

# KIMCO STEEL SALES LTD

## HSPP 28~ACCESSIBILITY FOR ONTARIANS WITH A DISABILITY SERVICE POLICY STATEMENT

<b>Date Issued:</b> October 22, 2012	<b>Review/Revised Date:</b> To be reviewed
<b>Approved by:</b> Gregg Rosen, President	annually & revised as necessary/
<b>Location:</b> Applies to all Kimco Departments & employees	When legislation changes

### Purpose and Scope

The Accessibility for Ontarians with Disabilities Act, 2005 (AODA) is Provincial Legislation with the purpose of developing, implementing and enforcing accessibility standards in order to achieve accessibility for persons with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises on or before January 1, 2025.

Ontario Regulation 429/07 entitled "Accessibility Standards for Customer Service" came into force on January 1, 2008 and applies to all employers with a staff of twenty or more employees, as of January 1, 2012. This regulation establishes accessibility standards specific to customer service for public sector organizations and other persons or organizations that provide goods and services to members of the public or other third parties.

This policy is in accordance with the Accessibility Standards for Customer Service Ontario Regulation 429/07 and addresses the following:

- The provision of goods and services to persons with disabilities
- The use of assistive devices by persons with disabilities
- The use of service animals by persons with disabilities
- The use of support persons by persons with disabilities
- Notice of temporary disruptions in services and facilities
- Staff training
- Feedback regarding the provision of goods and services to persons with disabilities
- Notice of availability and format of documents

**This Policy applies to all Kimco Steel Sales Ltd staff, contractors, service providers, visitors, and guests.**

### 1. Our Mission

The mission of **Kimco Steel Sales Ltd** is to always provide excellence service to all customers, contractors, suppliers, and visitors, including people with disabilities in a way that is consistent with the principles of independence, dignity, integration and equal opportunity.

## 2. Our Commitment

In fulfilling our mission, **Kimco Steel Sales Ltd** strives at all times to provide its goods and service in a way that respects the dignity and independence of people with disabilities. We are also committed to giving people with disabilities the same opportunity to access our Services and allowing them to benefit from the same services, in the same place and in a similar way as other individuals.

### 2.1 Disability

The definition of a Disability as applicable under the Accessibility for Ontarians with a Disability Act may be found in the Ontario Human Rights Code. This is a condensed definition:

- Any degree of physical infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness.
- A condition of mental impairment or disorder, a developmental or learning dysfunction.
- Examples: Epilepsy, paralysis, impaired vision or hearing, speech impediment, reliance a guide dog, wheel chair, or any other assistive devices.

**Please Note:** That unfortunately our offices are not wheelchair assessable at this time. It is however our policy to do our best to provide our services to disable customers by providing access to the premises as far as possible by reasonable accommodation.

### 2.2 Wheelchair Access

Persons using a wheel chair, guide dog, or any other assistive devices that cannot be accommodated at this time in accessing Kimco Steel Sales offices, will be served from a special prepared area in the Non-Ferrous warehouse attached to the office. The necessary infrastructure will be put in place to accommodate persons with disabilities. Signs to direct customers with a disability will be erected in the appropriate locations leading to the non-ferrous warehouse. The scale master will also aid in directing customers with a disability to the customer service area.

### 2.3 Providing Goods and Service to People with Disabilities

**Kimco Steel Sales Ltd** is committed to excellence in serving all individuals including people with disabilities and we will carry out our functions and responsibilities in the following areas:

#### 3.1 Communication

We will communicate with people with disabilities in ways that take into account their disability.

#### 3.2 Telephone services

We are committed to providing fully accessible telephone service to all individuals we deal with. We will train staff to communicate over the telephone in clear and plain language and to speak clearly and slowly, as might be required.

We will offer to communicate with individuals by **e.g. email, TTY, relay services**, if telephone communication is not suitable to their communication needs or is not available.

