 <p>DATA DIRECT "Empowering our Employees to outperform Customers' expectations through innovation, commitment and effective leadership."</p>	<b>Health &amp; Safety</b>	
Department	<b>Accessibility Plan for Ontarians with Disabilities Act – 2005 Ontario Regulation 429/07</b>	ISSUE DATE
ADMINISTRATIVE	REV 001 May 2023 REV 002 Nov 2023 REV 003 Mar 2024	January 3, 2011

## 1.0 PURPOSE

1.1 To define Data Direct Group Inc.'s Policy with respect to the Accessibility Standards for Customer Service, Ontario Regulation 429/07 under the Accessibility for Ontarians with Disabilities Act – 2005. Data Direct Group Inc. is committed to ensuring equal access and participation for people with disabilities. 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 meeting our accessibility requirements under the *Accessibility for Ontarians with Disabilities Act* and Ontario's accessibility laws. We are committed to meeting current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination.

## 2.0 SCOPE

2.1 This procedure is applicable only to Data Direct Group Inc.'s employees.

## 3.0 DEFINITIONS

3.1 Disability as defined in the Act means;

(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, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, general 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 any other animal, or on a wheelchair or other remedial appliance or device,

(b) a condition of mental impairment or a development disability,

(c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or the 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;

3.2 Section 38 of AODA states that the law that provides the higher level of accessibility is the law that must be followed.

3.3 The AODA allows for enforcement of these levels of customer service through inspections, compliance orders and administrative penalties.

3.4 Section 3 of the ADOA sets out that nothing in the Act or in the regulations diminishes in any way the legal obligations of the Government of Ontario or any person or organization with respect to persons with disabilities that are imposed under any other Act or otherwise imposed

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by law.

## 4.0 POLICY

4.1 Data Direct will offer reasonable policies and procedures necessary for providing goods and services to people with disabilities.

4.2 Data Direct will make efforts to ensure that policies, practices and procedures are consistent with the key principles of independence, dignity, integration and equality of opportunity.


4.3 Ensure that all employees as well as everyone developing our customer services policies receives training on all topics outlined in the customer service standard.

4.4 Data Direct will communicate with a person with a disability in a manner that takes into account his or her specific disability. We will not prohibit support persons or guide dogs from entering our facilities and will ensure full wheelchair or assisted device access to customer service areas as required.

4.5 In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, Data Direct 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. The notice will include the services and facility affected. We will post the notices on our doors at work so the public can see it upon visiting as well as on our websites, and social media sites. In addition, we would email our customers to make them aware.

4.6 Data Direct has a process for people to provide constructive feedback on how we provide goods and services to people with disabilities. This process includes how Data Direct will respond to any of this feedback and how we will take action on any complaints. This information about our feedback process can be made available to the public as required. All employees and customers are welcome to provide feedback that will help us identify barriers and we will respond to the concerns in a timely manner. Employees and customers are able to approach their managers and our account representative and discuss any concerns they have about providing or receiving assistance that would enhance the experience of the person with needs. Alternatively, the employee or customer may create their communication in writing and present to their managers or account managers. Data Direct encourages ideas to improve in these areas. All ideas are brought forth at meetings held regularly through the year with Management, Executives, and Founders and outcomes would be communicated in a timely manner back to the employee or client. All information and communication is provided at no cost and offering our services to those with needs will be at the same price structure as those with no special needs. This policy is available upon request by clients and we will share the policy in a manner that best meets their needs.

4.7 Data Direct has notified employees, job applicants and the public that accommodations can be made during recruitment and hiring if required. We notify job applicants when they are individually selected to participate in an assessment or selection process that accommodations are available upon request. We provide updated information to employees whenever there is a change to existing policies. Where needed, we will also provide customized emergency information to help an employee with a disability during an emergency.

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4.8 Data Direct will make written information and other forms of communication accessible upon request to our employees or clients. If required we will provide these accessible formats in a timing manner. There is no additional charge for these accessible formats. There are some exceptions to make information accessible as outlined in How to Make Information Accessible by the Ontario Government.

The policy will include how to comply in regards to: emergency and public safety information, feedback processes for the public, employee information, and public information.

Types of accessible formats include: HTML and Microsoft Word, braille, accessible audio formats, large print, and a video transcript.

Types of communication supports include:

- reading the written information aloud to the person directly
- exchanging hand-written notes, or providing a note taker or communication assistant
- captioning or audio description
- assistive listening systems
- augmentative and alternative communication methods and strategies (for example, the use of letter, word, or picture boards, and reading devices that speak out loud to convey the information)
- sign language interpretation and intervenor services
- repeating, clarifying or restating information
- 

Tools to make information accessible:


- American Sign Language (ASL)
- Braille
- Captioning
- Digital Accessible Information System (DAISY)
- Screen Reader
- Structured electronic files
- Language settings for screen readers

## 5.0 ON-GOING PLAN REQUIREMENT

The plan is dynamic and will be reviewed and enhanced on an on-going basis. Input is drawn from past experiences and requirements going forward. Implemented in 2020 makes 2025 the year to review. The Department Managers, Executive Team and the Founders shall review the plan, document any changes required, implement changes and discuss timeframes associated with new items or items to be modified. The minutes of the meeting will be maintained in our internal net drive. The plan is centered around these areas:

### Initiatives, strategies, planning and action to remove and prevent barriers

Ensuring that all Human Rights regarding the attitudinal behavior of the employees and management towards those with disabilities are respected.

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Throughout our internal training sessions all feedback is welcome to help eliminate all barriers. Great feedback is also given from our clients who access our services.

## **5.0 TRAINING**

5.1 Training will be provided to each person as soon as reasonable after they are assigned duties, generally after their 90 day probation period.

5.1.1 Data Direct will provide training in the form of a Self-Awareness Quiz, watching a Serv-Ability video (website information listed below), reviewing the Training Resources. The training websites are shown in our Training Policy Document. Training is available to watch, read, hear or have it presented.

## **6.0 RECORD KEEPING**

6.1 Record of each Employee's completion of the training will be filed electronically on our net drive. It is available upon request.