

ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE	
Procedure No. HR-2.0	Revision: 4 Date: Nov 10, 2023
Original Release Date: Jan 1st, 2012	Review Date:
Approved By:	
HC	JL
CEO	DIRECTOR OF HR

1.0 Purpose

The purpose of this policy is to develop, implement, and enforce accessibility standards in order to achieve accessibility for persons with disabilities with respect to goods and services.

2.0 Scope

This policy has been developed in accordance with the Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11 and the Ontario Regulation, O. Reg. 191/11: INTEGRATED ACCESSIBILITY STANDARDS and the provisions of the Ontario *Human Rights Code*.

All legislated changes impacting this policy will be reflected in CleanRiver® Recycling Solutions, a division of Midpoint International Inc. (hereinafter referred to as “CleanRiver”) policy through updates, on an on-going basis. The policy will be reviewed annually in accordance with applicable legislation. No changes will be made to this policy before considering the impact on people with disabilities.

This policy applies to all employees of CleanRiver.

Our Commitment

CleanRiver strives to provide our goods and services in a respectful and accessible manner to all customers, including persons with disabilities. Persons with disabilities will benefit from the same services, in the same place, in a similar way, as other customers. It is the commitment of CleanRiver to provide equitable treatment, with respect to providing our goods and services without discrimination in accordance with the provisions of the Ontario Human Rights Code.

When providing our goods and services to a person with a disability, we are committed to the following four core principles:

- **Dignity** – Service is provided in a way that allows the person with a disability to maintain self-respect and the respect of others. People with disabilities are not

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treated as an afterthought or forced to accept lesser service, quality, or convenience.

- **Independence** – Allowing a person with a disability to do things on their own without unnecessary help, or interference from others.
- **Integration** – Service is provided in a way that allows the person with a disability to benefit from the same services, in the same place, and in the same or similar way as other customers, unless an alternate measure is necessary to enable the person to access goods or services.
- **Equal Opportunity** – People with disabilities have an opportunity equal to that given to others to access our goods and services.

3.0 Responsibilities

3.1 The Founder, CEO, CFO, and Director of HR are responsible for and must do the following:

- Be knowledgeable of all related legislation
- Provide training to all employees
- Establish a process for people to provide feedback on how goods or services are provided to people with disabilities and outline how CleanRiver will respond and take action. CleanRiver will ensure that our feedback process is accessible by providing or arranging for accessible formats and communication supports, if requested
- Ensure policies, practices, and procedures are consistent with core principles of the standard

3.2 Employees are responsible for and must do the following:

- Comply with this policy
- Attend training

4.0 Definitions

Disability (as per the Ontario Human Rights Code)

- (a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, 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, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
- (b) a condition of mental impairment or a developmental disability,
- (c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- (d) a mental disorder, or
- (e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997; (“handicap”)

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Customers

People who receive goods or services from our organization.

Persons with Disabilities

Individuals who have a disability as defined under the Ontario Human Rights Code.

Barrier

Anything that prevents a person with a disability from fully participating in all aspects of society because of their disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy, or practice.

Accessibility

Accessibility is the degree to which a product, device, service, environment, or facility is usable by as many people as possible, including persons with disabilities.

Goods and Services

The goods and services provided by CleanRiver.

Assistive Devices

A device used to assist a person with a disability in carrying out activities or in accessing the services of persons or organizations covered by the customer service standard (i.e., canes, hearing aids, wheelchairs, etc.)

Service Animals

A service animal is an animal for a person with a disability:

- If it is readily apparent that the animal is used by the person for reasons relating to their disability; or
- If the person provides a letter from a physician or nurse, or regulated health professionals (including psychologists, psychotherapists, audiologists, chiropractors, and optometrists) confirming that the person requires the animal for reasons relating to the disability.

Guide Dog

A dog trained as a guide for a blind person and has the qualifications prescribed by the regulations of the Blind Persons' Rights Act.

Support Person

A support person is an individual hired or chosen by a person with a disability to accompany them in order to help with communication, mobility, personal care, medical needs, or with access to goods or services.

Premises

Includes the buildings, land, or grounds where goods or services are provided.

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5.0 Procedure

Communication

- 5.1 We will communicate with people with disabilities in ways that take into account their disability and offer communication methods that are suitable to their communication needs (i.e., e-mail, telephone, in-person, etc.).
- 5.2 If a person with a disability requiring a wheelchair enters our premises, employees working at reception or otherwise responsible for receiving guests are required to come downstairs from the reception area to greet the guest. Employees are required to take into consideration the person’s disability when making suitable meeting arrangements/accommodations.
- 5.3 Employees shall inform persons with disabilities that there are wheelchair accessible washrooms located on the first floor.
- 5.4 All employees will be educated and trained on how to address and communicate effectively and appropriately with customers with disabilities.
- 5.5 Promotional materials, such as our brochures and catalogues will be available in an accessible format upon request (i.e., small print vs. large print, offering an in-person meeting to review and read materials if requested, etc.).
- 5.6 Upon request, information provided on our company website will be offered in video or recorded format, phone support or in-person client visits will be provided to read website material, and website information will be made available in large print format.

