

# ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

## Customer Service Policy

Acura Sherway is committed to diversity, inclusion, and accessibility in everything we do. With this in mind, we are continuously taking steps to improve the overall accessibility of our customers' experience.

The following policy has been established by Acura Sherway in Ontario to govern the provision of services with Regulation 191/11, "Integrated Accessibility Standards ("Regulation") under the *Accessibility for Ontarians with Disabilities Act, 2005*. Our Accessibility for Ontarians with Disabilities policies are consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

## Training

Acura Sherway will ensure we provide accessible customer service training to all Employees and volunteers, anyone involved in developing our policies, and anyone who provides goods, services, or facilities to customers on our behalf. In addition, training will be provided on a continual basis to all newly hired Employees as part of our onboarding process.

Employees will be trained on accessible customer service. Training will include:

- The purpose of the *Accessibility for Ontarians with Disabilities Act, 2005* and the requirements of the customer service standard.
- The Company's policies related to 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 support person.
- What to do if a person with a disability is having difficulty in accessing The Company's goods, services, or facilities.

Employees will be notified and trained when changes are made to our accessible customer service policies.

## Assistive Devices

People with disabilities may use their personal assistive devices when accessing our goods, services, or facilities. In cases where the assistive device presents a significant and unavoidable health or safety concern, or where it may not be permitted for other reasons, other measures will be used to ensure the person with a disability can access our goods, services, or facilities.

## Communication

We will communicate with people with disabilities in a way that considers their disability. Through the Accessibility Standards for Customer Service training, our Employees will have the knowledge and skills to better serve and communicate with those with disabilities.

We will work with the person with a disability to determine what method of communication is best for them.

## Service Animals

Persons with disabilities may enter our premises accompanied by a service animal and keep the animal with them, if the animal is not otherwise excluded by law. While visiting Acura Sherway, it is the responsibility of the person with a service animal to control the animal at all times.

When we are not able to easily identify that an animal is a service animal, our manager(s) may ask a person to provide documentation from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.

If service animals are prohibited by another law, we will do the following to ensure people with disabilities can access our services or facilities:

- Explain why the animal is excluded.
- Discuss with the customer another way of providing goods, services, or facilities.

In the event a customer is allergic to animals, alternative arrangements will be negotiated.

## Support Persons

A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises.

Consent from the person with a disability is required when communicating private issues related to the person with a disability, in the presence of a support person.

## Notice of temporary disruption

Acura Sherway will make reasonable effort to provide customers with notice in the event of a disruption in the facilities or services. The notice will include information about the reason for the disruption, and its anticipated duration, and a description of alternative facilities or services, if available. We may not be able to give advance notice in the case of an emergency disruption.

To make information accessible, signs and printed notices will be clearly laid out and will be displayed prominently at the entrance and at reception.

## Feedback Process

Acura Sherway welcomes feedback on how we provide accessible customer service, as feedback will help us identify barriers and respond to concerns.

Acura Sherway will investigate and respond to all complaints relating to accessibility in a timely, thorough, and objective manner. All customers can submit feedback or questions to the Human Resources Department.

## Notice of availability of documents

Acura Sherway will notify the public that documents related to accessible customer service, are available upon request. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner.

## Modifications to this or other policies

Acura Sherway is committed to developing customer service policies that respect and promote dignity and independence of people with disabilities. Acura Sherway retains the right to amend or change this policy at any time; however, any change will only be made after considering the impact on people with disabilities.

## Questions About This Policy

This policy has been developed to break down barriers and to increase accessibility for persons with disabilities in the areas of customer service. If anyone has a question about this policy, or if the purpose of a policy is not understood, an explanation will be provided by Corporate HR:

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INTEGRATED ACCESSIBILITY STANDARDS REGULATION (IASIR) –  
 INTEGRATED ACCESSIBILITY STANDARDS – Multi-Year Plan

Section	Initiative	Description	Action	Status	Compliance Date
3	Establishment of Accessibility Policies	3. (1) Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements referred to in this Regulation.	<ul style="list-style-type: none"> <li>The company has developed and implemented a Customer Service Policy and IASR policy specific to the organization.</li> </ul>	Completed	January 1, 2014
4	Accessibility Plans	4. (1) Large organizations shall, <ol style="list-style-type: none"> <li>establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization’s strategy to prevent and remove barriers and meet its requirements under this Regulation;</li> <li>post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and</li> <li>review and update the accessibility plan at least once every five years.</li> </ol>	<ul style="list-style-type: none"> <li>Plan has been created and will be updated as needed.</li> <li>Posted to website as per legislation.</li> </ul>	Completed	January 1, 2014

