

Accessible Customer Service Policy

Intent

This policy is intended to meet the requirements of *Accessibility Standards for Customer Service, Ontario Regulation 429/07* under the *Accessibility for Ontarians with Disabilities Act, 2005*, and applies to the provision of goods and services to the public or other third parties, not to the goods themselves.

All goods and services provided by McCabe Promotional Advertising Inc. shall follow the principles of dignity, independence, integration and equal opportunity.

Scope

- a) This policy applies to the provision of goods and services at premises owned and operated by McCabe Promotional Advertising Inc.
- b) This policy applies to employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of McCabe Promotional Advertising Inc., including when the provision of goods and services occurs off the premises of McCabe Promotional Advertising Inc. such as in: delivery services, call centers, vendors, drivers, catering and third party marketing agencies.
- c) The section of this policy that addresses the use of guide dogs, service animals and service dogs only applies to the provision of goods and services that take place at premises owned and operated by McCabe Promotional Advertising Inc..
- d) This policy shall also apply to all persons who participate in the development of the McCabe Promotional Advertising Inc.'s policies, practices and procedures governing the provision of goods and services to members of the public or third parties.

Definitions

Assistive Device – is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that customers bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

Disability – the term disability as defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*, refers to:

- 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;
- a condition of mental impairment or a developmental disability;
- a learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- a mental disorder; or
- an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

Guide Dog – is a highly-trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons' Rights Act*, to provide mobility, safety and increased independence for people who are blind.

Service Animal – as reflected in *Ontario Regulation 429/07*, an animal is a service animal for a person with a disability if:

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

Service Dog – as reflected in *Health Protection and Promotion Act, Ontario Regulation 562* a dog other than a guide dog for the blind is a service dog if:

- it is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability;
- or the person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.

Support Person – as reflected in *Ontario Regulation 429/07*, 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.

General Principles

In accordance with the *Accessibility Standards for Customer Service, Ontario Regulation 429/07*, this policy addresses the following:

- A. The Provision of Goods and Services to Persons with Disabilities;
- B. The Use of Assistive Devices
- C. The Use of Guide Dogs, Service Animals and Service Dogs
- D. The Use of Support Persons
- E. Notice of Service Disruptions
- F. Customer Feedback
- G. Training
- H. Notice of Availability and Format of Required Documents

A. The Provision of Goods and Services to Persons with Disabilities

McCabe Promotional Advertising Inc. will make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- ensuring that all customers receive the same value and quality;
- allowing customers with disabilities to do things in their own ways, at their own pace when accessing goods and services as long as this does not present a safety risk;
- using alternative methods when possible to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner;
- taking into account individual needs when providing goods and services; and
- communicating in a manner that takes into account the customer's disability.

B. Assistive Devices

Customer's own assistive device(s):

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by McCabe Promotional Advertising Inc.

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 the access of goods and services. For example, open flames and oxygen tanks cannot be near one another. Therefore, the accommodation of a customer with an oxygen tank may involve ensuring the customer is in a location that would be considered safe for both the customer and business. Or, where elevators are not present and where an individual requires assistive devices for the purposes of mobility, service will be provided in a location that meets the needs of the customer.

C. Guide Dogs, Service Animals and Service Dogs

A customer with a disability that is accompanied by guide dog, service animal or service dog will be allowed access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to guide dogs, service animals and/or service dogs.

Food Service Areas:

A customer with a disability that is accompanied by guide dog or service dog will be allowed access to food service areas that are open to the public unless otherwise excluded by law.

Other types of service animals are not permitted into food service areas due to the *Health Protection and Promotion Act, Ontario Regulation 562 Section 60*.

Exclusion Guidelines:

If a guide dog, service animal or service dog is excluded by law (see applicable laws below) McCabe Promotional Advertising Inc. will offer alternative methods to enable the person with a disability to access goods and services, when possible (for example, securing the animal in a safe location and offering the guidance of an employee).

Applicable Laws:

Food Safety and Quality Act 2001, Ontario Regulation 31/05: Animals not intended for slaughter or to be euthanized are not allowed in any area or room of a meat plant. It also makes an exception for service dogs to allow them in those areas of a meat plant where food is served, sold or offered for sale to customers and in those areas that do not contain animals or animal parts and are not used for the receiving, processing, packaging, labelling, shipping, handling or storing of animals or parts of animals.

The *Health Protection and Promotion Act, Ontario Regulation 562 Section 60*, normally does not allow animals in places where food is manufactured, prepared, processed, handled, served, displayed, stored, sold or offered for sale. It does allow guide dogs and service dogs to go into places where food is served, sold or offered for sale. However, other types of service animals are not included in this exception.

