time that a member of the public or third party will be accompanied by a support person (e.g. a sign language interpreter). When possible:
  1. Plan for the presence of support persons, e.g., help facilitate the interpreting process by reserving seats of persons who are deaf and by allocating space near presenters for interpreters; and
  2. Provide written materials both to the person with the disability and the support person.

### **Health and Safety Requirements**

The Company recognizes that persons with disabilities are free to accept a reasonable risk of injury to themselves just as other persons do and, therefore, does not require that a person with a disability be accompanied by a support person when accessing its premises.

The Company would consider requiring the attendance of a support person if the following situations were to present themselves:

1. Where there is a significant risk to the health and safety of the person with a disability or others;
2. The risk is greater than the risk associated with other members of the public or third parties;
3. The risk cannot be eliminated or reduced by other means;
4. The assessment of the risk is based on consideration of the duration of the risk, the nature and severity of the potential harm, the likelihood that the potential harm will occur, and the imminence of the potential harm; and
5. The assessment of the risk is based on the individual's actual characteristics, not merely on generalizations, misperceptions, ignorance or fears about a disability.

The Company will fully analyze all options before requiring that a support person accompany a person with a disability due to health and safety concerns related to the person with the disability or to the Company employees.

### **Confidentiality**



Confidentiality and privacy of the person with a disability will be respected at all times by Company employees and may be requested of the support person where applicable.

The right to autonomous decision-making as protected by law is applicable to persons with disability accompanied by a support person.

Consent must be obtained from both the person with a disability and their support person with respect to confidential information being shared and/or discussed in front of the support person.

### **Questions/Inquiries/Complaints**

Complaints about the improper treatment of persons with support persons can be initiated by contacting:

Rothmans Benson & Hedges Inc.  
People & Culture department  
Telephone: +1 (416) 442 3627  
E-mail: [AODA.RBH@rbhinc.ca](mailto:AODA.RBH@rbhinc.ca)

Persons with disabilities have the right to be accompanied by support persons on the Company's premises under the ASCS. The Company considers interference with or denial of this right to be a serious violation of this Policy.

The Company will promptly investigate all complaints raising this issue and will take appropriate disciplinary action when employees fail to comply with this Policy.

## **7.0 FEEDBACK PROCESS**

The Company recognizes that receiving feedback provides a valuable opportunity to learn and improve. To that end, every person has the right to make a complaint or offer a suggestion or compliment on the way in which the Company provides its services to persons with disabilities.

### **Process to Initiate Feedback and/or Complaints**

The Company is committed to making every effort to provide services to members of the public and third parties that are free of accessibility barriers.

Members of the public and third parties who wish to provide feedback on the way the Company provides its services to persons with disabilities may do so via telephone, in writing, electronically or in person.

The Company has implemented a process for feedback on accessible service that has the following components:

- a. Those wishing to make feedback comments can do so electronically by e-mailing or calling the Company's People & Culture Department; and

- b. Members of the public and third parties may also wish to provide feedback directly to the Company contact via telephone, e-mail, written letter or in person.

Employees that receive feedback or a complaint from a member of the public or third party on the way in which the Company's provides its services to persons with disabilities must immediately forward the information to:

People & Culture Department  
Telephone: 416-442-3627  
E-mail: [AODA.RBH@rbhinc.ca](mailto:AODA.RBH@rbhinc.ca)

### **Process to Respond to Feedback and/or Complaints**

Feedback will always be acknowledged with an indication of whether a personalized response will be provided or not. Complaints will always be responded to with an indication of how the issue will be dealt with.

All feedback will be directed to the Company's HR Services Specialist.

The HR Services Specialist will document the nature of the complaint or feedback and all communication regarding the complaint and resolution of the complaint. All documentation will be filed in accordance with applicable privacy laws.

If the person initiating the feedback or complaint wishes to be contacted, the Company will respond within ten (10) business days either in writing, in person, by e-mail or by telephone acknowledging the receipt of feedback and outlining the action(s) to be taken. Response to the feedback will be provided by direct communication with the individual via phone, email or by mailing.

