

(Note: This policy has been updated to reflect the July 1, 2018, changes to the regulations under Ontario's Health Protection and Promotion Act.)

SCOPE

This Policy applies to all employees, managers, consultants, contractors, directors, officers of Waste Connections of Canada Inc. (the "Company") who deal with our customers in Ontario, including persons who act as our agents (such as contractors and independent consultants), and to all persons who are responsible for developing and updating policies about how we deal with our customers in Ontario.

PURPOSE

It is the objective of the Company to create and maintain a climate of mutual respect in which all customers/clients and persons who access our services, goods and facilities will be able to do so irrespective of any disability they may have. This Policy is created in accordance with the *Accessibility for Ontarians with Disabilities Act* (the "AODA") and specifically the Customer Service Standards. If a barrier to accessing our goods and services cannot be removed, we will seek alternative ways to access the goods and services.

Our business practices and policies will strive to ensure that all of our policies, practices and procedures are consistent with the core principles as outlined in the AODA, which include:

Dignity

Goods and services and access to our facilities are to be provided to all persons with disabilities in a manner that is respectful to the person and all such persons shall be treated as valued customers deserving of service.

Equality of Opportunity

All persons with disabilities are entitled to be given an opportunity to obtain, use and benefit from our goods, services and facilities equal to that of any other of our customers.

Integration

All persons with disabilities are entitled to benefit from our goods, services and facilities in the same place and in the same or similar manner as any other customer. This may require a different format and maintaining a flexible approach wherever possible, taking into account the person's individual needs. The objective is to attempt inclusiveness and full participation to the extent possible.

Independence

Goods and services and access to our facilities shall be provided in a way that respects the independence of persons with disabilities and means respecting the person's right to do it themselves and to choose how they wish to receive services. Any assistance offered must be with the express permission of the person.

The following definitions apply for the purposes of this Policy:

“**Assistive Device**” refers to any tool, technology or other mechanism that enables a person with a disability to maintain their independence in everyday life by performing tasks and activities such as moving, communicating or lifting.

“**Customer**” refers to anyone who is in receipt of the goods and services we provide, whether the person is a member of the general public, the end-user of our goods or services, a distributor, or a representative of another organization.

“**Disability**” means the same under the AODA as it does under the Ontario *Human Rights Code*:

- a) 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 coordination, 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,
- 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, or
- 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*.

“**Employee**” refers all employees, officers, directors, students, volunteers, or contractors of the Company who deal with any of our customers (or potential customers) in Ontario, whether working on a full-time or part-time basis.

“**Service animal**” for the purpose of this policy, an animal is a service animal for a person with a disability if:

1. The animal 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; or
2. The person provides documentation from a member of one of the following regulated health professional colleges confirming that 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; or
 - College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

This includes any animal used by a person with a disability for reasons relating to the disability, such as guide dogs, hearing alert animals (alerts owner to sounds), seizure alert animals (alerts owner to oncoming seizure; steers owner from danger during seizure), and psychiatric service animals (retrieves and prompts owner to take medicine; leads owner out of crowds; retrieves or activates medical alerts).

In cases where the assistive device presents a health and safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services, up to the point of undue hardship.

For example, open flames and oxygen tanks cannot be near one another. Therefore, the accommodation of a customer with an oxygen tank might involve ensuring the customer is in a location that would be considered safe for both the customer and business.

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

Guide Dogs and Service Animals

A person with a disability who is accompanied by a service animal is permitted access to all parts of the Company's premises that are open to the public, provided that the animal is not otherwise excluded by law. If for some reason the service animal is excluded by law, we will attempt to find an alternate means within a reasonable time frame to provide the person with the disability access.

If it is not readily apparent that the animal is a service animal, Waste Connections Canada reserves the right to ask the person with the disability to provide a letter from an appropriate medical professional confirming that the person requires the animal for reasons relating to his or her disability. Staff may respectfully ask if an animal is a service animal and will not ask the nature of the person's disability or purpose of the animal.

Staff will receive training on how to interact with a person with a disability who is accompanied by a service animal.

Exclusion Guidelines

If a customer's guide dog or service animal is excluded by law (see applicable laws below), Waste Connections of Canada will offer alternative methods to enable the person with a disability to access goods and services, when possible. For example, the company might accommodate a customer's disability by securing the animal in a safe location and offering the assistance of an employee to facilitate the delivery of goods and services.

Applicable Laws

Dog Owners' Liability Act, 2005: If there is a conflict between a provision of this legislation or of a regulation under this or any other act relating to banned breeds (such as pit bulls) and a provision of a by-law passed by a municipality relating to these breeds, the provision that is more restrictive in relation to controls or bans on these breeds prevails. Staff will respectfully explain that the service animal must be removed from the public area due to a municipal by-law and make alternate arrangements or provide the service outside the public area.

Recognizing a Guide Dog or Service Animal:

If it is not readily apparent that the animal is being used by the customer for reasons relating to their disability, Waste Connections of Canada may request verification from the customer.

