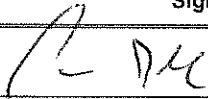


	Title: AODA – Accessibility Standards for Customer Service Policy		
	Policy No.: HR-PLC013	Rev. No.:03	Effective Date: 2026-07-24

AODA – Accessibility Standards for Customer Service Policy

Approval			
Date	Revision #	Approved by:	Signature
	00	Cameron Dell, President	
	00	Anne Tucker, Senior Director of Human Resources	

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1.0 Purpose

This policy sets out Clarion Medical Technologies' commitment and procedures for providing accessible customer service in accordance with the *Accessibility for Ontarians with Disabilities Act, 2005* and applicable Ontario accessibility standards, including the customer service requirements now incorporated into Ontario Regulation 191/11, *Integrated Accessibility Standards*. It applies to the provision of goods, services and facilities to members of the public and other third parties in Ontario.

Clarion Medical Technologies is committed to providing goods, services and facilities in a manner that respects the dignity, independence, integration and equal opportunity of persons with disabilities. Accessibility is an important part of our commitment to inclusive, responsive and high-quality customer service.

2.0 Scope

This policy applies to the provision of goods, services and facilities by Clarion Medical Technologies to members of the public and other third parties in Ontario, and to all employees, volunteers, agents, contractors and other representatives who interact with the public or third parties on behalf of Clarion Medical Technologies or who participate in developing customer service policies, practices or procedures.

3.0 Definitions

Assistive Device Is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that customers bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

Disability The term disability as defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*, refers to:

- 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;
- A condition of mental impairment or a developmental disability;
- A learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- A mental disorder; or

	Title: AODA – Accessibility Standards for Customer Service Policy		
	Policy No.: HR-PLC013	Rev. No.:03	Effective Date: 2026-07-24

- An injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

Guide Dog Is a highly-trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons' Rights Act*, to provide mobility, safety and increased independence for people who are blind.

Service Animal As reflected in *Ontario Regulation 429/07*, an animal is a service 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 confirming that the person requires the animal for reasons relating to the disability.

Service Dog As reflected in *Health Protection and Promotion Act, Ontario Regulation 562* a dog other than a guide dog for the blind is a service dog if:

- It is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability; or
- The person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.

Support Person As reflected in *Ontario Regulation 429/07*, a support person means, in relation to a person with a disability, another person who accompanies them in order to help with communication, mobility, personal care, medical needs or access to goods and services.

4.0 Reference

Accessibility for Ontarians with Disabilities Act, 2005

Ontario Regulation 191/11, Integrated Accessibility Standards

Ontario Regulation 429/07, Accessibility Standards for Customer Service (revoked July 1, 2016; historical customer service standard)

AODA Customer Service Feedback Form (HR-FRM007)

AODA Customer Service Feedback Follow Up Form (HR-FRM008)

5.0 Responsibility

Accessibility is a shared responsibility. Clarion Medical Technologies is responsible for maintaining accessible customer service policies, training applicable personnel, responding to

	Title: AODA – Accessibility Standards for Customer Service Policy		
Policy No.: HR-PLC013	Rev. No.:03	Effective Date: 2026-07-24	

accessibility feedback and making reasonable efforts to remove barriers. Employees, volunteers, agents, contractors and other representatives are responsible for following this policy and seeking assistance when a person with a disability requires support to access goods, services or facilities.

6.0 Procedural Details

General Principles

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

This policy addresses the following customer service accessibility requirements:

- A. The Provision of Goods and Services to Persons with Disabilities;
- B. The Use of Assistive Devices
- C. The Use of Guide Dogs, Service Animals and Service Dogs
- D. The Use of Support Persons
- E. Notice of Service Disruptions
- F. Customer Feedback
- G. Training
- H. Notice of Availability and Format of Required Documents

A. The Provision of Goods and Services to Persons with Disabilities

Clarion Medical Technologies will make reasonable efforts to provide goods, services and facilities to persons with disabilities in a manner that is consistent with the following principles:

- ensuring that all customers receive the same value and quality;
- allowing customers with disabilities to do things in their own ways, at their own pace when accessing goods and services as long as this does not present a safety risk;
- using alternative methods when possible to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner;
- taking into account individual needs when providing goods and services; and
- communicating in a manner that takes into account the customer's disability.

