

# Accessibility for Ontarians with Disabilities Act – Integrated Accessibility & Customer Service Standard

## 1.0 Purpose

In fulfilling our mission, Media6 IMG is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence.

We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and by meeting our accessibility requirements under Ontario’s accessibility laws.

The purpose of this standard is intended to meet current legislative requirements in order to achieve accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures, and premises on or before January 1, 2025.

## 2.0 Scope

Media6 IMG is committed to treating all people in a way that allows them to maintain their dignity and independence. Media6 IMG believes in integration and equal opportunity. Media6 IMG is committed to meeting the needs of persons 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.

This standard governs the provision of goods and services by Media6 IMG at all owned and operated facilities, as well as the provision of Media6 IMG goods and services off the premises by employees, volunteers, agents and/or contractors who act on behalf or represent Media6 IMG.

Media6 IMG will provide, on request, information in an accessible format or with communication supports to people with disabilities, in a manner that takes into account their disability.

This standard shall be implemented in accordance with the time frames established by the Regulation.

## 3.0 Legislation

1. Accessibility for Ontarians with Disabilities Act, 2005
2. O. Reg. 191/11: INTEGRATED ACCESSIBILITY STANDARDS
3. O. Reg. 429/07: ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE
4. Human Rights Code, R.S.O. 1990

## 4.0 Definitions

**Assistive Device:** Means devices used to assist persons with disabilities in carrying out activities or in accessing the services of persons or organizations. Assistive devices include but are not limited to, wheelchairs, reading machines, recording machines, hearing devices, and devices for grasping.

**Dignity:** Means treating people with disabilities as customers and clients who are as valued and as deserving of effective and full service as any other customer and/or client.

**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.
- 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.

**Independence:** Means freedom from control or influence of others, freedom to make your own choices.

**Service Animal:** An animal is a service animal for a person with a disability:

- a) If it is readily apparent that the animal is used by the person for reasons relating to his or her disability.
- b) If the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

**Support Person:** Means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, or medical needs or with access to goods or services.

**Third Party:** Means any person who works for or acts on behalf of another business, organization or the government including, without limitation, consultants, contractors, suppliers, and providers of other business and professional services.

## 5.0 Integrated Accessibility Standard

### 5.1 Multi-Year Accessibility Plan

Media6 IMG shall develop, maintain, and document a multi-year accessibility plan outlining the company's strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities.

The Multi Year Accessibility Plan shall be reviewed and updated at least once every five years, and shall be posted on the company's website. Upon request, Media6 IMG shall provide a copy of the Accessibility Plan in an accessible format.

## 5.2 Self-Service Kiosks

Media6 IMG shall consider accessibility when designing, procuring or acquiring our self-serve kiosks to better serve persons with disabilities.

## 5.3 Training Employees & Volunteers

Media6 IMG shall ensure that training is provided on the requirements of the accessibility referred to in the Regulation and continue to provide training on the Human Rights Code as it pertains to persons with disabilities, to:

- all its employees and volunteers;
- all persons who participate in developing Media6 IMG's policies; and,
- all other persons who provide goods, services or facilities on behalf of the company.

The training shall be appropriate to the duties of the employees, volunteers and other persons. Employees shall be trained when changes are made to the accessibility policy. New employees should be trained within three months of their first day. Media6 IMG shall keep a record of the training it provides.

## 5.4 Modifications to This Standard or Other Policies

Media6 IMG is committed to developing customer service policies that respect and promote the dignity and independence of people with disabilities. Therefore, no changes shall be made to this standard or other governing policy without considering the impact on people with disabilities.

Any policy of Media6 IMG that does not respect and promote the dignity and independence of people with disabilities shall be modified or removed in accordance with Media6 IMG's governance review process.

## 5.5 Information & Communications Standards

### 5.5.1 Feedback

Media6 IMG shall continue to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communications supports, upon request. As well feedback regarding Media6 IMG's provision of services to people with disabilities may be made:

1. In person directly at the time service is provided
2. By visiting <https://www.imgmfg.com/company/accessibility>
3. By emailing [alert@interiormanufacturinggroup.com](mailto:alert@interiormanufacturinggroup.com)
4. By telephoning (905)-278-9510 or toll free at 1-866-276-6820
5. In writing to Media6 IMG, Health & Safety Department, 974 Lakeshore Road E. Mississauga, Ontario L5E 1E4

All feedback should be directed to the Health & Safety and/or Human Resources Department(s). Members of the public and other Third Parties may expect a response to their feedback within ten business days.

### 5.5.2 Accessible Formats & Communication Supports

Upon request, Media6 IMG shall provide, or shall arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability.

Media6 IMG shall consult with the person making the request in determining the suitability of an accessible format or communication support.

Media6 IMG shall also notify the public about the availability of accessible formats and communication supports.

