

Carlton Cards Limited	
POLICIES, STANDARDS AND PROCEDURES	
ISSUING DEPT: HUMAN RESOURCES	REVISION DATE: August 2014
TITLE: Accessible Customer Service Policy	APPROVAL DATE: August 2014

A. PURPOSE

This policy is intended to meet the requirements of Accessibility Standards for Customer Service, Ontario Regulation 429/07 under the Accessibility for Ontarians with Disabilities Act, 2005, and applies to the provision of goods and services to the public or other third parties.

Statement of Commitment

Carlton Cards Limited strives to provide goods and services in a manner that is accessible to all our customers, internal and external stakeholders, and third parties in a way that respects the dignity and independence of people with disabilities. We are also committed to giving persons with disabilities the same opportunity to access our goods and services and to benefit from those services, in the same place and in a similar way as other individuals.

The Company will continue adhere to the applicable provincial legislation.

B. APPLICATION:

This policy applies to all Associates that deal with customers, members of the public or other third parties on behalf of Carlton Cards Limited, including when the provision of goods and services occurs off the premises of Carlton Cards Limited.

This policy shall also apply to contingent workers, (agency contractors, third party, etc) who work in Ontario or others who provide service in Ontario regardless of where they are located, as well as volunteers and third parties who interact with the public on behalf of Carlton Cards Limited in Ontario.

This policy applies not only during standard business hours, but to any activities on or off Carlton Cards Limited premises which could reasonably be associated with the workplace.

The section of this policy that addresses the use of guide dogs and service animals only applies to the provision of goods and services that take place at premises owned/operated by Carlton Cards Limited.

This policy is only affiliated to Carlton Cards Limited and does not apply to retail stores that have Carlton Cards name associated to them. Carlton Cards retails divisions are owned and operated independent of Carlton Cards Limited.

C. DEFINITIONS:

Assistive Devices – are tools, products or types of equipment that help perform tasks and activities; an Assistive Device is any device that helps someone do something that they might not otherwise be able to do well or at all. Generally the term is used for devices that help people overcome a handicap such as a mobility, vision, mental, dexterity or hearing loss (e.g. canes, crutches, wheelchairs or hearing aids).

Disability (as per the Ontario Human Rights Code) – “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, 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,
- (b) a condition of mental impairment or a developmental disability,
- (c) 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*; (“handicap”)

Persons with Disabilities – individuals who have a disability as defined under the Ontario Human Rights Code.

Support Persons – are any person, whether a paid professional, volunteer, family member, or friend, who accompany a person with a disability in order to help with communications, personal care or medical needs, while accessing goods or services.

Service Animals – are animals individually trained to do work or perform tasks for the benefit of a person with a disability.

D. POLICY

Carlton Cards Limited is nationally respected for its ability to provide its customers with high quality products, great prices, and excellent customer service. Carlton Cards Limited supports the full inclusion of persons with disabilities as set out in applicable legislation.

Carlton Cards Limited will use reasonable efforts to ensure that its policies, programs and procedures are consistent with the following principles:

- Dignity – Goods and services are provided in a manner that respects the dignity and independence of persons with disabilities; i.e. treating them as customers who are as valued and as deserving of high quality and timely service as any other customer.
- Independence – freedom from control or influence of others, freedom to do things in one’s own way.
- Integration – Goods and services to persons with disabilities and others must be integrated with the provision to others, unless an alternative measure is necessary to allow persons with disabilities to fully benefit from the same services in the same or similar way as other individuals. The alternative measure may be temporary or permanent.
- Equal Opportunity – Persons with disabilities are provided the same opportunity to obtain, use, and benefit from Carlton Cards Limited’s goods and services.
- Communication – Communication with persons with disability are conducted in a manner that takes the person’s disability into account.

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 People with Disabilities
- B. The Use of Assistive Devices
- C. The Use of Service Animals
- D. The Use of Support Persons
- E. Notice of Service Disruptions
- F. Customer Feedback

- G. Training
- H. Document Formats and Location of Customer Service Policy

A. The Provision of Goods and Services to People with Disabilities

Carlton Cards Limited is committed to excellence in servicing all customers including people with disabilities and we will carry out our functions and responsibilities utilizing every reasonable effort to:

- Take into account individual needs when providing goods and services;
- Communicate in a manner that takes into account the customer's disability;
- Ensure that all customers receive the same value and quality of customer service experience;
- Allow customers with disabilities to do things in their own way, at their own pace when accessing goods and services as long as this does not present a safety risk; and
- Use alternative measures when possible to ensure that customers with disabilities have access to the same services, in the same place, and in a similar manner.

B. The Use of Assistive Devices

Carlton Cards Limited is committed to servicing persons with disabilities who use assistive devices to obtain, use or benefit from our goods and services. Persons with disabilities may use their own assistive devices when accessing goods and services provided by Carlton Cards Limited.

