



Accessibility for Ontarians with Disabilities Act - Customer Service & Employment Policy

Policy, Practice and Procedures Pertaining to Customers & Employees

Purpose and Background

The goal of Ontario's Accessibility for Ontarians with Disabilities Act (AODA) is to specifically increase the awareness and improve accessibility for persons with disabilities seeking and receiving goods, services, facilities, accommodation, employment, buildings, structures and premises, and includes regulations pertaining to Customer service and employment, among other things.

The objective of this specific policy is to identify and communicate what the equal treatment provisions of the Ontario Human Rights Code, through the AODA and corresponding regulations (Customer Service Standard, Integrated Accessibility Standard, and Built Environment Standard), as introduced, require with respect to goods and service delivery and employment consideration for persons with disabilities, and currently addresses the following:

- The Provision of Goods and Services to Persons with Disabilities – Guests/Customers
- The Use of Assistive Devices by Persons with Disabilities – Guests/Customers, & Employees
- The Use of Guide Dogs and Service Animals by Persons with Disabilities – Guests/Customers
- The Use of Support Persons by Persons with Disabilities – Guests/Customers
- Notification & Supportive Procedures in the Event of Service Disruptions/Emergencies for Persons with Disabilities – Guests/Customers & Employees
- Canadian Niagara Hotels Group and its affiliates and subsidiaries' Employment Standards with Respect to Recruitment & Selection – Employees
- Notification, Individual Accommodation Plans & Return to Work process, Accessible Formats and Communication, Performance Management, Career Development, Advancement and Redeployment
- Staff Training – Employees
- Notice of Availability, Format, and Delivery of Required Documents for Persons with Disabilities – Guests/Customers & Employees
- Feedback – Guests/Customers & Employees

Statement of Commitment and Accountabilities

Canadian Niagara Hotels Group businesses are committed to providing a respectful, welcoming, accessible and inclusive experience where cost-effective goods, services and opportunities are available for all Customers/Guests and Employees alike. The Company is committed to, and strives to ensure that, the Accessibility for Ontarians with Disabilities Act (AODA) standards and all other relevant legislation concerning accessibility of persons with disabilities are embraced, honored, and rigorously observed. Canadian Niagara Hotels Group affiliates and subsidiaries will ensure that all persons within the Company



are aware of both their rights and responsibilities to foster an accessible and inclusive environment with and for persons with disabilities.

To the extent permitted by health and safety regulations, practicality, reasonable cost and business risk, people with disabilities will be given an equal opportunity to obtain, use and benefit from all businesses operated by the Canadian Niagara Hotels Group facilities, services, programs and employment. Where accessibility or use is not available, the Company will make every effort to offer other alternate suggestions. All services provided by the Company to Customers, Guests and Employees alike shall follow the principles of personal dignity and respect, independence, integration, individual consideration of needs, and timely communication.

Whether a person's disability is apparent or not, everyone should be treated with courtesy, made to feel welcome, and have their need for accommodation respected whenever they interact with any business operated by the Canadian Niagara Hotels Group.

Accountabilities

The Company's Executive Committee is accountable to and responsible for:

- The governance of this policy.
- Corporate liability for compliance with legislative requirements, including fiscal responsibility, human costs and human rights issues.
- Supporting and promoting the policy in their area of direct report and throughout the organization.
- Driving the Company's service and employment culture to a high level of understanding regarding disability and accommodation.
- Creating, disseminating/publishing, evaluating and revising the Company's multi-year accessibility plan to prevent and remove barriers for the disabled.

Canadian Niagara Hotels Group - Directors and Managers are accountable to and responsible for:

- Fostering open and constructive communication.
- Demonstrating sensitivity to and respect for confidentiality of information.
- Raising awareness and conducting business unit training to facilitate understanding and delivery of this policy.
- Participating and co-operating to facilitate workplace accommodation.
- Monitoring Staff effectiveness between both Customers and co-workers regarding implementation of this policy.

Canadian Niagara Hotels Group - Associates are accountable to and responsible for:

- Participating and cooperating with all parties to facilitate Guest/Customer and co-worker accommodation requests and efforts.
- Satisfying all Company's service and employment obligations.



Canadian Niagara Hotels Group – Employee Service Associates are accountable and responsible for:

- Participating and cooperating with all parties.
- Acting as a resource for all parties and participants.
- Supporting and educating directors and managers in their obligations under the policy.
- Creating and disseminating information and related training materials for Associates' awareness, understanding, and competency in meeting Customer and employment obligations under AODA.

