

Accessible Customer Service Policy

Purpose

At Bitstrips ULC (“Bitstrips”) and Snap ULC (“Snap”), we are committed to providing exceptional customer service to all of our clients. Making services accessible to persons with disabilities is an important part of this commitment to superior customer service.

We strive to provide our services in a way that respects the dignity and independence of people with disabilities. We are also committed to giving people with disabilities the same opportunity to access our services and allowing them to benefit from the same services in the same place and in a similar way as other clients.

This policy establishes our commitment to accessible customer service under the *Accessibility for Ontarians with Disabilities Act, 2005* and the customer service standard requirements under Ontario Regulation 191/11, The Integrated Accessibility Standards Regulations.

Application

Our Accessible Customer Service Policy (“the Policy”) applies to all of our employees and managers, and to any third parties (e.g., contractors) who we may arrange to provide our goods and services on our behalf. This policy applies to the extent that members of the public interact with our representatives directly and are able to directly access our services, products, and premises.

Communication

When communicating with people with disabilities, we will do so in ways that take into account their disability. Accordingly, we will train any staff who communicate with clients on how to interact and communicate with people with various types of disabilities.

Assistive devices

People with disabilities are welcome to use their own personal assistive devices (e.g., white cane, wheelchair, hearing and visual aids) in order to access or use our facilities and obtain our services, to the extent that those facilities and services are made available and accessible to the general public. We will train our staff to become familiar with various assistive devices that may be used by clients with disabilities while

accessing our services. We will also ensure that staff know how to use assistive devices that are available for clients on our premises.

Service animals and support persons

People with disabilities who are accompanied by a service animal are welcome on all parts of our premises that are open to the public and other third parties. Clients may keep the animal with him/her unless excluded by law, in which case, we will consider alternative measures to access to our services. Our staff and others dealing with the public on our behalf will be trained on how to interact with people with disabilities who are accompanied by a service animal.

Any person with a disability who is accompanied by a support person will be allowed to enter our facilities with his or her support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises.

Notice of temporary disruption

In the event of a planned or unexpected disruption in facilities or services usually used by people with disabilities, we will post a notice about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available. The notice will be placed at or near the affected facility or service and/or through other means (e.g., website) where necessary.

Training for staff

We will provide training to all our employees, all persons who are involved in the development and approval of our policies, and all other persons who provide goods, services or facilities on behalf of Bitstrips and Snap. This training will be provided shortly after staff commence their duties and/or upon changes to this Policy, practices and procedures.

Training will include the following:

- The purposes of the *Accessibility for Ontarians with Disabilities Act, 2005* and the requirements of the customer service standard
- How to interact and communicate with people with various types of disabilities

- 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 various assistive devices available on our premises, if any
- What to do if a person with a disability is having difficulty in accessing our facilities and services
- Our policies, practices and procedures relating to the customer service standard.

Feedback process

We welcome any feedback on our services from people with disabilities. Please send your comments to our [Twitter direct message](#) or use this [Contact Form](#).

We will consider your comments carefully. Clients can expect to hear back as soon as possible or within a reasonable period of time.

Note: Copies of documents required under the *Accessibility for Ontarians with Disabilities Act, 2005* are available upon request. Please notify us in advance if you require such documents in an alternative or accessible format.

Date:12/30/17

Prior Version Date: n/a

Accessibility Policy and Multi-Year Accessibility Plan

Compliance note: This policy and multi-year plan are prepared in compliance with Ontario Regulation 191/11 under the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”), as amended.

Introduction

The Integrated Accessibility Standards Regulations (“IASR”) under the AODA require that Bitstrips ULC and Snap ULC (“Bitstrips” and “Snap”) establish, implement, maintain and document its accessibility policies and multi-year accessibility plan (the “Accessibility Plan”), which outlines our strategy for preventing and removing barriers for persons with disabilities and to meet our requirements under the IASR and the AODA.

The Accessibility Policy and Multi-Year Accessibility Plan will be publicly available, including in an accessible format upon request. The Accessibility Plan will be reviewed and updated, if applicable, at least once every five years.

Application

The Accessibility Policy and Multi-Year Accessibility Plan applies to all employees of Bitstrips and Snap in Ontario, and, where indicated, to any independent contractors providing services on behalf of Bitstrips and Snap in Ontario.

Our Commitment

In fulfilling our mission, Bitstrips and Snap strive to treat all individuals in a manner that allows them to maintain their dignity and independence. Bitstrips and Snap promote integration and equal opportunity and is committed to meeting the needs of people with disabilities in a timely manner. We will seek to achieve this by preventing and removing barriers to accessibility and by meeting accessibility requirements under the AODA. This Accessibility Policy and Multi-Year Accessibility Plan sets out Bitstrips and Snap’s policy on how we will achieve accessibility generally, as well as in employment, and information and communications.