### 5.5.3 Accessible Websites & Web Content

Media6 IMG shall ensure that our Internet websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA except where this is impracticable.

## 5.6 Employment Standards

### 5.6.1 Recruitment

Media6 IMG shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

### 5.6.2 Recruitment, Assessment or Selection Process

Media6 IMG shall notify job applicants, when they are individually selected to participate further in an assessment or selection process that accommodation is available upon request in relation to the materials or processes to be used.

If a selected applicant requests an accommodation, Media6 IMG will consult with the applicant and provide, or arrange for the provision of, a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

### 5.6.3 Notice to Successful Applicants

When making offers of employment, Media6 IMG shall notify the successful applicant of its policies for accommodating employees with disabilities.

### 5.6.4 Informing Employees of Supports

Media6 IMG shall 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.

This information should be provided to new employees as soon as practicable after commencing employment but up to a maximum of three months of their first day.

### 5.6.5 Accessible Formats & Communication Supports for Employees

Upon the request of an employee with a disability, Media6 IMG shall consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his/her job, and information that is generally available to other employees.

In determining the suitability of an accessible format or communication support, Media6 IMG shall consult with the employee making the request.

#### 5.6.6 Workplace Emergency Response Information

Media6 IMG will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if Media6 IMG is aware of the need for accommodation due to the employee's disability. Media6 IMG shall provide this information as soon as practicable after becoming aware of the need for accommodation.

Where the employee requires assistance, Media6 IMG shall, with the consent of the employee, provide the workplace emergency response information to the person designated by Media6 IMG to provide assistance to the employee.

Media6 IMG shall review the individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodations needs or plans are reviewed.

#### 5.6.7 Documented Individual Accommodation Plans

Media6 IMG shall maintain a written process for the development of documented individual accommodation plans for employees with disabilities.

If requested, information regarding accessible formats and communications supports provided shall also be included in individual accommodation plans.

In addition, the plans shall include individualized workplace emergency response information (where required), and shall identify any other accommodation that is to be provided.

#### 5.6.8 Return to Work Process

Media6 IMG maintains a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

The return to work process outlines the steps Media6 IMG shall take to facilitate the return to work and shall include documented individual accommodation plans as part of the process.

This return to work process shall not replace or override any other return to work process created by or under any other statute.

#### 5.6.9 Performance Management, Career Development, Advancement & Redeployment

Media6 IMG shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.

## 6.0 Customer Service Standards for Persons with Disabilities

Media6 IMG is committed to providing its services in a way that respects the dignity and independence of people with disabilities. Media6 IMG is also committed to giving people with disabilities the same opportunity to access its services and allowing them to benefit from the same services, in the same

place, and in a similar way as other members of the public and Third Parties unless an alternate measure is necessary. Our accessible customer service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

## 6.1 Providing Services to People with Disabilities

Media6 IMG is committed to serving all members of the public and Third Parties including people with disabilities and shall carry out its functions and responsibilities in the following areas:

### 6.1.1 Communication

Media6 IMG shall communicate with people with disabilities in ways that take into account their disability.

Media6 IMG shall provide training on how to interact and communicate with people with various types of disabilities to all employees who deal with the public or other Third Parties on Media6 IMG's behalf, and all those who are involved in the development and approvals of policies, practices, and procedures on providing services to members of the public and other Third Parties.

### 6.1.2 Telephone Services

Media6 IMG is committed to providing fully accessible telephone service to members of the public and other Third Parties. Media6 IMG shall train staff to communicate with members of the public and other Third Parties over the telephone in clear and plain language and to speak clearly and slowly.

Media6 IMG shall offer to communicate with members of the public and other Third Parties by alternate means if telephone communication is not suitable to their communication needs or is not available.

### 6.1.3 Assistive Devices

Media6 IMG is committed to serving people with disabilities who use assistive devices to obtain, use, or benefit from its services. Media6 IMG shall ensure that their staff are trained and familiar with various assistive devices that may be used by members of the public or other Third Parties with disabilities while accessing Media6 IMG's services. People with disabilities may use their personal assistive devices when accessing our goods, services or facilities.

### 6.1.4 Use of Service Animals & Support Persons

Media6 IMG is committed to welcoming people with disabilities who are accompanied by a service animal on the parts of its premises where Media6 IMG provides services that are open to the public and other Third Parties unless the animal is otherwise excluded by law from the premises. Media6 IMG shall also ensure that all staff and others dealing with the public are properly trained in how to interact with people with disabilities who are accompanied by a service animal.

Media6 IMG is committed to welcoming people with disabilities who are accompanied by a support person on the parts of its premises where Media6 IMG provides services that are open to the public and other Third Parties. Any person with a disability who is accompanied by a support person shall be allowed to enter Media6 IMG's premises where Media6 IMG provides services that are open to the public and other Third Parties with his or her support person unless the person is otherwise excluded by law from the premises.

