

ACCESSIBILITY FOR PERSONS WITH DISABILITIES: CUSTOMER SERVICE POLICY

1.0 Purpose

The purpose of this policy is to outline the responsibilities of associates, third party vendors, and others who deal with the public or other third parties on behalf of the Trust in providing goods and services to people with disabilities in compliance with the Accessibility for Ontarians with Disabilities Act (AODA), 2005.

2.0 Scope

This policy applies to the following individuals:

- All associates, volunteers, interns, and/or consultants of the Trust
- All third-party vendors or others that represent the Trust, provide services to our customers, or interact with the public
- All associates involved with the development and/or implementation of Trust policies and procedures governed by this Act

3.0 Policy

As the leading Canadian developer of open-concept shopping centres, we are committed to providing equitable access, and high-quality facilities and/or services by meeting the needs of our diverse and valued customers. To this end, the Trust will ensure that it is compliant with the Accessibility for Ontarians with Disabilities Act, 2005, which aims to remove barriers that impact individuals with a disability. Through compliance, the Trust will endeavour to provide all individuals with equal access to our facilities and/or services while allowing individuals with a disability to maintain their independence, dignity, and integration.

The Trust's commitment is demonstrated in the following areas:

3.1 Communication

We communicate with people with disabilities in ways that take into account their disability. To this end, we train our staff to speak with others in a clear and understandable manner; respectful of the individual's capabilities at all times.

3.2 Personal Assistive Devices

Individuals with a disability may use their own assistive devices as required when accessing our facilities and/or services. If there is a physical, technological, or other type of barrier that hinders or prevents the use of an assistive device on our premises, we will first try to remove the identified barrier. However, if we are not able to remove the barrier, we will ask the impacted individual how he/she can be accommodated, and we will endeavour to accommodate the individual to a reasonable extent.

3.3 Use of Service Animals and Support Persons

Service Animals

Any person with a disability may enter Trust-owned premises, which are open to the public and other third parties, accompanied by a service animal. The individual may keep the animal with them as long as they do not hinder or prohibit the public from accessing such premises and/or the law does not otherwise exclude the animal. While visiting our premises, it is the responsibility of the person with a service animal to control and maintain care of the animal at all times.

In the event that a service animal poses a danger to itself or others, we will make all reasonable efforts to meet the needs of all individuals.

Support Person

Any person with a disability who is accompanied by a support person will be allowed to enter Trust-owned premises, which are open to the public and other third parties, with his/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/her support person while on our premises.

At times, we may require a person with a disability to be accompanied by a support person while on our premises in order to ensure the health and safety of all individuals located on the premises. The support person, if provided by the Trust, will be provided at no cost.

The Trust will obtain consent from the person with a disability should we need to disclose confidential or private information pertaining to the person with a disability in the presence of a support person.

3.4 Notice of Temporary Disruption

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of the Trust. In the event of any temporary disruption or barrier to our facilities and/or services, reasonable efforts will be made to provide advance notice. In some circumstances, such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

Should notice be required, it will be provided in at least one of the following methods:

- Posting of notices in a conspicuous place at the point of disruption, at the main entrance of our Home Office, and/or at the nearest accessible entrance to the facility and/or service disruption.
- Contacting individuals who have an appointment and who may be impacted by the disruption.
- Notifying individuals potentially impacted by the disruption when they are making an appointment.
- By any other method that may be reasonable under the circumstances.

Notifications will include the following information, unless it is not readily known or available:

- Services, facilities, and/or areas that are disrupted, unavailable, or inaccessible

- The reason for the disruption, unavailability, or inaccessibility
- The anticipated duration of the disruption, unavailability, or inaccessibility
- Description of alternative facilities or services (if available)

3.5 Training for Associates

Customer Service Standard training will be provided to all current associates, including contract associates/volunteers/interns who are employed for more than one year, and where possible, consultants, third party vendors, and others that work on behalf of the Trust. The foregoing training will be included as part of our standard orientation program.

Should we, for any reason, be unable to provide Customer Service Standard training to any consultant, third party vendor, or other party working on behalf of the Trust, we will obtain written confirmation from the respective party to verify that the representatives, employees, or otherwise who are acting on behalf of the Trust have received the relevant AODA training.

Regardless of the format, training will include the following topics:

- The purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Customer Services 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 support person
- How to learn about the use of various assistive devices available on-site or otherwise that may help with providing access or service to people with disabilities
- What to do if a person with a disability is having difficulty accessing our services or facilities
- Our policies, procedures, and practices relating to the Customer Service Standard.

Please note: Associates and/or others will be trained on an ongoing basis when changes are made to current policies, procedures, and/or practices.

3.6 Record of Training

We will maintain a record of training for individuals that have participated in the AODA training seminar(s) provided by the Trust. The record of training will include the date training was provided and the names of the associates and others who successfully completed the training.

3.7 Feedback Process

We welcome and encourage feedback regarding our accessibility services. In order to ensure that we receive and respond to all feedback, comments, questions, and/or concerns in a timely and appropriate manner, we will be providing the public with the feedback options noted below.

Please note: all comments related to this policy are submitted using one of the feedback options noted below will be acknowledged within seven calendar days from the date of receipt.

- You may write to our Home Office located at:

3200 Highway 7
Vaughan, Ontario
L4K 5Z5

Attention: Senior Director, Human Resources

- You may contact our Home Office at 905-326-6400 x7664; alternatively, you may contact us via our Loyalty number at 1-855-692-5891.

4.0 Notice of Availability and Format of Documents

The Trust will provide information related to this policy and/or its facilities or services as it relates to the AODA Customer Service Standard upon written, electronic, or in-person request.

Any communication and/or documentation pertaining to the AODA Customer Service Standard will be provided in a manner that is respectful of an individual's capabilities; thus, ensuring respect for the dignity and independence of the individual.

5.0 Definitions

Assistive Device: 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 personal oxygen tank, which may 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 the following:

- 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 other remedial appliance or device;
- A learning disability, or dysfunction in one of more of the processes involved in understanding or using symbols or spoken language;
- A mental disorder; or
- 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: 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(s): an animal specially trained to assist a person with a disability if:

1. The animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the vest or harness worn by the animal; or
2. The person provides documentation from a member of one of the following regulated health professional colleges confirming that the person requires the animal for reasons relating to the disability:
 - College of Audiologists and Speech-Language Pathologists of Ontario;
 - College of Chiropractors of Ontario;
 - College of Nurses of Ontario;
 - College of Occupational Therapists of Ontario;
 - College of Optometrists of Ontario;
 - College of Physicians and Surgeons of Ontario;
 - College of Physiotherapists of Ontario;
 - College of Psychologists of Ontario; or
 - College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

Support Person(s): 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.