



Policy: Integrated Accessibility Policy (Ontario)

	PROGRAM POLICY	
Policy Number & Title: Integrated Accessibility Policy (Canada)	Effective: January 1, 2020	Version: 3
GP-005	Program: IAA, Inc. (Ontario Only)	
Integrated Accessibility Policy (Ontario)	Approved by: Policy Committee	

Policy Statement

This policy applies to Canadian branches and operations of Impact Auto Auctions, Ltd., whether referred to as Impact or IAA, located in Ontario. This Policy establishes guidelines and procedures for employee use of any services IAA offers or provides to customers and the personal use of any IAA property and/or assets through its Ontario operations.

I. PURPOSE AND STATEMENT OF COMMITMENT

The purpose of this Statement Policy and Procedure is to ensure that our locations in Ontario have policies, practices and procedures for the following standards to meet obligations under the law, by developing, implementing and maintaining direction on how to accomplish or meet the requirements under the Accessibility for Ontarians with Disabilities Act (AODA).

This policy applies to all services or facilities on the Company’s behalf. This policy applies to customers, volunteers, visitors, contractors, and subcontractors and other third party providing goods, services or facilities. Applicants for employment with the Company who may require employment accommodation through the recruitment, assessment, selection, and hiring process.

There are five standards set out under the AODA, all of which will be implemented by the year 2025. These standards include: customer service, transportation, information and communications, built environment and employment (collectively the “Integrated Accessibility Standards” or “IAS”). IAA is committed to meeting the objectives and requirements of the AODA and IAS, including the accessibility needs of persons with Disabilities with respect to the Company’s programs, services and facilities, in a timely manner.

It is the responsibility of managers, immediate supervisors and department heads to ensure that all employees follow the procedures/guidelines set out in this policy.

II. DEFINITIONS

“**We**” and “**Our**” means all Ontario branches and operations of Impact Auto Auctions, Ltd., whether referred to as Impact, Impact Auto Auctions, or IAA (the “Company”).

“**Accessible Format(s)**” means 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, recorded audio and electronic formats, and other formats usable by persons with Disabilities.

“**Assistive Device(s)**” means any device used to assist a person in performing a particular task(s) or to aid that person in activities of daily living. This can include a wheelchair, screen reader, listening device or cane.



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“Communication Support(s)” means supports that persons with Disabilities may need to access information. Communication Supports may include, but are not limited to, captioning, alternative and augmentative supports, plain language, sign language and other supports that facilitate effective communications.

“Disability” or **“Disabilities”** means:

- 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 coordination, 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 developmental disability;
- c. A learning disability, or 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*.

“Employee(s)” means any employee or volunteer of the Company.

“Guide Dog(s)” means 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, 1990* to provide mobility, safety and increased independence for people who are blind.

“Service Animal(s)” 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 his or her Disability; or
- The person provides a letter from a regulated health professional confirming that the person requires the animal for reasons relating to the Disability.

“Support Person(s)” means an individual hired or chosen by a person with a Disability to provide services or assistance with communication, mobility, personal care, medical needs or with access to goods or services. Medical needs may include, but are not limited to, monitoring an individual's health or providing medical support by being available in the event of a seizure.



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III. INTEGRATED ACCESSIBILITY STANDARDS

A. Customer Service Standard

1. Purpose

The Company is committed to providing an equal opportunity to all of our customers. The objective of this policy is to ensure we meet the requirements of the customer service standard and promote its underlying core principles.

2. Scope

All Employees, contractors and agents who work on behalf of the Company and deal with members of the public or other third parties are expected to conduct themselves in accordance with this policy.

3. Core Principles

The Company will make every effort to ensure that this policy and related practices and procedures are consistent with the following four core principles:

- *Dignity*: Persons with Disabilities must be treated as valued customers as deserving of service as any other customer.
- *Equality of Opportunity*: Persons with Disabilities should be given an equal opportunity to obtain, use and benefit from the Company's goods and services.
- *Integration*: Wherever possible, persons with Disabilities should benefit from the Company's goods and services in the same place and in the same or in a similar manner as any other customer. In circumstances where integration does not serve the needs of persons with Disabilities, goods and services will, to the extent possible, be provided in another way that takes into account the person's individual needs.
- *Independence*: Goods and services must be provided in a way that respects the independence of persons with Disabilities. To this end, the Company will always be willing to assist persons with Disabilities but will not do so without express permission.

4. Communication

The Company strives to communicate with persons with Disabilities in a manner that takes into account the person's Disability. Communication strategies are set out in the Company's accessibility training program.