Dog Owners' Liability Act, Ontario: If there is a conflict between a provision of this Act or of a regulation under this or any other Act relating to banned breeds (such as pitbulls) and a provision of a by-law passed by a municipality relating to these breeds, the provision that is more restrictive in relation to controls or bans on these breeds prevails.

Recognizing a Guide Dog, Service Dog and/or Service Animal:

If it is not readily apparent that the animal is being used by the customer for reasons relating to his or her disability, McCabe Promotional Advertising Inc. may request verification from the customer.

Verification may include:

- a letter from a physician or nurse confirming that the person requires the animal for reasons related to the disability;
- a valid identification card signed by the Attorney General of Canada; or,
- a certificate of training from a recognized guide dog or service animal training school.

Care and Control of the Animal:

The customer that is accompanied by a guide dog, service dog and/or service animal is responsible for maintaining care and control of the animal at all times.

Allergies:

If a health and safety concern presents itself for example in the form of a severe allergy to the animal, McCabe Promotional Advertising Inc. will make all reasonable efforts to meet the needs of all individuals.

D. Support Persons

If a customer with a disability is accompanied by a support person, McCabe Promotional Advertising Inc. will ensure that both persons are allowed to enter the premises together and that the customer is not prevented from having access to the support person.

There may be times where seating and availability prevent the customer and support person from sitting beside each other. In these situations McCabe Promotional Advertising Inc. will make every reasonable attempt to resolve the issue.

In situations where confidential information might be discussed, consent will be obtained from the customer, prior to any conversation where confidential information might be discussed.

Admission Fees:

If payment is required by a support person for admission to the premises McCabe Promotional Advertising Inc. will ensure that notice is given in advance by posting notice of admission fees for support persons where McCabe Promotional Advertising Inc. fees are posted.

E. Notice of Disruptions in Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of McCabe Promotional Advertising Inc. In the event of any temporary disruptions to facilities or services that customer's with disabilities rely on to access or use McCabe Promotional Advertising Inc.'s goods or services, reasonable efforts will be made to provide advance notice. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

Notifications will Include:

In the event that a notification needs to be posted the following information will be included unless it is not readily available or known:

- goods or services that are disrupted or unavailable
- reason for the disruption
- anticipated duration
- a description of alternative services or options

Notifications Options:

When disruptions occur McCabe Promotional Advertising Inc. will provide notice by:

- posting notices in conspicuous places including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption.
- contacting customers with appointments;
- verbally notifying customers when they are making a reservation or appointment; or
- by any other method that may be reasonable under the circumstances.

F. Feedback Process

McCabe Promotional Advertising Inc. shall provide customers with the opportunity to provide feedback on the service provided to customers with disabilities. Information about the feedback process will be readily available to all customers and notice of the process will be made available. Feedback forms along with alternate methods of providing feedback such as verbally (in person or by telephone) or written (handwritten, delivered, website or email), will be available upon request.

Submitting Feedback:

Customers can submit feedback to:

- Alex Webb / Jan Homenuik - McCabe Health and Safety Representatives
- 519-455-7009 x1291 / 519-455-7009 x1269
- 458 Central Ave., London, ON, N6B3L6
- alex@mccabepro.com / jan@mccabepro.com
- www.mccabepro.com

Customers who wish to provide feedback by completing an onsite customer feedback form or verbally can do so to one of our designate Health and Safety Representatives described above.

Customers that provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

G. Training

Training will be provided to:

- a) all employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of McCabe Promotional Advertising Inc.; for example: salespersons, drivers, vendors, event operators, call centers and third party marketing agents; and,
- b) those who are involved in the development and approval of customer service policies, practices and procedures.

Training Provisions:

As reflected in *Ontario Regulation 429/07*, regardless of the format, training will cover the following:

- A review of the purpose of the *Accessibility for Ontarians with Disabilities Act, 2005*.
- A review of the requirements of the *Accessibility Standards for Customer Service, Ontario Regulation 429/07*.
- Instructions on how to interact and communicate with people with various types of disabilities.
- Instructions on how to interact with people with disabilities who:
 - use assistive devices;
 - require the assistance of a guide dog, service dog or other service animal; or
 - require the use of a support person (including the handling of admission fees).
- Instructions on how to use equipment or devices that are available at our premises or that we provide that may help people with disabilities.
- Instructions on what to do if a person with a disability is having difficulty accessing your services.
- McCabe Promotional Advertising Inc.'s policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

Training Schedule:

McCabe Promotional Advertising Inc. will provide training as soon as practicable. Training will be provided to new employees, volunteers, agents and/or contractors who deal with the public or act on our behalf (insert when such as, during orientation). Revised training will be provided in the event of changes to legislation, procedures and/or practices.

