

Oakwood Resort – AODA Policies, Practices and Procedures

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Purpose and Background

Under the AODA, Ontario Regulation 429/07, entitled "Accessibility Standards for Customer Service" (the "Service Regulation"), came into effect on January 1, 2008. The Service Regulation establishes accessibility standards specific to customer service for private sector organizations that provide goods and services to members of the public or other third parties.

The objective of this policy is to identify what the equal treatment provisions of the Ontario Human Rights Code, through the AODA and the Service Regulation, require with respect to service delivery to persons with disabilities and addresses the following:

- The Provision of Goods and Services to Persons with Disabilities;
- The Use of Assistive Devices;
- The Use of Guide Dogs and Service Animals;
- The Use of Support Persons;
- Notice of Service Disruptions;
- Customer Feedback;
- Training; and
- Notice of Availability and Format of Required Documents.

Statement of Commitment

The Oakwood Resort is committed to providing a respectful, welcoming, accessible, and inclusive environment for all persons with disabilities in a way that is respectful of the dignity and independence of people with disabilities, and in a manner which takes into account the person's disability and embodies the principles of integration and equal opportunity.

Scope of this Policy

1. This policy applies to the provision of goods and services at premises owned and/or operated by The Oakwood Resort, as well as any interactions with employees and customer/clients via telephone, email or written mail.
2. This policy applies to employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of The Oakwood Resort

General Definitions

Accessible Formats: include, but are not limited to accessible electronic formats, Braille, text transcripts, large print, recorded audio, and other formats accessible to persons with disabilities.

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 a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

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,
- a policy, practice, and procedure barrier.

Communication Supports: include but are not limited to sign language, plain language and other communication supports that facilitate effective communications.

Disability: a key feature of the AODA is its definition of "disability". Under the AODA, the definition of "disability" is the same as the definition in the Ontario Human Rights Code [2]:

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.

Additional Definitions:

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.

Service Animal: The Service Regulation [3] defines a "service animal" as "an animal for a person with disability".

In this policy, a service animal is:

- any animal used by a person with a disability for reasons relating to the disability; or
- where the person provides a letter from a physician confirming that they require the animal for reasons relating to their disability; or
- where the person provides 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.

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 and services.

Policy as per our Employee's & Our Guests:

Purpose and Background

The Integrated Accessibility Standards Regulation (Regulation 191/11) (the "IASR") under the AODA provides standards for private sector organizations to increase accessibility for persons with disabilities specifically in the areas of:

- ✓ Employment
- ✓ Training
- ✓ Information and Communications
- ✓ Recruitment
- ✓ Emergency Response Plan
- ✓ Accommodation
- ✓ Return to Work
- ✓ Performance Management
- ✓ All other "employee lifecycle" services
- ✓ All types of Guest services in terms of Guests accessing the Oakwood Resorts' product & services throughout our property

Accessibility Plan

In order to achieve our goals, The Oakwood Resort has developed a multi-year Accessibility Plan which documents The Oakwood Resort's strategy and commitment to meet the applicable standards of the AODA. The Accessibility Plan will be reviewed and updated at least once every five years. The Oakwood Resort HR department will prepare an annual status report on the progress and measures taken to implement The Oakwood Resort's Accessibility Plan as it pertains to our employee's in the following areas.

(1) Employee Training

The Oakwood Resort will ensure that timely training is provided to all necessary persons, that it aligns with the requirements of the accessibility standards referred to in the AODA, and The Oakwood Resort will continue to provide training on the Human Rights Code as it pertains to persons with disabilities.

Anyone that is helping to develop Oakwood Resort's policies will be trained.

(Appropriate records of training are maintained.) Training, using the most appropriate methodologies, as appropriate, is provided to the following person(s):

- all employees
- all persons who work under a contractual agreement directly with The Oakwood Resort
- all volunteers
- NOTE – due to the seasonal nature of our business – all employee's – new, existing, and returning employee's (who return from year to year in our spring/summer season), will be provided training which includes all updates re this AODA policy and any other updates regarding our multi-year AODA plan and progress against such...
- If at any time there are any changes to our policies, ongoing training will be provided as required.

(2) Information and Communication Standards

(a) Feedback

The Oakwood Resort will ensure that its processes for receiving and responding to feedback are made available to persons with disabilities, whether members of the public, clients, customers or employees, in

an appropriate, accessible format or communication support, upon their request, and that members of the public are notified of the availability of such an option.

(b) Accessible Formats and Communication Supports

The Oakwood Resort will, upon request and consultation, endeavour to provide information and communications under our control about our goods and services to people with disabilities using the appropriate accessible format or communication support wherever possible, in a timely manner and on par with the fee charged to others for the same information. The Oakwood Resort will notify the public about the availability of accessible formats and communications supports. The Oakwood Resort will review and determine its current offerings of accessible formats and communications supports and will engage in an ongoing process of identifying additional accessible formats and communications supports that may be offered by The Oakwood Resort.

