

Customer Service Accessibility Policy

Objectives

The purpose of this Policy is to establish how Foth Canada Corporation (“**Foth**”) will provide access to goods or services to the public, and other third parties, that do business with Foth (“**Customers**”) with disabilities in a manner that is consistent with the principles of independence, dignity, integration and equality of opportunity, and that is in compliance with Ontario Regulation 429/07 (the “Customer Service Standard”) under the *Accessibility for Ontarians with Disabilities Act* (“AODA”).

Policy Statement

Foth recognizes the importance of:

- Providing access to goods and services for individuals with disabilities;
- Openly communicating and responding to the needs of Customers with disabilities in order to provide them with excellent customer service; and
- Complying with the mandatory Customer Service Standard addressed under the AODA.

Application

This Policy applies to all Foth members, clients and contractors, including but not limited to senior leadership, members (whether full-time, part-time or temporary), students, co-ops and volunteers (“**Members, Clients and Contractors**”).

Communication

Members, clients and contractors will communicate with Customers with disabilities in a manner that takes into account their disabilities. Foth will consider how a Customer’s disability may affect the way that he or she expresses, receives or processes communications and, where possible, they will ask the Customer how to best communicate with him or her.

Assistive Devices

Assistive devices that may be used by individuals with disabilities will be welcome on Foth premises open to the public or other third parties, including but not limited to canes, crutches, walkers, wheelchairs, scooters, oxygen tanks, screen readers, listening devices, speech amplification devices, magnification devices, note-taking devices, and communication boards. Foth will take steps to ensure that Members, Clients and Contractors are familiar with such assistive devices.

Service Animals

Foth welcomes guide dogsⁱ or other animals that serve individuals with disabilities in those areas of Foth’s premises that are open to Customers and will permit the Customer to keep the service animal with him or her, except for those animals that are otherwise excluded by law from the premises. In the event that a service animal is otherwise excluded by law from the premises, Foth will provide the applicable Customer with an alternative method of obtaining, using or benefitting from its goods or services.

Support Persons

Foth welcomes persons who support individuals with disabilities to accompany them onto Foth premises open to the public or other third parties. Foth will ensure that Customers who so require have access to their support persons while on the premises. Such support persons need not be paid, professional support workers. They may be volunteers, family members or friends who provide support to the Customer. Support persons will be asked to follow the rules or requirements that are specific to

the goods or services provided by Foth. Foth will seek the consent of the Customer before confidential information is discussed in front of the support person. In some instances, support persons may be asked to sign a Confidentiality Agreement.

Temporary Unavailability of Access to Goods or Services for Customers with Disabilities

In the event that a facility, service or system offered by Foth to Customers with disabilities is expected in advance to become temporarily unavailable, in whole or in part, Foth will provide advance notice of the disruption on its telephone message, website, at the entranceⁱⁱ to its premises and by the service or facility. If the disruption is unexpected, the notices will be provided as soon as the anticipated disruption becomes known to Foth.

The notices will:

- Explain the reason for and anticipated length of the disruption; and
- Provide a description of and indicate the location of an alternative facility or service that is accessible to individuals with disabilities, if available.

Member, Client and Contractor Training

All Members, Clients and Contractors who interact with Customers on Foth's behalf or who are involved in developing Foth's policies, practice and procedures on the provision of goods and services will:

- Be provided with an overview of the AODA and the Customer Service Standard;
- Be trained how to interact, communicate and assist people with disabilities, and in particular, people with assistive devices, and those who require the assistance of a guide dog, service animal or support person;
- Be made aware of the policies and procedures created by Foth in accordance with the Customer Service Standard; and
- Be trained how to help a person with a disability who is having difficulty accessing Foth's services.

This training will also be provided on an ongoing basis as soon as practicable:

- To Members, Clients and Contractors who are newly assigned duties that include interaction with Customers on Foth's behalf or who are involved in developing member policies, practices and procedures on the provision of services; and
- Whenever Foth's policies change with respect to customer service accessibility for individuals with disabilities, to all Members, Clients and Contractors who interact with Customers on Foth's behalf or who are involved in developing Foth's policies, practices and procedures on the provision of services.

Foth will keep a log of all of the training it will provide, documenting who was trained, on what and when.

Customer Access to This Policy and Related Documents

A notice advising customers how they can request a copy of this Policy and all related documents will be posted on the Foth's website and at the entrance to its premises. Foth will provide or arrange for accessible formats or communication supports, upon request and in a timely manner. When an individual requests an accessible format or communication support, Foth will consult with the person to determine their accessibility needs and decide on the most appropriate accessible format or communication support given the needs of the individual and the capability of Foth.

Feedback Process

Foth invites feedback, including feedback about the delivery of its goods and services to persons with disabilities. Foth will investigate and respond to all complaints relating to such services in a timely, thorough and objective manner. Those who wish to provide such feedback or to file a complaint are encouraged to do so in person to Mitch Vanderydt at 401 Bay Street, Suite 1600, Toronto, Ontario, by telephone at 416-646-6603, in writing at 401 Bay Street, Suite 1600, Toronto, Ontario, M5H2Y4 , or by email at Mitch.Vanderydt@foth.com.

The details of this feedback process will also be posted at the entrance to Foth's premises.

In addition, Foth is also committed to ensuring that this feedback process is accessible to individuals with disabilities. Accordingly, Foth will provide or arrange for accessible formats or communication supports, upon request and in a timely manner. When an individual requests an accessible format or communication support, Foth will consult with the person to determine their accessibility needs and decide on the most appropriate accessible format or communication supports given the needs of the individual and the capability of Foth.

Notice of Availability

Foth will notify the public that its documents related to accessible customer service, are available upon request by posting a notice in each Ontario facility.

Modifications to this or other policies

Any Foth policy, practice or procedure that is known to not respect and promote the principles of dignity, independence, and equal opportunity for people with disabilities will be modified or removed.

ⁱ The Customer Service Standard defines a "guide dog" as a guide dog as defined in section 1 of the *Blind Persons' Rights Act*.

ⁱⁱ Revise as applicable, depending on the nature of the goods or service provided and the location that Customers are most likely to view the notice.