### 6.1.5 Billing

Media6 IMG is committed to providing accessible invoices to customers. Customers requiring invoices in an alternate format should communicate this requirement to Media6 IMG together with the different format options accessible to them. Media6 IMG shall then provide this customer with the invoices in the agreed upon alternate format.

### 6.1.6 Notice of Temporary Disruption

Media6 IMG shall provide members of the public and other Third Parties with notice of a planned or unexpected disruption in Media6 IMG facilities or customer services used by people with disabilities. This notice shall include information about the reason for the disruption, the anticipated duration, and a description of alternative facilities or services, if available.

The notice shall be placed at all public entrances and service counters on Media6 IMG's premises that are accessible to the public and other Third Parties as well as on Media6 IMG's website.

## 6.2 Training for Staff Related to Customer Service Standard

Media6 IMG shall provide training to all employees and volunteers, and others who deal with the public or other Third Parties on Media6 IMG's behalf, and all those who are involved in the development and approvals of policies, practices, and procedures on providing services to members of the public and other Third Parties.

This training should be provided within three months after staff commence their duties.

Training shall include the following:

- a) The purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard regulations.
- b) How to interact and communicate with people with various types of disabilities.
- c) How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person.
- d) How to use the equipment or devices available on-site or otherwise that may help with providing goods, services or facilities to people with disabilities.
- e) What to do if a person with a disability is having difficulty in accessing Media6 IMG's services.
- f) Media6 IMG's governance relating to the accessibility standards for customer service.

Staff should be trained on governance that affects the way services are provided to people with disabilities. Staff shall also be trained on an ongoing basis when changes are made to this governance.

## 7.0 Roles & Responsibilities

### 7.1 Senior Management

Senior Management is responsible for:

- Taking all reasonable care to prevent Media6 IMG from contravening AODA legislation.
- Demonstrating commitment by showing an active interest in and recognizing the workplace accommodation efforts of employees and managers.

## 7.2 Managers & Supervisors

Managers and supervisors are responsible for:

- Ensuring those employees who identify a disability are accommodated reasonably as outlined in this standard and or any other governing documents.
- Fostering an environment where all workplace parties are supportive of accommodation efforts.
- Conducting all aspects of the accommodation process in such a way that dignity is preserved and business needs are met.
- Completing the initial training on the AODA and any updated training on the AODA if Media6 IMG's governance is revised.
- Ensuring new staff members required to complete AODA training do so within three months of having joined Media6 IMG.

## 7.3 Employees

Employees are responsible for:

- Identifying their need for accommodation.
- Cooperating in finding a solution, discussing alternatives to meet their accommodation needs, while taking into account workplace realities.
- Complete training on AODA as required.
- Directing feedback regarding Media6 IMG's provision of services to people with disabilities requiring action to the Health & Safety and/or Human Resources Department(s).

## 7.4 Health & Safety and Human Resources Departments

Health & Safety and Human Resources Departments are responsible for:

- Preparing and updating, as required, governance, training materials, reports, and other documentation required by the AODA.
- Coordinating the training required under the AODA.
- Preparing and distributing the communications required under the AODA.
- Filing the Accessibility Report required under the AODA to confirm compliance with the accessibility standards for customer service.
- Maintaining training records including the dates on which training is provided and the number of individuals to whom it is provided.
- Producing training records, as required.
- Arranging to have documentation required under the AODA available in alternate formats.
- Receiving feedback regarding Media6 IMG's provision of services to people with disabilities under the feedback process required under the AODA.
- Including AODA training materials in new employee orientation materials.
- Supporting employees, managers and supervisors as required.
- Notifying site and Senior Management of any disruption in the Media6 IMG facilities or customer services used by people with disabilities such that notice of such disruption can be posted on Media6 IMG's website and locally at all public entrances and service counters on Media6 IMG's premises that are accessible to the public and other Third Parties.



- Monitoring AODA legislative developments and informing all applicable workplace parties of such developments in a timely manner.

## 7.5 Accounts Receivable

Accounts receivable is responsible for:

- Ensuring that accessible invoices are available to Media6 IMG customers upon request, as described in section 6.1.5.

## 7.6 Supply Chain

- Have consideration for accessibility when designing, procuring or acquiring self-serve kiosks to better serve persons with disabilities.

## 7.7 I.T. Department

I.T. Department is responsible for:

- Developing and maintaining accessible websites and web content conforming to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA except where this is impracticable.
- Developing and maintaining the online accessibility feedback process on Media6 IMG's website and ensuring such feedback is received to the Health & Safety and/or Human Resources Department(s).
- Posting notices of temporary disruption in facilities or services used by people with disabilities on Media6 IMG's website.
- Assisting in providing documentation or communication supports required under the AODA publicly available, when requested, in alternate formats to that take into account a person's disability.

## 8.0 Revision Summary

This standard and the multi-year accessibility plan will be reviewed and updated as necessary, but at least once every five years.