

Policy:
Accessible Customer Service Policy

Revision Date: December 2023
Origination Date: September 25, 2013

GENERAL POLICY STATEMENT

Deluxe Corporation is committed to providing equal treatment to people with disabilities whether visible or non-visible, with respect to the use and benefit of company services, programs, goods and facilities in a manner that respects the individual's dignity and that is equitable to all staff.

Purpose:

This policy is intended to meet the requirements of *Accessibility Standards for Customer Service, Ontario Regulation 429/07* under the *Accessibility for Ontarians with Disabilities Act, 2005*, and applies to the provision of goods and services to the public or other third parties, not to the goods themselves.

All goods and services provided by Deluxe shall follow the principles of dignity, independence, integration and equal opportunity.

Scope:

This policy applies to the provision of goods and services at premises owned and operated by Deluxe.

This policy applies to employees, agents and/or contractors who deal with the public or other third parties that act on behalf of Deluxe, including when the provision of goods and services occurs off the premises of Deluxe, such as in: delivery services, call centers, and vendors.

The section of this policy that addresses the use of guide dogs, service animals and service dogs only applies to the provision of goods and services that take place at premises owned and operated by Deluxe.

This policy shall also apply to all persons who participate in the development of the Deluxe's policies, practices and procedures governing the provision of goods and services to members of the public or third parties.

Policy:

In accordance with the *Accessibility Standards for Customer Service, Ontario Regulation 429/07*, this policy addresses the following:

- The Provision of Goods and Services to Persons with Disabilities;
- Accessible Formats and Communication Supports
- The Use of Assistive Devices
- The Use of Guide Dogs, Service Animals and Service Dogs
- The Use of Support Persons
- Notice of Service Disruptions
- Customer Feedback
- Training
- Employment Standards
- Responsibilities
- Monitoring/Contraventions

The Provision of Goods and Services to Persons with Disabilities

Deluxe will make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- ensuring that all customers receive the same value and quality;
- allowing customers with disabilities to do things in their own ways, at their own pace when accessing goods and services as long as this does not present a safety risk;
- using alternative methods when possible to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner;
- taking into account individual needs when providing goods and services; and
- communicating in a manner that takes into account the customer's disability.

Accessible Formats and Communication Supports

Deluxe employees, temporary or contract workers and third-party contractors shall, upon request, and in consultation with the individual making the request, provide or make arrangements to provide accessible formats and communications supports for persons with disabilities in a timely manner, taking into account the individual's accessibility needs and at a cost that does not cause undue hardship to the company.

This does not apply to products and product labels, unconvertible information or communications and information that Deluxe does not control directly or indirectly through a contractual relationship. If it is determined that the information or communications are unconvertible, the company shall provide the individual requesting the information or communication with:

- An explanation as to why the information or communications are unconvertible;
- A summary of the unconvertible information or communication

Deluxe shall notify customers that the documents related to the *Accessibility Standard for Customer Service* are available upon request, and in a format that takes into account the customer's disability. Notification will be given by posting the information in a conspicuous place owned and operated by Deluxe.

Accessible Websites and Web Content

Internet websites and web content controlled directly the Deluxe or through a contractual relationship that allows for modification of the product shall conform to applicable Accessibility Guideline standards.

Emergency procedures, Plans and Information

Upon request, Deluxe shall provide all existing emergency procedures, plans and safety information in an accessible format or with appropriate communication supports in a timely manner.

Assistive Devices

Customer's own assistive device(s):

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by Deluxe.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services. For example, open flames and oxygen tanks cannot be near one another. Therefore, the accommodation of a customer with an oxygen tank may involve ensuring the customer is in a location that would be considered safe for both the customer and

business. Or, where elevators are not present and where an individual requires assistive devices for the purposes of mobility, service will be provided in a location that meets the needs of the customer.

Guide Dogs, Service Animals and Service Dogs:

A customer with a disability that is accompanied by guide dog, service animal or service dog will be allowed access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to guide dogs, service animals and/or service dogs.

Recognizing a Guide Dog, Service Dog and/or Service Animal:

If it is not readily apparent that the animal is being used by the customer for reasons relating to his or her disability, Deluxe may request verification from the customer.

Verification may include:

a letter from a physician or nurse confirming that the person requires the animal for reasons related to the disability;

a valid identification card signed by the Attorney General of Canada; or,

a certificate of training from a recognized guide dog or service animal training school.

Care and Control of the Animal:

The customer that is accompanied by a guide dog, service dog and/or service animal is responsible for maintaining care and control of the animal at all time.

Allergies:

If a health and safety concern presents itself for example in the form of a severe allergy to the animal, Deluxe will make all reasonable efforts to meet the needs of all individuals.

