



Wessuc Inc.

Accessibility Policy and Program

STATEMENT OF COMMITMENT

Wessuc Inc. is committed to providing an inclusive, accessible, and welcoming environment for all persons with disabilities in a way that respects the independence and dignity of individuals with disabilities and in a manner which takes into account the person's disability and embodies the principles of integration and equal opportunity.

Wessuc Inc. is committed to continuous improvement in becoming a barrier free environment and meeting the requirements of all existing legislation and its own policies and goals related to identifying, removing and preventing barriers to people with disabilities that might interfere with their ability to interact with Wessuc Inc.

Wessuc Inc. ensures that all persons within its' community are aware of their rights and responsibilities to foster an accessible and inclusive environment with and for persons with disabilities.

Wessuc Inc. is committed to, and will strive to ensure that, the Accessibility for Ontarian's with Disabilities Act (AODA), 2005, its regulations, standards and all other relevant legislation concerning accessibility, are rigorously observed in a timely fashion.





GENERAL DEFINITIONS

Accessible Formats: include, but are not limited to: accessible electronic formats, Braille, text transcripts, large print, recorded audio, and other formats accessible to persons with disabilities.

Assistive Device: a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that members and guests bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

Barrier: as defined by the Ontarians with Disabilities Act, 2001, anything that prevents a person with a disability from fully participating in all aspects of society because of his/her disability. This includes:

- a physical barrier,
- an architectural barrier,
- an informational or communications barrier,
- an attitudinal barrier,
- a policy, practice and procedure barrier.

Communication Supports: include but are not limited to sign language, plain language and other communication supports that facilitate effective communications.

Disability: a key feature of the AODA is its definition of "disability". Under the AODA, the definition of "disability" is the same as the definition in the Ontario Human Rights Code [2]:

Any degree of physical disability, infirmity, malformation or disfigurement including, but not limited to:

- 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 of 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.
- An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety & Insurance Act, 1997.

The definition includes disabilities of different severity, visible as well as non-visible disabilities, and disabilities the effects of which may come and go. This is a broad definition, and one that must be considered closely when educating our employees in the appropriate response to our customers.



Purpose of the Policy

The Integrated Accessibility Standards Regulation (Regulation 191/11) (the "IASR") under the AODA provides standards for private sector organizations to increase accessibility for persons with disabilities specifically in the areas of:

- Customer Service
- Information and Communications
- Employment
- Transportation
- Design of Public Spaces

Accessibility Plan

The Accessibility Plan was developed in consultation with a cross-functional team at Wessuc Inc. that helped to identify barriers that prevent a person with a disability from fully participating in aspects of society because of his or her disability (such as attitudinal, information or communication, technology, organizational and physical) within the stated goals of the IASR.

The Accessibility Plan will be reviewed every year and updated at least once every five years.

(1) Training

Wessuc Inc. will ensure that timely training is provided to all necessary persons, and that it aligns with the requirements of the accessibility standards referred to in the IASR. Wessuc Inc. will continue to provide training on the Human Rights Code as it pertains to persons with disabilities. Appropriate records of training are maintained.

Training, using the most appropriate methodologies, as appropriate, is provided to the following person(s):

- all employees
- all persons who work under a contractual agreement directly with Wessuc Inc.

Wessuc Inc. has developed a training plan that integrates the requirements of the IASR with its current elearning module.

(2) Information and Communication Standards



Wessuc Inc. will ensure that its processes for receiving and responding to feedback are made available to persons with disabilities, whether members of the public, clients, customers or employees, in an appropriate, accessible format or communication support, upon their request, and that members of the public are notified of the availability of such an option.

(3) Accessibility to Wessuc Inc. Services

Wessuc Inc. will ensure that:

- (a) Services are provided in a manner that respects the dignity and independence of the person with disabilities.
- (b) Services provided to persons with disabilities are integrated.
- (c) Services provided to persons with disabilities are integrated with the provision to others unless an alternative is necessary to allow a person with a disability to benefit from services. The alternative measure may be temporary or permanent.
- (d) Communication with a person with a disability is conducted in a manner that takes into account his or her disability.
- (e) People with disabilities may use assistive devices, service animals and support persons as is necessary to access Wessuc Inc. services.

(4) Employment Standards

(a) Recruitment

Wessuc Inc. will notify its employees and external applicants about the availability of accommodation for applicants with disabilities in its recruitment process.