B. Assistive Devices

Customer's own assistive device(s):

	Title: AODA – Accessibility Standards for Customer Service Policy		
	Policy No.: HR-PLC013	Rev. No.:03	Effective Date: 2026-07-24

Persons with disabilities may use their own assistive devices when accessing Clarion Medical Technologies' goods, services or facilities, unless the device creates a health or safety risk or another barrier that cannot be reasonably addressed.

Where an assistive device cannot be used safely or effectively, Clarion Medical Technologies will work with the person to identify an alternative method of access that is reasonable in the circumstances and respects the person's dignity and independence.

C. **Guide Dogs, Service Animals and Service Dogs**

Persons with disabilities who are accompanied by a guide dog, service animal or service dog will be permitted to enter the parts of Clarion Medical Technologies' premises that are open to the public or other third parties and to keep the animal with them, unless the animal is otherwise excluded by law.

Food Service Areas:

A customer with a disability that is accompanied by guide dog or service dog will be allowed access to food service areas that are open to the public unless otherwise excluded by law.

Other types of service animals are not permitted into food service areas due to the *Health Protection and Promotion Act, Ontario Regulation 562 Section 60*.

Exclusion Guidelines:

If a service animal is excluded by law, Clarion Medical Technologies will explain why the animal is excluded and will work with the person to identify another reasonable way for the person to obtain, use or benefit from the goods, services or facilities.

Applicable Laws:

The *Health Protection and Promotion Act, Ontario Regulation 562 Section 60*, normally does not allow animals in places where food is manufactured, prepared, processed, handled, served, displayed, stored, sold or offered for sale. It does allow guide dogs and service dogs to go into places where food is served, sold or offered for sale. However, other types of service animals are not included in this exception.

Dog Owners' Liability Act, Ontario: If there is a conflict between a provision of this Act or of a regulation under this or any other Act relating to banned breeds (such as pitbulls) and a provision of a by-law passed by a municipality relating to these breeds, the provision that is more restrictive in relation to controls or bans on these breeds prevails.

Recognizing a Guide Dog, Service Dog and/or Service Animal:

If it is not readily apparent that an animal is a service animal, Clarion Medical Technologies may request documentation from a regulated health professional confirming that the person requires the animal for reasons relating to the disability.

Verification may include:

	Title: AODA – Accessibility Standards for Customer Service Policy		
	Policy No.: HR-PLC013	Rev. No.:03	Effective Date: 2026-07-24

- a letter from a physician or nurse confirming that the person requires the animal for reasons related to the disability;
- a valid identification card signed by the Attorney General of Canada; or,
- a certificate of training from a recognized guide dog or service animal training school.

Care and Control of the Animal:

The person accompanied by the service animal is responsible for the care, control and supervision of the animal at all times.

Allergies:

Where another person's health and safety needs are affected, such as by a severe allergy, Clarion Medical Technologies will make reasonable efforts to meet the needs of all individuals involved.

D. Support Persons

Persons with disabilities who are accompanied by a support person will be permitted to enter Clarion Medical Technologies' premises together and will not be prevented from having access to the support person while on the premises.

Where seating, capacity, confidentiality, health and safety requirements or other operational considerations affect access to a support person, Clarion Medical Technologies will make reasonable efforts to resolve the matter in a way that enables the person with a disability to access the goods, services or facilities.

If confidential information will be discussed, Clarion Medical Technologies will obtain the customer's consent before discussing that information in the presence of a support person.

If an admission fee is charged for a support person, Clarion Medical Technologies will provide advance notice of the amount payable for the support person.

E. Notice of Disruptions in Service

If there is a temporary disruption to facilities, goods or services that persons with disabilities usually use to access Clarion Medical Technologies' goods, services or facilities, Clarion Medical Technologies will provide notice as soon as reasonably possible. Advance notice will be provided where the disruption is planned and known in advance.

Notifications will Include:

The notice will include, where available, the reason for the disruption, the expected duration and a description of any alternative facilities, goods or services.

