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# Subaru Canada, Inc.

## Accessibility for Ontarians with Disabilities



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# 1. General

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## STATEMENT OF COMMITMENT TO ACCESSIBILITY

Subaru Canada, Inc. (referred to as SCI or the Company) is committed to providing a barrier-free environment for our customers, employees, job applicants, visitors and other stakeholders who enter our premises, contact us or access our information. As an organization, we commit to applying the principles of dignity, independence, integration, and equal opportunity outlined in the Accessibility for Ontarians with Disabilities Act (AODA), Customer Service Standard, and the Integrated Accessibility Standards Regulation (IASR). SCI understands the importance of ensuring the full inclusion of all persons with disabilities by fostering an accessible and welcoming environment for all.

## DISABILITY DEFINED

The Accessibility for Ontarians with Disabilities Act (AODA) was published in 2005 and defines disability as:

- (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 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,
- (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; (“handicap”)

For more information, please visit the following links:

[Accessibility for Ontarians with Disabilities Act, 2005 \(external link\)](#), (AODA)

[Ontario Regulation 429/07- Accessibility Standards for Customer Service \(external link\)](#)  
(Accessible Customer Service Standards)

[Ontario Regulation 191/11 – Integrated Accessibility Standards \(external link\)](#) (IASR).

## INTEGRATED ACCESSIBILITY STANDARDS MULTI-YEAR PLAN

In accordance with Section 4 of the Integrated Accessibility Standards, Subaru Canada, Inc. has established a multi-year action plan that outlines the organization's strategy to prevent and remove barriers and meet its requirements under the Regulation. This document is broken down into three sections: (1) Accessibility Policy and Multi-Year Accessibility Plan (2) Information and Communication (3) Employment. The plan will be reviewed and updated at least once every five years and will be made available in an accessible format upon request.

### Accessibility Policy and Multi-Year Accessibility Plan

Accessibility Initiative	Compliance Date	Status
Create an accessibility policy	January 1, 2014	Complete
Create a multi-year accessibility plan	January 1, 2014	Complete
Review the multi-year accessibility plan	January 1, 2018	Complete
Provide accessibility training	January 1, 2015	Complete

### Information and Communication

Accessibility Initiative	Compliance Date	Status
Implement an accessible feedback process	January 1, 2015	Complete
Offer accessible formats and communication supports	January 1, 2016	Complete
Ensure the Subaru Canada Inc. website and web content meet all accessibility requirements	January 1, 2021	In Progress

### Employment

Accessibility Initiative	Compliance Date	Status
Ensure the recruitment, assessment and selection process is accessible	January 1, 2016	Complete
Inform employees of supports	January 1, 2016	Complete
Provide accessible formats and communication supports for employees	January 1, 2016	Complete
Implement workplace emergency response information	January 1, 2012	Complete
Document all individual accommodation plans	January 1, 2016	Complete
Implement the return to work process	January 1, 2016	Complete
Ensure the performance management, career development, advancement and employee redeployment process is accessible	January 1, 2016	Complete

## TRAINING

SCI is committed to providing training on the requirements of the accessibility standards referred to in the AODA, IASR and the Human Rights Code (as it relates to persons with disabilities). Training will be appropriate to the function of the employees and other persons.

Specifically, the training will cover the details and requirements of:

- Accessibility for Ontarians with Disabilities Act
- Information and Communication Standards (under the IASR)
- Employment Standards (under the IASR)
- Understanding Human Rights (as it pertains to the AODA)
- Built Environment (under the IASR – training will be given to the individual(s) with oversight on the development / alterations of public spaces)

SCI will keep a record of completed training and will also include accessibility training as part of all new hire orientations.



## 2. Information and Communication Standard

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### FEEDBACK

SCI welcomes feedback in a variety of ways (electronically, phone, mail, survey, etc.) and commits to continuously examining the Customer Experience to ensure accessible formats and communication supports are in place. The Company's Customer Experience department can be contacted:

- Over the phone at 1-800-894-4212 (08:30-16:30 Eastern Standard Time).
- In writing at Subaru Canada, Inc., 560 Suffolk Court, Mississauga, ON, L5R 4J7.
- Electronically using the email template on [www.subaru.ca](http://www.subaru.ca) under the 'Contact Us' section.

Additional appropriate accessible formats will be provided, upon request.

### ACCESSIBLE FORMATS AND COMMUNICATION SUPPORTS

Upon request, SCI will provide, or arrange for the provision of accessible formats and communication supports for persons with disabilities as quickly as possible and at no additional cost beyond the regular cost. The Company will consult with the person making the request in determining the suitability of an accessible format or communication support.

### ACCESSIBLE WEBSITES AND WEB CONTENT

SCI is committed to producing an accessible website and web content that will comply with the World Wide Web Consortium's Web Content Accessibility Guidelines (WCAG), beginning at Level A and increasing to Level AA.



## 3. Employment Standard

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### RECRUITMENT, ASSESSMENT, SELECTION

SCI is committed to ensuring the recruitment, assessment and selection process is fully accessible.

- I. SCI will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.
- II. Throughout the recruitment process, SCI will notify job applicants when they are individually selected to participate in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.
- III. If a selected applicant requests an accommodation, SCI will consult with the 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.
- IV. When making offers of employment, SCI will notify the successful applicant of its policies for accommodating employees with disabilities.

### INFORMING EMPLOYEES OF SUPPORTS

SCI will ensure that employees are informed of all accessibility policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practicable after commencing employment.

