

**POLICY:**



**Industries (Canada) Ltd.**

**SUBJECT: ACCESSIBILITY POLICY**

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**APPLIES TO:** Lennox Ontario Locations

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**APPROVED BY:** Martha Armstrong

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# Accessibility Policy

Lennox Industries (Canada) Ltd. is committed to providing a respectful, accessible, and inclusive environment for all of our employees and customers. It is our policy and purpose to meet the standards outlined in the province's *Accessibility for Ontarians with Disabilities Act (AODA)* and to break down barriers to goods, services and employment opportunities provided by Lennox Industries (Canada) Ltd.

## Background

The purpose of the *Accessibility for Ontarians with Disabilities Act* (AODA) is to remove barriers for people with disabilities and to work towards achieving a fully accessible Ontario by 2025. All organizations in Ontario with one or more employees must adhere to the following Accessibility Standards, as compliance dates come into effect:

- Integrated Accessibility Standards Regulation (IASR) (Ontario Regulation 191/11)
  - Customer Service
  - Information and Communications
  - Employment
  - Transportation
  - Design of Public Spaces (Built Environment)

## What is considered a disability under the AODA and its standards?

The AODA uses the same definition of “disability” as the *Ontario Human Rights Code*, which includes both visible and invisible disabilities. All disabilities – whether temporary, short-term, long-term, or permanent – are included in this definition. It is important to understand that the emphasis of the AODA is not on specific disabilities, but is on removing barriers to accessibility of goods and services.

Some examples of types of disabilities covered by the AODA include:

- Mobility
- Vision
- Hearing
- Speech or communication
- Mental health
- Developmental or intellectual
- Chronic diseases or conditions

## Guiding principles

The principles of the AODA assist Lennox Industries (Canada) Ltd. and its employees in taking reasonable efforts and making decisions to ensure that goods and services are as accessible and inclusive as possible.

The four guiding principles of the AODA focus on recognizing that all people with disabilities are entitled to:

- **Independence** – Independence means creating an environment in which people with disabilities are able to do things on their own, without unnecessary help or interference from others.
- **Dignity** – Treating people with dignity means not treating people with disabilities as an afterthought or forcing them to accept lesser quality or convenience, but instead enabling people with disabilities to maintain self-respect and the respect of others.
- **Integration** – Integration allows people with disabilities to benefit from the same interactions in the same place and in the same or similar ways as people without disabilities.
- **Equal opportunity** – Equal opportunity means ensuring that people with disabilities are afforded the same choices, benefits, and opportunities as people with disabilities.

## Purpose

This Accessibility Policy is intended to fulfill the policy requirements of the Integrated Accessibility Standards Regulation (IASR) (Ontario Regulation 191/11).

## Application

This policy applies to all employees and others who are working with Lennox Industries (Canada) Ltd. and involved in delivering goods and services by any means. This includes all Lennox Industries (Canada) Ltd. employees and contingent workers (agency contractors, third party, etc.) who work in Ontario and others who provide service in Ontario regardless of where they are located, as well as volunteers and third parties who interact in Ontario on behalf of Lennox Industries (Canada) Ltd.

## Assistive devices

Lennox Industries (Canada) Ltd. employees will provide and communicate reasonable measures so that customers with disabilities may use their own personal assistive devices (for example, hearing aids, wheelchairs, walkers, oxygen tanks) as required to access Lennox Industries (Canada) Ltd. facilities and services.

If a person with a disability is hindered or prevented from accessing goods or services using their assistive device, Lennox Industries (Canada) Ltd. will consult with the person and accommodate them by providing an alternative wherever possible.

Information and resources on how to provide and communicate reasonable measures for customers to use their own personal assistive devices will be provided as part of employee training.

## Communication and format of documents

Lennox Industries (Canada) Ltd. employees will communicate with people with disabilities in a manner that takes into account their disability.

Documents will be provided in accessible formats that take into account information needs and requests.

## Notice of disruption of services

In the event of temporary disruptions to the accessibility of Lennox Industries (Canada) Ltd. facilities or services, all reasonable efforts will be made to provide advance notice. This will include communicating information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available.

In some circumstances, such as in a situation of unplanned or emergency temporary disruptions, advance notice might not be possible, but notice will be provided as soon as possible.

When disruptions occur, Lennox Industries (Canada) Ltd. staff will make every effort to provide notice by:

- posting Notice of Disruption of Services notices in conspicuous places including at the point of disruption, at the main entrance of the facility, at the nearest entrance to the service disruption, and/or on the Lennox Industries (Canada) Ltd. website; and/or by
- any other method that may be reasonable under the circumstances.

## Feedback process

Feedback regarding accessibility to goods and services and the manner in which Lennox Industries (Canada) Ltd. employees interact with people with disabilities is welcome and appreciated. A feedback form and procedure have been established for people to provide feedback and for staff to respond to feedback.

The Feedback Form and Feedback Form Procedure are included in employee training. Copies of the Feedback Form are available at Reception or at the Parts Counter or by emailing [Accessibility@lennoxind.com](mailto:Accessibility@lennoxind.com).

## Training

Both customer service staff and management at Lennox Industries (Canada) Ltd. recognize the importance of understanding how to provide accessible customer service. All employees and applicable individuals in Ontario are required to receive mandatory training regarding how to provide accessible customer service.

