Accessibility for Ontarians with Disabilities Act (AODA) Policy

1.0 Introduction

In compliance with the Accessibility for Ontarians with Disabilities Act, 2005, the purpose of this policy is to outline the responsibilities of employees, agents and volunteers (staff personnel) acting on behalf of Southmedic while providing goods, services and employment opportunities to people with disabilities.

2.0 Scope

2.1 This policy applies to all employees, volunteers, and agents of Southmedic.

2.2 This policy applies in all interactions with employees or customers at Southmedic regarding the applicable pillars related to the Accessibility for Ontarian with Disabilities Act: Information and Communication, Customer Service and Employment standards.

3.0 Definitions

Disability -

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, including 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”.

Barrier - means anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, an information or communication barrier, an attitudinal barrier, a technological barrier, a policy or a practice.

Guide Dog - means a dog trained as a guide for a blind person and having qualifications prescribed by the regulations; Blind Persons’ Right Act, R.S.O. 1990, c. B.7

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Service Animal - Defines a "service animal" as "an animal for a person with disability". In this policy, a service animal is:

- any animal used by a person with a disability for reasons relating to the disability; or
- where the person provides a letter from a physician confirming that they require the animal for reasons relating to their disability; or

Support Person - A 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, medical needs or access to goods and services.

4.0 Commitment

4.1 Southmedic is committed to providing an environment that is accessible and inclusive to all people. We are committed to treating people with disabilities in a respectful manner that allows them to maintain their dignity and independence. We believe in an equal accessible environment, and we are committed to meeting the needs of people with disabilities in a timely manner. Southmedic demonstrates its commitment to accessibility for people with disabilities by removing and preventing barriers and meeting the applicable requirements under the Accessibility for Ontarians with Disabilities Act and the Integrated Accessibility Standards Regulation (IASR).

4.2 Southmedic is committed to providing goods and services to our customers in manner that respects individuals with disabilities. Southmedic is committed to ensuring that we foster an inclusive and accessible environment by complying with all customer service standards in relation to the AODA. This policy and the accessibility plan will be reviewed in accordance with the AODA and Integrated Accessibility Standards and Regulations (IASR) requirements. If any updates or changes are made, the most up to date version will be posted internally and externally.

5.0 Providing Information/Communication, Customer Service and Employment

5.1 Information and Communication

5.1.1 Communication

Southmedic is committed to communicating with people with disabilities in a manner that takes into account their disability. Southmedic employees receive AODA training which provides personnel information on how to

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interact and communicate with people with disabilities. Our company websites meet the requirements of WCAG 2.0 Level AA.

5.1.2 Documentation

Upon request of documentation in an alternative format, Southmedic will ensure that the documentation will be provided in a timely reasonable manner and at a cost no more than the regular cost charged to another person. Southmedic will consult with the person making the request in determining the suitability of an accessibility format or communication support. Southmedic will ensure that an individual with a disability will be provided with general information available at the workplace as well as information to perform their job duties in a format that meets their needs.

If certain information or communication are unconvertible, Southmedic will ensure to provide a summary of the unconvertible information and/or communication and the reason as to why the information or communication is unconvertible. As per the Integrated Accessibility Standards, information or communications are only considered unconvertible under the following conditions;

a) It is not technically feasible to convert the information or communication or

b) The technology to convert the information or communication is not readily available.

5.1.3 Feedback Process

Southmedic will ensure that its process for receiving and responding to feedback is accessible to people with disabilities by providing, or arranging for the provision of, accessible forms and communicate supports, upon request.

5.2 Customer Service

Southmedic ensures that the customer service standards are met in relation to the AODA by ensuring the following principles and practices are in place:

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5.2.1 Communication

Southmedic is committed to communicating with people with disabilities in manner that considers their disability. Southmedic has taken the following steps to ensure that we have met the needs for people with disabilities:

- Providing AODA certificate training, which has information on how to communicate with customers with disabilities.
- Using alternative methods when possible to ensure that customers with disabilities have access to the same services in a similar manner;
- Providing documents in an alternative format upon request.
- Providing multiple avenues for customers to communicate with our customer service team; email or phone

When Southmedic bills for services, it should demonstrate a commitment to providing accessible invoices to all of our customers. This means that invoices should be provided in alternate formats upon request (e.g., hard copy, large print, email) and that staff is prepared to answer questions customers may have about the content of the invoice.

5.2.2 Assistive Devices

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by Southmedic. If a customer is unable to access goods or services through their own assistive devices, Southmedic will assist with accommodating this individual with other reasonable service options to meet their needs.

5.2.3 Service Animals

A customer with a disability that is accompanied by a guide dog or service dog will be allowed access to premises that are open to the public unless otherwise excluded by law. If a guide dog or service animal is excluded by law, Southmedic will try to offer alternative methods to enable the person with a disability to access goods and services, when possible. Due to the nature of the products being manufactured, animals cannot enter any of our

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manufacturing areas as this would violate regulatory requirements regarding medical devices. Customers are responsible for the care, supervision and control of their service animal while on Southmedic's property.