Support Persons:

If a customer with a disability is accompanied by a support person, Deluxe will ensure that both persons are allowed to enter the premises together and that the customer is not prevented from having access to the support person.

In situations where confidential information might be discussed, consent will be obtained from the customer, prior to any conversation where confidential information might be discussed.

Notice of Disruptions in Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Deluxe. In the event of any temporary disruptions to facilities or services that customer's with disabilities rely on to access or use Deluxe's goods 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.

Notifications will Include:

In the event that a notification needs to be posted the following information will be included unless it is not readily available or known:

- goods or services that are disrupted or unavailable
- reason for the disruption
- anticipated duration

- a description of alternative services or options

Notifications Options:

When disruptions occur Deluxe will provide notice by:

- posting notices in conspicuous places including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption;
- contacting customers with appointments;
- verbally notifying customers when they are making a reservation or appointment; or
- by any other method that may be reasonable under the circumstances.

Feedback Process

Deluxe shall provide customers with the opportunity to provide feedback on the service provided to customers with disabilities. Information about the feedback process will be readily available to all customers and notice of the process will be made available by email. Feedback forms along with alternate methods of providing feedback such as verbally (in person or by telephone) or written (hand written, delivered, website or email), will be available upon request.

Submitting Feedback:

Customers can submit feedback to:

Accessibility@deluxe.com

Customers that provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

Deluxe employees, temporary or contract workers can submit feedback to:

- Accessibility@deluxe.com
- 1-800-332-2544

Training

Training will be provided to:

- all employees, and/or contractors or other third parties that act on behalf of Deluxe and,
- those who are involved in the development and approval of customer service policies, practices and procedures.

Training Provisions:

As reflected in *Ontario Regulation 429/07*, regardless of the format, training will cover the following:

A review of the purpose of the *Accessibility for Ontarians with Disabilities Act, 2005*.

A review of the requirements of the *Accessibility Standards for Customer Service, Ontario Regulation 429/07*.

Instructions on how to interact and communicate with people with various types of disabilities.

Instructions on how to interact with people with disabilities who:

- use assistive devices;

- require the assistance of a guide dog, service dog or other service animal; or
- require the use of a support person (including the handling of admission fees).

Instructions on what to do if a person with a disability is having difficulty accessing your services. Deluxe 's policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

Training Schedule:

Deluxe will provide training as soon as practicable. Training will be provided to new employees, and/or contractors or those who act on our behalf. Revised training will be provided in the event of changes to legislation, procedures and/or practices.

Record of Training:

Deluxe will keep a record of training that includes the dates training was provided and the number of employees who attended the training.

Employment Standards

Recruitment

Job applicants who are selected for an interview shall be provided with accommodation for materials to be used in the process, upon request.

Successful applicants will be notified in their employment agreements that a policy for accommodating employees with disabilities is available. Deluxe will provide job accommodation needs due to disability up to the point of undue hardship, as soon as is practical after they begin their employment as previously set out in this Policy.

Documented Individual Accommodation Plans

Our Individual Accommodation Plan Process and Individual Accommodation Plan template are available on our intranet site and includes information regarding requests for accessible formats, communication supports and individualized workplace emergency response information. Alternate formats of the accessibility plan will be made available upon request.

Return to Work Process

Deluxe has a documented return to work process in place for employees returning to work due to disability and requiring disability-related accommodations and shall outline the steps the company shall take to facilitate the return to work. Our Return to Work Process and Return to Work Plan template are available on our intranet site.

Performance Management and Career Development

Accessibility needs of employees with disabilities shall be taken into account as well as any individual's accommodation plans when providing career development or performance management.

Responsibilities

This policy will be reviewed regularly to ensure on-going compliance with regulated accessibility standards and legislated obligations.

Management shall provide advice and direction on the implementation of this policy in support of their staff. Managers shall ensure that they and their staff are familiar with and comply with this Policy.

Monitoring/Contraventions

Failure to comply with Accessibility Regulations can result in administrative penalties. Managers shall monitor current practices to ensure compliance. Failure to comply with this Policy may result in disciplinary action, up to and including dismissal.

Definitions

Assistive Device – is 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 a personal oxygen tank that might 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:

- 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 a developmental disability;
- a learning disability, or dysfunction in one or 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 – is 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 – as reflected in *Ontario Regulation 429/07*, 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
- if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

Service Dog – as reflected in *Health Protection and Promotion Act, Ontario Regulation 562* a dog other than a guide dog for the blind is a service dog if:

- it is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability;
- or the person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.

Support Person – as reflected in *Ontario Regulation 429/07*, a support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to goods and services.