Under the IASR, the following accessibility strategies set out the requirements that are applicable to Bitstrips and Snap:

1. Training;
2. Information and Communication;
3. Kiosks;
4. Employment; and
5. Design of Public Spaces Standards

Accessibility Standards for Customer Service

Bitstrips and Snap are committed to compliance with the accessibility standards for customer service as provided for under the IASR. In accordance with O. Reg. 191/11, Bitstrips and Snap have developed and implemented its Accessible Customer Service Policy.

Accessible Emergency Information

Bitstrips and Snap are committed to providing all customers and clients with publicly available emergency information in an accessible way upon request.

Bitstrips and Snap will also provide employees with disabilities with individualized emergency response information when necessary.

Integrated Accessibility Standards Regulations (IASR)

The following sets out how Bitstrips and Snap are committed to complying with the IASR.

1. Training

Bitstrips and Snap are committed to providing training on the requirements of the accessibility standards referred to in the IASR and on the *Human Rights Code*, as it pertains to persons with disabilities.

In accordance with the IASR, Bitstrips and Snap will:

- determine and ensure that appropriate training on the requirements of the IASR and on the *Human Rights Code* as it pertains to persons with disabilities, is provided to all employees and volunteers, all other persons providing goods, services or facilities on behalf of Bitstrips and Snap are in the Province of Ontario, as well as all persons participating in the development and approval of Bitstrips and Snap's policies;
- ensure that the training is provided to persons referenced above as soon as practicable;
- keep and maintain a record of the training provided, including the dates that the training was provided and the number of individuals to whom it was provided; and
- ensure that training is provided on any changes to Bitstrips' policies on an ongoing basis.

Compliance Date: 12/27/17

2. Information and Communication

Bitstrips and Snap are committed to making company information and communications accessible to persons with disabilities. Bitstrips and Snap will incorporate new accessibility requirements under the information and communication standards to ensure that its information and communications systems and platforms are accessible and are provided, upon request, in accessible formats that meet the needs of persons with disabilities.

a. Feedback, Accessible Formats and Communication Supports

In accordance with the IASR, Bitstrips and Snap will:

- ensure that existing and new processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request and in a timely manner;
- more broadly, as a general principle where accessible formats and communication supports for persons with disabilities are requested:
 - provide or arrange for the provision of such accessible formats and communication supports;
 - consult with the person making the request to determine the suitability of the accessible format or communication support;
 - provide or arrange for the provision of accessible formats and communication supports in a timely manner that takes into account the person's accessibility needs due to disability, and at a cost no more than the regular cost charged to other persons; and
- notify the public about the availability of accessible formats and communication supports.

Compliance Date:

- 12/27/17: Feedback
- 12/27/17: Accessible formats and communication supports.

b. Accessible Websites and Web Content

In accordance with the IASR, Bitstrips and Snap will take reasonable steps to ensure that all new websites controlled by Bitstrips and Snap, and web content on those sites published after January 1, 2012, will conform with the World Wide Consortium Web Content Accessibility Guidelines (WCAG 2.0) Level AA, except where meeting the requirement is not practicable.

Compliance Date:

- 12/27/17: Bitstrips
- 1/1/21: Snap (legislative compliance deadline)

3. Kiosks

While Bitstrips and Snap do not utilize kiosks in providing its services to the general public, Bitstrips and Snap recognize its obligations under the IASR should it choose to utilize kiosks for this purpose in the future.

4. Employment

a. Recruitment

Bitstrips and Snap are committed to fair and accessible employment recruiting practices that attract and retain employees with disabilities. This includes providing accessibility across all stages of the employment cycle.

In accordance with the IASR, Bitstrips and Snap will do the following:

(i) Recruitment General

Bitstrips and Snap will notify employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process. This will include:

- review and, as necessary, modification of existing recruitment policies, procedures and processes;
- specifying that accommodation is available for applicants with disabilities, on Bitstrips and Snap's website and on job postings; and

(ii) Recruitment, assessment and selection

Bitstrips and Snap will notify job applicants, when they are individually selected to participate in an assessment or selection process and inform them that accommodations are available upon request in relation to the materials or processes to be used in the assessment/selection process. This will include:

- a review and, as necessary, modification of existing recruitment policies, procedures and processes;
- inclusion of availability of accommodation notice as part of the script in the scheduling of an interview and/or assessment; and
- if a selected applicant requests an accommodation, a consultation with the applicant and arrangement for provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to the disability; and

(iii) Notice to Successful Applicants

When making offers of employment, Bitstrips and Snap will notify the successful applicant of its policies for accommodating employees with disabilities. This will include:

- a review and, as necessary, modification of existing recruitment policies, procedures and processes; and
- inclusion of notification of Bitstrips and Snap's policies on accommodating employees with disabilities in offer of employment letters.