### 3.3 Assistive devices

We are committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our Services. We will ensure that our staffs are trained and familiar with various assistive devices that may be used by individuals with disabilities while accessing the Services we provide.

We will also ensure that staff knows how to use the assistive devices available on our premises for disabled individuals accessing our facilities.

## 4. Use of service animals and support persons

We are 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 that all staff dealing with the public is properly trained in how to interact with people with disabilities who are accompanied by a service animal.

We are committed to welcoming people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter **Kimco Steel Sales Ltd** premises with his or her support person. At no time will a person with a disability who is accompanied by a support person to be prevented from having access to his or her support person while on our premises.

If **Kimco Steel Sales Ltd** needs to discuss confidential information with a person accompanied by a support person, the person with the disability will be asked if he or she wishes the support person to be present and, if so, to sign a consent form authorizing the **Kimco Steel Sales Ltd** to disclose confidential information in the presence of the support person (see Appendix A). In addition, the support person will be asked to sign a confidentiality agreement (see Appendix B) to keep the confidential information disclosed by the **Kimco Steel Sales Ltd** in strict confidence.

## 5. Notice of Temporary Disruption

**Kimco Steel Sales Ltd** will provide individuals with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

The notice will be placed at all public entrances and service counters on our premises.

## 6. Training for Staff

**Kimco Steel Sales Ltd** will provide training to all employees, who deal with the public or other third parties on their behalf, and all those who are involved in the development and approvals of service policies, practices and procedures. Individuals in the following positions will be trained:

### Training will include the following:

- The purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service 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 a support person
- How to use the e.g. TTY, wheelchair lifts, etc., available on provider's premises or otherwise that may help with the provision of services to people with disabilities
- What to do if a person with a disability is having difficulty in accessing **Kimco Steel Sales Services**
- **Kimco Steel Sales Ltd** policies, practices and procedures relating to the customer service standard.

Applicable staff will be trained on policies, practices and procedures that affect the way services are provided to people with disabilities. Staff will also be trained on an ongoing basis when changes are made to these policies, practices and procedures.

## 7. **Feedback Process**

The ultimate goal Of **Kimco Steel Sales Ltd** is to meet and surpass expectations while serving individuals with disabilities. Comments on our services regarding how well those expectations are being met are welcome and appreciated.

Feedback regarding the way Kimco Steel Sales Ltd provides services to people with disabilities can be made by e-mail, verbally/in person, suggestion box, feedback card and telephone. All feedback will be directed to Kimco management, or to the Safety Officer, Melvin Skeete. Individuals can expect to hear back within **Ten Working Days**.

## 8. **Modifications to this or other policies**

We are committed to developing disability service policies that respect and promote the dignity and independence of people with disabilities. Therefore, no changes will be made to this policy before considering the impact on people with disabilities. Any policy of **Kimco Steel Sales Ltd** that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

## 9. **Emergency Notification**

When an employee disclose a disability that may impair their ability to respond to an emergency situation, Kimco Steel Sales Limited will work with the Employee to develop a documented plan to remove barriers for their safe exit/response to probable incidents. The Employee is required to notify Human Resources of changes that require these plans to be upgraded.

## 10. **Self-Service Kiosks**

When Kimco Steel Sales Limited implements interactive electronic terminals (Self-Service Kiosks) for public and third parties use, the design and implementation will consider persons with disabilities.

## **11. Accommodating Employees and Job Recruitment [By January 1, 2016]**

Advertising for jobs will include a statement regarding availability of accommodation for applicants with disabilities in the recruitment process.

When applicants are selected to participate in an assessment or selection process or when given offers of employment, the applicant shall be notified that accommodations are available upon request in relation to the materials or processes to be used.

## **12. Accessibility Planning [By January 1, 2016]**

In accordance with AODA Regulations, accessibility planning will be developed, implemented and documented to ensure the removal of barriers to promote the accessibility for the disabled.

