

COSMETICA LABORATORIES, INC

Ensuring Equal Access to Goods and Services for Employees and Customers with Disabilities

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Department: Human Resources

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Approvals:

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I. PURPOSE

To ensure that employees at Cosmetica Laboratories Inc. (hereby known as 'Cosmetica') are aware of the various challenges surrounding employees, customers and visitors with disabilities, having knowledge and information about different types of disabilities impacting our employees, customers and visitors, and to do everything reasonable to ensure that our disabled employees, customers and visitors have equal access to goods and services while visiting or working on our premises.

II. POLICY STATEMENT

Cosmetica is committed to creating an inclusive culture across the organization by preventing and removing barriers for persons with disabilities. Where it is not possible to remove barriers, Cosmetica will make efforts to accommodate persons with disabilities in a timely, effective and suitable manner.

Cosmetica supports the principles of the Accessibility for Ontarians with Disabilities Act (AODA), which includes both the Customer Service Standard and the Integrated Accessibility Standards Regulation (IASR).

Cosmetica's goal is to ensure accessibility for our employees and the public.

III. APPLICATION & SCOPE

This policy applies to all of Cosmetica's employees, customers, and visitors.

IV. DEFINITIONS:

Employee

Anyone who works at Cosmetica that is permanent, temporary, on contract or on a job placement.

Visitor

A visitor can be a client, vendor, supplier or anyone that visits the premises.

Disability

Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness

- Includes diabetes, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical compensation,
- Blindness or visual impediment, deafness or hearing impediment,
- Muteness or speech impediment or
- Physical reliance on a guide dog or other animal or on a wheelchair or other appliance or device

A condition of mental impairment, developmental disability or learning disability.

Any injury or disability for which benefits were claimed or received under a provincial insurance plan

Barrier

Anything that keeps someone with a disability from fully participating in all aspects of society because of their disability. Barriers can involve:

- Attitude – the way people think
- Architectural / Structural – relate to design elements of a building
- Information / Communication – difficulties in receiving and conveying information
- Technology – technologies can prevent people from accessing information
- Systemic – company policies and procedures can create barriers often unknowingly

Equal Opportunity

People with disabilities have an opportunity equal to that given to others to access our goods and services

Integration of Services

Service is provided in a way that allows the disabled person to benefit from the same service, in the same place and in the same way as other customers.

Assistive Devices

Those devices utilized by disabled persons in order to improve their functionality. Assistive devices can include canes, wheelchairs, hearing aids, support persons, service animals, and many others.

Feedback

Includes any comments, compliments, suggestions, or complains by employees, customers, or visitors.

Information

Includes data, facts, and knowledge that exist in any format including text, audio, digital or images that convey meaning.

V. REQUIREMENTS & RESPONSIBILITIES

Management, Human Resources, & Employees

1. Confidentiality of Information

Personal information concerning an individual's disability cannot be released without written consent of the individual and must be managed in a manner that is consistent with Freedom of Information Guidelines and Personal Information Protection Guidelines where appropriate. Where the accommodation process requires the release of confidential information to a third party (such as an external resource group), the third party, and any person or department delegated by that third party, will be required to ensure that confidentiality is protected, that the information obtained is kept in a secure location, and used solely for the purpose that the release was required.

2. Notice of Successful Applicants

Successful applicants shall be notified about policies for accommodating employees with disabilities if requested by the applicant through self disclosure.

Cosmetica will make every attempt to accommodate employees or applicants with disabilities upon self-disclosure. This will include the following:

Employee Supports

Cosmetica will inform employees of the policies used to support employees with disability, including policies or job accommodations, that takes into account an employee's accessibility needs due to a disability. Cosmetica will provide this information to new employees after they begin employment and provide update information to all employees when there is a change to existing policies or job accommodations that take into account an employees' accessibility needs.

Workplace Emergency Response Information

If an employee's disability is such that workplace emergency response is necessary and Cosmetica is aware of the need for accommodation, this information shall be provided to employees. In addition, this information shall be provided, with the employee's consent, to the person designated to provide assistance. When the employees moves to a different location, or employee's overall accommodation needs or plans are reviewed, or the company reviews its overall general emergency response plan, all this information should be reviewed and updated.