(c) Accessible Websites and Web Content

The Oakwood Resort will ensure all of its websites, content, and applications directly controlled by The Oakwood Resort, or through its contractual relationships, will be in conformity with WCAG 2.0 Level AA, as required by the IASR, by April 2024, as practicable

(3) Employment Standards

(a) Employee Recruitment

The Oakwood Resort will notify its employees and external applicants about the availability of accommodation for applicants with disabilities in its recruitment process.

(b) Employee Recruitment, Assessment or Selection Process

The Oakwood Resort will ensure that job applicants are notified when they are individually selected to participate in the assessment or selection process, and that accommodation for disabilities are made available upon request in relation to the materials or processes to be used. The Oakwood Resort will consult with individuals who request accommodations and will provide for appropriate accommodations.

(c) Notice to Successful Applicants

When presenting offers of employment, The Oakwood Resort will notify the successful applicant of its policies for accommodating employees with disabilities.

(d) Informing Employees of Supports

The Oakwood Resort will ensure that employees are informed of all accessibility policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practicable after commencing employment.

(e) Accessible Formats and Communication Supports for Employees

Upon request of an employee with a disability, The Oakwood Resort will consult with the employee to provide, or arrange for accessible formats and communication supports for information that is needed to perform his/her job, and information that is available to other employees. In order to determine the suitability of an accessible format or communication support, The Oakwood Resort will consult with the employee making the request. Accessible formats and communications supports regarding general workplace information will also be provided to employees with disabilities.

(f) Employee & Guest Workplace Emergency Response Information

The Oakwood Resort will provide employees with disabilities individualized workplace emergency response information when the employee's disability is such that the information is required and The Oakwood Resort has been informed of the need to accommodate the employee's disability.

(g) Employee Documented Individual Accommodation Plans

The Oakwood Resort currently accommodate the needs of its employees with disabilities as required under the Ontario Human Rights Code. The Oakwood Resort will develop individualized accommodation

plans for its employees with disabilities, as The Oakwood Resort is made aware. The process by which The Oakwood Resort will consult, develop, determine, document, review and routinely update the individualized accommodation plan will be formalized. The Oakwood Resort will implement and maintain measures effective to maintain the privacy of its employees with disabilities.

(h) Employee Return to Work Process

The Oakwood Resort will maintain a documented return to work process for employees who have been absent from work due to a disability and who require disability-related accommodations and support in order to return to work. The return to work process will clearly define and outline the steps The Oakwood Resort will take to facilitate the return to work and will include documented accommodation plans for each individual as part of the process. The above stated return to work process will not replace, hinder or override any other return to work process created by or under any other statute (i.e., the Workplace Safety Insurance Act, 1997).

(i) Employee Performance Management, Career Development and Advancement and Redeployment

The Oakwood Resort will continue to consider the accessibility needs of employees with disabilities as well as individual accommodation plans, when conducting performance management reviews, providing career development and advancement to employees and when redeploying employees.

Customer Service Policy, Practice and Procedure for Guests:

(1) The Provision of Goods and Services to Persons with Disabilities

The Oakwood Resort 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 our guests receive the same value and equality;
- Allowing guests 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 guests 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 guest's disability.
- *NOTE - It is best to wait until an individual describes his or her situation to you, rather than to make your own assumptions. Many types of disabilities have similar characteristics and assumptions may be wrong.*

(2) Assistive Devices

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by The Oakwood Resort. 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, 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.

(3) Guide Dogs and Service Animals

A guest with a disability that is accompanied by a guide dog or service dog will be allowed access to premises that are open to the public unless otherwise excluded by law. 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 pit bulls) 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. If a guide dog or service animal is excluded by law, The Oakwood Resort will try to offer alternative methods to enable the person with a disability to access goods and services, when possible.

Recognizing a Guide Dog and/or Service Animal: If it is not readily apparent that the animal is being used by the guest for reasons relating to his or her disability, The Oakwood Resort 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 guest that is accompanied by a guide dog or service animal is responsible for maintaining care and control of the animal at all times.

(4) Allergies

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

(5) Support Persons

If a guest with a disability is accompanied by a support person, The Oakwood Resort will ensure that both persons are allowed to enter the premises together and that the customer/client is not prevented from having access to the support person. All guest confidentiality requirements and practices will also apply to support persons.

(8) Feedback Process

The Oakwood Resort shall provide customers/clients 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. Feedback forms along with alternate methods of providing feedback such as verbally (in person or by telephone) or written (hand written or email) will be available upon request.