Use of Guide Dogs and Service Animals

- 5.7 We are committed to welcoming persons with disabilities accompanied by their guide dog or service animal. A person with a disability will be allowed to enter those areas of the company premises that are open to the public or third parties, with their service animal unless the animal is otherwise excluded by another law. At no time will a person with a disability who is accompanied by a service animal be prevented from having access to their service animal while on the premises.

If a service animal is excluded by law, CleanRiver will use other measures to provide services to the person with a disability.

CleanRiver is permitted to ask for proof that the animal is a service animal. The person with a disability is required to provide a letter from a physician or nurse, or regulated health professionals (including psychologists, psychotherapists, audiologists, chiropractors and optometrists) confirming that the person requires the animal for reasons relating to the disability.

Service animals would not be permitted in the following areas:

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- Server, IT, or other utility rooms
- Lunchroom
- Plant

All employees will be trained on the different types of service animals, as well as how to properly interact with those using service animals.

Support Persons

5.8 We are committed to welcoming persons with disabilities who are accompanied by a support person. A person with a disability will be allowed to enter those areas of the company premises that are open to the public or third parties with their support person.

In certain cases, CleanRiver may require a person with a disability to be accompanied by a support person for health and safety reasons. Before making this decision, CleanRiver will:

- *Consult with the person with a disability to understand their needs*
- *Consider health or safety reasons based on available evidence*
- *Determine if there is no other reasonable way to protect the health or safety of the person or others on the premises*

In such a situation, admission fees or fares (if applicable) will be waived for the support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to their support person while on our premises.

Assistive Devices

5.9 We are committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our goods and services. We will ensure employees are trained on and familiar with various assistive devices that may be used by customers with disabilities while accessing our goods and services.

5.10 Persons with disabilities shall be permitted to obtain, use, or benefit from our goods and services through the use of their assistive devices.

5.11 It is the responsibility of the person with a disability to ensure that their own assistive device is operated in a safe manner at all times.

5.12 All employees will be trained as required to use assistive devices and CleanRiver will maintain accurate records of training delivered to our employees. These records will be made available upon inspection as may be required.

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Notice of Temporary Disruption to Facilities or Services

5.13 We will provide notice when facilities or services that people with disabilities rely on to access or use goods or services are temporarily disrupted. The notice will be placed in a conspicuous place in areas open to the public or third parties. The notice will include the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

Feedback Process

5.14 Our ultimate goal is to meet and surpass customer expectations while serving customers with disabilities. People with disabilities who wish to provide feedback on the way the Company provides goods or services to people with disabilities and/or general communication are encouraged to do so. CleanRiver will ensure that our feedback process is accessible by providing or arranging for accessible formats and communication supports, if requested.

5.15 Comments and feedback can be submitted:

- By completing the Accessibility Feedback Form (HRF-1.0-A) on our website at: <https://cleanriver.com/about-us/accessibility/>
- By email to Jennifer Lyall, Director of HR, at: accessibility@cleanriver.com
- By phone to Jennifer Lyall, Director of HR, at: 1 888-646-4246
- In-person at CleanRiver at: 288 Don Hillock Drive, Aurora, Ontario.

5.16 When CleanRiver receives the accessibility feedback form, CleanRiver will strive to acknowledge receipt back to the individual within 24 to 48 hours, excluding weekends.

5.17 **The CEO, in collaboration with the Director of HR,** must formally provide written response of the action taken or that will be taken to the individual **within 21 days**.

5.18 This procedure will be communicated, trained and evaluated as per HR-2.0.

Billing

5.19 We are committed to providing accessible invoices to all of our customers. Invoices will be provided in alternate formats upon request. CleanRiver will answer any questions customers may have about the content of their invoice in person, by telephone or by e-mail.

Modifications to This Policy and Other Policies

5.20 CleanRiver will reassess how we provide goods and services to persons with disabilities as often as is necessary to ensure our goods and services are fully accessible. No changes will be made to this policy or other policies before considering the impact on persons with disabilities.

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Training

5.21 Upon hire, CleanRiver will provide training to all employees on providing accessible customer service and how to interact with people with various types of disabilities. Employees will complete refresher training every two (2) years. CleanRiver will maintain accurate records of training delivered to our employees. These records will be made available upon inspection as may be required.

6.0 Associated Documents

HRF-1.0-A Feedback Form
Training Records Form

7.0 References

Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11
O. Reg. 191/11: INTEGRATED ACCESSIBILITY STANDARDS
Ontario Human Rights Code

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