ACCESSIBLE CUSTOMER SERVICE POLICY

1. PURPOSE

Ellwood Construction (the Company) is committed to providing goods, services, and facilities in a manner that respects the dignity, independence, integration, and equal opportunity of persons with disabilities.

This policy establishes the practices and procedures the Company follows to meet the requirements of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA), the Integrated Accessibility Standards Regulation (IASR), and the Ontario Human Rights Code relating to accessible customer service.

2. SCOPE

This policy applies to all employees, volunteers (where applicable), contractors, students, and any individual or organization providing goods, services, or facilities on behalf of Ellwood Construction who interact with members of the public or other third parties.

3. ACCESSIBLE CUSTOMER SERVICE PRACTICES

3.1. Communication

The Company will communicate with persons with disabilities in ways that take their disability into account and, upon request, will provide accessible formats and communication supports in a timely manner at no additional cost.

3.2. Telephone Services

The Company trains its employees to communicate over the telephone in clear and plain language and to speak clearly and slowly. The Company offers to communicate with customers by email, in person or with the assistance of a support person, if telephone communication is not suitable to the individual's communication needs.

Alternative communication methods, including email, in-person communication, or other communication supports, will be used where appropriate.

3.3. Assistive Devices

The Company serves people with disabilities who use assistive devices to obtain, use or benefit from our goods and services. The Company ensures that our employees are trained and familiar

with various assistive devices that may be used by customers with disabilities while accessing our goods or services on our premises. Such assistive devices include but are not limited to:

- Wheelchairs
- Walkers
- White Canes
- Note Taking Devices
- Portable Magnifiers
- Assistive Listening Devices
- Personal Oxygen Tanks
- Devices for Grasping

In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with a disability can access our goods, services, facilities, or job sites.

3.4. Billing

Invoices and other customer-facing documents will be provided in accessible formats upon request, including large print, electronic formats, or other formats that meet the individual's accessibility needs.

3.5. Service Animals and Support Persons

Persons with disabilities who are accompanied by a service animal are welcome in those areas of the Company's premises that are open to the public unless the animal is otherwise excluded by law.

Where a service animal is excluded by law, the Company will make reasonable efforts to provide alternative measures that enable the individual to access the Company's goods, services, or facilities.

Persons with disabilities who are accompanied by a support person are welcome to access the Company's goods, services, and facilities together with their support person. Where confidential information may be discussed, the Company may obtain the consent of the individual before discussing confidential matters in the presence of the support person.

3.6. Temporary Disruption

The Company provides customers with notice in the event of a planned or unexpected disruption in the facilities or services used by people with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and where practicable, a description of alternative facilities or services, if available. The notice will be placed at the main public entrances on our premises.

3.7. Training for Staff

The Company will provide accessibility training to employees, volunteers (where applicable), persons who participate in developing Company policies, and others who provide goods, services, or facilities on the Company's behalf, as required by the AODA and the IASR.

Training will be appropriate to the duties of the individual receiving it and will be provided as soon as practicable after hire or assignment of duties. Additional training will be provided whenever there are changes to accessibility legislation or to the Company's accessibility policies, practices, or procedures.

Accessibility training may include, but is not limited to:

- the purposes and requirements of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and applicable accessibility standards;
- the Ontario Human Rights Code as it relates to persons with disabilities;
- accessible customer service principles;
- communicating and interacting with persons with disabilities;
- the use of assistive devices, service animals, and support persons;
- responding to requests for accessible formats and communication supports; and
- the Company's accessibility policies, practices, and procedures.

The Company will maintain records of accessibility training in accordance with the IASR.

3.8. Feedback Process

The Company welcomes feedback on our efforts to ensure accessible customer service to people with disabilities. Those wishing to ask questions or provide feedback to the Company regarding this policy or other AODA initiatives may contact us through the following methods.

Mail
Human Resources Manager
Ellwood Construction
2075 Great Northern Road
Sault Ste. Marie, ON P6B 0C3

Telephone
(705) 688-4436

Email
hr@corpservices.ca

In Person
Human Resources Manager
2075 Great Northern Road
Sault Ste. Marie, ON P6B 0C3

In situations where you prefer to stay anonymous, feedback can also be sent through our EthicsPoint hotline. The information you provide will be sent to us by EthicsPoint on a totally confidential and anonymous basis if you should choose.

Online https://secure.ethicspoint.com/domain/media/en/gui/74594/index.html
Telephone: 1-844-994-2318

The Company will acknowledge and respond in a timely manner and, where practicable, within seven (7) business days.

