

Spring GDS Canada Accessibility Policy and Plan

Statement of Commitment

G3 Worldwide (Canada) Inc. operating as Spring Global Delivery Solutions (Spring GDS Canada) is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence.

We believe in integration and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the *Accessibility for Ontarians with Disabilities Act, 2005* and *Ontario's accessibility laws*.

Spring GDS Canada is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination.

Spring GDS Canada understands that obligations under the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) and its accessibility standards do not substitute or limit its obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law.

Spring GDS Canada is committed to excellence in serving and providing goods, services, or facilities to all customers including people with disabilities.

Scope

This policy applies to all employees who conduct business on behalf of G3 Worldwide (Canada) Inc. operating as Spring Global Delivery Solutions.

Definitions

- **Accessible formats:** formats that are an alternative to standard print and are accessible to persons with disabilities. Accessible formats may include, but are not limited to, large print, braille, recorded audio and electronic formats.
- **Accommodation:** arrangement made with, or assistance provided to, persons with disabilities, to ensure equal access to our goods, services, or facilities. Accommodation will vary depending on an individual's needs.
- **Barrier:** anything that prevents a person with a disability from accessing our goods, services, or facilities, including physical, attitudinal and technological barriers, and inadequate information or communication.
- **Communication:** the interaction between two or more persons where information is provided, sent or received.
- **Communication supports:** supports that facilitate effective communication, and may include plain language formats, sign language and captioning.
- **Disability:** any degree of physical, mental, emotional, developmental or learning impairment, and includes temporary and permanent disabilities, visible and invisible disabilities (e.g. visual, hearing or mental impairment, or learning or developmental disabilities).
- **Information:** data, facts and knowledge that exists in any format, including text, audio, digital or images.
- **Assistive Device:** any device that assists a person with a disability in accessing our goods, services, or facilities. These may include, but are not limited to: American Sign Language (ASL) interpretation, wheelchair, cane, walker, assistive listening device, other or similar aids.

Service

Spring GDS Canada is committed to excellence in serving all our clients/customers, including those with disabilities. Our accessible customer service policy is consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

We will do so by removing and preventing barriers to accessibility and by meeting our accessibility requirements under Ontario's accessibility laws and our obligations under the Human Rights Code. Where there is a barrier to accessing our goods, services, or facilities, we will seek to provide alternate ways to facilitate accessibility for our clients/customers with disabilities.

For more information on accessible customer service, please refer to our Spring GDS Canada Accessible Customer Service Policy.

Training

We are committed to training all employees and volunteers in accessible customer service, other Ontario's accessibility standards, and aspects of the Ontario Human Rights Code that relate to persons with disabilities. In addition, we will train all persons who participate in developing the organization's policies, and all other persons who provide goods, services, or facilities on behalf of the organization.

Training of our employees and volunteers on accessibility relates to their specific roles. Staff will be trained as soon as reasonably practicable after being hired and in respect of any changes to relevant policies on accessibility.

Assistive Devices

Spring GDS Canada recognizes that some people with disabilities may use their personal assistive devices when accessing our goods, services, or facilities.

In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with a disability can access our goods, services, or facilities.

We will ensure that our staff are trained and familiar with various assistive devices that may be used by customers with disabilities while accessing our goods, services, or facilities.

Service Animals

Spring GDS Canada recognizes that some people with disabilities rely on assistance from their service animal while accessing our goods, services, or facilities. We welcome people with disabilities and their service animals. Service animals are allowed in the parts of our premises that are common areas and must remain with the person they are accompanying at all times.

When we cannot easily identify that an animal is a service animal, our staff may ask for documentation (letter or form) from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.

A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

Support Persons

Spring GDS Canada recognizes that some people with disabilities rely on a support person for assistance while accessing our goods, services, or facilities. A person with a disability who is accompanied by a support person will be allowed to have the support person accompany them while on our premises.

In certain cases, this organization might require a person with a disability to be accompanied by a support person for the health or safety reasons of the person with a disability, and others on the premises.

Notice of Temporary Disruption

In the event of a planned or unexpected disruption to goods, services, or facilities for customers with disabilities, our Customer Service department will notify customers promptly. This clearly posted notice will include information about the reason for the disruption, its anticipated length of time, our Customer Service Department contact information, and a description of alternative facilities or services, if available.