## **8.0 NOTICE OF TEMPORARY DISRUPTIONS**

If there is a temporary disruption of facilities or services that persons with disabilities usually use to access the Company's services, the Company will give notice of the disruption to the public. Notice will include information about the reason for the disruption, its anticipated duration and a description of alternative facilities or services. Notice will be given by posting the information in a conspicuous place on the Company's premises. Disruptions to all of the Company services, such as during a power outage does not require notice.

Servicing of elevators is the responsibility of the respective property management companies, and as such, they would be required to ensure that notice of temporary disruptions to elevator service is provided as required by the ASCS. If all elevators to access the Company's premises are out of service, the Company will assess the situation and determine whether notice needs to be provided to members of the public and/or third parties that could reasonably be expected to access the Company's premises.

## **9.0 TRAINING POLICY**

### **Training Needs Analysis**

Management will ensure that an accessibility training program is developed and maintained for the Company that identifies applicable legal requirements.

Training needs will be identified through a number of means, including but not limited to:

- Reviewing applicable legal requirements contained in the *AODA* and the *ASCS* and applicable guidelines; and
- Consultation with management on their employee's job descriptions and what they do in practice on a regular basis.

People & Culture will determine the classes of personnel to receive the training, including the extent of the training required for each job function and family.

Management will ensure that training is provided as necessary. Training and instruction may be provided through a number of means, including but not limited to:

- In-class training sessions;
- On-line training sessions; and
- Pamphlets and handouts.

### **Summary of Contents of Training**

Training will include the following:

- Review of the purposes of the *AODA*, including a description of barriers to accessible client service;
- An overview of the requirements of the *ASCS*;
- Instruction on the ways in which a person with a disability may communicate (e.g. sign language, gestures, boards with symbols on them, through interveners, by TTY);
- Instruction on how to appropriately interact and communicate with persons with various types of disabilities;
- Instruction on how to interact with persons with disabilities who use an assistive device or require the assistance of a service animal or a support person (including appropriate and inappropriate methods of interaction);
- How to locate the assistive devices at the Company's premises (i.e. automatic doors) and a description of alternative methods of service provision used at the Company (i.e. providing assistance of staff person) that may help with the provision of the Company's services to persons with disabilities;
- What to do if a person with a disability is having difficulty in accessing the Company's services;

- Review of the Company's policies, practices and procedures about the provision of its services to persons with disabilities; and
- How to deal with feedback and complaints, including internal escalation of the feedback or complaint, as appropriate.

People & Culture, General Managers and Office Management must receive additional instruction on the Company Complaint Management Process, including how to document, resolve and file feedback and complaints.

The degree, nature and format of the training will be tailored to the actual need of the person being trained to ensure that training resources are focused where they will have the greatest impact on compliance with the ASCS and our ability to provide accessible service.

### **Timing of Training**

Training will be provided within thirty (30) days after commencement of an employee's or agent's duties that include interaction with members of the public and third parties in the provision of the Company's services, or development of policies, practices and procedures related to the Company's services.

The Company will provide updated training to individuals that require such training, whenever changes are made to the Company policies, practices and procedures respecting the way in which services are provided to persons with disabilities.

## **10.0 NOTICE OF AVAILABILITY OF DOCUMENTATION**

The Company will notify persons to whom it provides services, by visibly posting a statement on the floors where our offices are located, that a copy of this Policy is available upon request. If the Company is required to provide a copy of this Policy to a person with a disability, it will provide the person with the Policy or the information contained in the Policy in a format that takes the persons disability into account.

