



<b>POLICY NAME</b>	<b>ACCESSIBLE CUSTOMER SERVICE POLICY</b>
<b>DEPT/GROUP</b>	<b>HUMAN RESOURCES</b>
<b>POLICY SCOPE</b>	<b>WESTROCK EMPLOYEES AND ALL VISITORS</b>
<b>POLICY REGION</b>	<b>ONTARIO, CANADA</b>
<b>EFFECTIVE DATE/LAST REVISION DATE</b>	<b>JUNE 5, 2023</b>
<b>APPROVER</b>	<b>Carolyn McDermott</b>

**Intent**

This policy (the “Policy”) is intended to meet the requirements of the *Customer Service Standards* which are included within the broader *Integrated Accessibility Standards, Ontario Regulation 191/11* (the “IAS”) under the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”).

WestRock is committed to providing our customers and the public with consistently high levels of customer service. In the pursuit of our commitment, WestRock will strive to ensure that our goods, services and facilities are accessible to persons with disabilities.

The objective of this policy (the “Policy”) is to identify and document how WestRock seeks to achieve compliance with the requirements of the IAS and how it will continue to work towards improving accessibility in customer service for persons with a disability.

**Scope**

- a) The Policy applies to the provision of goods, facilities and services at premises owned and operated by WestRock.
- b) The Policy applies to employees, volunteers, agents and/or contractors who provide goods services or facilities to customers, the public or other third parties on behalf of WestRock, including when the provision of goods, services and facilities occurs off the premises of WestRock such as in: delivery services, vendors, and drivers.

- c) The Policy shall also apply to all persons who participate in the development of the WestRock's policies, practices and procedures governing the provision of goods, services, and facilities to members of the public or third parties.
- d) The Policy applies to the provision of goods, services, and facilities to our customers, the public and other third parties, not to the goods themselves.

## **Definitions**

Accessible Format – May include, but is not limited to, large print, recorded audio and electronic format, braille and any other format usable by a person with a disability.

Assistive Device – is a technical aid, communication device or other device used to assist a person in performing a particular task or tasks or to aid the person in an activity of daily living. Personal assistive devices include 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.

Communication Support – May include, but is not limited to, captioning, alternative and an augmentative communication support, plain language, sign language and any other support that facilitates effective communication.

Disability – the term disability as defined by the AODA 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 - A guide dog as defined in section 1 of the Blind Persons Rights' Act is a dog trained as a guide for a person who is blind and having qualifications prescribed by the regulations under the Blind Persons' Rights Act.

Service Animal – means an animal:

- a) That can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the vest or harness worn by the animal.
- b) For which the person provides documentation from a member of the following regulated health professionals confirming the person requires the animal for reasons relating to the disability:
  - College of Audiologists and Speech-Language Pathologists of Ontario.
  - College of Chiropractors of Ontario.
  - College of Nurses of Ontario.

- College of Occupational Therapists of Ontario.
- College of Optometrists of Ontario.
- College of Physicians and Surgeons of Ontario.
- College of Physiotherapists of Ontario.
- College of Psychologists of Ontario.
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

Support Person – as reflected in *Ontario Regulation 191/11*, a support person means, in relation to a person with a disability, another person who accompanies the person with a disability in order to help with communication, mobility, personal care, medical needs or access to goods, services and facilities.

### **General Principles**

In accordance with the IAS, this policy addresses the following:

- A. The Provision of Goods and Services to Persons with Disabilities.
- B. The Use of Assistive Devices
- C. The Use of Support Persons
- D. The Use of Service Animals
- E. Accessible Communication
- F. Notice of Disruption of Services
- G. Training
- H. Accessible Feedback Procedures
- I. Notice of Availability and Format of Required Documents

#### **A. The Provision of Goods and Services to Persons with Disabilities**

WestRock will strive to ensure that its policies, practices, and procedures are consistent with the principles of dignity, independence, integration and equal opportunity. WestRock will work to achieve this goal by:

- endeavouring to ensure that all customers, including customers with disabilities, receive the same value and quality from our goods, services or facilities.
- unless an alternative measure is necessary to promote accessibility, working to ensure the provision of goods, services, and facilities to persons with disabilities is integrated with the provision of goods, services, and facilities to others.
- providing persons with a disability an opportunity equal to that given to others to obtain, use or benefit from our goods, services, and facilities.
- allowing customers with disabilities to do things in their own ways, at their own pace when accessing our goods, services, and facilities as long as this does not present a safety risk.
- considering individual needs when providing goods, services, and facilities; and
- communicating in a manner that considers a person's disability.

