

## ACCESSIBILITY POLICY (AODA)

Lubecore International is committed to upholding and exceeding Ontario's legislation intended to remove barriers to accessibility for persons with disabilities. This includes providing equal access to employment, information, goods, and services, and treating persons with disabilities with dignity and respect in a way that takes their disability into account.

### DEFINITIONS

Definitions taken from the *Accessibility for Ontarians with Disabilities Act, S.O. 2005, C. 11* or *Ontario Human Rights Code*.

"Accessible formats" may include, but are not limited to, large print, recorded audio and electronic formats, braille, and other formats usable by persons with disabilities.

"Barrier" means anything that prevents a person with a disability from fully participating in all aspects of society because of their disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy, or a practice; ("obstacle").

"Disability" is defined broadly by the *Ontario Human Rights Code* as:

1. "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 coordination, 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,
2. a condition of mental impairment or a developmental disability,
3. a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
4. a mental disorder, or
5. an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*."

### POLICY

Lubecore International will make every reasonable effort to meet the requirements of the *Accessibility for Ontarians with Disabilities Act (AODA), 2005*, including all applicable elements of the *Integrated Accessibility Standards*.

1. Information and Communication
2. Employment
3. Customer Service
4. Design of Public Spaces (as applicable)
5. Transportation (as applicable)

Lubecore International will provide training to all employees, volunteers, and independent contractors to ensure they are familiar with our policies, practices, and procedures for communicating with and providing services to persons with disabilities.

### **Information and Communication**

Lubecore International will make its information accessible to people with disabilities by creating materials and supports in accessible formats, and it will notify the public of the types of accessible formats provided.

Further, Lubecore International will deliver alternate formats of information to clients, upon request. If a particular material cannot be converted into an accessible format that meets the needs of the person requesting it, Lubecore International will provide details of why it cannot be converted and provide a summary of the information or communication in another way that is suitable to the person requesting it.

This extends to any emergency procedures or safety information prepared by Lubecore International.

### **Employment**

Lubecore International welcomes and encourages employment applications from people with disabilities and will do its part to make hiring and employee support practices more accessible by providing accommodation during all stages of recruitment, hiring, and employment.

If a job applicant requests accommodation, Lubecore International will consult with the applicant and provide suitable accommodation that takes the person's accessibility needs into account.

When making offers of employment, Lubecore International will notify the successful applicant of its policies for accommodating employees with disabilities.

New employees will be reminded about the organization's job accommodation policies as soon as possible upon being hired and notified when any future changes are made to policies. Policy and practice information will include available employment accommodations that will be provided for job related matters such as performance management, career development, emergency response plans, and return to work information.

Lubecore International will consult with an employee who requests it, to provide or arrange for the provision of accessible formats and communication supports that take the employee's needs into account when providing information that is needed to perform the employee's job, and information that is generally available to employees in the workplace.

### **Customer Service**

Lubecore International will provide customer service in a manner that removes barriers for people with disabilities according to the following key principles of the AODA:

- Goods and services will be provided in a manner that respects the dignity and independence of persons with disabilities.

- Service to people with disabilities will be integrated with others, unless an alternate way of providing the goods, service or facility is required by the person with the disability.
- Persons with disabilities will be given equal opportunity to use and benefit from the goods, services, or facilities an organization or business has to offer.
- We will communicate with people with disabilities in a way that takes the individual's disability into account.

#### Assistive Devices, and Service Animals, Service Dogs or Guide Dogs

Persons with disabilities who use an assistive device will be permitted to use their own device to access the goods and services of Lubecore International.

If a person with a disability is accompanied by a guide dog or other service animal, Lubecore International shall ensure that the person is permitted to enter the premises with the animal and to keep the animal with them, unless the animal is otherwise excluded by law from the premises.

#### Support Workers

If a person with a disability is accompanied by a support person, Lubecore International will ensure that both persons are permitted to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the premises.

Lubecore International will ensure that notice is given in advance if admission fees will be charged to support workers for accessing the goods or services in their role as support person, including how much the fee will be.

#### Service Interruptions

If there is a temporary disruption in any of our services either in whole or in part, Lubecore International will provide notice of the disruption to the public via as many channels as possible, in accessible formats, where available. We will physically post notices where the disruption is taking place as well as through any other channels that are appropriate such as email, phone, text, social media, or on our website.

Notice of the disruption will include the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available.

#### Process for Receiving Feedback

Lubecore International will accept feedback about the way in which it provides goods and services to persons with disabilities in person, by phone or email, or in another way that is suitable to a person with a disability.

When a complaint is received about the way we provide goods, services, or facilities to persons with disabilities, Lubecore International will let the person who submitted the feedback know about the actions the organization will take to resolve the issue.

At Lubecore International, the person designated to accept feedback is Bridget Kelly at [bkelly@lubecore.com](mailto:bkelly@lubecore.com).

**Transportation**

Lubecore International provides conventional and/or specialized commercial transportation services to passengers and will adhere to the Transportation Standard.

**Design of Public Spaces**

If Lubecore International redesigns or redevelops an outdoor public space such as a parking area, outdoor eating area or play space, exterior path of travel, recreational trail or beach access route, or an indoor or outdoor service counter, waiting area or queuing line, it will do so in accordance the Design of Public Spaces Standard of the AODA. Lubecore International will also ensure any newly redesigned or redeveloped areas are maintained in accordance with the rules set out by the AODA.