This plan will be posted on the internal website as well as the external public and third parties facing website as required. The Plan will be reviewed and updated every 3 years or as required by regulations. This plan can be requested in alternate formats.

Individual Employees who require accessible formats or communication support will be accommodated to the extent practicable upon request.

## **13. Return to Work Process [By January 1, 2016]**

**Kimco Steel Sales Limited** will develop and have in place a documented return to work process for its Employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

The return to work process will outline the process to facilitate the return to work and will include documented individual accommodation plans as part of the process as required.

This return to work process will supplement other processes created by or under other statutes (e.g., the Ontario Workplace Safety Insurance Act, 1997).

## **14. Performance Management, Career Development and Advancement & Redeployment**

By January 2016, Kimco Steel Sales Limited will take into account the accessibility needs of Employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to Employees, or when redeploying Employees.

## **15. Public Spaces**

For those limited areas that are intended for public access, Kimco Steel Sales Limited will consider accessibility requirements when making new areas or major renovations to existing areas. These spaces can include accessible parking, outdoor paths, ramps, stairs, outdoor public eating areas, and service related elements such as service counters.

## **16. Questions about this policy**

This policy exists to achieve service excellence to individuals with disabilities.

If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation should be provided by, or referred to, Safety Officer of **Kimco Steel Sales Ltd**, Melvin Skeete.

### **Location of Customer Service Policy**

#### ***Mandatory Requirements***

- Provide notice that documents are available outlining accessible service policies

- Post notice in an appropriate, conspicuous place
- Kimco Steel Sales Website

Prepared: October 22, 2012 by: Melvin Skeete, Safety Officer

Reviewed: August 6, 2014

Revised: August 6, 2014 (Review/Revise Date Added)

Revised: December 17, 2015 (#9 Emergency Notification, #10 Self-Service Kiosks, #11 Accommodating Employees & Job recruitment, #12 Accessibility planning, #13 Return to Work, Performance Management, #14 Career Development & Advancement & Redevelopment & # 15 Public Spaces added)

Reviewed: November 30, 2016 (no Change)

Reviewed: February 24, 2017 (no change)

Reviewed: July 15, 2018 (no change)

Reviewed: April 10, 2019. (no change)

Authorized by:  
17/12/2015

Gregg Rosen

---

Gregg Rosen, President, Kimco Steel Sales Ltd

## Appendix A: Consent for Presence of Support Person

I, \_\_\_\_\_ consent to \_\_\_\_\_ being  
Name of member/applicant with disability Name of support person

present during my meeting with staff/representatives of Kimco Steel sales Ltd on Date: \_\_\_\_\_

and to the sharing of confidential and/or personal information in the presence of \_\_\_\_\_  
Name of Support Person

SIGNED this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_

\_\_\_\_\_  
Kimco Steel Sales Ltd

\_\_\_\_\_  
Member/Applicant

## Appendix B: Declaration of Confidentiality

I, \_\_\_\_\_ have been asked to accompany  
Name of support person

\_\_\_\_\_ as a support person. I understand and agree at all times to  
Name of member/applicant with disability  
treat information discussed by staff/representatives of **Kimco Steel Sales** Ltd and

\_\_\_\_\_ for whom I am a support person as confidential and agree  
Member/ applicant with disability

to safeguard the confidentiality of all information shared.

SIGNED this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_

\_\_\_\_\_  
Kimco Steel Sales Ltd

\_\_\_\_\_  
Support Person



## Appendix C: Training Records

I have received training about the Accessibility for Ontarians with Disabilities Act, 2005 (AODA), the Accessibility for Customer Service, Ontario Regulation 429/07, on how to communicate and interact with people with disabilities and best practices for providing accessible customer service to people with disabilities. This training was provided in the following format:

1. Resource Book
2. Training Workshop
3. Video
4. Other: (Specify): \_\_\_\_\_

\_\_\_\_\_  
Name

\_\_\_\_\_  
Position

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature