



Title: Accessibility Policy

Subject:	Accessibility at LoyaltyOne (Ontario)
Effective	November 15, 2020
Supersedes:	December 7 th , 2012
Applicable to:	LoyaltyOne Associates

Scope

LoyaltyOne, Co. (the “Company”) is committed to ensuring equal access and participation for people with disabilities. The Company is committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. The Company seeks to remove and prevent barriers to accessibility and to meet accessibility requirements under the *Accessibility for Ontarians with Disabilities Act* (“AODA”) and Ontario’s accessibility laws.

Purpose and Application

Under AODA, organizations must meet specific requirements of accessibility standards established by regulation. This policy outlines the accessibility standards for customer service and employment at the Company. This policy applies to all associates of the Company, clients, and contracted personnel.

The Company is committed to developing customer service policies and employment practices that respect and promote the dignity and independence of people with disabilities.

All Company policies must adhere to these principles. LoyaltyOne retains the right to amend or change this policy at any time, however, any such change(s) will only be made after considering the impact on people with disabilities, and in accordance with the principles described above.

Definitions:

Accessible means customer service is provided in a manner that is capable of being easily understood or appreciated; easy to get at; capable of being reached, or entered; obtainable.

Assistive Device means any device or mechanism that assists a person with a disability in accessing, and benefiting from the services provided. Assistive devices may include, but are not limited to; ASL interpretation, wheelchair, walker, cane, assistive listening device, visual alarms, or assistive software programs.

Disability means:

- a) Any degree of physical 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 impairment,



deafness or hearing impairment, 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,
- 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.

Guide Dog means a dog trained as a guide for a blind person and having the qualifications prescribed by the *Blind Persons' Rights Act* R.S.O. 1990, c. B.7, s. 1 (1).

Service animal is an animal that provides assistance for a person with a disability. It may be readily apparent that the animal is used by the person for reasons relating to his/her disability; or a person may be asked to provide a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability

Policy Statement

The Company views accessibility as providing its associates, customers and stakeholders with uninhibited access to all of its services and information. The goal is to be a barrier-free organization by identifying, removing and preventing barriers that may limit the involvement of all people regardless of ability. Goods and services will be provided in a manner that respects the dignity and independence to all customers. The provision of services to persons with disabilities will be integrated wherever possible. Persons with disabilities will be given an opportunity equal to that given to others, to obtain, use or benefit from the goods and services provided by and on behalf of the Company.

Policy Requirements

1) Use of Service Animals and Support Persons

- a. If a person with a disability is accompanied by a guide dog or other service animal, LoyaltyOne will ensure that the person is permitted to enter their facility with the animal and to keep the animal with him or her unless the animal is otherwise excluded by law. Where a service animal is excluded by law, LoyaltyOne will ensure that other measures are available to enable the person with a disability to obtain, use and benefit from LoyaltyOne's goods and services. When communicating with people with disabilities we will take into account their disability.
- b. If a person with a disability is accompanied by a support person, LoyaltyOne will ensure that both persons are permitted to enter any facility, and that the person with a disability is not prevented from having access to the support person. Where and if a fee is charged for the support person, prior notice of the fee will be made available.

2) Notice of Temporary Disruptions



LoyaltyOne will provide notice of temporary disruptions. The notice will include information about the reason for the disruption, its anticipated duration and a description of any available, alternative services. Notice will be posted in conspicuous places, at the main entrances into the facility and may be displayed at the location of the disruption, on the website, or using another suitable method.

3) Feedback process

- a. LoyaltyOne has a feedback process through which people with disabilities are encouraged to provide information and feedback about the goods and services they receive. Feedback can be received in a variety of ways, in person, by mail, or email, by telephone, fax or otherwise. Where possible the public is encouraged to provide feedback using the "Contact us" area of the LoyaltyOne website. All feedback is sent to the appropriate General Manager for review and action.
- b. Feedback forms along with alternate methods of providing feedback such as verbally (in person or by telephone) or written (had written, delivered, website or email) will be available upon request.

