Workplace Accessibilities Policy

Policy Number:	380	**Replaces Date:**	January 1, 2025
Effective Date:	January 1, 2026	**Approval:**	

Purpose:
TFT Global Inc. (TFT) is committed to maintaining an environment which respects the dignity and worth of all people. As a company we will interact, communicate with, and provide goods and services to members of the public based on full inclusion by preventing, minimizing, and removing barriers to participation by persons with disabilities.
This policy is intended to meet the requirements of the:

A) *Accessibility Standards for Customer Service, Ontario Regulation 429/07 B) Integrated Accessibility Standards Regulation (IASR) 191/11* as outlined under the *Accessibility for Ontarians with Disabilities Act, 2005.*

All goods and services provided by TFT shall follow the principles of dignity, independence, integration, and equal opportunity.

This policy applies to A) the provision of goods and services to the public, or other third parties, not to the goods themselves and B) the employee workplace accessibility and practices within regulatory compliance timelines.

Scope:

a) This policy applies to the provision of goods and services at premises operated by TFT.

b) This policy applies to affected TFT employees who deal with other employees / RTW programs, customers, job applicants or other third parties with disabilities.

c) The section of this policy that addresses the use of guide dogs, service animals and service dogs only apply to the provision of goods and services that take place at premises operated by TFT.

d) This policy shall also apply to all persons who participate in the development of the TFT's policies, practices and procedures governing the provision of goods and services to members of the public or third parties.

Definitions:

Assistive Device: Is 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 customers 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.

Disability: The term disability as defined by the *Accessibility for Ontarians with Disabilities Act, 2005,* and the *Ontario Human Rights Code, refers to:*

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- 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 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;
- 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 or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

Guide Dog: Is a highly-trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons' Rights Act,* to provide mobility, safety and increased independence for people who are blind.

Service Animal: As reflected in *Ontario Regulation 429/07*, an animal is a service animal for a person with a disability if:

- It is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- If the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

Service Dog: As reflected in *Health Protection and Promotion Act, Ontario Regulation 562* a dog other than a guide dog for the blind is a service dog if:

- It is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability.
- Or the person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.

Support Person: As reflected in *Ontario Regulation 429/07*, a 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, medical needs or access to goods and services.

Responsibilities:

Senior Management:

- Ensure implementation of this policy.
- Assess any feedback given on the services provided relating to disabilities and make changes as required.
- Review Workplace Accessibilities Policy annually and as legislation changes to ensure that TFT has met their requirements under the IASR.

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Management/ Supervisor:

- Ensure provisions of this policy are adhered to within TFT.
- Communicate Emergency Response Procedures to employees, customers or third parties with disabilities visiting TFT.
- Assist those with a disability in an evacuation situation.

Human Resources:

- Share with Management any feedback that is received on the services provided relating to disabilities and make changes as required.
- Ensure all employees are trained bi- annually and at their orientation on this policy.
- Assist those with a disability who are visiting in Human Resources in an Evacuation situation.

Employees:

- Respect all provisions of this policy.
- Attend mandatory training on this policy.

General Principles:

In accordance with the *Accessibility Standards for Customer Service, Ontario Regulation 429/07,* this policy addresses the following:

A. The Provision of Goods and Services to Persons with Disabilities
B. Assistive Devices
C. The Use of Guide Dogs, Service Animals and Service Dogs
D. The Use of Support Persons
E. Notice of Service Disruptions
F. Customer Feedback
G. Emergency Response
H. Training
I. Notice of Availability and Format of Required Documents

A: The Provision of Goods and Services to Persons with Disabilities:

TFT will make every reasonable effort to ensure that its policies, practices, and procedures are consistent with the principles of dignity, independence, integration, and equal opportunity by:

- Ensuring that all customers receive the same value and quality.
- Allowing employees, customers or other third parties with disabilities to function at their own pace when accessing goods and services if this does not present a safety risk.
- Using alternative methods when possible to ensure that employees, customers or other third parties with disabilities have access to the same services, in the same place and in a similar manner.
- Considering individual needs in workplace and business activities when providing goods and services; and
- Communicating in a manner that considers the employee, customer, or other third-party disability.

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B: Assistive Devices:

Customer's own assistive device(s):
Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by TFT.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services.

C: Guide Dogs, Service Animals and Service Dogs (*Restricted to General Office Areas Only*):

An employee, customer or other third party with a disability that is accompanied by a guide dog, service animal or service dog will be allowed access to premises that are open to the public unless otherwise excluded by law.

Food Service Areas: Refer to the; *Health Protection and Promotion Act, Ontario Regulation 562 Section 60*.

Exclusion Guidelines:

If a guide dog, service animal or service dog is excluded by law (see applicable laws below) TFT will offer alternative methods to enable the person with a disability to access goods and services, when possible (for example, securing the animal in a safe location and offering the guidance of an employee).

Applicable Laws:

1) *Food Safety and Quality Act 2001, Ontario Regulation 31/05.*
2) The *Health Protection and Promotion Act, Ontario Regulation 562 Section 60.*
3) *Dog Owners' Liability Act, Ontario.*

D: Support Persons:

If an employee, customer, job applicant or other third party with a disability is accompanied by a support person, TFT will ensure that both persons are allowed to enter the premises together and that the customer is not prevented from having access to the support person.

In situations where confidential information might be discussed, consent will be obtained from the customer prior to any conversation where confidential information might be discussed.

