

Accessibility Standards for Customer Service (AODA) Policy

Purpose

The Delphi Group, GLOBE Series and Lumos Clean Energy Advisors (together referred to as “the Companies”) strives at all times to provide its services in a way that respects the dignity and independence of people with disabilities. We are also committed to giving people with disabilities the same opportunity to access our services and allowing them to benefit from the same services, in the same place and in a way similar to other individuals.

This policy relates to the standards for providing services to people with disabilities as guided by the Accessibility for Ontarians with Disabilities Act (AODA) - Accessibility Standards for Customer Service, 429/07 however we strive to apply the same principles and respect to individuals with disabilities in our offices across Canada.

Scope

This policy applies to all individuals working for the Companies and all individuals who provide services on behalf of the Companies, including employees and those individuals who have a contractual employment relationship with the Companies.

Definitions

Assistive Device: any piece of equipment a person with a disability uses to help him or her with daily living. Personal assistive devices include, but are not limited to, wheelchairs, hearing aids, white canes or speech amplification devices.

Disability: refers to any person with a disability as defined under Canadian Human Rights legislation. This includes physical, mental or developmental disabilities that may not be visible or permanent.

Guide Dog: a dog trained as a guide for a blind person and having the qualifications prescribed by the regulations under the *Blind Persons’ Rights Act*.

Service Animal: any animal used by a person with a disability where it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or where the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to his or her disability.

Support Person: a person who accompanies a person with a disability in order to help him or her with daily tasks, such as communication, mobility, personal care or medical needs or with access to goods or services. The support person may be a paid support worker, a volunteer, a friend or a family member; the support person does not need to have special training or qualifications.

Policy

- 1) **Communication:** The Companies strive to communicate with clients with a disability in a manner that takes into account both the disability and the client's preferred method of communication. The Companies can communicate with clients in writing, via telephone, email, or meetings, either in person or via video conferencing.
- 2) **Assistive Devices:** Clients with a disability are permitted, where possible, to use their own assistive device when on our premises for the purposes of obtaining, using or benefiting from our goods and services. If there is a physical, technological or other type of barrier that prevents the use of an assistive device on our premises we will first endeavor to remove that barrier. If we are not able to remove the barrier, we will ask the client how he/she can be accommodated and what alternative methods of service would be more accessible to him/her. We will make best efforts to provide an alternative means of assistance to the client with a disability.
- 3) **Service Animals:** Clients with a disability may be accompanied by a service animal and keep the service animal with them on the Companies' premises, if the public or other third parties have access to such premises and the service animal is not otherwise excluded by law. If a service animal must be excluded, we explain to our client why this is the case and explore alternative ways to meet the client's needs. It is the responsibility of the client using the service animal to ensure that the service animal is kept in control at all times.
- 4) **Support Persons:** Clients with a disability may be accompanied by a support person and have access to the support person on the Companies' premises. Where appropriate, Support Persons may be required to acknowledge that it is the client, and not the support person, to whom the Companies is providing its advice and services. The Companies may require a client with a disability to be accompanied by a support person where it is necessary to protect the health or safety of the client with a disability or the health or safety of others on the premises.
- 5) **Notice of Temporary Disruption:** The Companies will make reasonable efforts to provide notice to persons with disabilities in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. If the disruption is anticipated, the Companies will provide a reasonable amount of advance notice of the disruption. If the disruption is unexpected, notice will be provided as soon as possible. The notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

- 6) **Training:** The Companies will provide training to employees and others who deal with the public or third parties on their behalf. Training for new employees will occur as part of the Companies' orientation training, and ongoing training will be provided to all employees with respect to any changes to the Companies' policies, and practices.

Training will cover the following:

- An overview of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard
- The Companies' policy, practice and procedures relating to the Accessibility Standards for Customer Service Policy
- How to interact and communicate to 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 the Companies' goods and services.

- 7) **Feedback Process:** The Companies are committed to providing high quality products and services to all members of the public and third parties that it serves, including clients with disabilities. Comments on how well we achieve this goal are welcomed and appreciated.

Feedback regarding the way we provide products and services to people with disabilities can be made by telephone, in person, in writing, in electronic format (e.g. e-mail) or through other relevant methods.

All feedback will be directed to Nancy Greene, Director of Finance/Operations and the Companies' Accessibility Officer who can be reached at:
(613) 562-2005 ext. 210 or ngreene@delphi.ca

Privacy will be respected and all feedback will be reviewed for possible action that can be taken to improve the Companies' services. In most cases, a response to the feedback will be provided within 30 working days. Feedback and/or responses will be delivered in a format that is accessible to the complainant.

- 8) **Notice of Availability of Documents:** The Companies will notify the public that documents related to accessible customer service, are available upon request by posting a notice in the following location: Company website: www.delphi.ca

The Companies will provide this document 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.

- 9) **Questions or concerns about the Companies' Accessibility Standards for Customer Service Policy or AODA:** Employees may address any questions or concerns to the President. For more information the Customer Service Standard, contact the Ministry of Community and Social Services of Ontario.

Reviews and Approvals of Policy

Release Dates

Initial Release Date:	Date: March 20, 2018
Last Modified Date:	Date: March 20, 2018

Revision Tracking

Revision	Description	Date
1.0	Initial Draft	March 6, 2018
1.1	Final Draft – Initial Release	March 19, 2018

Reviews and Approvals

Company	Signing Authority	Date
The Delphi Group	Ted Ferguson, President	March 19, 2018
GLOBE Series	Nancy Wright, COO	March 19, 2018
Lumos Clean Energy Advisors	Chris Henderson, President	March 19, 2018