

1. Accessibility Policy

Policy Statement

Cober is committed to identifying and removing barriers that impede the ability of people with disabilities to access our services. The Company is committed to improving accessibility in our workplace and in serving all our customers including persons with disabilities with the same dignity, inclusion and level of accessibility.

In June, 2005 the Ontario government passed the *Accessibility for Ontarians with Disabilities Act* (AODA). The purpose of the Act is to develop, implement and enforce standards of Accessibility for all Ontarians. Cober Policy is consistent with the AODA, and the Accessibility Standards for Customer Service, Ontario Regulation 429/07.

Purpose

The purpose of this policy is to outline practices and procedures that will be in place to help identify and remove barriers that prohibit the same level of accessibility for all people. At Cober we will provide a respectful, welcoming, accessible and inclusive environment in the provision of services for both clients and employees alike.

Accountabilities

The Company and the Senior Management Team are accountable for:

- The governance of the policy.
- Corporate liability for compliance with legislative requirements.
- Informing all staff of the policy, internal procedures and enhancing a high level of understanding regarding disability and accommodation.
- Training staff who deal with the public on accessibility laws and how to administer their duties to ensure they support and help people with disabilities who access our environment for service.
- Participate and facilitate workplace accommodation.

Employees are accountable for:

- Participating and cooperating with all parties to facilitate workplace accommodation.
- Employees dealing with the public will provide dignified assistance and support to people with disabilities accessing our services or premises. They will follow the procedures outlined in this policy and reinforced in their training.

Definitions

DISABILITY: According to the Ontario Human Rights Code.

Any Degree of physical disability, infirmity, malformation or disfigurement including, but not limited to:

- Diabetes mellitus
- Epilepsy
- Brain injury
- Any degree of paralysis
- Amputation
- Lack of physical coordination
- Blindness or visual impediment
- Deafness or hearing impairment
- Muteness or speech impediment
- Physical reliance of a guide dog or other animal, or on a wheelchair or other remedial appliance or device.



- a) A condition of mental impairment or a developmental disability.
- b) A learning disability or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language
- c) A mental disorder.
- d) An injury or disability for which benefits were claimed or received under the insurance or WSIB Act, 1997.

The definition includes disabilities of different severity, visible as well as non-visible disability, and disabilities the effects of which may come and go.

BARRIER: Anything that prevents a person with a disability from fully participating in all aspects of society because of their disability. Barrier can be physical, architectural, informational or communication barrier, attitudinal barrier, a policy, practice or procedure barrier.

GUIDE DOG/SERVICE ANIMAL: A service dog that is trained at a special facility to provide mobility, safety and increased independence for people who are blind or hearing alert animals used by people who are hearing impaired.

PERSONAL ASSISTIVE DEVICES: Personal supports used by persons with disabilities that enable them to carry out the activities of daily living and allow access to services. (ie. Wheelchair, scooter, braces).

SUPPORT PERSON: Accompanies a person with a disability in order to help with communication, mobility, personal care or medical needs. A support person may be a paid professional, a volunteer, family member or friend of the person with a disability.

Policy Practices and Procedures

Establishment of accessibility policies and plans

Cober will create, implement and maintain policies that include an accessibility plan that will be achieved by the Company. This document includes a disability plan to prevent and remove barriers and building strategies to make Cober accessible to our employees and clients.

Training

Standards for Customer Service Training will be provided to employees who deal with the public.

RECEPTION/ CLIENT SERVICES/SALES STAFF: The Company will train our service employees on the requirements of the Act, how to communicate and interact with people with disabilities, how to interact with service animals or a support person. How to address any accessibility concerns regarding our practices and procedures pertaining to providing accessible customer service to people with disabilities.

Accessibility Awareness Training will be provided to all employees.

ALL EMPLOYEES: Will receive a copy of this policy to review to gain a better understanding of accessibility and the company procedures when requesting personal accommodation and when dealing with a client with disabilities. Employees are encouraged to help the company promote a respectful, welcoming, accessible, and inclusive environment for everyone.

Information and Communications

The Company is committed to meeting the communication needs of people with disabilities. When requested, we will provide information and communication material in accessible formats or with communication supports for our staff and our clients. This includes publicly available information about our goods, services and facilities as well as building emergency information. The company will consult with people with disabilities to determine their information and communication needs. Accessible formats will be developed in-house and will be provided to clients/employees within a reasonable timeframe.

Website – Cober's website will be reviewed and will meet the web content accessibility guidelines to ensure it is accessible for all users.

Built Work Environment

The Company will conduct a review of the work facilities and will identify any barriers and seek recommendations on how to improve building accessibility for our client's and staff. We will examine access to, from and within the building and outdoor spaces. The review will also include table/counter heights, aisle and door widths, parking and general signage, and pedestrian access.

Report Filing

Cober will review its policies and procedures annually and will file accessibility reports under Section 14 of the Act with respect to the accessibility standards in the AODA.

Accessible Employment

Commitment

Diversity, inclusion and respecting the uniqueness of all people are values that are embraced in all aspects of Cober's culture. We are committed to improving accessibility in our workplace and in serving all our customers including people with disabilities with the same dignity, inclusion and level of accessibility.

Recruitment and Selection Process

The Company will notify job applicants when they are individually selected that they may participate in a selection process where accommodations are available upon request.