7	Training	<p>7. (1) Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to,</p> <ul style="list-style-type: none"> <li>(a) all employees, and volunteers;</li> <li>(b) all persons who participate in developing the organization's policies; and</li> <li>(c) all other persons who provide goods, services, or facilities on behalf of the organization</li> </ul>	<ul style="list-style-type: none"> <li>• Employees will be provided with a review of all applicable AODA policies and appropriate training as it relates to their specific roles upon hire.</li> </ul>	Ongoing	January 1, 2015
11	Feedback	<p>11. (1) Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request.</p>	<ul style="list-style-type: none"> <li>• Customers and the public may submit their feedback or inquiry through the business's general email.</li> <li>• Special requests will be handled on a case-by-case basis and any disputes handled through Human Resources.</li> </ul>	Ongoing	January 1, 2015

12	Accessible Formats & Communication Supports	12. (1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, (a) in a timely manner that takes into account the person’s accessibility needs due to disability; and (b) at a cost that is no more than the regular cost charged to other persons.	<ul style="list-style-type: none"> <li>• The company will arrange for a suitable and alternative format/communication support. The request will be facilitated through the department in which it affects (e.g., sales, service, administration).</li> <li>• Requests will be handled on a case-by-case basis and any disputes handled through Human Resources</li> </ul>	Ongoing	January 1, 2016
12	Accessible Formats & Communication Supports	12. (2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	<ul style="list-style-type: none"> <li>• The company will explore and assess suitable options following consultation with the individual to determine their needs.</li> <li>• Requests will be handled on a case-by-case basis and any disputes handled through Human Resources</li> </ul>	Ongoing	January 1, 2016
12	Accessible Formats & Communication Supports	12. (3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	<ul style="list-style-type: none"> <li>• The policy and our multi-year accessibility plan have been posted on the company website, which notifies the public about the availability of accessible formats and communication supports</li> </ul>	Completed	January 1, 2016

14	Accessible Websites & Web Content	14.(2) Designated public sector organizations and large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out in this section.	<ul style="list-style-type: none"> <li>• Requirements have been provided to IT and Marketing staff.</li> <li>• Continue to actively assess accessibility of existing website organization and content to meet this requirement.</li> </ul>	Ongoing	<p><b>January 1, 2012</b> New internet and intranet websites and web content on those sites must conform with WCAG 2.0 Level AA, other than,</p> <p>I. Success criteria 1.2.4 Captions (Live), and</p> <p>II. Success criteria 1.2.5 Audio Descriptions (Pre-recorded).</p> <p><b>January 1, 2016</b> All internet websites and web content must conform with WCAG 2.0 Level AA, other than, 4</p> <p>I. Success criteria 1.2. Captions (Live), and</p> <p>II. Success criteria 1.2.5 Audio</p>
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					<p>Descriptions (Pre-recorded) <b>January 1, 2020</b> All internet and intranet websites and web content must conform with WCAG 2.0.</p>
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PART III – Employment Standard

22	Recruitment, General	22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	<ul style="list-style-type: none"> <li>The company has an accessibility statement included on job postings notifying potential applicants of our commitment to provide suitable accommodation to candidates taking part in all aspects of the selection process, upon request.</li> </ul>	Completed	January 1, 2016
23	Recruitment, Assessment or Selection Process	<p>23.(1) During a recruitment process, an employer shall notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used.</p> <p>(2) If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a</p>	<ul style="list-style-type: none"> <li>Upon initial contact, the selected applicant will be informed that accommodations are available as it relates to the materials or processes to be used.</li> <li>The company will work with the selected applicant to provide an acceptable alternative where possible.</li> <li>Requests will be handled by Human Resources and hiring managers.</li> </ul>	Ongoing	January 1, 2016

		manner that takes into account the applicant's accessibility needs due to disability.			
24	Notice to Successful Applicants	24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	<ul style="list-style-type: none"> <li>Notification will be provided to all candidates during the recruitment process and reinforced to all new hires during on-boarding.</li> </ul>	Ongoing	January 1, 2016
25	Informing Employees of Supports	<p>(1) Every employer shall inform its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.</p> <p>(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.</p> <p>(3) Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. O. Reg. 191/11, s. 25</p>	<ul style="list-style-type: none"> <li>The company will continue to inform its employees of its 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.</li> <li>This information will be provided to new employees as soon as practical after commencing employment.</li> <li>All changes will be communicated to employees. The updated policies will be posted on the company's and HRIS system.</li> </ul>	Ongoing	January 1, 2016

26	Accessible Formats & Communication Supports for Employees	<p>(1) In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for,</p> <p>(a) information that is needed in order to perform the employee’s job; and</p> <p>(b) information that is generally available to employees in the workplace.</p> <p>(2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>	<ul style="list-style-type: none"> <li>• In determining the suitability of an accessible format or communication support, the company will consult the employee making the request.</li> <li>• Prior to providing the information needed to perform one’s job or information generally available in the workplace, employees requiring accessible formats or communication supports will be requested to notify Human Resources so that alternate arrangements may be made.</li> <li>• Upon receiving a request, Human Resources will work with the employee and any individuals responsible for providing the information (e.g., the employee’s manager or supervisor) to deliver a suitable accessible format or communication support.</li> </ul>	Ongoing	January 1, 2016
27	Workplace Emergency Response Information	Every employer shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee’s disability.	<ul style="list-style-type: none"> <li>• Where an employee discloses a disability such that the individualized information is necessary, the company will share emergency information with the employee and determine the most appropriate and effective workplace response during an emergency.</li> <li>• The employee’s direct Manager and Human Resources to handle on a case-by-case basis.</li> </ul>	Ongoing	January 1, 2012