- goods or services that are disrupted or unavailable
- reason for the disruption

	Title: AODA – Accessibility Standards for Customer Service Policy		
	Policy No.: HR-PLC013	Rev. No.:03	Effective Date: 2026-07-24

- anticipated duration
- a description of alternative services or options

Notifications Options:

Notice may be provided by posting information at the affected location, at entrances, on the company website or intranet, by contacting affected customers directly, verbally, or by any other method that is reasonable in the circumstances.

- posting notices in conspicuous places including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption and/or on the Clarion Medical Technologies website;
- contacting customers with appointments;
- verbally notifying customers when they are making a reservation or appointment; or
- by any other method that may be reasonable under the circumstances.

F. Feedback Process

Clarion Medical Technologies welcomes feedback about the accessibility of its goods, services and facilities and about the way it provides customer service to persons with disabilities. Feedback may be provided verbally, in writing, by telephone, by email, through the website or by another method that is reasonable in the circumstances. Accessible formats and communication supports will be made available upon request.

Submitting Feedback:

Customers can submit feedback to:

- Human Resources
- (519) 620-3900
- 125 Fleming Drive, Cambridge, Ontario N1T 2B7
- hr@clarionmedical.com

Customers who wish to provide feedback verbally can do so to any Clarion Medical Technologies employee.

Feedback will be reviewed by Human Resources or another appropriate representative. Where the feedback is a complaint, Clarion Medical Technologies will acknowledge receipt, review the concern in a timely manner and communicate any resulting actions where appropriate.

G. Training

Clarion Medical Technologies will provide accessibility training to:

	Title: AODA – Accessibility Standards for Customer Service Policy		
Policy No.: HR-PLC013	Rev. No.:03	Effective Date: 2026-07-24	

- a) all employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of Clarion Medical Technologies; for example: salespersons, drivers, vendors, event operators, and third party marketing agents; and,
- b) those who are involved in the development and approval of customer service policies, practices and procedures.

Training Provisions:

Training will be appropriate to the duties of the individual and will cover, as applicable:

- A review of the purpose of the *Accessibility for Ontarians with Disabilities Act, 2005*.
- A review of the requirements of the *Accessibility Standards for Customer Service, Ontario Regulation 429/07*.
- Instructions on how to interact and communicate with people with various types of disabilities.
- Instructions on how to interact with people with disabilities who:
 - use assistive devices;
 - require the assistance of a guide dog, service dog or other service animal; or
 - require the use of a support person (including the handling of admission fees).
- Instructions on how to use equipment or devices that are available at our premises or that we provide that may help people with disabilities.
- Instructions on what to do if a person with a disability is having difficulty accessing your services.
- Clarion Medical Technologies' policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

Training Schedule:

Training will be provided as soon as practicable after an individual is assigned applicable duties and on an ongoing basis when changes are made to this policy, related procedures, practices or applicable legislative requirements.

Record of Training:

Clarion Medical Technologies will maintain training records, including the dates training was provided and the number of individuals trained.

Notice of Availability and Format of Documents

Clarion Medical Technologies will notify the public that documents related to accessible customer service are available upon request. Upon request, Clarion Medical Technologies will provide or arrange for accessible formats and communication supports in a timely manner that

	Title: AODA – Accessibility Standards for Customer Service Policy		
	Policy No.: HR-PLC013	Rev. No.:03	Effective Date: 2026-07-24

takes into account the person's accessibility needs due to disability and will consult with the person making the request to determine the suitability of the format or support.

Administration:

If you have any questions or concerns about this policy or its related procedures, please contact:

- Human Resources
- (519) 620-3900
- 125 Fleming Drive, Cambridge, Ontario N1T 2B7
- hr@clarionmedical.com

This policy will be reviewed periodically and updated as required to reflect operational needs and legislative changes.

7.0 Revision History

Date	Revision #	Description
May 31, 2016	01	revised by counsel
October 26, 2020	02	Contact Information revised and made into a formal tracked document
July 23, 2026	03	Updated customer service accessibility wording for alignment with Ontario Regulation 429/07, including support persons, service animals, disruptions, feedback, training and document format requirements.