If accommodations are requested, the Company will consult with the applicant to make appropriate arrangements.

Communications and Accessible Formats

Employees will be informed of policies to support employees with disabilities, including the provisions of job accommodation.

When an employee requests an accessible format Cober Human Resources will arrange for the provision of any material that is needed to perform the employee's job or information that is generally available in the workplace

Workplace Emergency Response Information

Cober will develop information regarding evacuation procedures and building alarms to provide to employees and visitors. Alternative formats or assistance with procedures will be provided upon request.

Accommodation Plans and Return to Work Process

The Company will document any individual accommodation plan provided to an employee in a format that takes into account any accessibility needs. The plan will include any reasonable accommodation required for an employee to function in the workplace.

Return to work Process – The Company will participate in a return to work process for employees who have been absent from work due to a disability. The process will take into account any reasonable accommodation required to assist the employee in successfully returning to resume work duties. The insurance provider or WSIB may be consulted to assist with accommodation plans as part of the return to work process.

Performance Management

The Company will take into account the accessibility needs of any employees with disabilities when assessing job performance. Employees will be treated in an equitable manner and will be given the same opportunity to progress in the Company based on individual goals and achievement.

Accessible Client Service Plan

2. Client Service Policy, Practice and Procedures

The provision of Goods and Services to Persons with Disabilities

Company Commitment

Cober is committed to providing a respectful, welcoming and accessible environment in the provision of goods and services for both clients and employees alike.

People with disabilities will be given an equal opportunity to obtain, use and benefit from our products and services in a way that is respectful of dignity and independence. The Company is committed to becoming a barrier free environment and adhering to existing legislation and our own policies related to identifying, removing and preventing barriers for people with disabilities.

Client Service Principles

Dignity

The principle of respecting the dignity of a person with a disability means treating them as clients who are valued and as deserving of high quality and timely services as any other client. The delivery of our Company services must take into account how persons with disabilities can effectively access and use them.

Independence

Allowing people to do things on their own. Staff must allow persons with disabilities to take the time they need, without rushing them or taking over a task unnecessarily.

Integration

Company services must be integrated to allow persons with disabilities to fully benefit from the same services, in the same place and in the same or similar way as other clients. Practices and procedures are designed to be accessible to everyone.

Equal Opportunity

Our Company will provide the same opportunities and level of service for all people including persons with disabilities.

Client Services Procedures

Cober employees will be encouraged to be pro-active in seeking solutions and removing barriers for our clients to access our services,

Communication

The term “**persons with disabilities**” will be the norm in our work environment and if a specific condition must be referenced, the person's condition will be referenced last. (eg. Person with low vision, Person with mobility disability)

When referencing places on the premises or accommodations for people use the term **"accessible"** rather than "disabled" or "handicapped". Examples Accessible parking space, building entrance or washrooms.

Always remember to put people first. It is proper to say person with disability, rather than "disabled person" or "the disabled".

It is best to wait until individuals describe their situation to you rather than make assumptions. Many disabilities have similar characteristics and your assumptions may be wrong.

Assistive Devices

Persons with disabilities may use their own assistive devices as required when accessing the services provided by Cober.

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 access of services.

Service Animals

The Company welcomes people with disabilities and their service animals. Service animals are allowed in all of the office areas and on the safe walkway in the plant area. Service animals will not be allowed in the work areas within the plant for safety reasons. The client accompanied by the service animal is responsible for maintaining care and control of the animal at all times. Employees will be prepared to respond to requests for water for the service animal or to show the owner an outdoor area where the animal can be taken to relieve itself.

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.

Online Accessibility

In addition to accessibility priorities at our facilities, Cober Printing Limited will make every effort to uphold AODA requirements for its online components. This includes any publicly accessible websites or online materials that persons with a disability should have equal access to. Cober Printing Limited currently complies with all relevant legislation and has fully accessible content in all online materials and will continue to work to improve accessibility for all.

Training

Training will be provided to all employees who deal with the public; revised training will be provided in the event of changes to the policy. The Company will keep a record of employees who are trained in Human Resources.

The training will include information on the purpose of the AODA act, requirements of this regulation, how to communicate and interact with people with disabilities, how to interact with service animals or support person, what to do if a person has difficulty accessing Cober's services or facilities.

Emergency and Client Safety Information

Cober will develop information regarding evacuation procedures and building alarms to provide to guests and employees. Alternative formats will be provided upon request.

Notice of Disruptions in Service

In the event of a temporary disruption to our facilities or service that clients with disabilities rely on to access or use, reasonable efforts will be made to provide advanced notice.

Feedback

Our clients will be informed about our feedback process and how action will be taken if a complaint is received. A designated representative of the Company will acknowledge verbal/written (emailed)/ telephone feedback within two business days. Feedback forms will be available on the Company website and at the front reception upon request.

Client's can submit feedback to:

hr@cobersolutions.com or (519) 745-7136

Modification to this or other policies

Any policy, practice or procedure of Cober that does not respect and promote the principles of dignity, independence, integration and equal opportunity for people with disabilities will be modified or removed.

Questions

Any questions or concerns regarding these policies can be directed to Human Resources.

Policy Review

This policy will be reviewed by the Cober HR team annually and include any necessary updates or amendments.