27	Workplace Emergency Response Information	(2) If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.	<ul style="list-style-type: none"> <li>• Where individualized emergency response information is required for an employee, the company will obtain the employee's consent to only share the emergency information with the individual's who provide assistance to them. The details of the employee's medical condition or disability will remain confidential.</li> <li>• The employee's direct Manager and Human Resources to handle on case-by-case basis.</li> </ul>	Ongoing	January 1, 2012
27	Workplace Emergency Response Information	(3) Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.	<ul style="list-style-type: none"> <li>• The process for providing emergency information will include alternative formats where needed and will be completed in a timely manner upon receipt of the request or becoming aware of the need for an individualized plan.</li> <li>• Employee's direct Manager and Human Resources to handle on a case-by-case basis.</li> </ul>	Ongoing	January 1, 2012

27	Workplace Emergency Response Information	<p>(4) Every employer shall review the individualized workplace emergency response information,</p> <ul style="list-style-type: none"> <li>(a) when the employee moves to a different location in the organization;</li> <li>(b) when the employee's overall accommodations needs or plans are reviewed; and</li> <li>(c) when the employer reviews its general emergency response policies.</li> </ul>	<ul style="list-style-type: none"> <li>• The emergency information will be reviewed with the employee if they move to another work location / department, if their accommodation needs change, when the employee reviews its general emergency response policies, or when emergency response procedures change.</li> <li>• The employee's direct Manager and Human Resources to handle on a case-by-case basis.</li> </ul>	Ongoing	January 1, 2012
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28	Documented Individual Accommodation Plans	<p><b>28.</b> (1) Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.</p>	<ul style="list-style-type: none"> <li>• Accommodation plans to be determined on a case-by-case basis taking into consideration the employee’s disability and need for accommodation.</li> </ul>	Ongoing	January 1, 2016
28	Documented Individual Accommodation Plans	<p><b>28</b> (2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none"> <li>1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</li> <li>2. The means by which the employee is assessed on an individual basis.</li> <li>3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer’s expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved.</li> <li>4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining</li> </ol>	<ul style="list-style-type: none"> <li>• When the need for an accommodation is disclosed, information will be collected on the employee’s functional abilities to help determine if/how the employee’s needs can be accommodated.</li> <li>• After identifying the most appropriate and reasonable accommodation(s), the details will be documented in a written plan, including (1) what accommodation(s) will be provided; (2) how to make information accessible to the employee including accessible formats and communication supports; (3) employee emergency information and / or emergency response plan (if applicable); (4) when the plan will be reviewed and updated.</li> <li>• The employee will be provided with a copy of the individualized accommodation plan in an accessible format (of required), or written reasons for denying accommodation.</li> <li>• The frequency with which the accommodation plan will be reviewed and updated will be agreed upon and</li> </ul>	Ongoing	January 1, 2016

		<p>agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.</p> <ol style="list-style-type: none"> <li>5. The steps taken to protect the privacy of the employee's personal information.</li> <li>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</li> <li>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</li> <li>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</li> </ol>	<p>included in the individualized plan. If the accommodation is no longer appropriate, the situation will be reassessed and the plan will be updated.</p> <ul style="list-style-type: none"> <li>• The accommodation plan will also be reviewed and updated if the employee's work location or position changes, or if the nature of the employee's disability changes.</li> <li>• Throughout the process, the details of the employee's medical condition or disability will remain confidential.</li> </ul>		
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29	Return to Work Process	<p><b>29.</b> (1) Every employer, other than an employer that is a small organization,</p> <p>(a) shall develop and have in place a return-to-work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and</p> <p>(b) shall document the process.</p>	<ul style="list-style-type: none"> <li>• This regulation is addressed in the company's current Return to Work policy.</li> </ul>	Ongoing	January 1, 2016
29	Return to Work Process	<p>(2) The return-to-work process shall,</p> <p>(a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and</p> <p>(b) use documented individual accommodation plans, as described in section 28, as part of the process</p>	<ul style="list-style-type: none"> <li>• This regulation is addressed in the company's current Return to Work policy.</li> <li>• Once the most appropriate accommodations are identified, implement use of the individual documented return to work plans for non-occupational illnesses or injuries</li> </ul>	Ongoing	January 1, 2016
30	Performance Management	<p><b>30.</b> (1) An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.</p>	<ul style="list-style-type: none"> <li>• Direct Manager and Human Resources to handle on a base by case basis.</li> </ul>	Ongoing	January 1, 2016



31	Career Development & Advancement	<p><b>31.</b> (1) An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.</p>	<ul style="list-style-type: none"> <li>Employee's direct Manager and Human Resources to handle on a case-by-case basis.</li> </ul>	Ongoing	January 1, 2016
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