



## Accessibility Policy

<b>Policy Administrator:</b> ISC Human Resources	<b>Approved by:</b> President, Credit Risk Management Canada Ltd.	
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### Approval Table

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# Defined Terms

**“AODA”** means the *Access for Ontarians with Disabilities Act, 2005* (Ontario);

**“Business Days”** means any day except Saturday, Sunday, or any day that is a public (statutory) holiday in Ontario;

**“Company”** means Credit Risk Management Canada Ltd (“UPL” or “UPLevel”);

**“Employees”** means employees and contractors of the Company; and

**“Policy”** means this Accessibility Policy.

## Scope

This Policy applies to all Employees of the Company. If there is a conflict between this Policy and any other Company policy, this Policy is to be followed and takes precedence.

## 1. Policy Statement

The Company is committed to ensuring equal access and participation for people with disabilities. Based on the principles of independence, dignity, integration and equality of opportunity, the purpose of this Policy is to advise Employees of the requirements of the *Access for Ontarians with Disabilities Act, 2005* (“AODA”) and to ensure the Company meets accessibility requirements under AODA and all applicable accessibility laws.

## 2. AODA Standards

### 2.1 Training

The Company will provide training to all Employees on Ontario’s accessibility standards. Training will be provided to existing staff and to new staff within three (3) months of hire. Training will be provided to all staff when changes to this Policy and its associated procedures require additional training. Records of training dates and participants will be kept.

Training must cover:

- The purpose of AODA and the requirements of the Customer Service Standards;
- The Company’s policies related to the Customer Service Standards;
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person;
- How to use the equipment or devices available onsite or otherwise that may help with providing goods, services or facilities to people with disabilities; and
- What to do if a person with a disability is having difficulty in accessing our organization’s goods, services, or facilities.

## **2.2 Assistive Devices**

Anyone with a disability may use their own assistive device(s) for the purpose of obtaining and using the Company's programs and services while adhering to the Company's security protocols and privacy obligations. The Company will ensure that Employees are familiar with assistive devices that may be used by customers with disabilities while interacting with the Company.

## **2.3 Communication**

Employees must communicate with a person with a disability in a manner that considers the person's disability. Employees are required to work with the person to determine what method of communication works best for them.

## **2.4 Service Animals**

The Company welcomes people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public and third parties. Employees may ask for documentation from a regulated health professional when they cannot easily identify that an animal is a service animal.

Service animals must be under the care and control of the person with a disability at all times.

## **2.5 Support Persons**

A person with a disability is allowed to have a support person accompany them on the Company's premises. Where confidential and/or personal information is to be discussed, the Company may require verbal or written consent from the person with a disability to allow their support person to be present.

## **2.6 Notice of Temporary Disruption**

In the event of a planned or unexpected disruption to its services, the Company will post a notice to its website. The notice will include information on the reason for the disruption, the anticipated length of the disruption, and information on alternate services, if available.

## **2.7 Feedback Process**

Anyone may provide feedback on how the Company interacts with people with disabilities through the Company's website, as feedback helps the Company identify barriers and respond to concerns. The Company will ensure its feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communications supports upon request.

Complaints will be addressed according to the Company's complaint management procedures, with complaints brought to the attention of the VP, Operations within 24 hours of being submitted and a response provided to the complainant within five (5) Business Days.

## 2.8 Notice of Availability of Documents

As posted on the Company's website, documents related to accessible customer service are available upon request. The Company will work with the person making the request to determine the suitability of the format or communication support, and will provide the accessible format at no additional cost.

## 3. Compliance

Refusal to comply with this Policy may result in corrective discipline up to and including termination.