Compliance Date: 6/1/17

b. Informing Employees of Supports and General Provision of Accessible Formats and Communications Supports

In accordance with the IASR, Bitstrips and Snap will inform all employees of policies that support employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability. This will include:

- informing current employees and new hires of Bitstrips and Snap's policies supporting employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's needs due to disability;
- providing information as soon as practicable after the new employee begins employment, specifically in the orientation process;
- keeping employees up to date on changes to existing policies on job accommodations with respect to disabilities;
- where an employee with a disability so requests it, Bitstrips and Snap will provide or arrange for provision of suitable accessible formats and communications supports for:
 - information that is needed in order to perform the employee's job;
 - information that is generally available to employees in the workplace; and
- in meeting the obligations to provide the information that is set out above, Bitstrips and Snap will consult with the requesting employee in determining the suitability of an accessible format or communication support.

Compliance Date: 12/27/17

c. Documented Individual Accommodation Plans/Return to Work Process

Bitstrips and Snap will incorporate new accessibility requirements under the IASR to ensure that barriers in accommodation and return to work processes are eliminated and corporate policies surrounding accommodation and return to work are followed, where applicable.

Bitstrips and Snap's existing policies and practices include steps that Bitstrips and Snap will take to accommodate employees with disabilities and to facilitate employees' return to work after absence due to disability.

Bitstrips and Snap will review and assess existing policies to ensure that they include steps that Bitstrips and Snap will take to accommodate employees with disabilities and to facilitate employees' return to work after absence due to disability. Bitstrips and Snap will also ensure that they include a process for the development of documented individual accommodation plans for employees with disabilities, if such plans are required.

In accordance with the provisions of the IASR, Bitstrips and Snap will ensure that the process for the development of documented individual accommodation plans includes the following elements:

- information regarding the manner in which the employee requesting accommodation can participate in the development of the plan;
- information regarding the means by which the employee is assessed on an individual basis;
- information regarding the manner in which Bitstrips and Snap can request an evaluation by an outside medical or other expert, at Bitstrips and Snap's expense, to assist Bitstrips and Snap in determining if and how accommodation can be achieved;
- steps to protect the privacy of the employee's personal information;
- information regarding the frequency with which individual accommodation plans will be reviewed and updated and the manner in which this will be done;
- the reasons for a denial if an individual accommodation plan is denied;
- information regarding the means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs;
- the following will be included if individual accommodation plans are established:
 - any information regarding accessible formats and communication supports that have been provided for or arranged, in order to provide the employee with:
 - information that is needed in order to perform the employee's job;
 - information that is generally available to employees in the workplace; and
- identify any other accommodation that is to be provided to the employee.

Bitstrips and Snap will ensure that the return to work process as set out in its existing policies outlines:

- the steps Bitstrips and Snap will take to facilitate the employee's return to work after a disability-related absence;
- the development of a written individualized return to work plan for such employees; and

- the use of individual accommodation plans, as discussed above, in the return to work process.

Compliance Date: 12/1/17

d. Performance Management, Career Development and Redeployment

Bitstrips and Snap will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans:

- when using its performance management process in respect of employees with disabilities;
- when providing career development and advancement to employees with disabilities; and
- when redeploying employees with disabilities.

In accordance with the IASR, Bitstrips and Snap will:

- review, assess and, as necessary, modify existing policies, procedures and practices to ensure compliance with the IASR;
- take the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account when:
 - assessing performance;
 - managing career development and advancement; and
 - redeployment is required.
- review, assess and, as necessary, include in performance management workshops, accessibility criteria;
- take into account the accessibility needs of employees with disabilities when providing career development and advancement to its employees with disabilities, including notification of the ability to provide accommodations on internal job postings; and
- take into account the accessibility needs of employees with disabilities when redeploying employees, including review and, as necessary, modification of employee transfer checklist.

Compliance Date: 12/1/17

5. Design of Public Spaces

Bitstrips and Snap will meet the Accessibility Standards for all built obligations should any such construction or redevelopment take place.

Bitstrips and Snap will put procedures in place to prevent service disruption to its accessible parts of public spaces. In the event of a service disruption, Bitstrips and Snap will notify the public of the service disruption and alternatives available.

Compliance Date: 1/1/17

Information and Feedback

For more information on this accessibility plan or to provide feedback, please send your comments to our [Twitter direct message](#) or use this [Contact Form](#).

Accessible formats of this document are available free upon request.