E: Notice of Disruptions in Service:

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of TFT. In the event of any temporary disruptions to facilities or services that customer is with disabilities rely on to access or use TFT's goods or services, reasonable efforts will be made to provide advance notice. In some circumstances (such as in the situation of unplanned temporary disruptions), advance notice may not be possible.

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Notifications will include:

If a notification needs to be posted, the following information will be included unless it is not readily available or known:

- Goods or services that are disrupted or unavailable
- Reason for the disruption
- Anticipated duration
- A description of alternative services or options

Notifications Options:

When disruptions occur TFT will provide notice by:

- Posting notices in places including the main entrance and the nearest accessible entrance to the service disruption.
- Contacting customers with appointments.
- Verbally notifying customers when they are making a reservation or appointment.
- By any other method that may be reasonable under the circumstances.

F: Feedback Process:

TFT shall provide employees, customers or other third parties with the opportunity to provide feedback on the goods, services and facilities provided relating to disabilities. Methods of providing feedback include verbally (in person or by telephone) or written (handwritten, delivered, or email).

Submitting Feedback:

Customers, employees, job applicants or other third parties can submit feedback to:

- Human Resources Manager
- 519-842-4540 ext. 1403
- 25 Townline Road Suite 200, Tillsonburg ON N4G 2R5
- Email: hr@tftglobal.com
- www.tftglobal.com HR AODA Feedback Tab

Customers, job applicants or other third parties who wish to provide feedback can do so with the Human Resources Department.

Customers, job applicants or other third parties that provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted within 48 hours.

Employees may contact Human Resources directly with feedback.

G: Emergency Preparedness and Response (Effective Jan. 1, 2012):

Managers will be responsible and shall communicate emergency response procedures to their direct employees, customers or other third parties with disabilities. Direct Managers/ designate shall ensure that individuals with disabilities are assisted as required to the designated evacuation point.

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Human Resources will be responsible and shall communicate emergency response procedures for employees in training, job applicants or other third parties with disabilities visiting HR. HR shall ensure that individuals with disabilities are assisted as required to the designated evacuation point.

Emergency preparedness and response procedures will be reviewed on an ongoing basis and updated by the Human Resources Department in consultation with the JHSC, Management and Senior Management. Refer to the TFT: Emergency Preparedness Procedures and Action Plan Policy # 365.

H: Training:

Training will be provided to:

a) TFT employees who work with other employees, customers, or other third parties; for example: human resources, management, salespersons, customer service; and,

b) TFT employees who are involved in the development and approval of customer service policies, practices, and procedures.

c) New employees will receive basic awareness training during their orientation process.

Training Provisions:

As reflected in *Ontario Regulation 429/07,* regardless of the format, training will cover the following:

- A review of the purpose of the *Accessibility for Ontarians with Disabilities Act, 2005*.
- A review of the requirements of the *Accessibility Standards for Customer Service, Ontario Regulation 429/07*.
- Instructions on how to interact and communicate with people with various types of disabilities.
- Instructions on how to interact with people with disabilities who:
    - use assistive devices.
    - require the assistance of a guide dog, service dog or other service animal; or
- Instructions on how to use equipment or devices that are available at our premises or that we provide that may help people with disabilities.
- Instructions on what to do if a person with a disability is having difficulty accessing your services.
- TFT policies, procedures and practices pertaining to providing accessibility service to employees, customers or third parties with disabilities.

Training Schedule:

TFT will provide training at orientation to all new employees as well as provide training on a bi-annual basis. Revised training will be provided in the event of changes to legislation, procedures and/or practices.

Record of Training:

TFT will keep a record of training that includes the dates training was provided and the name of employees who attended the training.

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I: Notice of Availability and Format of Documents:

TFT shall notify customers or other third parties that this policy and documents related to the *Accessibility Standard for Customer Service* are available upon request and in a format that considers the employee's or customer's (person's) disability. Notification will be given by email or telephone or posting the information on the intranet/ company website and/or any other reasonable method.

This policy and its related procedures will be reviewed as required in the event of legislative changes and regulatory compliance timelines.

J: IT- TFT Website Compliance:

Any new TFT Website installed after January 1, 2014 will receive the design features to meet and comply too the Web Content Accessibility Guidelines (WCAG) 2.0 Level requirements. Current systems will receive updates when upgraded or replaced by January 1, 2021.

K: Facilities Management – New Additions and Modifications to Building Structure

Any new owned TFT building addition or modification to an existing building structure must comply too the new Ontario Building Code Part 11 Integrated Accessibilities Standards requirements effective January 1, 2015. This building design review will consider Accessible Washrooms, Front Entrances, barriers review, etc. This review will include parking space and front entrance accommodation design.

Referenced Documents:

- Accessibility for Ontarians with Disabilities Act, 2005
- Accessibility Standards for Customer Service, Ontario Regulation 429/07
- Integrated Accessibility Standards Regulation 191/11
- Blind Person's Rights Act, 1990
- Dog Owners' Liability Act, Ontario
- Food Safety and Quality Act 2001, Ontario Regulation 31/05
- Health Protection and Promotion Act, Ontario Regulation 562
- Ontario Human Rights Code, 1990
- Ontario Workplace Safety and Insurance Act (WSIA 1997)
- TFT Global Inc. Multi-year Accessibility Plan

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