



Accessibility Policy and Plan

Loyalty Markets is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence.

We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and meeting requirements under Ontario's accessibility laws.

Loyalty Markets is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination.

Loyalty Markets understands that obligations under the ***Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*** and its accessibility standards do not substitute or limit its obligations under the Ontario Human Rights Code or obligations to people with disabilities under any law.

Loyalty Markets is committed to excellence in serving and providing goods, services or facilities to all customers including people with disabilities.

Our accessible customer service policies are consistent with the principles of independence, dignity, integration, and equality of opportunity for people with disabilities, dignity, integration and equality of opportunity for people with disabilities.

Assistive Devices

LOYALTY MARKETS will ensure that its staff is trained and familiar with various assistive devices that may be used by customers with disabilities while accessing our goods or services.

Persons with disabilities may use their own assistive devices as required with accessing services at LOYALTY MARKETS location.

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 to goods and services.

Communication

LOYALTY MARKETS will communicate with people with disabilities in ways that consider their disability.

- Train employees to recognize and be aware of signs of communication problems
- Ask the person to indicate their communication preference

- Communicate with a person with a disability in a manner that considers his/her disability

Service Animals

We welcome people with disabilities and their service animals. Service animals are allowed on the parts of our premises (in Ontario) that are open to the public.

Support Persons

If a customer with a disability is accompanied by a support person, LOYALTY MARKETS will ensure that both persons can enter the premises and the customer will not be prevented from having full access to the support person. In situations where confidential information might be discussed, consent will first be obtained from the customer, prior to any such conversation or disclosure.

Fees will not be charged for support persons.

In the event a third party is hosting an event and charging fees for the event, the support person will be allowed to attend the event at their own cost unless not required by the third party.

Should this situation change in the future, we will notify customers of this through a notice posted on our premises and at the time of booking any appointments.

Notice of Temporary Disruption

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, LOYALTY MARKETS will notify customers promptly. LOYALTY MARKETS will give notice of temporary disruptions to services or facilities used by persons with disabilities including the reason for the disruption, the anticipation of the disruption and any alternative facilities or services that may be available. The notice shall be posted in a conspicuous place on the premises.

Feedback Process

Loyalty Markets welcomes feedback on how we provide accessible customer service. Customer feedback will help us identify barriers and respond to concerns. Feedback (including complaints) regarding our services may be provided to us in the following methods:

1. Website – under the “Contact Us” page. We will respond by email or by phone if it is requested by the individual.
2. Phone – Loyalty Markets head office will receive the phone call and direct the caller to our Customer Success department.

Feedback regarding our AODA processes will be handled as follows:

1. Send us an email at info@loyaltymarkets.com or call us at 647-495-8878
2. If the feedback is sent by email, we will reply within three business days.

Loyalty Markets ensures our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication support, on request.

Training for Staff

Training will be provided to all LOYALTY MARKETS employees in Ontario, those that assist in developing policies and procedures that govern the provision of services to the public, and others who deal with the public or other third parties on their behalf. This training will be given to all new employees as part of their orientation. All training records will be kept in employee files.

Training will include:

- an overview 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 support person
- what to do if a person with a disability is having difficulty accessing LOYALTY MARKETS services

Additional staff training will be provided when changes are implemented to this plan.

Feedback process

Customers who wish to provide feedback on the way LOYALTY MARKETS provides services to people with disabilities can do so by speaking with the representative whom they are dealing with, a customer service representative, by contacting LOYALTY MARKETS via e-mail or phone.

All employee feedback should be directed to the Team Lead/ Supervisor/ Manager, or Health and Safety.

Modifications to this or other policies

Any policy of LOYALTY MARKETS that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

Providing Services to People with Disabilities

LOYALTY MARKETS is committed to excellence in servicing all customers, including persons with disabilities. LOYALTY MARKETS appreciates the difficulties that can be faced by people with disabilities and strives to ensure that it can provide its services in a way that minimizes those difficulties.

Recruitment and Selection

LOYALTY MARKETS will notify its employees and the public, including internal and external job applicants about the availability of accommodation for applicants with disabilities in its recruitment processes. Where needed, accommodations for disabilities will be provided, on request, to support their participation in all aspects of the recruitment process.

LOYALTY MARKETS will notify candidates that accommodations are available upon request in relation to the materials or processes to be used.

During the application process, LOYALTY MARKETS will provide necessary support to the applicants. We will consult with the selected applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

Employment

LOYALTY MARKETS will inform its employees of the policies used to support employees with disabilities. We will provide this information to new employees as a part of their orientation. All existing employees will be provided with updated information on changes in accessibility policies whenever there is a change to existing policy.