Documented Individual Accommodation Plan

A written process for the development and maintenance of documented individual accommodation plans shall be developed with employees with disabilities. The plans may include accessible formats and communication supports if the workplace emergency response information is requested.

Return to Work Process

Cosmetica shall have a return to work process documented for employees with disabilities returning to work and need accommodation. This document should outline the steps Cosmetica will take to facilitate the process.

Performance Management and Career Development and Redeployment

Cosmetica shall take the accessibility needs of its employees with disabilities as well as any individual accommodation plan when providing career development, performance management and when considering redeployment.

Management & Human Resources

1. Information and Communications

i. Feedback

Cosmetica will continue to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communications supports, upon request.

ii. Accessibility Formats and Communication Supports for Employees

When an employee requests it, Cosmetica will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:

- Information needed to perform the employee's job
- Information that is generally available to all employees in the workplace

Cosmetica will consult with the employee making the request in determining suitability of an accessible format or communication support.

Management & Purchasing

1. Procurement

Cosmetica will incorporate accessibility features and criteria when procuring and acquiring goods, services, or facilities, except where it is not practical to do so. If this is not possible, Cosmetica will provide information upon request.

Product Development

1. Accessible Website and Web Content

Cosmetica shall make their internet website and web content conform with WCAG 2.0 at Level A and increase to Level AA. Cosmetica shall be in accordance with the schedule set out in the AODA Integrated Accessibility Standards.

Human Resources

1. Employment

Cosmetica's Human Resources Department and Management will attempt to accommodate employees and customers with disabilities when required to do so.

Recruitment

Cosmetica shall notify employees and the public about the availability of accommodation for applicants with disabilities during the recruitment and assessment process.

Recruitment, Assessment or Selection Process

Job applicants will be notified that accommodations for material to be used are available for those selected for an interview or testing, if requested. Cosmetica shall consult with an applicant who requests an accommodation in a manner that takes into account their disability.

2. Accessibility Policy

Through this policy Cosmetica Laboratories Inc. confirms our commitment to meet the needs of persons with disabilities in a timely manner. Cosmetica will make these documents publicly available and provide them in an accessible format upon request.

3. Accessibility Plan

Cosmetica shall prepare a multi-year Accessibility Plan which will outline a phased in strategy that will remove barriers and address current and future requirements of the AODA. Cosmetica will report annually on the progress and implementation of the plan; post on website and make this information available to the public. The plan will be reviewed and updated every five (5) years.

Cosmetica shall meet all the requirements of AODA which includes the Customer Service Standard and the Integrated Accessibility Standards and will provide information in an accessible format, upon request.

4. Training

Cosmetica will ensure that training is provided on the requirements of the accessibility standards referred to in the Regulation and continue to provide training on the *Human Rights Code* as it pertains to persons with disabilities.

VI. PROCEDURE

Cosmetica Laboratories Inc. will ensure our disabled customers and/or visitors have equal access to goods and services while on our premises. This commitment involves:

- a) Ensuring awareness of disabilities that can potentially impact our customers
- b) Understanding the different assistive devices that disabled customers or visitors may depend on and how those devices may impact their access to goods and services we provide
- c) Ensuring that we behave in a manner that takes into consideration customer and visitor disabilities, such that their access to goods and services is equivalent to that of our non-disabled customers and visitors, on a reasonable basis.
- d) That all Company employees that deal with customers and visitors, or are involved in the provision of Company goods and services receive adequate training in the supporting legislation as well as in the appropriate procedures of dealing with these customers and visitors
- e) That this training is refreshed periodically as the legislation changes, and as individual employee roles change

VII. REFERENCE

Accessibility for Ontarians with Disabilities Act, 2005
Ontario Human Rights Code
Integrity Accessibility Standards Regulation

VIII. DOCUMENTATION

N/A

VIII. RESPONSIBILITY FOR PROCEDURE MODIFICATION

Human Resources

VII. DISTRIBUTION

SharePoint Corporate Site
Company Website: www.cosmeticalabs.com

VIII. ENCLOSURE

None required

IX. REVISION SUMMARY

Rev 1.