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

Carlton Cards Limited will ensure that our Associates are trained and familiar with various assistive devices that may be used by customers, internal and external stakeholders, and third parties, with disabilities while accessing our goods and services.

C. The Use of Service Animals

A customer 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 and other third parties. "No Pet" policies do not apply to guide dogs, service animals and/or service dogs.

Carlton Cards Limited will also ensure that all Associates dealing with the public or third parties are properly trained on how to interact with persons with disabilities who are accompanied by a service animal.

If there is a conflict that arises concerning a service animal on site (e.g. with another staff member who is allergic or fearful about an animal), Managers will work with the parties to find an acceptable solution. The best solution will be one that respects each individual's right to a safe, secure and accessible environment.

D. The Use of Support Persons

Carlton Cards Limited 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 will be allowed to enter Carlton Cards Limited premises open to the public or other third parties with his or her support person. At no time will a person with a disability who is accompanied by a support person to be prevented from having access to his or her support person while on our premises.

In situations where confidential information might be discussed, consent will be obtained from the customer, prior to any conversation taking place in the presence of the support person.

When support persons are required (e.g. sign language interpreters, real-time captioners, attendants) for Carlton Cards Limited sponsored meetings, consultations or events, Carlton Cards Limited will arrange to pay support persons directly for their time.

E. Notice of Service Disruptions

Carlton Cards Limited will provide individuals with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

When disruptions occur, Carlton Cards Limited will post notices in conspicuous places including at the point of disruption, at the main entrances, and at reception counter, and the nearest accessible entrance to the service disruption and/or on the Carlton Cards Limited website. Customers with scheduled appointments will be contacted; or verbally notify customers when they are making appointments, or by any other method that may be reasonable under the circumstances.

F. Training

Carlton Cards Limited will provide training to all Associates, who deal with the public, or other third parties, and all those who are involved in the development and approval of customer service policies, practices and procedures.

Training will include 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 with people with disabilities who:
 - May or may not use assistive devices
 - May or may not require the assistance of a guide dog, service dog or other services animal; or
 - May or may not require the use of a support person (including the handling of admission fees).
- Instructions on what to do if a person with a disability is having difficulty accessing our services.
- **Carlton Cards Limited's** policies, procedures and practices pertaining to the provision of customer service to customers with disabilities.

To create awareness and to ensure compliance, AODA training is mandatory and will be provided to all applicable Associates. Management is responsible for ensuring that all Associates receive the AODA training.

All new Associates are required to complete the AODA training within 45 days of being hired.

Carlton Cards Limited will keep a record of training that includes the dates training was provided and the names of the Associates who attended the training.

G. Customer Feedback

Feedback regarding the way Carlton Cards Limited provides goods and services to persons with disabilities can be made verbally (in person or by phone) or in writing via mail, email, fax.

Complaints will be addressed according to the already established processes of Carlton Cards Limited.

All feedback will be directed to the Human Resources Generalist. Feedback will be used to improve customer service where applicable.

The Human Resources Generalist will acknowledge receipt of the feedback within 5 business days and will provide a further response outlining actions taken within 10 business days. The responses will be given to the person who provided the feedback in the format requested by the customer or in the most appropriate format where no request was made by the person providing feedback.

H. Document Formats and Location of Customer Service Policy

All documents required under the Accessibility Standards for Customer Service, Ontario Regulation, 429/07 will be made available upon request to Carlton Cards Limited, Attention: Human Resources Generalist. Documents are also available in alternative formats. To make a request, the customer is asked to contact the Human Resources Generalist via an in person meeting, phone, mail, email, or fax.

The AODA policy is posted on the Employee Bulletin Board in Carlton Cards Limited Head Office and is also available for download on the Carlton Cards Limited intranet site under Human Resources > Company Policies.

Any questions about this AODA policy, the feedback process or availability of documents can be directed to:

Human Resources Generalist
Carlton Cards Limited
1820 Matheson Blvd
Mississauga, ON L4W 0B3

Telephone: 905-219-6410
Fax: 905-219-6405
Email: humanresources@carltoncards.ca

E. APPLICATION OR INTERPRETATION

Questions arising from this document should be directed to Management and the Human Resources Generalist for consultation.

The Company is committed to developing customer service policies that respect and promote dignity and independence of persons with disabilities. Therefore, no changes will be made to this policy before considering the impact on persons with disabilities.

Any policy of Carlton Cards Limited that does not respect and promote the dignity and independence of persons with disabilities will be modified or removed.

The Company reserves the right to add, delete, amend, or change any part or all of this policy at any time with or without notice.



AODA Accessibility for Ontarians with Disabilities

Multi Year Plan

Purpose

The purpose of this document is to outline the steps that Carlton Cards Limited will take to comply with Ontario's accessibility laws as well as prevent and remove barriers to anyone with a disability.

