



POLICY: ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES (AODA)

1.0 COMMITMENT

Adjeleian Allen Rubeli (AAR) is committed to ensuring equal access and participation for people with disabilities. In alignment with our shared values of fairness and adaptability, 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 the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)* and Ontario's accessibility laws.

AAR is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination.

AAR understand that obligations under the AODA and its accessibility standards do not substitute or limit its obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law.

We are committed to excellence in serving and providing goods, services or facilities to all clients, including people with disabilities. Our accessible client service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

2.0 TRAINING

Our firm is committed to training all staff (including co-op students, individuals who participate in developing the organization's policies, and all other individuals who provide goods, services or facilities on behalf of the organization) in accessible customer service, other Ontario accessibility standards, and aspects of the Ontario Human Rights Code that relate to persons with disabilities.

Training includes:

- Purpose of the AODA and the requirements of the Customer Service Standards
- Our company policies related to the Customer Service Standards
- How to interact and communicate with people with various types of disabilities
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- What to do if a person with a disability is having difficulty in accessing our organization's goods, services or facilities.

We train every person as soon as practicable after they are hired and provide training in respect of any changes to the policies.

We maintain records of the training provided, including the dates on which the training was provided and the number of individuals to whom it was provided.



3.0 ASSISTIVE DEVICES

People with disabilities may use their personal assistive devices when accessing our goods, services or facilities.

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 or facilities. For example, we will use video technology if a job site is not accessible for safety reasons.

We ensure that our staff are trained and familiar with various assistive devices we have on site or that we provide that may be used by customers with disabilities while accessing our goods, services or facilities.

4.0 COMMUNICATION

We communicate with people with disabilities in ways that take into account their disability.

We will work with the person with disabilities to determine what method of communication works for them.

5.0 SERVICE ANIMALS

AAR welcomes people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public and third parties.

When we cannot easily identify that an animal is a service animal, our staff may ask for documentation (template, letter or form) from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.

A service animal can be easily identified through visual indicators, such as when it wears a harness or vest, or when it helps the person perform certain tasks.

A regulated health professional is defined as a member of one of the following colleges:

- College of Audiologists and Speech-Language Pathologists of Ontario
- College of Chiropractors of Ontario
- College of Nurses of Ontario
- College of Occupational Therapists of Ontario
- College of Optometrists of Ontario
- College of Physicians and Surgeons of Ontario
- College of Physiotherapists of Ontario
- College of Psychologists of Ontario
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

If service animals are prohibited by another law, we will do the following to ensure people with disabilities can access our goods, services or facilities:

- Explain why the animal is excluded



- Discuss with the customer another way of providing goods, services or facilities

AAR facilities include areas that are restricted to only personnel with appropriate security clearance. Non-personnel and their service animals are prohibited from these specific areas.

6.0 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.

In certain cases, this organization might require a person with a disability to be accompanied by a support person for the health and safety reasons of:

- The person with the disability
- Others on the premises.

Before making a decision, we will:

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

7.0 NOTICE OF TEMPORARY DISRUPTIONS

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, AAR will notify customers promptly. This clearly posted notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available.

Services/Facilities include the Ottawa office located at:

The Fuller Building
75 Albert Street, Suite 1005
Ottawa Ontario K1P 5E7

The notice will be made publicly available in the following ways:

- Direct communication, in circumstances where a person with a disability is expected to visit an office; and/or
- An update to the voicemail greeting for the office; and/or
- A notification posted on the office door; and/or
- A notification posted on the company website.

8.0 FEEDBACK PROCESS

AAR welcomes feedback on how we provide accessible customer service. Customer feedback will help us identify barriers and responds to concerns.



Feedback may be provided in the following ways:

- Directly to any AAR team member.
- By email to: aar@aar.ca
- By leaving a message in the general mailbox at: 613-232-5786

All feedback, including complaints, will be reviewed internally, and then discussed with the individual providing the feedback or complaint, in order to ensure mutual understanding.

Customers can expect to hear back within 7-10 number of days.

AAR ensures our feedback process is accessible to people with disabilities by arranging for accessible formats and communication supports, on request.

9.0 NOTICE OF AVAILABILITY OF DOCUMENTS

AAR notifies the public that documents related to accessible customer service are available upon request by way of this Accessibility Commitment and Policy document posted on the company website.

We will provide these documents in an accessible format or with communication support, on request. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and, at no additional cost.

10.0 INFORMATION AND COMMUNICATIONS

AAR has a process for receiving and responding to feedback and the process is accessible to persons with disabilities upon request.

We communicate with people with disabilities in ways that take into account their disability. When asked, we will provide information about our organization and its services, including public safety information, in accessible formats or with communication supports:

- In a timely manner, taking into account the person's accessibility needs due to disability; and
- At a cost that is no more than the regular cost charged to other persons.

We will consult with the person making the request in determining the suitability of an accessible format or communication support. If the organization determines that information or communications are unconvertable, the organization shall provide the requestor with:

- An explanation as to why the information or communications are unconvertable; and
- A summary of the unconvertable information or communications.

We notify the public about the availability of accessible formats and communication supports by way of this Accessibility Commitment and Policy document posted on the company website.



11.0 EMPLOYMENT

AAR notifies employees, job applicants and the public that accommodations can be made during recruitment and hiring. We notify job applicants when they are individually selected to participate in an assessment or selection process that accommodations are available upon request. We consult with the applicants and provide or arrange for suitable accommodation.

We notify successful applicants of policies for accommodating employees with disabilities when making offers of employment.

We notify staff that supports are available for those with disabilities as soon as practicable after they begin their employment. We provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that take into account an employee's accessibility needs due to a disability.

We will consult with employees when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to a disability. We will consult with the person making the request in determining the suitability of an accessible format or communication supports specifically for:

- Information that is needed in order to perform the employee's job; and
- Information that is generally available to the employees in the workplace.

Where needed, we will also provide customized emergency information to help an employee with a disability during an emergency. With the employee's consent, we will provide workplace emergency information to a designated person who is providing assistance to that employee during an emergency.

We will provide the information as soon as practicable after we become aware of the need for accommodation due to the employee's disability.

We will review the individualized workplace emergency response information:

- When the employee moves to a different location in the organization.
- When the employee's overall accommodation needs or plans are reviewed; and
- When the employer reviews its general emergency response policies.

AAR has a written process to develop individual accommodation plans for employees.

We have a written process for employees who have been absent from work due to a disability and required disability-related accommodations in order to return to work.

Our performance management, career development and redeployment processes take into account the accessibility needs of all employees.

13.0 DESIGN OF PUBLIC SPACES

AAR will meet accessibility laws when building or making major changes to public spaces. Our public spaces include:



- Recreational trails/beach access routes
- Outdoor public eating areas like rest stops or picnic areas
- Outdoor play spaces, like playgrounds in provincial parks and local communities
- Accessible off-street parking
- Accessible on-street parking
- Service-related elements like service counters, fixed queuing lines and waiting areas**

We will put procedures in place to prevent service disruptions to the accessible parts of our public spaces.

14.0 CHANGES TO EXISTING POLICIES

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

This document is publicly available. Accessible formats are available upon request.