The notice will be made available in the following ways:

- Notice posted on the Front Entrance Door, Back Receiving Door, and Lunchroom
- E-mail sent to clients/customers

Feedback Process

Spring GDS Canada welcomes feedback on how we provide goods, services, or facilities to people with disabilities. Customer feedback will help us identify barriers and respond to concerns.

Feedback may be provided to our Customer Service Department in the following way(s):

- **Email:** customer.service.ca@spring-gds.com
- **Mail:** 3170 Orlando Drive Unit 3, Mississauga ON, L4V 1R5
Attn: Customer Relations Manager
- **Phone:** 1-888-624-5327

Spring GDS Canada ensures our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, upon request.

All feedback received will be reviewed within a reasonable time period and we will take appropriate steps as needed to address any issues raised.

Notice of Availability of Documents

Spring GDS Canada will provide documents in an accessible format or with communication support, upon request. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and, at no additional cost.

Information and Communication

Spring GDS Canada is committed to communicating with people with disabilities in ways that take into account their disability. We have a process for receiving and responding to feedback and the process is accessible to persons with disabilities upon request.

We will work with the person with disabilities to determine what method of communication works best for them. Upon request, we will provide or arrange for the provision of accessible formats or with communication supports to persons with disabilities in a timely manner, taking into account the person's accessibility needs due to disability, and at a cost that is no more than the regular cost charged to other persons.

We will consult with the person making the request in determining the suitability of an accessible format or communication support. If the organization determines that information or communications are unconvertible, the organization shall provide the requestor with:

- a) an explanation as to why the information or communications are unconvertible; and
- b) a summary of the unconvertible information or communications.

We notify the public about the availability of accessible formats and communication supports by placing a notice in our Visitor Log Book and Website.

We will also meet the internationally-recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario's accessibility laws.

Employment

Recruitment:

We notify employees, and internal and external job applicants in job postings that accommodations can be made during the recruitment and hiring process. We notify job applicants when they are individually selected to participate in an assessment or selection process that accommodations are available upon request. We will consult with applicants and provide or arrange for suitable accommodation.

We notify successful applicants of policies for accommodating employees with disabilities when making offers of employment.

Accessible Formats & Communication Supports for Employees:

Employees are notified that supports are available for those with disabilities whether permanent or temporary, as soon as practicable after they begin their employment. We provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that take into account an employee's accessibility needs due to a disability.

We will consult with the employee, their reporting manager, and the Joint Health & Safety Committee (JHSC) when arranging for the provision of suitable accommodation in a manner that takes their accessibility needs into account. We will consult with the person making the request in determining the suitability of an accessible format or communication supports specifically for information that is needed in order to perform the employee's job, and for information that is generally available to employees in the workplace.

Workplace Emergency Response Information:

We will provide individualized workplace emergency response information to help an employee with a disability (permanent or temporary), during an emergency when an employee has self-identified as requiring individualized accommodation needs, or we become aware of the need for accommodation. With the employee's consent, we will provide workplace emergency information to a designated person who is providing assistance to that employee during an emergency.

We will provide the information as soon as practicable after we become aware of the need for accommodation due to the employee's disability (permanent or temporary).

We will review the individualized workplace emergency response information:

- a) when the employee moves to a different location in the organization;
- b) when the employee's overall accommodations needs or plans are reviewed; and
- c) when the employer reviews its general emergency response policies

Return to Work and Accommodation Plans:

A documented return to work accommodation plan will be developed and implemented for employees who have been absent from work due to illness, injury, or disability (permanent or temporary) and require accommodations in order to return to work.

We will work in collaboration with the affected employee, the Ontario Workplace Safety and Insurance Board (WSIB) (if applicable), and the employee's physician (if applicable) to ensure that appropriate accommodations are in place for employees who have been absent from work due to illness, injury, or disability (permanent or temporary) and require accommodations in order to return to work.

Performance Management, Career Development and Advancement, Redeployment:

When undertaking any performance management, career development and redeployment processes, we will ensure that the accessibility needs of its employees with disabilities are taken into account. This will include a review of any individual accommodation plan that is in place for individual employees.

Review of the Policy

This policy will be reviewed and updated as needed once every 5 years to ensure compliance with the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) and any other relevant legislation and posted on our website. Any policies of this organization that do not respect and promote the principles of dignity, independence, integration and equal opportunity for people with disabilities will be modified or removed.

This document is publicly available. Accessible formats are available upon request by contacting our Customer Service Department via our Feedback Process.