Definitions

Disability:

Under both Ontario's Human Rights Code and the Accessibility of Ontarians with Disabilities Act (AODA), the definition of "disability" is the same:

- Any degree of physical disability, infirmity, malformation or disfigurement including, but not limited to:
 - Diabetes mellitus;
 - Epilepsy;
 - A brain injury;
 - Any degree of paralysis;
 - Amputation;
 - Lack of physical coordination;
 - Blindness or visual impediment;
 - Deafness or hearing impediment;
 - Muteness or speech impediment; or
 - Physical reliance of 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 a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language.
- A mental disorder.
- An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety & Insurance Act, 1997.

The definition includes disabilities of different severity, visible as well as non-visible disabilities, and disabilities the effects of which may come and go.

This is a broad definition, and one that must be considered closely when educating our Employees in the appropriate response to our Customers.

**Barrier:**

As defined by the Ontarians with Disabilities Act, 2001, anything that prevents a person with a disability from fully participating in all aspects of society because of his/her disability. This includes:

- a physical barrier,
- an architectural barrier,
- an informational or communications barrier,
- an attitudinal barrier, or
- a policy, practice or procedural barrier.

Assistive Device:

- 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 members and Guests bring with them such as hearing aids, glasses, magnifying visual devices, a wheelchair, walker, a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

Canadian Niagara Hotels Group Associates are committed to serving persons with disabilities who use assistive devices to obtain, use or benefit from our goods and services.

Assistive devices such as communication aids, cognition aids, personal mobility aids and medical aids are allowed at all of our facilities, where access is possible at the venue. Persons with disabilities are permitted and encouraged to use their own personal assistive devices to access our facilities and goods and services. It should be noted that it is the responsibility of the person with a disability to ensure that his or her assistive device is operated in a safe manner at all times. In cases where the use of the assistive device presents a clear safety concern to other people, whether Customer or staff member, or where accessibility might be an issue, other reasonable alternative options/measures will be explored in an effort to provide access of goods and services while protecting the safety of others.

Canadian Niagara Hotels Group and its subsidiaries and affiliates will ensure that Associates know how to use typical assistive devices likely to be used by persons with disabilities in the hotel, restaurant, retail, conference, and attractions business segments, and inform Customers of the assistive devices that are available. Any Company Associate member on duty trained in American Sign Language (ASL) will be made available to assist persons with disabilities where possible.

Understanding the importance of dignity and independence for a person with disabilities, an Associate shall not touch or otherwise remove a person's assistive device without that person's consent. If an assistive device is temporarily stored away, the Company shall take necessary measures to ensure the assistive device is safely stored, protected, and easily retrievable if required.

Guide Dog:

A highly trained working dog that has been trained at one of the special facilities to provide mobility, safety and increased independence for people who are blind, and is otherwise described under the Blind Persons' Rights Act.

**Service Animal:**

A "service animal" is defined as "an animal for a person with disability", and includes a Guide Dog. In this policy, a service animal refers to any animal used by a person with a disability for reasons relating to the disability.

Persons with disabilities may bring their service animals on the parts of our premises that are open to the public or other third parties, unless otherwise excluded by law. On rare occasions, a manager may determine that a support person is required, or that a service animal cannot enter an area of the premises consistent with other laws. In these instances, managers will suggest appropriate alternatives and provide assistance in an effort to provide access to the good, service or facility at issue.

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 a pit-bull) 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 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 (i.e. wearing a vest or harness identifying it as a guide dog or service animal), the Company may request verification from the Customer.

Verification may include:

- a valid identification card signed by the Attorney General of Canada;
- valid documentation from an Ontario regulated health professional listed under Section 80.45 (4) (b) of the Integrated Accessibility Standard (Reg. 191/11) confirming that the person requires the animal for reasons relating to their disability, including an Ontario Regulated: Audiologist, Speech-Language Pathologist, Chiropractor, Nurse, Occupational Therapist, Physician or Surgeon, Physiotherapist, Psychologist, Physiotherapist or Mental Health Therapist; or
- a certificate of training from a recognized guide dog or service animal training school.

Care and Control of the Animal:

The Customer/Client that is accompanied by a guide dog 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, the Company will make all reasonable efforts to meet the needs of all parties.

Employees will be prepared to respond to requests of water for the service animal and to show the owner an appropriate location where the animal can be taken to relieve itself.

The Company will ensure that Employees are trained in how to interact with persons with disabilities who are accompanied by a service animal.

**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, services, and facilities.

Any person with a disability who is accompanied by a support person will be allowed to enter Canadian Niagara Hotels Group and its subsidiaries and affiliates premises open to the public with his or her support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises. At attractions that have paid admission, the support person will be admitted for free.