### ACCESSIBLE FORMATS AND COMMUNICATION SUPPORTS FOR EMPLOYEES

Upon the request by an employee with a disability, SCI will consult with the employee to provide accessible formats and communication supports for:

- i. information that is needed in order to perform his/her job; and
- ii. information that is generally available to employees in the workplace.

The Organization will consult with the employee making the request in determining the suitability of an accessible format or communication support.

## WORKPLACE EMERGENCY RESPONSE INFORMATION

SCI will provide individualized workplace emergency response information and support to employees who have a disability, if the disability is such that the individualized information is necessary and SCI is aware of the need for accommodation due to the employee's disability. The Organization commits to providing the information required as soon as practicable after becoming aware of the need for accommodation due to the employee's disability.

## DOCUMENTED INDIVIDUAL ACCOMMODATION PLANS

SCI commits to following all the required steps when documenting individual accommodation plans for employees with disabilities (stated below from section 28 of Regulation 191/11).

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

1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
2. The means by which the employee is assessed on an individual basis.
3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved.
4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.
5. The steps taken to protect the privacy of the employee's personal information.
6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

Individual accommodation plans will:

- (a) if requested, include any information regarding accessible formats and communications supports provided.
- (b) if required, include individualized workplace emergency response information.
- (c) identify any other accommodation that is to be provided.

## **RETURN TO WORK PROCESS**

SCI will maintain a documented return to work process for employees who have been absent from work due to a disability and who require disability-related accommodations and support in order to return to work. The return to work process will clearly define and outline the steps SCI will take to facilitate the return to work and will include documented accommodation plans for each individual as part of the process. This return to work process does not replace or override any other return to work process created by or under any other statute.

## **PERFORMANCE MANAGEMENT, CAREER DEVELOPMENT AND ADVANCEMENT AND REDEPLOYMENT**

SCI will continue to consider the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management plans and reviews, offering career development and when redeploying employees with disabilities.

## 4. Customer Service Standard

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### INTENT

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 Subaru Canada, Inc. (referred to as the Company or SCI) shall follow the principles of dignity, independence, integration and equal opportunity.

### SCOPE

- a. This policy applies to the provision of goods and services at premises owned and operated by the Company.
- b. This policy applies to employees, interns, agents and/or contractors who deal with the public or other third parties that act on behalf of the Company, including when the provision of goods and services occurs off the premises of the Company such as in: auto shows, PR events and Subaru dealerships.
- c. 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 the Company.
- d. This policy shall also apply to all persons who participate in the development of the Company's policies, practices and procedures governing the provision of goods and services to members of the public or third parties.

### 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.

## **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.

## **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.

## **GENERAL PRINCIPLES**

In accordance with the *Accessibility Standards for Customer Service, Ontario Regulation 429/07*, 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 Guide Dogs, Service Animals and Service Dogs
- D. The Use of Support Persons
- E. Notice of Service Disruptions
- F. Customer Feedback

- G. Training
- H. Notice of Availability and Format of Required Documents
- I. Training
- J. Notice of Availability and Format of Documents

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

SCI 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.

#### **B. 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 the Company.

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.

#### **C. 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.

##### ***Exclusion Guidelines:***

If a guide dog, service animal or service dog is excluded by law (see applicable laws below) the Company will offer alternative methods to enable the person with a disability to access goods and services, when possible (for example, securing the animal in a safe location and offering the guidance of an employee).

**Applicable Law:**

*Dog Owners' Liability Act, Ontario:* If there is a conflict between a provision of this Act or of a regulation under this or any other Act relating to banned breeds (such as pitbulls) 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.

**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, SCl 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, the Company will make all reasonable efforts to meet the needs of all individuals.

**D. Support Persons**

If a customer with a disability is accompanied by a support person, the Company 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.

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

## **E. Notice of Disruptions in Service**

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of SCI. In the event of any temporary disruptions to facilities or services that customer's with disabilities rely on to access or use the Company'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, SCI 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 and/or on the SCI website;
- 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.

## **F. Feedback Process**

SCI 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 on our website. 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:

Manager, Customer Care - [customercare@subaru.ca](mailto:customercare@subaru.ca)  
(905) 568-4959  
560 Suffolk Court  
Mississauga, On  
L5R 4J7

Customers who wish to provide feedback by completing a customer feedback form or verbally can do so through our Customer Experience Department.

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

## **G. Training**

Training will be provided to:

- a) all employees, interns, agents and/or contractors who deal with the public or other third parties that act on behalf of the Company ; for example: salespersons, Customer Care and third party suppliers who act on behalf of the Company.
- b) 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 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 your services.
- The Company's policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

### ***Training Schedule:***

SCI will provide training to existing and new employees, interns, and/or contractor(s) who deal with the public or act on our behalf. Subsequent training will be provided in the event of changes to legislation, procedures and/or practices.

### **Record of Training:**

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

### **H. Notice of Availability and Format of Documents**

SCI 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 our lobby.

If you have any questions or concerns about this policy or its related procedures please contact:

Manager, Human Resources  
905-568-4959

560 Suffolk Court  
Mississauga, On  
L5R 4J7  
[hr@subaru.ca](mailto:hr@subaru.ca)

This document draws on the requirements of Ontario Regulation 429/07, Accessibility Standards for Customer Service:  
[http://www.e-laws.gov.on.ca/html/source/regs/english/2007/elaws\\_src\\_regs\\_r07429\\_e.htm](http://www.e-laws.gov.on.ca/html/source/regs/english/2007/elaws_src_regs_r07429_e.htm)

SCI will provide this document in an accessible format upon request.