

Document Name:	Ensuring Equal Access to Goods and Services for Employees and Customers with Disabilities		Pages:	6
Revision Date:	June 1 , 2021	Supersedes: SOP No.: 210-02-016	Replacement	
Author:	Human Resources	Approved By:	Shannon McGivern	

PURPOSE

To ensure that employees of Cosmetica Laboratories Inc., are aware of the various challenges encountered by employees, customers, and visitors with disabilities by providing knowledge and information about different types of disabilities and taking action to ensure equal access to goods and services for individuals visiting or working on our premises

POLICY STATEMENT

Cosmetica is committed to creating an inclusive culture for persons with disabilities and preventing and removing the barriers that affect them. Where it is not possible to remove barriers, Cosmetica will make every effort 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 include both the Customer Service Standard and the Integrated Accessibility Standards Regulation (IASR).

Cosmetica’s goal is to ensure accessibility for our employees, visitors and the public.

APPLICATION & SCOPE

This policy applies to all employees, students, contractors, and visitors. It applies in any location in which Cosmetica engages in work-related activities.

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 co-ordination;
- Blindness or visual impediment, deafness or hearing impediment;
- Muteness or speech impediment;
- 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, learning disability or mental disorder;
- 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 include:
 - Attitude - the way people think
 - Architectural/ Physical - 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, among others.

Feedback: Includes any comments, compliments, suggestions, or complaints 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.

REQUIREMENTS & RESPONSIBILITIES

Cosmetica Laboratories, Human Resources and Employees

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 respects applicable privacy laws. 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.

Notice to Successful Job Applicants

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

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

i. Employee Supports

Cosmetica will inform employees of the policies and practices available to support employees with a disability, including 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 updated information to all employees when there is a change to existing policies or job accommodations that take into account an employees' accessibility needs.

ii. 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 with the employee's consent, to the person designated to provide assistance. When the employee 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.

iii. 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.

iv. Return to Work Process

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

v. Performance Management, Career Development, and Redeployment

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

Management and 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 and Procurement

i. 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.

ii. Product Development

- **Accessible Website and Web Content**

Cosmetica shall comply in accordance make its internet website and web content conform with WCAG 2.0 Level AA by June 30, 2021. Cosmetica shall be in accordance with the schedule for achievement of accessibility standards set out in the AODA Integrated Accessibility Standards.

Human Resources

Employment

Cosmetica will seek to accommodate employees and customers with disabilities as is appropriate under the circumstances.

Recruitment

Cosmetica shall notify employees and the public about the availability of accommodation for job 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.

Accessibility Policy

Through this policy, Cosmetica 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.

Accessibility Plan

Cosmetica shall prepare a Multi-Year Accessibility Plan that 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 the plan on its 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.

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.

PROCEDURE

Cosmetica 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 relevant legislation as well as in the appropriate procedures of dealing with customers and visitors with disabilities.
- e) That this training is refreshed periodically as the legislation changes, and as individual employee roles change

REFERENCE

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

RESPONSIBILITY FOR PROCEDURE MODIFICATION

Human Resources

DISTRIBUTION

SharePoint Corporate Site
Employee Communication Boards
Company Website: www.cosmeticalabs.com