Allergies and Other Health and Safety Concerns

If a health and safety concern presents itself, for example, in the form of a severe allergy to the animal, Waste Connections of Canada will make all reasonable efforts to meet the needs of all individuals. Pursuant to the company's obligations under the *Human Rights Code* and the *Occupational Health and Safety Act*, each customer's accommodation needs will be considered on a case-by-case basis, up to the point of undue hardship.

Due diligence needs to be paid to address health and safety requirements. For example, if a person's health and safety could be seriously affected by the presence of a service animal on the premises open to the public, management must fully analyse all options for safely accommodating the service animal. Options could include creating distance between the two individuals to eliminate in-person contact, changing the time the two individuals receive service, or using air purifiers and other measures that could allow the person to use their service animal on the premises.

In very exceptional circumstances where a service animal becomes out of control, causing a clear disruption or a threat to the health and safety of others, and the animal's behaviour is not corrected by the owner, a person with a disability can be asked to remove their service animal from the premises.

As a courtesy, particularly if the person and service animal have been in attendance on the premises for a long time, staff may ask whether the animal requires water, may designate an area in which the service animal can relieve itself, or ask whether the staff can be of assistance pertaining to the service animal.

The Use of Support Persons

If a customer with a disability is accompanied by a support person, Waste Connections of Canada will ensure that both persons may enter the premises together and that the customer is not prevented from having access to the support person.

There may be times where seating and availability prevent the customer and support person from sitting beside each other. In these situations, the company will make every reasonable attempt to resolve the issue.

In situations where confidential information might be discussed, consent will be obtained from the customer before any potentially confidential information is mentioned.

Staff will receive training on how to interact with persons with disabilities who are accompanied by a support person, including:

- Communicating directly with the customer, rather than the support person
- Addressing potential issues of confidentiality

Admission Fees

Where the company requires a support person to accompany a person with a disability, and where the person with a disability has agreed to the accompaniment, the company will not charge the support person any fees or fares.

Notice of Disruptions in Service

Service disruptions may occur for reasons that may or may not be within the control or knowledge of Waste Connections of Canada. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use 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.

If 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; and
- A description of alternative services or options.

Notification Options

When disruptions occur, Waste Connections of Canada 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, or on the company website;
- Contacting customers with appointments;
- Verbally notifying customers when they make a reservation or appointment; or
- By any other method that may be reasonable under the circumstances.

Customer Feedback

Waste Connections of Canada 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 request. Feedback forms, along with alternate methods of providing feedback verbally (in person or by telephone) or written (handwritten, delivered, website, or e-mail), will be available upon request.

Submitting Feedback

Customers can submit feedback to:

Waste Connections of Canada Inc.
6220 Hwy 7, Suite 600, Woodbridge ON, L4H 4G3
T: 905-532-7510
F: 905-532-7576

Customers who wish to provide feedback by completing an onsite customer feedback form or verbally can do so to any Waste Connections of Canada employee.

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

Training

Training will be provided to:

- Every employee of or a volunteer with Waste Connections of Canada;
- Every person who participates in developing the policies of Waste Connections of Canada; and
- Every other person who provides goods, services, or facilities on behalf of Waste Connections of Canada.

Training Provisions

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 customer service standards;
- 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 use of a support person (including the handling of admission fees);
- Instructions on how to use equipment or devices that are available at our premises or that we provide that may help people with disabilities;
- Instructions on what to do if a person with a disability is having difficulty accessing our services; and
- Policies, procedures, and practices of the company pertaining to providing accessible customer service to customers with disabilities.

Training Schedule

Waste Connections of Canada will provide training as soon as practicable. Training will be provided to new employees. Revised training will be provided in the event of changes to legislation, procedures, policies, or practices.

Record of Training

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

MODIFICATIONS TO THIS OR OTHER POLICIES

All of our policies, practices and procedures will be reviewed on an ongoing basis to ensure compliance with the AODA. Any policy, practice or procedure that does not comply with and promote the dignity and independence of people with disabilities will be modified or removed.

ACCESSIBILITY OF DOCUMENTS

This Policy and all other documents required by the AODA pertaining to our policies, practices and procedures on the provision of services to persons with disabilities can also be obtained by contacting the Accessibility Coordinator using the contact information set out above. Upon request, reasonable attempts will be made to provide these documents to clients with disabilities in a format that takes into account the person's disability.

Notice of availability of these documents will be posted on our website and posted in a conspicuous place at each of the Company's locations where this Policy applies.

NOTICE OF AVAILABILITY AND FORMAT OF DOCUMENTS TO CUSTOMERS

Waste Connections of Canada shall notify customers that the documents related to the customer service standards 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 Waste Connections of Canada, the website of Waste Connections of Canada, and any other reasonable method.

Administration

If you have any questions or concerns about this policy or its related procedures, please contact our Accessibility Coordinator at:

Attention: Legal Department/Accessibility Coordinator
Waste Connections of Canada Inc.
6220 Hwy 7, Suite 600, Woodbridge ON, L4H 4G3
T: 905-532-7510
F: 905-532-7576

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