Accessible formats and communication supports are available upon request and will be provided in a timely manner at no additional cost.

4. DEFINITIONS

Unless otherwise defined in this policy, terms shall have the meanings assigned to them under the *Accessibility for Ontarians with Disabilities Act,* 2005 (AODA), the I*ntegrated Accessibility Standards Regulation* (IASR), and the Ontario Human Rights Code.

For the purposes of this Policy:

Accessible Format: An alternative format that enables a person with a disability to access information. Examples include large print, electronic formats compatible with screen readers, audio formats, Braille, or other formats that meet an individual's accessibility needs.

Assistive Device: Any device, equipment, technology, or other instrument used by a person with a disability to assist with daily living, communication, mobility, personal care, medical needs, or access to goods, services, or facilities. Examples include, but are not limited to, wheelchairs, walkers, hearing aids, communication devices, oxygen tanks, white canes, and other mobility or adaptive equipment.

Barrier: As defined in the *AODA*, anything that prevents a person with a disability from fully participating in all aspects of society because of their disability. Barriers may include physical, architectural, information or communication, attitudinal, technological, policy, or practice barriers.

Communication Support: Supports that assist a person with a disability in accessing or communicating information. Examples include captioning, plain language, sign language interpretation, reading information aloud, or other methods appropriate to the individual's needs.

Disability: As defined in the Ontario Human Rights Code and the AODA, includes the following:

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.

Transitional Modified Work Plan: A documented plan developed collaboratively between the Company and an employee with a disability that outlines workplace accommodations necessary to enable the employee to perform the essential duties of their position and participate fully in the workplace.

Service Animal: An animal accompanying a person with a disability where:

a) it is readily apparent that the animal is used by the person for reasons relating to their disability; or
b) the person provides documentation from a regulated health professional confirming that the animal is required for reasons relating to the disability.

Documentation may be provided by a regulated health professional authorized under Ontario law to provide such documentation.

Support Person: A person who accompanies a person with a disability in order to assist with communication, mobility, personal care, medical needs, or access to goods, services, or facilities.

5. RESPONSIBILITIES

Managers and Supervisors will:

- support accessible customer service practices;
- respond promptly to accessibility concerns;
- ensure staff receive required training;
- escalate unresolved accessibility concerns to Human Resources when appropriate.

Employees will:

- provide respectful and accessible customer service;
- report accessibility barriers;
- participate in required accessibility training.

6. MODIFICATIONS TO THIS OR OTHER POLICIES

The Company will consider the impact on persons with disabilities before making changes to policies, practices, or procedures that affect the delivery of accessible customer service.

7. SUPPORTING DOCUMENTS

- Accessibility Policy
- Multi-Year Accessibility Plan

8. REFERENCES

- *Accessibility for Ontarians with Disabilities Act, 2005*, S.O. 2005, c. 11.
- *Integrated Accessibility Standards Regulation*, Ontario Regulation 191/11, made under the *Accessibility for Ontarians with Disabilities Act*, 2005.
- Ontario Human Rights Code, R.S.O. 1990, c. H.19.
- Government of Ontario – Accessibility in Ontario: What You Need to Know https://www.ontario.ca/page/accessibility-ontario-what-you-need-to-know
- Government of Ontario – Accessibility Rules for Businesses and Non-Profit Organizations https://www.ontario.ca/page/accessibility-rules-businesses-and-non-profits
- Government of Ontario – Guide to the Integrated Accessibility Standards Regulation (IASR) (where applicable) https://www.ontario.ca/page/accessibility-laws
- Web Content Accessibility Guidelines (WCAG) 2.1 Level AA
- World Wide Web Consortium (W3C) https://www.w3.org/TR/WCAG21/

9. REVISION HISTORY

The Company is committed to developing policies that respect and promote the dignity and independence of people with disabilities. The Company retains the right to amend, modify or repeal this policy at any time; however, any such change will only be made after considering the impact on people with disabilities.

REV NO.	APPROVAL DATE (YYYY-MM-DD)	AUTHOR	APPROVER	COMMENTS
01	2020-09-24	C. Heystee	M. Gran|M. Croskery	Initial document.
02	2023-06-01	C. Heystee	M. Gran|M. Croskery	Review and update
03	2026-08-27	N. Parent	M. Gran|M. Croskery	Comprehensive review to align with updated Multi-Year Accessibility Plan and Accessibility Policy.

This policy is available on the Company's website and in accessible formats upon request. The Company will provide accessible formats and communication supports in a timely manner and at no additional cost.