5. Assistive Devices

Persons with Disabilities are permitted to use their own Assistive Devices when on the Company's premises for the purposes of obtaining, using or benefiting from the Company's goods and services.

If there is a physical, technological or other type of barrier that prevents the use of an Assistive Device on the Company's premises, we will make best efforts to remove that barrier. If we are not able to remove the barrier, we will ask the individual with the Disability how he/she can be accommodated, what alternative measures would enable equal access to the Company's goods and services and the Company will make its best effort to provide the individual with alternative means of assistance.



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Employees will receive training on the various types of Assistive Devices that may be used by persons with Disabilities while accessing the Company's goods and services.

6. Accessibility to Company Premises

The Company has equipped its facilities with accessible parking spaces, wheelchair ramps, and accessible doors in order to provide persons with Disabilities with an equal opportunity to obtain, use and benefit from the Company's goods and services:

All employees receive mandatory online training within the first 30 days of employment, on how to use these services in order to ensure that all persons with Disabilities are provided with sufficient accommodation. Our training program includes the following:

- How to interact and communicate with individuals with physical/mobility, speech, learning, and/or mental disabilities, as well as those with vision or hearing loss.
- Addressing accommodation requests, such as use of an assistive device, service animal, or support person
- Ensuring an inclusive environment to the fullest extent, for all staff, visitors and third parties

7. Guide Dogs and Service Animals

Persons with Disabilities that are accompanied by a Guide Dog or Service Animal will be allowed to access the Company's premises that are open to the public and keep the animal with him or her unless otherwise excluded by law. If a Guide Dog or Service Animal must be excluded from the premises, the Company will provide the individual with the reasons for the exclusion and explore alternative ways to meet the individual's needs.

If it is not readily apparent that the animal is a Service Animal, the Company may request a letter from a regulated health professional confirming that the person requires the animal for reasons relating to his/her Disability.

Employees will receive training on how to interact with persons with Disabilities accompanied by a Guide Dog or Service Animal.

8. Support Persons

Persons with Disabilities may enter premises owned and/or operated by the Company with a Support Person and have unobstructed access to the Support Person while on the premises.

The Company may require persons with Disabilities to be accompanied by a Support Person where it is necessary to protect the health or safety of the person with a Disability or the health and safety of others on the premises. Before making this decision, we will: (a) consult with the person who has a Disability regarding their needs; (b) consider the health and safety reasons based on available evidence; and (c) determine whether there is another reasonable way to protect the health and safety of the person who has a Disability or others on the premises. If a Support Person is required, we will waive any admission fees or fares for the Support Person.

Employees will receive training on how to interact with persons with Disabilities who are accompanied by a Support Person.



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9. Notice of Temporary Disruptions

The Company will notify customers if there is a planned or unexpected disruption of facilities or services typically used by persons with Disabilities in order to access the Company's goods and services. The notice will be posted at the entrance of the affected premises and on our website.

The notice will include the following information:

- The facility or service that is unavailable;
- The anticipated duration of the disruption;
- The reason for the disruption; and
- Alternative facilities or services, if available.

10. WORKPLACE EMERGENCY RESPONSE INFORMATION

In addition to providing customers with Disabilities with full accessibility to goods and services at all times in a way that respects their dignity and independence, the Company is committed to providing Employees with Disabilities with the same opportunities as other Employees. With this in mind, the Company will provide individualized workplace emergency response information to all Employees with a visible or non-visible Disability, if the individual so requires. This information can also be provided to the Employee who is designated to assist the Employee with Disabilities.

B. INFORMATION AND COMMUNICATIONS STANDARDS

The Company will create, provide and receive information and communications in a way that is accessible for persons with Disabilities.

1. Feedback

The Company will 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 Communication Supports upon request.

2. Accessible Formats

Upon request, we will provide or arrange for the provision of Accessible Formats and Communication Supports for persons with Disabilities in a timely manner that takes in account the person's accessibility needs. The Company will work collaboratively with the person making the request to determine the suitability of an Accessible Format or Communication Support. We will also notify the public about the availability of Accessible Formats and Communication Supports.

3. Accessible Website

The Company's internet websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines ("WCAG 2.0 AA").



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C. Employment Standards

The Company will identify, prevent and remove barriers at all stages of the employment life cycle for persons with Disabilities.

1. Recruitment, Assessment and Selection Processes

The Company will notify job applicants about the availability of accommodation for persons with Disabilities in its recruitment process. We will also notify job applicants when they are selected to participate in an assessment or selection process that accommodations are available upon request. If a selected applicant requests an accommodation, we will consult with the applicant and provide or arrange for the provision of suitable accommodation in a manner that takes into account the applicant's accessibility needs.