(b) Recruitment, Assessment or Selection Process

Wessuc Inc. will ensure that job applicants are notified when they are individually selected to participate in the assessment or selection process and that accommodation for disabilities is made available upon request in relation to the materials or processes to be used. Wessuc Inc. will consult with individuals who request accommodations and will provide for appropriate accommodations.

(c) Notice to Successful Applicants



When presenting offers of employment, Wessuc Inc. will notify the successful applicant of its policies for accommodating employees with disabilities.

(d) Informing Employees of Supports

Wessuc Inc. will ensure that employees are informed of all accessibility policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practicable after commencing employment.

(e) Accessible Formats and Communication Supports for Employees

Upon request of an employee with a disability, Wessuc Inc. will consult with the employee to provide, or arrange for accessible formats and communication supports for information that is needed to perform his/her job, and information that is available to other employees. In order to determine the suitability of an accessible format or communication support, Wessuc Inc. will consult with the employee making the request. Accessible formats and communications supports regarding general workplace information will also be provided to employees with disabilities.

(f) Workplace Emergency Response Information

Wessuc Inc. provides employees with disabilities individualized workplace emergency response information when the employee's disability is such that the information is required and Wessuc Inc. has been informed of the need to accommodate the employee's disability.

(g) Documented Individual Accommodation Plans

Wessuc Inc. currently accommodates the needs of its employees with disabilities as required under the Ontario Human Rights Code. Wessuc Inc. will develop individualized accommodation plans for its employees with disabilities, as Wessuc Inc. is made aware. Wessuc Inc. will implement and maintain measures effective to maintain the privacy of its employees with disabilities.

(h) Return to Work Process

Wessuc Inc. will maintain a documented return to work process for employees who have been absent from work due to a disability and who require disability-related accommodations and support in order to return to work. The return to work process will clearly define and outline the steps Wessuc Inc. will take to facilitate the return to work and will include documented accommodation plans for each individual as part of the process. The above stated return to work process will not replace, hinder or override any other return to work process created by or under any other statute.



(i) Performance Management, Career Development and Advancement and Redeployment

Wessuc Inc. will continue to consider the accessibility needs of employees with disabilities as well as individual accommodation plans, when conducting performance management reviews, providing career development and advancement to employees and when redeploying employees.

Scope of the Policy

This policy governs the provision of service by Wessuc Inc. at all Wessuc Inc. owned and operated facilities, as well as the provision of services off the premises by employees, agents(and or contractors) who operate on behalf or represent Wessuc Inc.

(1) Assistive Devices

(a) Policy:

Wessuc Inc. is committed to serving people with disabilities who use assistive devices. Assistive devices are devices that are used to assist persons with disabilities in carrying out activities or in accessing the services of persons or organizations.

(b) Procedures:

We ensure that those members/visitors who use assistive devices are welcome and accommodated, if required.

(2) Communicating with a Visitor with a Disability

(a) Policy:

Wessuc Inc.'s policies and procedures take a person's disability into account when communicating with the individual. Two way communications is a process of providing, sending receiving and understanding information. To communicate in an effective way, Wessuc Inc. considers how the disability affects the way the person expresses, receives or processes communications. Where possible we will ask the person directly the best way to communicate with him/her.

(b) Procedures:

Wessuc Inc. uses a variety of ways, wherever possible, to make communications more accessible by:

- Considering the needs of people with disabilities during the planning stage of services.
- Using plain language to make a document easier to read for people with certain learning disabilities.



- Offering information in alternate formats, on request.
- Printed hand-outs of commonly used information;
 - O Large print; and printed hand-outs of commonly used information.
 - o E-mail as an alternative channel to provide accessible communication.
 - o Hand- write or type information back and forth.

(3) Service Animals

(a) Policy:

Wessuc Inc. is committed to welcoming members/visitors with disabilities who are accompanied by a trained, accredited service animal. A service animal may accompany a client or visitor or any third party with a disability to all parts of our premises that are open to the public. Service animals may be used for, but not limited to, the following disabilities: vision loss, physical disability, hearing loss, autism, epilepsy, etc. Wessuc Inc. ensures that all employees and others dealing with the public are properly trained in how to interact with people with disabilities, who are accompanied by a service animal.

(b) Procedures:

To be considered a service animal under this standard, it must be either readily apparent that the animal is used because of the persons disability or the person with the disability may be asked to provide a letter from a physician or nurse confirming that it is required because his/her disability.

Guide dogs or other service animals, including service animals in training, are allowed to accompany people with disabilities on Wessuc Inc. premises open to the public.

If the service animal is causing a disturbance for other members/visitors, the person and accompanying service animal may be required to leave the premises.