## **11.0 RECORDS**

- Paper training records (i.e. certificates, written evaluations, documented job observations, etc.) for direct employees of the Company will be kept on site at the organization where the person is employed, following the Company's Record Retention Policy;
- A record of all training provided will be kept by Office Management, following the Company's Record Retention Policy;
- The training record will contain the date of the training, the names of the attendees, the method of training (i.e. classroom, video) and the name of the facilitator (if applicable); and

- Obsolete or past copies of documents will be retained and managed by People & Culture in accordance with the Company's Record Retention Policy;

## **12.0 RESPONSIBILITY AND ACCOUNTABILITY**

### **12.1 Company Management is responsible to:**

- Ensure that policies, practices and procedures governing the provision of the Company's services to persons with disabilities are developed, implemented and maintained in accordance with the ASCS;
- Ensure that a system is maintained for the effective communication of legislative requirements related to accessibility;
- Ensure that the training developed and/or provided by the Company meets or exceeds the legal training requirements;
- Ensure delivery of training within each functional area in accordance with this procedure. Each functional area within the organization is responsible for delivery of training and to ensure all affected employees meet the training requirements as specified;
- Take steps to ensure employees and agents acting on the Company's behalf in the delivery of its services comply with the ASCS and this Policy; and
- Ensure that the resources, both human and fiscal, required to implement this procedure are provided.

### **12.2 General Managers are responsible to:**

- Make the decision to exclude a service animal, where required by this Policy;
- Make the decision to require a person with a disability to be accompanied onto the Company's premises with a support person due to health and safety reasons;
- Address the concerns of employees who are allergic to or fearful of a potential service animal, if necessary;
- Investigate complaints with respect to the improper treatment of persons with assistive devices, service animals or support persons on the Company's premise; and
- Document feedback and/or complaint and acknowledge receipt of feedback/complaint. Work with other business units to research and resolve the complaint. Obtain approval from Management with respect to resolution options, if required.

### **12.3 Supervisors are responsible to:**

- Ensure that employees are trained to support members of the public and third parties who may use assistive devices, service animals and/or support persons while accessing the Company's services;
- Ensure that employees are aware of all assistive devices and measures provided by the Company to assist persons with disabilities to access the Company's services;
- Track attendance and training records. Maintain a master copy of all training provided employees;
- Maintain and ensure the confidentiality of any documents provided by members of the public or third parties informing the Company that an animal is being used as a service animal. Keep copies of such letters when necessary and only for as long as necessary;
- Work with the appropriate Manager to research and resolve complaints, as required; and
- Communicate resolution options to members of the public and third parties, as necessary.

12.4 People & Culture Department is responsible to:

- Assist Office Management to identify training needs, review and assist in the development of training programs that meet or exceed the legal requirements;
- Monitor legal training requirements outlined in accessibility standards and inform Management when changes occur;
- Retain and manage training records and obsolete or past copies of documents;
- Define and develop training content and set the frequency requirements;
- Ensure that all documents are stored in compliance with privacy regulations and in accordance with the Company's Privacy Policy;
- Assist in monitoring compliance with this procedure;
- Advise management of any changes to legislation that would warrant changes or amendments to this Policy. Ensure Policy is updated/revised as required;
- Retain and manage obsolete or past copies of documents; and
- Assist General Managers with investigation of complaints.

12.5 Employees are responsible to:

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- Treat persons who use assistive devices, support persons and service animals with the same courtesy and respect that the Company affords to all persons;
- Appropriately interact with persons with disabilities who use an assistive device, service animal or support person;
- Where appropriate, advise persons with disabilities about accessible features at the Company's premises;
- When hosting or planning an event, locate and describe accessible features in the immediate environment, like automatic doors or accessible washrooms;
- Refrain from operating the assistive device unless express instructions to the contrary have been received;
- Permit service animals and support persons to accompany members of the public and third parties with disabilities to all areas of the premises normally used by these individuals. This includes washroom and meeting rooms;
- If there are any questions about the use of a service animal or support person by members of the public or third parties, refer the matter to Management immediately;
- Immediately notify Management of all feedback and/or complaints related to the way in which the Company provides its services to persons with disabilities;
- Attend scheduled training. Work in compliance with the training received; and
- Identify any accessibility training needs that they are aware of to their supervisor or Management.