If the Company believes a person with disabilities should be otherwise accompanied by a support person when on Company premises – solely for either the health or safety of the person with disabilities or others on the premises – the Company shall first consult with the person with disabilities and ensure there are no other alternate reasonable ways of either protecting the health and safety of a person or removing/isolating the risk. In the event the Company requires a person with disabilities to secure a support person, the Company shall permit the person reasonable time to contact and make arrangements, including arrival time to the property.

Staff Training

Canadian Niagara Hotels Group of businesses will provide general training to all Employees on this policy, and specific training on Customer service to all staff who are involved in providing Customer service or developing Customer service and employment policies, practices and procedures. New Associates and Associates who commence new roles within the Company, specifically those in which Customer interaction or employee hiring, supervision or accommodation is involved, will undertake training as part of their orientation, if they have not already done so.

Canadian Niagara Hotels Group of businesses will provide Associate training that includes:

- A review of the purposes of the Ontarians with Disabilities Act, 2005 and the requirements of the Accessibility Standards for Customer Service & Integrated Accessibility (Information & Communications, Employment & Transportation).
- How to interact and communicate effectively and respectfully with persons with disabilities of various types.
- How to interact and communicate with persons with disabilities who use an assistive device, or require the assistance of a service animal or support person.
- How to use the equipment or devices available on Company property that may assist in the provision of goods or services to persons with disabilities.
- What to do if a person with a disability is having difficulty in accessing Canadian Niagara Hotels Group and its subsidiaries and affiliates' goods or services.
- What supports are available to Employees of the Company and how to access them.
- Other Aspects of the Company's Employment Policy as it pertains to providing or arranging for accessible formats or communication supports, workplace emergency response information,



performance management, requesting individual accommodation plans, including explaining privacy protection and documentation efforts, what to expect in the return to work process, and accommodation/accessibility efforts in career development planning and advancement and, where applicable, job redeployment.

- The Company's policies, practices and procedures relating to the provision of goods, services, or facilities to persons with disabilities.

Associates will be trained, as appropriate, on policies, practices, and procedures that affect the way goods, services and facilities are provided to persons with disabilities. Associates will also be trained on an on-going basis when changes are made to these policies, practices and procedures.

Canadian Niagara Hotels Group of businesses are also committed to ensuring that organizations providing services on behalf of any member business undertake in training in accessible Customer service, as outlined above.

Notice of Service Disruptions

From time to time, temporary service disruptions will be experienced at Canadian Niagara Hotels Group and its affiliates and subsidiaries' facilities due to reasons that may or may not be within the control or knowledge of the Company. In instances of service disruption, the Company shall provide its visitors with reasonable notice in the event of a planned or unexpected disruption in the facilities or services usually used by persons with disabilities. This notice shall include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

Notice of these temporary disruptions shall be provided in a conspicuous place and manner, and through internal communication systems. The steps to be taken in connection with a temporary disruption will be available at the location and shall be provided to visitors as requested.

Employment Related Accessibility Policies:

The Canadian Niagara Hotels Group and its affiliates and subsidiaries maintain a detailed handbook for Employees which is presented to all candidates for employment prior to hire and which outlines all applicable policies pertaining to staff, including provisions for persons with disabilities.

Customer/Employee Feedback Process

Canadian Niagara Hotels Group and its affiliates and subsidiaries provide Guests/Customers/and Employees with the opportunity to provide feedback on the service provided to persons with disabilities. Information about the feedback process will be readily available to all Customers/Clients and notice of the process will be made available at location reception.

The goal of this policy is to meet service both delivery expectations while serving Guests/Customers as well as employment related matters pertaining to persons with disabilities.

Comments on our services regarding how well those expectations are being met are welcomed and appreciated.



Where possible, accessibility complaints will be addressed immediately. However, some accessibility complaints may require more effort to address, and must be reviewed for further action, possibly at a higher level. Canadian Niagara Hotels will acknowledge verbal/written/telephone feedback within three business days, and within fifteen business days of the receipt of a mailed/e-mailed complaint. In some cases, it may not be possible or appropriate to acknowledge feedback, for example, if the Guest/Customer or employee wish to remain anonymous, or indicates that he/she does not want to receive an acknowledgment.

Questions about this Policy & Accessibility Compliance Reports

This policy exists to achieve service excellence by Company representatives to Customers and Employees with disabilities.

If there are any questions about the purpose, interpretation or application of this policy, including requesting a copy of the most recent accessibility compliance report filed, please contact Employee Services @ hr@niagarafallshotels.com – 905- 374-4446 x 4352