The owner is responsible to "stoop and scoop".

Wessuc Inc. anticipates there will be special situations and is prepared to make every effort to accommodate the circumstances on an individual basis, as they arise, keeping safety to all members, visitors, staff, volunteers and service animals in mind.

(4) Support Persons

(a) Policy:

Wessuc Inc. is 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 is 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 Wessuc Inc. premises.

A support person is an individual hired or chosen by a person with a disability to provide services or assistance with communication, mobility, personal care, medical needs or with access to goods and services.

(b) Procedures:

Members/visitors are informed of this through Wessuc Inc.'s communication to the public.

(5) Temporary Disruptions of Service

(a) Policy:

Wessuc Inc. is aware that temporary disruptions of services and programs may occur due to reasons that may or may not be within our control or knowledge. Wessuc Inc. makes a reasonable effort to provide advance notice of the disruption to the public, including information about the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any that may be available.

(b) Procedures:

The notice is made available for broadcasting news and updates trough the website or temporary signage. In the event of an unexpected disruption, advance notice is not possible. In such cases Wessuc Inc. will provide notice, as soon as possible, through its communication networks.

(7) Process to Receive and Respond to Feedback

(a) Policy:

Wessuc Inc. has a process in place for receiving and responding to feedback about how goods and services are provided to clients and visitors with disabilities.

(b) Procedures:

Workers/visitors with disabilities can offer their feedback in the following ways:

- E-mail and telephone, (re-direct, as required to Health & Safety Coordinator).
- In writing where correspondence is re-directed to Health & Safety Coordinator.
- In person to Wessuc staff.

The person is requested to provide their name and contact information (phone or e-mail). Once feedback is received, the following actions are taken to respond:

The feedback is directed to the appropriate person for action.



• The feedback is assessed for appropriate action. (Note: the customer service standard does not require a response to be provided for all feedback.)

The feedback process is readily available to the public through:

- A sign in Wessuc Inc. locations;
- A document describing the feedback process, available on request in different formats;
- Other communication networks, as appropriate.

The notice includes the following:

Dear Valued Worker and Visitor.

We strive to improve accessibility for our clients and visitors with disabilities. We welcome your feedback. Please call 1-(866)-493-7782 or e-mail info@wessuc.com to share your comments, or request a copy of our accessibility policy.

Thank you,

Wessuc Inc. Management

(8) Customer Service Training

(a) Policy:

Wessuc Inc. provides training to all those who are involved in the development and approvals of customer service policies and procedures on providing goods and services to clients and visitors with disabilities. All third parties and others, who deal with the public on behalf of Wessuc Inc., will receive the required AODA training.

(b) Procedures:

All staff will be trained by Wessuc Inc. This training will be provided as soon as practicable or as soon as it can be done in the circumstances, after an employee or volunteer commences their duties. This training will include the following;

- The history of the legislation and the purposes of the Accessibility for Ontarians with Disabilities Act, 2005 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.



- How to use assistive devices available on the premises or otherwise that may help with the provision of goods or services to people with disabilities.
- What to do if a person with a disability is having difficulty in accessing Wessuc Inc.'s goods and services.
- Wessuc Inc.'s policies and procedures relating to the customer service standard.
- Ongoing training in connection with any changes to these policies and procedures.

(9) Posting of Documents

(a) Policy:

Notices are posted, informing the public that the documents required by the Customer Service Standard are available upon request and will be provided in a format that takes a person's disability into account.

(b) Procedure:

Documents are available through the following networks, as appropriate.

- Bulletin boards
- Sales centre

Accountability and Responsibility

(a) Wessuc Inc.'s Management team is accountable to and responsible for:

- The governance of the policy.
- Corporate liability for compliance with legislative requirements, including fiscal responsibility, human costs and human rights issues.
- Support and promote the policy in their area of direct report and throughout the organization.
- Drive the culture to a high level of understanding regarding disability and accommodation.

(b) Wessuc Inc.'s Directors and Managers are accountable to and responsible for:

- Fostering open and constructive communication.
- Demonstrating sensitivity to and respect confidentiality of information.
- Raising awareness to facilitate understanding of the policy.



Participating and co-operating to facilitate workplace accommodation.

(c) Wessuc Inc.'s Employees are accountable to and responsible for:

• Participating and cooperating with all parties to facilitate workplace accommodation.

(d) The Human Resources Staff at Wessuc is responsible for:

- Participating and cooperating with all parties.
- Acting as a resource for all parties and participants.
- Supporting and educating managers in their obligations.