









CCG's Accessible Customer Service Policy

Overview

CAA Club Group of Companies (CCG) strives to exceed the expectations of its members, brokers, clients, and customers, including people with disabilities. CCG is committed to complying with all applicable provincial accessibility legislation and regulatory requirements, including Accessibility Standards for Customer Service under the Ontarians for Disabilities Act (AODA, 2005); the Accessibility for Manitoban's Act (AMA, 2013) and Quebec's Act to secure handicapped persons in the exercise of their rights with a view to achieving social, school and workplace integration (2004) amongst others.

This policy applies to CAA Club Group (CCG) and its affiliated companies, including CAA Insurance Company, Orion Travel Insurance Company, Echelon Insurance, CAA South Central Ontario, CAA Manitoba and CAA Services (South Central Ontario) Inc. These are collectively referred to as "CAA Club Group of Companies").

Intent

CCG is committed to providing goods and services to our all its members, brokers, clients, and customers in an inclusive and accessible manner by removing all reasonably identifiable barriers or by proving alternate ways to access goods and services.

Our policies, practices and measures reflect the principles of dignity, independence, integration, and equal opportunity for people with disabilities.

Application

This policy is applicable to all CCG's Permanent Full-Time and Permanent Part-Time Associates, Temporary Contracts, Summer Students, Co-ops, Interns, Volunteers, Third-Party Vendors or Suppliers and any Contractors performing work or providing services on behalf of CCG.

Definitions

Disability:

- 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")

Accessible: Easy to approach, reach, enter, speak with or use.











Barrier: Means anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice; ("obstacle")

Assistive Device: This is a tool, technology or other mechanism that enables a person with a disability to do everyday tasks and activities, such as moving, communicating, or lifting. Personal assistive devices can include, but are not limited to, things like wheelchairs, hearing aids, white canes or speech amplification devices.

Support Person: can be a paid personal support worker (PSW), a volunteer, a family member, or a friend. PSWs are trained professionals.

Service Animal (AODA): An animal is a service animal if the animal can be readily identified as one that is being used by a person for reasons relating to that person's disability, including where the animal is confirmed as such by a letter from a qualified "regulated health professional."

Service Animal (Manitoba's Human Rights Code): "an animal that has been trained to provide assistance to a person with a disability that relates to that person's disability".

Communication Needs:

CCG will communicate with people with disabilities in ways that consider their disability. We will train Associates or any other party that on behalf of communicates with Members, Brokers, Clients, and Customers on how to interact and communicate with people with various types of disabilities. People with disabilities requiring communication in an alternate format will be provided with accommodations that meet their individual disability needs.

To meet communication needs, when appropriate we offer:

- To communicate in different ways such as writing things down, reading things out loud, and taking extra time to explain things.
- Offer a chair when longer conversations are needed
- Offer a quieter space
- Sit down to engage with someone with a wheelchair
- Provide information in an alternate format on request
- We write documents in plain language and use signs and documents that are easy to read amongst others.

To request information in an alternate format, go to our company's website, download, complete and submit a "Request for Documents in an Alternate Format Form". Please send to:

- Members/customers to submit form to store contact and accessibility@caasco.ca
- Associates to submit form to accessibility@caasco.ca and cc Supervisor/Manager.











Assistive Devices

We accommodate the use of assistive devices when Associates, Members, Brokers, Clients or Customers are accessing our goods, services, or facilities.

To accommodate for the use of assistive devices CCG will:

- Trained Associates or anyone providing products or services on behalf of CCG on how to use the assistive devices. Examples may include; wheelchairs, doorbells, automatic doors and more.
- We will ensure assistive devices are not touch or move without permission
- In cases where the assistive device presents significant and unavoidable health or safety concerns, we attempt to use other measures to ensure the person with disabilities can access our goods, services, or facilities

Support Persons

CCG is committed to welcoming people with disabilities who are accompanied by a support person. Any Member, Broker, Client, or Customer with a disability who is accompanied by a support person will be allowed to enter CCG premises with his or her support person. If an amount is payable by a person for admission to the premises or in connection with the person's presence at the premises, the provider of the services will ensure that notice is given in advance about the amount if any, payable in respect of the support person.

CCG will do as follows with regards to support persons:

- We address the Member, Broker, Client, or Customer and not the support person unless instructed by the person with the disability to do otherwise.
- We make space for support persons on-site and ensure the person with the disability always have access to the support person.
- We would share information for admissions for support persons in advance, if applicable.

Service Animals

CCG is committed to welcoming people with disabilities who are accompanied by a service animal on the parts of our premises that are open to the public and other third parties. We will also ensure all Associates or anyone else performing work on behalf of CCG is trained in how to interact with people with disabilities who are accompanied by a Service Animal.