**13.0 DEFINITIONS/ACRONYMS**

<b>Term/Acronym</b>	<b>Definition</b>
Agent	A person or organization contracted by party to provide services on its behalf.
Alternative Ways	Ways of helping members of the public or third parties that access the Company's premises or services when they are unable to use their own assistive devices.
AODA	<i>Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, C. 11</i>
ASCS	Accessibility Standards for Customer Service, O. reg. 429/07
Assistive Device	An assistive device is a tool, technology or other mechanism that enables a person with a disability to do everyday tasks and activities

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	such as moving, communicating or lifting. It helps the person to maintain their independence.
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, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice.
Blind Person	Means a person who because of blindness is dependent on a guide dog or white cane.
Complaint	Complaints identify a problem where the person is looking for remedy. For example, "I can't access your building because there is no automatic door opener, when are you going to install one?"
Dignity (as referenced in s. 3(2) of the ASCS)	Persons with disabilities are treated as valued and as deserving of effective and full service as any other person.
Disability (as defined by Ontario's AODA, s. 2)	"disability" means, (a) 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, (b) 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, (c) 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, (d) a mental disorder, or (e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.
Equal Opportunity (as referenced in s. 3(2) of the ASCS)	Persons with disabilities must be given an opportunity equal to that given to others to obtain, use and benefit from a company's services.
Employees	All workers employed by a company including partners, associates, and staff, including full-time, part-time, temporary employees or employees on contract.
Feedback	Feedback refers to commentary offered where the person is not necessarily looking for action or remedy. For example, "You should consider having an automatic door opener." Feedback can be positive or negative.



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Guide Dog, as per the <i>Blind Person's Rights Act, R.S.O. 1990, c.B.7</i> and Guide Dogs, R.R.O. 1990, Regulation 58	Means a dog trained as a guide for a blind person and having the qualifications prescribed by the regulations.
Independence (as referenced in s. 3(2) of the ASCS)	Means freedom from control or influence of others.
Integration (as referenced in s. 3(2) of the ASCS)	The provision of a company's services to persons with disabilities must be integrated unless an alternate measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from a company's services.
Members of the Public	Members of the public include those individuals that use the Company's services – e.g. clients
Office Management	General Manager and department heads.
'Operate Premises'	A provider is deemed to 'operate premises' if they have control over the premises and are responsible for determining who is allowed to enter and exit the premises or areas of those premises. Providers who rent or lease their facilities have control over their premises.
Premises	Premises include the buildings, land or grounds where a company provides services.
Service Animal	<p>An animal is a service animal for a person with a disability,</p> <p>(a) if it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or</p> <p>(b) if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.</p> <p>A service animal may also be referred to as a mobility animal or assistance animal.</p>
Supervisor (as defined by Ontario's <i>Occupational Health and Safety Act, R.S.O. 1990, c. O.1</i> )	A person who has charge of a workplace or authority over a worker. This may include, but is not limited to, managers, assigned supervisors, department heads, and coordinators.
Support Person	Means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care or medical needs or with access to services.
Third Parties	Other business or organizations that a company makes its services available to.

**14.0 REFERENCES****Related documents, procedures, and policies**

- Privacy Policy;
- Disciplinary Policy; and
- Records Retention Policy.

**Applicable statutes and regulations**

- *Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, Chapter 11;*
- Accessibility Standards for Customer Service, O. Reg. 429/07;
- Human Rights Code, R.S.O. 1990, Chapter H.19;
- *Blind Person's Rights Act, R.S.O. 1990, c.B.7;*
- Guide Dogs, R.R.O. 1990, Regulation 58; and
- *Freedom of Information and Protection of Privacy Act, R.S.O. 1990, Chapter F.31.*

**Guidelines and other documents**

- Accessibility Standard for Customer Service, Training Resource, Ministry of Community and Social Services, February 2009; and
- Accessibility Standard for Customer Service: Employer Handbook, Ministry of Community and Social Service, April 2009.

**15.0 REFERENCE DOCUMENTS**

- Accessibility Policy Statement posted on the floors where our offices are located.

**16.0 REVISION HISTORY**

<b>Revision Number</b>	<b>Originator</b>	<b>Document Owner</b>	<b>Approval(s)</b>	<b>Reason for Change</b>	<b>Date</b>
01	Gowlings, LLP	Rothmans, Benson & Hedges Inc.		Compliance with ASCS – New Policy	December 2012
02	P&C Department	Rothmans, Benson & Hedges Inc.		Contact information updated	June 2021

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