Record of Training:

McCabe Promotional Advertising Inc. will keep a record of training that includes the dates training was provided and the number of employees who attended the training.

Notice of Availability and Format of Documents

McCabe Promotional Advertising Inc. shall notify customers that the documents related to the *Accessibility Standard for Customer Service* are available upon request and in a format that takes into account the customer's disability. Notification will be given by posting the information in a conspicuous place owned and operated by McCabe Promotional Advertising Inc., the McCabe Promotional Advertising Inc.'s website and/or any other reasonable method Administration

If you have any questions or concerns about this policy or its related procedures please contact:

- Alex Webb – Operations Manager
- 519-455-7009 x1291
- 458 Central Ave., London, ON, N6B3L6
- alex@mccabepro.com
- www.mccabepro.com

This policy and its related procedures will be reviewed as required in the event of legislative changes.

Acknowledgement & Agreement

Employee's will acknowledge that they have read and understand the Accessibility Standards for Customer Service Policy of McCabe Promotional Advertising Inc. via Collage HR, McCabe's internal HR software program. Employee's will sign off that they agree to adhere to this Policy and will ensure that employees working under their direction adhere to these guiding principles. Employee's will be asked to confirm that they understand that violation of this Policy will incite corrective action, up to and including termination of employment.

Multi-Year Accessibility Plan, 2025 - 2028

Introduction

McCabe Promotional Advertising Inc. is a full-service branded merchandise agency that helps brands spark conversations, strengthen connections, and leave a lasting impression with custom, end-to-end solutions.

We're one of Canada's largest agencies with offices in London, Toronto, and Ottawa, a decoration facility with state-of-the-art equipment, and have been B Corp certified since 2019. B Corp certification officially recognizes that we meet high standards of social and environmental performance, accountability, and transparency across employee benefits, give-back initiatives, and responsible supply chain practices.

McCabe is committed to working towards full compliance with current standards of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA); and any expected upcoming legislations and the Accessible Canada Act as they are introduced.

In doing so, we affirm our commitment to providing quality services in a manner that respects the dignity and independence of persons with disabilities.

By the requirements set out in the IASR (Integrated Accessibility Standards Regulation), we will:

- Post the multi-year accessibility plan on our website (www.mccabepro.com);
- Provide the plan in an accessible format upon request;
- Review and update the accessibility plan at least once every five years;
- Review and update the accessibility plan in consultation with persons with disabilities.

Statement Of Commitment

McCabe strives to meet the needs of its employees and customers with disabilities and is working hard to remove and prevent barriers to accessibility. We are committed to fulfilling our requirements under the Accessibility for Ontarians with Disabilities Act, 2005.

McCabe is committed to treating people in a way that allows them to maintain their dignity and independence. We believe in inclusion and equal opportunity. We are committed to meeting the accessibility needs of people with disabilities in a timely manner and will do so by identifying, preventing, and removing barriers to accessibility and meeting accessibility requirements under the AODA and IASR.

McCabe is dedicated to continuously developing, implementing, and maintaining policies that govern how the organization achieves or will achieve accessibility through meeting all regulation requirements.

Accessibility Policy

McCabe has developed a statement, policy, program, and multi-year plan that outlines strategies and actions to identify, prevent, and remove barriers for persons with disabilities.

We are committed to maintaining an AODA policy. The policy includes an organizational statement of commitment and requirements for employees at all levels of the organization to meet the accessibility requirements for persons with disabilities in a timely manner.

Actions Taken:

- The AODA policy was developed in November 2024;
- The AODA policy will be reviewed and updated following internal review processes;
- The AODA policy will be made available in an accessible format to customers requesting a copy of the policy.

Actions Planned:

- Continue to review the AODA policy at least every five years or whenever McCabe practices and/or procedures change to ensure it is up to date and all AODA requirements are integrated;
- Continue making the AODA policy available in an accessible format to customers requesting a copy of the policy.

Multi-Year Accessibility Plan

Actions Taken:

- A multi-year accessibility plan is developed in 2024. It will be updated in 2028.

Actions Planned:

- Post a multi-year accessibility plan to the McCabe website.
- Provide the plan in an accessible format on request.
- Review and update the multi-year accessibility plan at least every five years based on changing accessibility requirements and internal and external feedback.

Emergency Procedures, Plans Or Public Safety Information

Safety is a top priority at McCabe, and we strive to ensure that our Company is safe for employees, visitors, and clients.