#### **B. Assistive Devices**

Persons with disabilities are permitted, where possible, to use their own Assistive Devices as required for the purposes of obtaining, using, or benefiting from WestRock's services.

If there is a physical, technological, or other type of barrier that prevents the use of an Assistive Device on WestRock's premises, WestRock will make efforts to provide an alternative means of assistance to the person with a disability.

### C. **Support Persons**

A person with a disability may enter WestRock premises and have access to the Support Person while on the premises.

WestRock may require a person with a disability to be accompanied by a Support Person when on the premises, but only if, after consulting with the person with a disability and considering the available evidence, WestRock determines:

- a) A Support Person is necessary to protect the health or safety of the person with a disability or the health or safety of others on the premises; and
- b) There is no other reasonable way to protect the health or safety of the person with a disability and the health or safety of others on the premises.

### D. **The Use of Service Animals**

A person with a disability may enter WestRock premises accompanied by a Guide Dog or Service Animal and keep the Guide Dog or Service Animal with them, if the public has access to such premises and the Guide Dog or Service Animal is not otherwise excluded by law.

If a Guide Dog or Service Animal must be excluded by law, WestRock will provide the explanation for why and explore alternative ways to meet the customer's needs.

### E. **Accessible Communication**

WestRock strives to communicate with people with disabilities in ways that consider the individual's disability.

### F. **Notice of Disruption of Services**

WestRock will provide customers with notice in the event of a planned or unexpected disruption in the facility or services usually used by people with disabilities to access WestRock's goods, services, and facilities. This notice will include information about the facility or service that is unavailable, 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 on our premises.

### G. **Training**

WestRock will provide initial training, and ongoing training as required under the IAS to all persons to whom this Policy applies.

#### *i. Content of Training*

Training will be appropriate to the individual's duties and will include some or all of the following:

- a review of the purpose of the AODA and requirements of the IAS;
- 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 or other Service Animal; or
  - require the assistance of a Support Person;

- how to use equipment or devices made available on WestRock's premises to assist persons with a disability to obtain, use or benefit from WestRock's goods, services and facilities;
- instructions on what to do if a person with a disability is having difficulty accessing our goods, services or facilities; and
- WestRock's policies, procedures and practices pertaining to providing accessible customer service to persons with disabilities;

*ii. Training Schedule*

WestRock will ensure training is provided to all persons to whom this Policy applies as soon as practicable after a new individual assumes a role to which this Policy applies. WestRock will ensure on-going training is provided in the event of a material change to legislation or WestRock's policies.

*iii. Record of Training*

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

**H. Feedback Procedure**

WestRock welcomes and appreciates feedback regarding this Policy and its implementation. Feedback can be provided in the following ways:

- a) In person at Milton, Ontario.
- b) By telephone at 416.453.8789.
- c) In writing to Carolyn McDermott, 8150 Parkhill Drive, Milton, ON, N1H 7K3
- d) Electronically, either by email to Carolyn.mcdermott@westrock.com or through alternate means of providing electronic text (i.e., on a memory stick or diskette).

Where the feedback requires WestRock to take an action or where a complaint is received, WestRock will take the necessary action in response to the feedback or complaint and will document the action taken. This documentation will be available upon request.

WestRock will make information about this feedback procedure readily available to the public and shall make it accessible to a person with a disability by providing, or arranging for the provision of Accessible Formats and Communication Supports, on request.

**I. Notice of Availability and Format of Information and Documents**

WestRock shall notify customers and the public that the documents required by the IAS are available upon request. Notification will be given by posting the information in a conspicuous place on WestRock's premises, WestRock's website and/or any other reasonable method.

Upon request, documents, or information contained in documents, required by the IAS, to a person with a disability in an Accessible Format or with a Communication Support and will be provided in a timely manner. The document will also be provided at a cost that is no more than the regular cost charged to other persons. WestRock will consult with the person making the request in determining the suitability of an Accessible Format or Communication Support.

J. **Administration**

If you have any questions or concerns about this policy or its related procedures, please contact the Human Resources Department

This policy and its related procedures will be reviewed as required in the event of legislative changes.

**Referenced Documents:**

- *Accessibility for Ontarians with Disabilities Act, 2005*
- *Integrated Accessibility Standards ("IAS"), Ontario Regulation 191/11*
- *Ontario Human Rights Code*

Acknowledgement & Agreement

I, \_\_\_\_\_ acknowledge that I have read and understand the Accessible Customer Service Policy of WestRock. Further, I agree to adhere to this Policy and will ensure that employees working under my direction adhere to Policy as well. I understand that if I violate this Policy, I may face corrective action, up to and including termination of employment.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_