4) Notice of availability of documents

- a. LoyaltyOne will provide the public notice of the availability of the documents, required by the *Accessibility Standards for Customer Service*, (O. Reg 429/07) upon request. Notice of availability will be provided on the website and through other printed methods.

5) Format of documents

Where indicated by AODA, the Company will give a copy of a document to a person with a disability, LoyaltyOne will take into account the persons' ability to access the information and will provide the document or information contained in the document in a format that meets those needs as agreed upon with the person.

6) Recruitment and Employment

As an employer, the Company takes positive steps to promote accessibility, including:

- Training employees on the requirements of Ontario's accessibility legislation and on the accessibility aspect of human rights legislation that apply to persons with disabilities
- Removing barriers in the recruitment and hiring process and providing applicants with accommodations when requested.
- Providing customized workplace emergency response information and plans for associates who have a disability.
- Making employment-related information available to associates in accessible formats.
- Developing individual accommodation plans where requested by an employee with a disability.



- Taking accessibility needs into account during performance management and career advancement processes.
- Incorporating accessibility and disability-related accommodations into Return to Work processes for associates who have been on a leave of absence.
- Considering the accessibility needs of associates with disabilities when they return to work

(a) Associate Training

Every person who deals with members of the public or who participates in developing LoyaltyOne's policies, practices and procedures governing the provision of goods and services to the public, including all associates, contractors and others who provide service on behalf of the Company will receive training regarding the provision of goods and services to persons with disabilities.

The training will include the following information

- the purposes of the *Accessibility for Ontarians with Disabilities Act*,
- how to interact and communicate with persons with various types of disabilities,
- how to interact with persons with disabilities who use an assistive device, or require the assistance of a service animal or support person
- how to use equipment made available by the Company to help people with disabilities to access goods and services
- what to do if a person with a disability is having difficulty accessing the Company's goods and services

Training will be provided to each associate according to their role. Training will be provided on an ongoing basis in connection with changes to policies, practices and procedures governing the provision of goods or services to persons with disabilities. A record of the dates on which training is provided and the number of individuals to whom it is provided will be kept.

(b) Recruitment Process

The Company will notify associates and external applicants about the availability of accommodation for applicants with disabilities in its recruitment process.

The Company will ensure that applicants are notified when they are asked to participate in the interview process that accommodations for disabilities are available upon request in relation to the materials or processes involved. The Company will consult with applicants who request accommodations to provide appropriate accommodations.

If an applicant is successful in the interview process and is presented with an offer of employment, the Company will notify the individual of its **Accommodation Policy**. Accessible formats and communications supports regarding general workplace information will also be provided to associates with disabilities.



(c) Informing Associates of Supports

The Company will ensure that associates are informed of this **Accessibility Policy**, as well as the Company's **Accommodation Policy**. These policies support associates with disabilities, including accommodations that respond to an associate's accessibility needs due to disability.

When requested by an associate with a disability, the Company will consult with the employee to provide, or arrange for accessible formatting and communication supports for information that is needed to perform their job. To determine the suitability of an accessible format or communication support, the Company will consult with the associate.

The Company will consider the accessibility needs of associates with disabilities and any accommodation plan (see below) in place when conducting performance management reviews, providing career development and advancement to associates.

(d) Emergency Response

The Company provides associates with disabilities individualized workplace emergency response information when the associate's disability is such that the information is required and the Company has been informed of the need to accommodate the associate's disability.

(e) Accommodation Plans

The Company accommodates the needs of its associates with disabilities as required under the *Ontario Human Rights Code*. As determined necessary by the Company's third party benefits provider, the Company will develop individualized accommodation plans for its associates with disabilities, as the Company is made aware. The process by which Company will consult, develop, determine, document, review and routinely update the individualized accommodation plan can be found in the **Accommodation Policy**. Company will implement and maintain measures effective to maintain the privacy of its associates with disabilities.

The Company will follow Return to Work plans for associates who have been absent from work due to a disability and who require an accommodation to Return to Work. Please refer to the **Accommodation Policy** for further information.