This 2014-2021 accessibility plan outlines the policies and actions that Carlton Cards Limited will put in place to improve opportunities for people with disabilities.

For the purposes of this plan, the definition of disability means:

- 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 a 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 ("handicap")

Statement of Commitment

Carlton Cards Limited is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act.

Accessible Emergency Information

Carlton Cards Limited is committed to providing the customers and clients with publicly available emergency information in an accessible way upon request. We will also provide employees with disabilities with individualized emergency response information when necessary

Training

Carlton Cards Limited will provide training to its associates, volunteers and other staff members on Ontario's accessibility laws and on the Human Rights Code as it relates to people with disabilities. Training will be provided in a way that best suits the duties of employees, volunteers and other staff members

Carlton Cards Limited will take the following steps to ensure employees are provided with the training to meet Ontario's accessible laws by **January 1, 2015**

- We will hold an All Associates Meeting for employees at Carlton Cards Limited in Mississauga to outline the laws and each associate's responsibilities to comply with said laws
- We will hold a webinar for external associates located in Ontario to outline the laws and each associate's responsibilities to comply with said laws

Information and Communication

Carlton Cards Limited is committed to meeting the communication needs of people with disabilities. We will consult with people with disabilities to determine their information and communication needs

Carlton Cards Limited will take the following steps to make all new websites and content on those sites conform to WCGA 2.0 Level A by **January 1, 2014**

- Provide captions and text alternatives for images and multimedia
- Use strong contrast between text and background
- Create content that can be presented using assistive technologies like screen readers without losing meaning
- Use structured content and make it keyboard accessible
- Avoid using time limits when asking users to provide a response or information
- Avoid blinking images
- Helps users navigate and find content
- Helps users avoid and correct mistakes
- Makes tables accessible to those persons using screen readers

Carlton Cards Limited will ensure that all of it's public websites conform to WCGA 2.0 Level AA by **January 1, 2021**

Feedback Accessibility

Carlton Cards Limited is committed to making sure that all people with disabilities have an option for providing feedback to the company as well as receiving responses in a manner that they can understand.

Carlton Cards Limited will take the following steps to ensure the feedback process is accessible to people with disabilities upon request. These steps will be in place by **January 1, 2015**

- Ensure that there are multiple methods by which a person can communicate with the company
 - Web site access (Links to access feedback mechanisms)
 - Email
 - Written letters (address of company provided)
 - Telephone availability (customer service lines available)
 - Fax

Accessibility to Publicly available information

Carlton Cards Limited will to make sure that all publicly available information is made accessible upon request

- All publicly available information shall contain a statement that an accessible alternative will be made available upon request
- The company shall consult with people with disabilities to ensure that the methods chosen are appropriate
- Information will be provided in a timely manner in a format that can be used by the requester

Employment

Carlton Cards Limited is an equal opportunity employer. As such, all persons with disabilities are encouraged to apply for employment with the company. The company will ensure all job postings are communicated in a method allowing persons with disabilities to understand the application process. Assistance will be provided to any person who requires assistance in applying for a position within Carlton Cards Limited.

During the recruitment and hiring process, Carlton Cards will make every effort to remove barriers to persons with disabilities including alternative methods application such as telephone, email and written applications.

Accommodation Plans

Carlton Cards Limited is committed to developing individual accommodation plans and return to work policies for employees that have been absent due to a disability.

The company will work in consultation with the employee to ensure that barriers to completing their job successfully are removed including:

- Use alternative methods when possible to ensure that employees with disabilities have full access to company services
- Accommodate the needs of any employee that requires the use of an assistive device
- Accommodate the needs of any employee that requires the use of a service animal
- Accommodate the needs of any employee that requires the assistance of a support person
- Provide employees with disabilities advance notice of service interruptions that may impact their ability to do their jobs. The company will make every effort to assist the employee during the interruption period
- The company will provide training for other associates to help them understand the needs of the employee with a disability

Public Spaces

Carlton Cards Limited will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces. Public spaces include:

- Outdoor public eating areas
- Outdoor paths of travel such as sidewalks, ramps or stairs
- Accessible off street parking

In the event of a service disruption in a public space, Carlton Cards Limited will make every effort to inform persons with disabilities of the disruption and will make alternative plans during the disruption

Timeline

Website WCGA 2.0
Level A Compliant

Website WCGA 2.0
Level AA Compliant

2014

2015

2021

Employee Training

Feedback available via:
Web site access
Email
Written letters
Telephone availability Fax

Contact Information

For further information or clarification please contact:

Human Resources Generalist
Carlton Cards Limited
1820 Matheson Boulevard
Mississauga, Ontario
L4W 0B3
Phone: 905-219-6410
Fax: 905-219-6405
Email: humanresources@carltoncards.ca