Accessible formats and communication support for employees

LOYALTY MARKETS will consult with the employee, on employee's request, to provide or arrange for the provision and identify suitability of accessible formats and communication supports for the information that is needed to perform the employee's job; and the information that is generally available to employees in the workplace.

Workplace emergency response information

LOYALTY MARKETS will provide individualized workplace emergency response information to employees who have a disability or to the person designated to aid the employee with disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability (permanent or temporary).

The individualized workplace emergency response information will be reviewed when the employee moves to a different location in the organization; when the employee's overall accommodation needs or plans are reviewed; and when the Loyalty Markets reviews its general emergency response policies.

Individual Accommodation Plans

LOYALTY MARKETS will develop individual accommodation plans for employees with disabilities of which they have been made aware. There may be times where an employer may initiate a dialogue to offer assistance and accommodation to an employee who is clearly unwell or perceived to have a disability.

The process for the development of documented individual accommodation plans will include the following elements:

1. An employee requesting accommodation will have the opportunity to participate in the development of the individual accommodation plan, and will be able to provide own point of view on the accommodation required in his/her circumstances.
2. The employee will be assessed on an individual basis, based on his/her needs.

3. The employer can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if and how accommodation can be achieved.
4. The employee can request the participation of a workplace representative in the development of the accommodation plan.
5. Employee's personal information will be held confidential and will not be shared with the parties not involved in the accommodation process.
6. The frequency in which the individual accommodation plan will be reviewed and updated, and the way it will be done.
7. If an individual accommodation plan is denied, the reasons for the denial will be provided to the employee.
8. Individual accommodation plans will be communicated to the employee by the means and in a format that considers the employee's accessibility needs due to disability.
9. If requested, individual accommodation plans will include any information regarding accessible formats and communications supports available.
10. If required, individual accommodation plans will include individualized workplace emergency response information and identify any other accommodation that is to be provided.

Employee's emergency response information will be reviewed when:

- a) The employee changes work locations
- b) The employee's overall accommodation needs are being reviewed
- c) The organization's general emergency response policies are being reviewed

Responsibilities of employer:

- Provide the same level of safety for all employees and visitors during evacuations.

Following an emergency, the employer's responsibilities are:

- Call a staff meeting within 48 hours to talk about what has happened.
- Acknowledge the fear, anxiety and loss workers are experiencing.
- Provide information about next steps.
- Inform employees on when, where, and how operations will resume, if worksite operations have been disrupted.

Responsibilities of employee with a disability:

- Be familiar with the building and the evacuation options – exits, stairwells, ramps, areas of refuge.
- Know your workplace emergency evacuation plan.
- Work with your employer to select co-workers who are able to assist you in case of an emergency.
- Participate in emergency drills.
- Be aware of the emergency notification systems at the workplace.
- Take responsibility for disability-specific needs, including having own personal preparedness kit with extra medication, extra batteries for personal assistive devices, extra tire or a tire repair kit for wheelchair users, and any other contingency supplies specific to the person's disability.

Responsibilities of emergency wardens:

- Ensure the safe evacuation process is followed during the evacuation, and collect accurate information about evacuated employees and visitors.
- Provide information to first responders when they arrive about the number of evacuated employees and visitors, including people with disabilities waiting in areas of refuge and where they are located.

Responsibilities of all employees:

- Follow evacuation procedure during the evacuation.
- Loyalty Markets and ensure safe evacuation of person with disability that an employee is assigned to assist.
- Loyalty Markets clients or visitors an employee is with during the emergency, and ensure their safe evacuation.
- Loyalty Markets persons with disabilities and ensure safe evacuation of the person with disability that an employee is assigned to assist.

Return to Work

LOYALTY MARKETS has a back to work process in place to help employees to return to work when they have been absent because of their disability and they need some form of accommodation to return to work. Return to work plan will be appropriate for employees who have permanent, recurring or temporary disabilities and require disability-related accommodation to effectively return to work.

Performance Management

LOYALTY MARKETS will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.

If employee responsibilities change as a result of performance management process, and the employee has a disability, LOYALTY MARKETS will revisit the employee's individual accommodation plan to ensure that all necessary adjustments are made.

Career Development and Advancement

LOYALTY MARKETS will take into account the accessibility needs of the employees with disabilities as well as any individual accommodation plans when providing career development and advancement to the employees who have disabilities.

LOYALTY MARKETS will take into account what accommodations employees with disabilities may need to succeed elsewhere in the organization or to take on new responsibilities in their current position.

Redeployment

LOYALTY MARKETS will take into account the accessibility needs of the employees with disabilities as well as any individual accommodation plans when redeploying employees who have disabilities.

During the redeployment processes, LOYALTY MARKETS will consider the accessibility needs of employees with disabilities, as well as reviewing individual accommodation plans when moving employees with disabilities to other jobs within the organizations, so that employees can continue to have their accommodation.