

ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE POLICY	
Procedure No. HR-3.0-A	Rev: Rev. Date:
Release Date: November 1, 2023	Review Date: November 2023
Approved By:	
ES	SC
PRESIDENT	CHIEF FINANCIAL OFFICER

### 1.0 Purpose

The purpose of this policy is to develop, implement, and enforce accessibility standards in order to achieve accessibility for persons with disabilities with respect to goods and services.

### 2.0 Scope

This policy has been developed in accordance with the Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11 and the Ontario Regulation, O. Reg. 191/11: INTEGRATED ACCESSIBILITY STANDARDS.

All legislated changes impacting this policy will be reflected in Whitehots Inc. (the “Company”) policy through updates, on an ongoing basis. The policy will be reviewed annually in accordance with applicable legislation. No changes will be made to this policy before considering the impact on people with disabilities.

This policy applies to all employees and any other member of the Company.

#### Our Commitment

The Company strives to provide our goods and services in a respectful and accessible manner to all customers, including persons with disabilities. Persons with disabilities will benefit from the same services, in the same place, in a similar way, as other customers. It is the commitment of the Company to provide equitable treatment, with respect to providing our goods and services without discrimination in accordance with the provisions of the Ontario *Human Rights Code*.

When providing our goods and services to a person with a disability, we are committed to the following four core principles:

- **Dignity** – Service is provided in a way that allows the person with a disability to maintain self-respect and the respect of other people. People with disabilities are not treated as an afterthought or forced to accept lesser service, quality, or convenience.
- **Independence** – Allowing a person with a disability to do things on their own without unnecessary help, or interference from others.
- **Integration** – Service is provided in a way that allows the person with a disability to benefit from the same services, in the same place, and in the same or similar way as

ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE POLICY		REVISION:
PROCEDURE #HR-3.0-A	DATE: November 1, 2023	PAGE 1 of 6

other customers, unless an alternate measure is necessary to enable the person to access goods or services.

- **Equal Opportunity** – People with disabilities have an opportunity equal to that given to others to access our goods and services.

### 3.0 Responsibilities

#### 3.1 The President and the CFO are responsible to:

- Be knowledgeable of all related legislation
- Provide training to all employees and other members of the organization
- Establish a process for individuals to provide feedback on how goods or services are provided to people with disabilities and outline how the Company will respond and take action. This feedback process must be accessible, and the Company will provide or arrange accessible formats and communication supports, upon request
- Ensure policies, practices, and procedures are consistent with core principles of the standard

#### 3.2 Employees and other members of the Company are responsible for and must do the following:

- Comply with this policy
- Attend training

### 4.0 Definitions

#### 4.1 Disability (as per the Ontario Human Rights Code)

- 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”)

#### 4.2 Customers

People who receive goods or services from the Company.

#### 4.3 Persons with Disabilities

Individuals who have a disability as defined under the *Ontario Human Rights Code*.

<b>ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE POLICY</b>		<b>REVISION:</b>
<b>PROCEDURE #HR-3.0-A</b>	<b>DATE: November 1, 2023</b>	<b>PAGE 2 of 6</b>

#### 4.4 Barrier

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 practice.

#### 4.5 Accessibility

Accessibility is the degree to which a product, device, service, environment, or facility is usable by as many people as possible, including persons with disabilities.

#### 4.6 Goods and Services

The goods and services provided by the Company.

#### 4.7 Assistive Devices

A device used to assist a person with a disability in carrying out activities or in accessing the services of persons or organizations covered by the customer service standard. (i.e., canes, hearing aids, wheelchairs, etc.)

#### 4.8 Service Animals

A service animal is an animal for a person with a disability:

- If it is readily apparent that the animal is used by the person for reasons relating to their disability; or
- If the person provides a letter from a physician or nurse, or a regulated health professional (including psychologists, psychotherapists, audiologists, chiropractors, and optometrists) confirming that the person requires the animal for reasons relating to the disability

### 5.0 **Procedures**

#### **Communication**

5.1 We will communicate with people with disabilities, to the best of our ability, in ways that take into account their disability and offer communication methods that are suitable to their communication needs (i.e., email, telephone, or in-person, etc.).

5.2 If a person with a disability requiring a wheelchair enters our premises and they require assistance, an employee is required to come out to greet them. If an extended visit is required, suitable meeting accommodation will be arranged and the employee scheduling the meeting is required to take into consideration the person's disability when making these arrangements.

5.3 Information provided on our company website and promotional marketing materials will be offered in alternative formats, upon request, (i.e., small print vs. large print, offering an in-person meeting to review and read materials or website information if requested, etc.).