2. Notice to Successful Applicants

When making offers of employment, the Company will notify the successful applicant of its policies for accommodating Employees with Disabilities.

3. Informing Employees of Supports

The Company will continue to inform Employees of its policies and any updates to those policies used to support Employees with Disabilities, including policies on the provision of job accommodation that take into account an Employee's accessibility needs. This information will be provided to new Employees as soon as practicable after commencing employment.

4. Accessible Formats and Communication Supports for Employees

Upon the request of an Employee with a Disability, the Company will consult with the Employee to provide or arrange for the provision of Accessible Formats and Communication Supports needed to perform the Employee's job, as well as information generally available to other Employees. When determining the suitability of an Accessible Format or Communication Support, we will consult with the Employee making the request. However, the Company reserves the flexibility to decide on the most appropriate Accessible Formats or Communication Supports for Employees (based on the needs of the specific Employee and the capacity of the Company to provide the support).

5. Workplace Emergency Response Information

The Company will provide individualized workplace emergency response information to Employees with Disabilities if we are made aware of the need for accommodation. The Company will provide this information as soon as practicable after becoming aware of the need for accommodation.

In circumstances where the Employee requires assistance, we will, with the consent of the Employee, provide the workplace emergency response information to those designated by the Company to provide assistance to the Employee (e.g., immediate supervisor, fire warden, etc).

Individualized workplace emergency response information will be reviewed when an Employee moves to a different location within the office, when the individual overall accommodation needs or plans are modified when, from time-to-time, the Company reviews its general emergency response plans.



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6. Documented Individual Accommodation Plans

The Company will develop and have in place a written process for the development of documented individual accommodation plans for Employees with Disabilities.

7. Return to Work Process

The Company will develop, document and have in place a return to work process for Employees who have been absent from work due to a Disability, and who require Disability related accommodations in order to return to work. Such processes will be documented and will outline the steps the Company will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

8. Performance Management, Career Development and Advancement and Redeployment

We will take into account the accessibility needs and individual accommodation plans of Employees with Disabilities in performance management processes, when providing career development and advancement opportunities, and when considering redeployment.

9. Accessibility and Human Rights Training

Education and training are core elements of any organization's human rights strategy. Training must be given to all staff who deals with members of the public or other third parties (other organizations) as well as to others who deal with members of the public or other third parties on our Company's behalf.

All staff should be provided the mandatory training through workbooks, videos, handouts (e.g. fact sheets or brochures at an orientation session), in a classroom setting or in another format.

Each manager, immediate supervisor is responsible to ensure all employees are trained under the Accessibility Standards under the AODA, the **Human Rights Code** and all related policies, practices and procedures.

Our training program consists of the following:

- How to interact and communicate with people with various types of disabilities in various situations and use an assistive device, service animal or support person;
- How to use the equipment or assistive devices that may be available; and
- How to provide the emergency response plan and safety information to persons with disabilities in an accessible format or with communication supports as soon as practical;

Training will be provided to all current employees, new employees (within 30 days after commencing employment) who work with the public or who have tasks or responsibilities under any of the AODA standards.

The training may not be exactly the same for all staff and need not be delivered in the same manner so long as it meets the requirements outlined in this policy.

The training will be appropriate to the duties of the person receiving such training. The Company will incorporate this training requirement into hiring practices to ensure that new Employees complete the required training within a reasonable time of having accepted a position with the Company.



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We will maintain a record of Employees who receive and complete the training. The records will include the dates that training is provided, and the names of the individuals who received and completed the training.

IV. FEEDBACK

The Company welcomes and appreciates feedback regarding this policy and its implementation. Feedback can be provided in the following ways:

- Via e-mail: atsoi@iaai.com
- By telephone at 416-909-5275
- In writing: Alison Tsoi
1206-90 Burnhamthorpe Rd W, Mississauga, ON L5B 3C3
- By other means, which may incorporate Assistive Devices or Communication Supports

The Company will respond to feedback within [five (5)] business days of receipt of the feedback.

V. DOCUMENTATION TO BE MADE AVAILABLE

This policy is made available to any member of the public upon request. This policy will also be posted on our Intranet and in a conspicuous place in the workplace.

VI. FORMAT OF DOCUMENTS

The Company will provide documents, or the information contained in documents, required to be provided under the Customer Service Standard, to persons with Disabilities in a format that takes into account the person's Disability.

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