Actions Planned:

- Conduct a review of emergency procedures and ensure that managers can provide building-related emergency and public/employee safety information in an accessible format or with appropriate communication support, as soon as practical, upon request.
- McCabe provided employees with an individualized emergency response information form.
- With the consent of an employee who acquires assistance, a colleague will be assigned for assistance in case of emergencies.
- Visual emergency signs will be introduced for hearing impaired employees.
- Company will continue to review the individualized workplace emergency response plans, when necessary, i.e., the location of the employee changes and/or if there are any changes in disability

Training

Accessibility and inclusion of people with disabilities is a core value for the Company. McCabe is committed to providing appropriate AODA training to all employees including management.

Actions Planned:

- Developing a training program that includes the requirements of the AODA, the IASR and the Ontario Human Rights Code as it pertains to persons with disabilities;
- Training will be designed in a way that best suits the duties and needs of employees and every person who deals with the public on behalf of the Company.
- Ensure new employees complete training within the probationary period.
- Track and maintain a database of training records of participant names and dates of completion.

Information And Communication Standard

McCabe is dedicated to meeting the communication needs of people with disabilities. We will consult with and request feedback from persons with disabilities to determine their information and communication needs. We want to achieve the most effective and efficient access to information and our goods and services for all users.

The Company has undertaken the following plans to ensure compliance with this standard:

Actions Planned:

- To establish an accessible feedback process such as telephone inquiries, email, and in-person.
- Upgrade our website to be user-friendly for people with a range of needs. Persons with disabilities are encouraged to contact McCabe via email or phone if they require additional information.

Customer Service Standard

McCabe strives for service excellence in all of our interactions with our customers. From the very first moment of contact to the last. We are committed to meeting the requirements of AODA and the IASR (Integrated Accessibility Standard Regulation)

Actions Taken:

- Goods or services are provided in a manner that respects the dignity and independence of persons with disabilities.
- Company representatives, when communicating with a person with disability, will do so in a manner that considers the person's disability.
- Assistive devices and service animals are permitted on our premises in areas where customers have access.
- Support persons who accompany a person with a disability are welcome in areas where the public or third parties are permitted and or served.

Actions Planned:

- Emergency procedures will be developed to ensure customers with varying abilities are assisted in building emergencies;
- Continue enabling customers to use assistive devices and welcoming the assistance of service animals and support persons;
- Committed to developing communication methods when accessible services are temporarily unavailable using methodologies appropriate for the circumstances.

Employment Standard

McCabe is committed to inclusive and accessible employment practices that attract and retain individuals with disabilities. The Company has taken the following steps to notify the public and employees that, when requested, McCabe will accommodate people with disabilities throughout the recruitment and onboarding process.

Recruitment

McCabe is committed to ensuring that our recruitment, selection, and assessment processes are fair and accessible. All supervisors, managers, and employees involved in staffing of any type will be required to complete AODA training.

Action taken:

- Correspondence to applicants includes the statement: McCabe is an equal opportunity employer. Accommodation is available upon request.
- Job applicants who get selected for an interview are notified that accommodations are available, upon request. Processes have been established to consult with any applicant who requests an accommodation.

Actions Planned:

- All supervisors, managers, and employees involved in staffing of any type are required to complete AODA training.
- Continue addressing barriers to recruitment.
- Continue to accommodate employees and applicants

Documented Individual Accommodation Plans

Action taken:

- McCabe is dedicated to producing and providing documented individual accommodation that includes the following:
 - Participation of the employee requiring the individual accommodation plan due to illness or injury;
 - High level of confidentiality;
 - Regular reviews and updates;
 - Reason for denial if applicable;
 - Means of providing individual accommodation plans in a format that considers the needs of the employee;
 - If required, include individualized workplace emergency response information.
- Accessible Emergency Information
 - McCabe is committed to creating and implementing a process for developing individual accommodation plans and return-to-work policies for employees who have been absent due to a disability.

Actions planned:

- When applicable, the Company will develop and maintain a return-to-work process for employees who have been away from work due to a disability and require disability-related accommodations to return to work. The process will include the steps the Company will undertake to facilitate the return-to-work process and use documented individual accommodation plans.

Performance Management And Career Development

McCabe is dedicated to ensuring the accessibility requirements of employees with disabilities are considered with regards to performance, management and assessments, career progression plans, and position reassignments.

The Company will continue to review and update policies and procedures to include the following elements:

- Accessibility needs of employees with disabilities, as well as individual accommodation plans, are considered when:
 - using performance management processes
 - providing career development and advancement opportunities
 - reassigning employees with disabilities

Design Of Public Spaces

McCabe's public areas currently meet the required Accessibility Standards for the design of public spaces. The Company will establish plans to continue to meet the Accessibility Standards for the design of public spaces when building or making major modifications to public spaces. In the event of a service disruption, McCabe will notify the public of the service disruption and alternative accessibility available for obtaining goods and services with applicable methodologies.

Last Revised: November 2024

Contact Information

For more information on this accessibility plan, please contact:

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