CCG will do as follows with regards to Service Animals:

- We treat the service animal as a working animal
- Do not distract the service animal from its job by petting, feeding, or playing with it unless given permission by the person with the service animal to do so.
- know how to identify a service animal by its harness or vest and by the assistance the animal is providing.
- If we have concerns, we may ask if the animal has been trained to help a person with a disability-related need.
- We do not inquire about the disability.
- We expect the person who is handling the service animal to maintain control of the animal physically or through voice, signal, or other means











- If the service animal is showing signs of not being controlled (i.e., by barking, whining, or wandering), we may provide a warning to the handler to control the animal or ask them to leave.
- If another law prohibits service animals, we explain why the animal cannot enter the space and discuss with the person another way of providing goods or services.

Maintain Accessibility Features

To ensure barrier-free access to our goods, services, or facilities, we maintain our accessibility features so they can be used as intended.

The following practices reflects some of the measures taken:

- We organize our space so that there is room for people with wheelchairs,
- Walkers or other assistive devices.
- Our seating accommodates people of varying sizes and abilities.
- · We keep hallways, aisles, entrance, and reception areas, waiting rooms and
- · meeting rooms clear of clutter.
- We keep our entrance to our facilities clear of ice and snow.
- We place standing signs out of the way to avoid tripping hazards.
- We use both audio and visual cues to inform customers it is their turn to be
- served.
- We take our goods and/or services to the Member, Broker, Client, or Customer when our premises and structures are not accessible.

Notice of Temporary Disruption

CCG will let the public know when and why an accessibility feature, a product or service is temporarily unavailable, how long it will be unavailable, and other ways to access our goods and services. Notice of Service Disruption Template available on Company's intranet site.

Temporary Service Disruptions will be communicated as follow:

- posted on website, on social media, and/or in newsletters
- posted at our building entrance, ticket counter or service reception desk and/or in high traffic areas
- through employees, volunteers, or management (in person, by phone or through recorded greetings)
- If requested, we work with the customer to find other ways to provide goods and services

Customer Feedback

We welcome and respond promptly to feedback we receive on the accessibility of our goods and services. We document the actions we take to respond to the feedback we receive, and that information is available on request in a format that meets the individual's communication needs.

To provide feedback

- Visiting our websites, download, fill-out and submit a "Customer Feedback Form".
 - For Members/customers to submit form to Store contact and cc accessibility@caasco.ca











- Associates, please submit to Human Resources and cc <u>accessibility@caasco.ca</u> and Supervisor or Manager
- Mail: Attention to Human Resources/AODA. 60 Commerce Valley Dr E. Thornhill. ON. L3T P9
- Email: accessibility@caasco.ca or HR@caasco.ca or hr@echeloninsurance.ca

All feedback will be directed to the Store and Human Resources Department and a response will be provided within 5 business days. The feedback process is available to any person upon request.

Customer Feedback Form and Request for a Document in an Alternate Format are available on the company's intranet and internet sites and accessible to both Associates and the public.

Practices and Measures:

- All feedback is directed to the store Upon review, the store's management and personnel will determine what action should occur, if any.
- In the case of an Associate, the feedback is directed to Human Resources.
- If the feedback requires us to follow-up, the Associate, Member, Broker, Client, or Customer is notified that the request is being reviewed and when they can expect a response.
- The Associate, Member, Broker, Client, or Customer will be advised of what action we will take to address the feedback, if any.
- We'll respond to feedback in a way that meets the communication needs of the individual.

Training

CCG provides the required training on accessible customer service to employees, volunteers, management, or any other third-party performing work on behalf of CCG.

Training will include:

- The purpose of accessibility legislative requirements and standards
- 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 a support person
- How to use various equipment or devices
- What to do if a person with a disability is having difficulty in accessing CCG's goods and services
- CCG's policies, practices and procedures relating to the customer service standard

Training will also be provided on an ongoing basis in connection with changes to applicable legislation, and/or practices, procedures and practices related to providing goods and services to people with disabilities.

- We keep a written record of our accessibility, training, and accessibility policies.
- Our reports provide a record of training material and when training was offered.
- We let the public know that our written policies are available on request











References

Accessibility for Ontarians with Disabilities Act (AODA)

Customer Service Standard (aoda.ca)

C.C.S.M. c. A1.7 (gov.mb.ca)

Customer Service Standard Regulation, M.R. 171/2015 (gov.mb.ca)

Act to secure handicapped persons in the exercise of their rights (Quebec)

Policy Owner:

Chief Human Resources Officer

Administration and Contact Information

Human Resources – accessibility@caasco.ca or HR@caasco.ca or hr@echeloninsurance.ca