Lennox Industries (Canada) Ltd. management will ensure that the following persons receive AODA and accessibility training or confirm that they have received such training:

- all Lennox Industries (Canada) Ltd. employees;
- “applicable individuals” as defined as Lennox Industries (Canada) Ltd. (permanent or temporary), contingent workforce (agency or independent) and volunteers that interact with the Ontario public on behalf of Lennox Industries (Canada) Ltd.; and
- individuals who participate in developing Lennox Industries (Canada) Ltd. policies.

Supervisors, managers and others in senior leadership roles are responsible to ensure that all employees and contractors in their organizations receive the mandatory AODA training. Human Resources will assist in supporting compliance with education materials and reporting.

All new employees are required to complete AODA training within 90 days of hire. In addition, all employees will be required to receive additional training when there are material updates to the course and/or legislation/standards.

At minimum, training will cover the following:

- the purposes of the AODA and 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 assistive devices or require the assistance of a guide dog, other service animal, or a support person; and
- what to do if a person with a disability is having difficulty accessing Lennox Industries (Canada) Ltd. services.

Each employee has an employee file that documents the type and date of training received. Lennox Industries (Canada) Ltd. management maintains these records, which are recorded for training and administrative purposes, and subject to the *Personal Information Protection and Electronic Documents Act* (PIPEDA).

Third-party organizations providing goods or services on behalf of Lennox Industries (Canada) Ltd. to Ontarians shall provide relevant training, learning opportunities or direction to their employees and volunteers regarding their roles and responsibilities under the AODA.

## **Guide dogs and service animals**

Lennox Industries (Canada) Ltd. allows people with disabilities to bring a guide dog or service animal with them to Lennox Industries (Canada) Ltd. facilities open to the public or required for delivery of goods and services, unless otherwise prohibited by law. Signage indicating this policy is posted at the main entrance at each facility.

Each individual who is accompanied by a guide dog or service animal is responsible for maintaining care and control of the animal at all times.

If a health or safety concern presents itself (for example, another client or staff member has a severe allergy to the guide dog or service animal), Lennox Industries (Canada) Ltd. employees will make all reasonable efforts to meet the needs of all individuals involved.

## **Support persons**

Lennox Industries (Canada) Ltd. permits people with disabilities who are accompanied by a support person to bring that person with them, at no fee, to access facilities and services open to the public or required for delivery of goods and services.

## **Employment**

Lennox Industries (Canada) Ltd. will communicate to the public and staff that, when requested, Lennox Industries (Canada) Ltd. will accommodate disabilities during recruitment and assessment processes and when people are hired.

Lennox Industries (Canada) Ltd. will provide individualized workplace emergency response information to employees who have a disability.

If using performance management, career development and redeployment processes, Lennox Industries (Canada) Ltd. staff will take into account the accessibility needs of employees with disabilities.

## **Design of Public Spaces**

Lennox Industries (Canada) Ltd. will meet required Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces (for example, entrances and washrooms).

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

Any Lennox Industries (Canada) Ltd. policies that do not respect and promote the dignity and independence of people with disabilities will be modified or removed.

## **Availability of AODA Documents**

All relevant documents required by the Customer Service Standard, including the Accessibility Policy, will be made available upon request and in a format reasonably accommodating disabilities. The Accessibility Policy is included as part of employee training and the Policy is available at Reception or at the Parts Counter or by emailing [Accessibility@lennoxind.com](mailto:Accessibility@lennoxind.com).

Any questions about this Accessibility Policy, the feedback process, or availability of documents can be directed to the HR Manager, Lennox Industries (Canada) Ltd.

Mail: 1 Spar Drive  
Brampton, ON L6S 6E1  
Email: [Accessibility@lennoxind.com](mailto:Accessibility@lennoxind.com)  
Fax (905) 793-3858

## Glossary

**Accessible** shall mean capable of being entered or reached, approachable; easy to get at; capable of being influenced, obtainable; able to be understood or appreciated.

**Assistive devices** are devices (for example, mobility aids or hearing aids) intended to assist people with disabilities in carrying out activities.

**Disability** is defined as follows:

- 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 a 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** describes a dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons' Rights Act* to act as a guide dog for people who are visually impaired.

**Service animal** is an animal used by a person with a disability when

- it is readily apparent that the animal is used by the person for reasons relating to his or her disability (e.g., the animal is wearing a harness, saddle bags, or a sign that identifies the animal as a service animal)
- the person provides a letter from a regulated health professional ([http://www.health.gov.on.ca/en/pro/programs/hhrsd/about/regulated\\_professions.aspx](http://www.health.gov.on.ca/en/pro/programs/hhrsd/about/regulated_professions.aspx)) confirming that the person requires the animal for reasons relating to a disability (the letter does not need to identify a specific disability or specifically how the animal is needed or used)
- the person provides a certificate of training from a recognized guide dog or service animal training school; or
- the person provides a valid identification card signed by the Attorney General of Canada.

**Support person** describes an individual who accompanies a person with a disability in order to provide services or assistance with communication, mobility, personal care, medical needs or access to goods or services. A support person could be a paid personal support worker, a volunteer, a friend or a family member and does not necessarily need to have special training or qualifications.