5.2.4 Support Persons

If a customer/client with a disability is accompanied by a support person, Southmedic will ensure that both persons are allowed to enter the premises together and that the customer/client is not prevented from having access to the support person. All customer/client confidentiality requirements and practices will also apply to support persons.

5.2.5 Notice of Disruptions in Service

In the event of a service disruption, Southmedic will ensure to provide information regarding the issue in a conspicuous place by posting a notice of disruption in an evident place on our website. These notices will be made publicly through our website within a reasonable time of the issue arising. These notices will include a brief disruption reason, its anticipated duration, and a description of alternative services, if available.

5.2.6 Feedback Process

Southmedic has developed a process for people to give feedback on how we provide services/goods to customers with disabilities. Feedback can be provided to our customer service team via phone, email or an online feedback form through Southmedic's website. To call our customer service team, customers can use the following number, 1 705 720 1902, and select option 1. To email our customer service team, customers can use the email address, custserv@southmedic.com. All Customer Service related feedback will be directed to our Customer Service Team and will receive a response within ten business days. Our customer service and sales teams will work in collaboration with our IT department and our HR department to ensure that people with disabilities are reasonable accommodated and have access to Southmedic's goods and services. If a complaint is received regarding an accessibility concern, Southmedic will take reasonable corrective action to address the concern in a timely manner. Information about the feedback process will be readily available to customers/clients upon request.

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5.2.7 Availability and Format of Documents (Alternative Formats)

All documents required by the Accessibility Standards for Customer Service, including the Southmedic's Accessibility Policy, notices of temporary disruptions, training documentation, and written feedback process are available upon request, subject to the Freedom of Information and Protection of Privacy Act ("FIPPA"). Southmedic will post on their website of the availability of accessible format and communication support for the feedback process and other Accessibility Standards. When providing these documents to a person with a disability, Southmedic inc. will ensure to provide the document, or the information contained in the document, in a format that takes the person's disability into account.

5.3 Employment Standards

Southmedic is committed to welcoming people with disabilities in all aspects of recruitment, employment, and training.

5.3.1 Communication of Accommodation Availability

5.3.1.1 Recruitment & Selection

During the recruitment process, Southmedic informs candidates publicly via Southmedic's website that accommodations are available upon request for people with disabilities. Upon receiving an accommodation request during the recruitment process, Southmedic will consult with the applicant and provide a suitable accommodation to meet the needs of the applicant with a disability. Successful applicants are informed of the availability of accommodations within their offer letter.

5.3.1.2 Employment

Employees are trained on the accommodation policy and procedure during the orientation process and are made aware of their availability. Southmedic will continue to inform its employees of its policies and procedures in relation to accommodations. Southmedic employees are retrained on the AODA requirements as policies or procedures, or legislatives changes occur that impact accessibility.

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5.3.2 Accommodation Process and Workplace Emergency Response Information

Southmedic has developed an accommodation procedure that actively inquires on any potential accommodation needs related to any of the protected grounds including people with disabilities. As a part of Southmedic's Accommodation process, an employee with disability will be provided with Individualized Workplace Emergency Response Plan and Safety plan defined in collaboration with Human Resources and Health and Safety. More information regarding Southmedic's accommodation process can be found in our Leave of Absences and Accommodation Policies, which can be made available upon request.

5.3.3 Return to Work Process

In the circumstance of returning to work, Southmedic will take all necessary steps to ensure that appropriate accommodation is provided to employees with disabilities. Further information regarding Southmedic's return to work processes can be found in our Leave of Absence and Accommodation policies, which can be made available upon request.

5.3.4 Performance Management

Upon reviewing an employee's performance, Southmedic shall take into account any accessibility needs of employees with disabilities. Southmedic will conduct performance appraisals in a manner that allows a person with a disability to fully participate in the process, and in a manner that adheres to their individualized accommodation plan.

5.3.5 Career Development and Advancement

Southmedic will ensure to provide employees with disabilities an equal opportunity to participate in any career develop/progression in accordance with their individualized accommodation plan. If an employee with a disability requires any accommodation to participate in a career development/progression opportunity, Southmedic will ensure that they are accommodated.

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5.3.6 Redeployment

Upon redeployment of employees, Southmedic will ensure to take into account the needs of people with disabilities. Southmedic will ensure to follow all individualized accommodation plans for employees with disabilities to ensure that they are still able to fully participate in the workplace.

6.0 Training

6.1 Accessibility for Ontarian with Disabilities Training will be provided to all employees, agents or volunteers of Southmedic. The training for all staff personnel will include:

- The purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Integrated Accessibility Standards Regulation (IASR)
- How to interact and communicate with persons with various types of disability
- How to interact with persons with disabilities who use an assistive device or require the assistance of a service animal or a support person
- How to use equipment or devices available on Southmedic's premises or otherwise provided by the Southmedic that may help with the provision of goods or services to a person with a disability
- What to do if a person with a particular type of disability is having difficulty accessing the provider's good or services

6.2 Training will be provided to staff personnel in the following situations:

- Upon initial hire
- If there are changes/updates to AODA legislation
- Anytime there are Southmedic policy, practice or procedure updates/ changes that impact accessibility.

Southmedic will keep record of all AODA training that includes the date training was provided, and the names of the personnel trained.

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