<b>ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE POLICY</b>		<b>REVISION:</b>
<b>PROCEDURE #HR-3.0-A</b>	<b>DATE: November 1, 2023</b>	<b>PAGE 3 of 6</b>

5.4 All employees will be educated and trained on how to address and communicate effectively and appropriately with customers with disabilities.

**Use of Guide Dogs and Service Animals**

5.5 We are committed to welcoming persons with disabilities accompanied by their guide dog or service animal in those areas of the company premises that are open to the public and other third parties, unless the animal is otherwise excluded by another law. If a service animal is excluded by law, we will use other measures to provide services to the person with a disability.

5.6 The Company is permitted to ask for proof that the animal is a service animal. The person with a disability is required to provide a letter from a physician or nurse, or a regulated health professional (including psychologists, psychotherapists, audiologists, speech pathologists, chiropractors, occupational therapists, optometrists, registered psychotherapists, and mental health therapists) confirming that the person requires the animal for reasons relating to the disability.

All employees and other members of the organization will be trained on the different types of service animals, as well as how to properly interact with those using service animals.

**Support Persons**

5.7 We are committed to welcoming persons with disabilities who are accompanied by a support person. A person with a disability who is accompanied by a support person will be allowed to have that person accompany them in those areas of the company premises that are open to the public and other third parties.

In certain cases, the Company may require a person with a disability to be accompanied by a support person for health and safety reasons. Before making this decision, the Company will:

- *Consult with the person with a disability to understand their needs*
- *Consider health or safety reasons based on available evidence*
- *Determine if there is no other reasonable way to protect the health or safety of the person or others on the premises*

In such a situation, admission fees or fares (if applicable) will be waived for the support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to their support person while on our premises.

**Assistive Devices**

5.8 We are committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our goods and services. We will ensure employees and other members of the organization are trained on and familiar with various assistive devices that may be used by customers with disabilities while accessing our goods and services.

<b>ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE POLICY</b>		<b>REVISION:</b>
<b>PROCEDURE #HR-3.0-A</b>	<b>DATE: November 1, 2023</b>	<b>PAGE 4 of 6</b>

- 5.8.1 Persons with disabilities shall be permitted to obtain, use, or benefit from our goods and services through the use of their assistive devices.
- 5.8.2 It is the responsibility of the person with a disability to ensure that their own assistive device is operated in a safe manner at all times.
- 5.8.3 All employees and other members of the organization will be trained as required about assistive devices and the Company will maintain accurate records of training delivered. These records will be made available upon inspection as may be required.

**Notice of Temporary Disruption to Facilities or Services**

5.9 We will provide notice when facilities or services that people with disabilities rely on to access or use goods or services are temporarily disrupted. The notice will be placed in a conspicuous place in areas open to the public or third parties. The notice will include the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

**Feedback Process**

5.10 People with disabilities who wish to provide feedback on the way the Company provides accessibility to our premises and/or general communication are encouraged to do so. Comments and feedback can be submitted:

- By email to Sharon Culver, Chief Financial Officer at [sculver@whitehots.com](mailto:sculver@whitehots.com)
- By phone to Sharon Culver, Chief Financial Officer at 1-800-567-9188
- By using the Feedback Form found on our website at:  
<https://www.whitehots.com/whitehots-accessibility>

5.11 The Chief Financial Officer will ensure that our feedback process is accessible by providing or arranging for accessible formats and communication supports, if requested. All feedback, including complaints, will be handled by the Chief Financial Officer and will respond back within one week of receiving the feedback.

**Training**

5.12 Upon hire, the Company will provide training to all employees on providing accessible customer service and how to interact with people with various types of disabilities. Employees will complete refresher training every two (2) years. The Company will maintain accurate records of training delivered. These records will be made available upon inspection as may be required.

**6.0 Communication**

This policy standard will be communicated as follows:

- *During new hire orientation*
- *In the Employee Handbook*

<b>ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE POLICY</b>		<b>REVISION:</b>
<b>PROCEDURE #HR-3.0-A</b>	<b>DATE: November 1, 2023</b>	<b>PAGE 5 of 6</b>

**7.0 References, Associated Documents, and Forms**

HRF-11.0 Customer Feedback Form

Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11

O. Reg. 191/11: INTEGRATED ACCESSIBILITY STANDARDS

<b>ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE POLICY</b>		<b>REVISION:</b>
<b>PROCEDURE #HR-3.0-A</b>	<b>DATE: November 1, 2023</b>	<b>PAGE 6 of 6</b>