



## ACCESSIBILITY POLICY

### POLICY STATEMENT

At **Hallmark Canada** (“the Company”), we strive to provide goods, services and facilities in a way that respects the dignity and independence of persons with disabilities. We are committed to ensuring that employees, customers and all stakeholders with disabilities are all treated equally, in accordance with applicable legislation.

### PURPOSE

This Policy is intended to provide the overarching framework to guide the review and development of other **Hallmark Canada** policies, standards, procedures and guidelines to meet the requirements of *Accessibility for Ontarians with Disabilities Act, 2005* and *The Accessibility for Manitobans Act, 2013*.

#### Application

This Policy applies to all **Hallmark Canada** employees, volunteers, and to any individual or organization that provides goods, services, facilities to the public or other third parties on behalf of the Company in accordance with the legislation.

#### Principles

**Hallmark Canada** supports the full inclusion of persons with disabilities as set out in the Canadian *Charter of Rights and Freedoms*, *Ontario Human Rights Code*, *Manitoba Human Rights Code*, *The Accessibility for Manitobans Act, 2013* (the “Manitoba Act”), and the *Accessibility for Ontarians with Disabilities Act (AODA), 2005*.

**Hallmark Canada** acknowledges its responsibility to remove barriers to persons with disabilities, in accordance with applicable legislation. In that regard, all services, programs, goods and facilities are to be available to people with disabilities in a manner that:

- is free from discrimination and accords with all applicable human rights legislation
- does not establish or perpetuate differences based on a person’s disability
- recognizes that, as prescribed by applicable legislation, people should have barrier- free access to places, events, and functions that are generally available to the community, and to those things that will give them equality of opportunity and outcome
- uses accessible formats and communication supports
- seeks to provide integrated services
- provides an equitable opportunity to obtain, use and benefit from our goods and services, and
- takes into consideration a person’s disability.

## **POLICY REQUIREMENTS**

### **General Standards**

**Hallmark Canada** is a private sector organization under the AODA and the Manitoba Act, and is committed to meeting accessibility needs in accordance with its obligations under those statutes.

### **Establishment of Accessibility Plans and Policies**

**Hallmark Canada** has a Multi-Year Accessibility Plan, which is subject to review and update at least once every five years. The Plan is available on the Company internet and intranet sites, and can be made available in an accessible format and with communication supports, upon request. Progress on the Plan will be posted to those internet/ intranet sites annually. The Company maintains policies governing how it will meet the requirements under the AODA and the Manitoba Act, and will provide policies in accessible format, upon request.

### **Procurement of Goods, Services, Facilities and Kiosks**

When procuring goods, services, self-service kiosks or facilities, **Hallmark Canada** will incorporate accessibility criteria and features in accordance with applicable legislation, unless it is not feasible, at which point an explanation will be provided, upon request.

### **Training**

All employees, volunteers, third parties providing goods, services or facilities to members of the public on **Hallmark Canada's** behalf, as well as those who develop the policies, practices and procedures governing the provision of goods, services or facilities to members of the public or other third parties, will receive accessibility training.

The training includes:

- A review of the purposes of the AODA and the requirements of the Integrated Accessibility Standards (Ontario Regulation 191/11) ("IASR"), or, as the case may be, a review of the Manitoba Act, and all regulations made under the Manitoba Act.
- Instruction about the following:
  - How to interact and communicate with persons of various types of disability
  - How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person
  - How to use equipment or devices that may be available on the Company's premises or otherwise provided by the Company that may help with the provision of goods or services to a person with a disability
  - What to do if a person with a particular type of disability is having difficulty accessing Hallmark Canada's goods or services
- A review of the Ontario Human Rights Code, or, as the case may be, the Manitoba Human Rights Code, as those statutes pertain to persons with disabilities.
- The training provided will be appropriate to the duties of the employee, volunteer or third party. Training will take place as part of the on-boarding orientation processes or within 45 days of hire to an applicable role, and on an ongoing basis in connection with changes to the policies, practices and procedures governing the provision of goods or services to persons with disabilities. Upon completion, **Hallmark Canada** will keep a record of the training provided - including the dates on which accessibility training took place.

## **Feedback**

**Hallmark Canada** welcomes feedback on how our services are delivered to people with disabilities.

Feedback can be submitted to Lori Pavely, Accessibility Officer (call 905-752-7124 or email [lori.pavely@hallmark.com](mailto:lori.pavely@hallmark.com)). As appropriate, feedback will be forwarded to the relevant personnel, responded to, documented and tracked. This documentation will be available upon request.

Feedback will be accepted in accessible formats and with other communication supports as required by applicable legislation. The Company will comply with its statutory obligations to ensure that all other customer feedback processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request.

## **Documentation**

Documentation that describes this Policy and each of its requirements is maintained on the Company website and provided to individuals, upon request, and in the appropriate format and/or with communication support in accordance with applicable legislation.

## **CUSTOMER SERVICE STANDARDS**

**Hallmark Canada** will use reasonable efforts to ensure that its policies, programs and procedures are consistent with the following principles:

- 1) Dignity
- 2) Independence
- 3) Integration (except when alternate measures are necessary to meet the needs of persons with disabilities);
- 4) Equal opportunity to obtain, use and benefit from its goods, services and facilities; and
- 5) Facilitating communication that takes into account the disability of any customer

### **1) Dignity**

The principle of respecting the dignity of a person with a disability means treating them as customers and clients who are as valued and as deserving of high quality and timely service as any other customers. Persons with disabilities are not treated as an afterthought or forced to accept lesser service, quality or convenience.

### **2) Independence**

In some instances, independence means freedom from control or influence of others – freedom to make one's choices. In other situations, it may mean the freedom to do things in one's own way. People who may move or speak more slowly or differently must not be denied an opportunity to receive customer service because of this. Staff must allow persons with disabilities to take the time they need, without rushing them or taking over a task for them if someone prefers to do it themselves in their own way.

### **3) Integration**

The provision of goods or services to persons with disabilities and others must be integrated to allow persons with disabilities to fully benefit from the same services in the same or similar way as other customers.

### **4) Equal Opportunity**

In the case of services, equal opportunity means that persons with disabilities have the same opportunity as others to obtain, use and benefit from the way goods or services are provided.

### **5) Communication**

In the course of providing goods or services to persons with disabilities, communication means communicating in a manner that takes into account the customer's disability.

## **Documentation**

In accordance with applicable legislation:

- The policies established under this Standard will be made available upon request; and a notice of this availability will be prominently displayed on the applicable premises and on the Company website, or given by other means that are reasonable in the circumstances.
- Documentation that is requested by a person with a disability will be provided in a timely manner that takes into account the person's disability, and at no cost to the person.

## **The Provision of Goods, Services and Facilities to Persons with Disabilities**

**Hallmark Canada** will make every reasonable effort, in accordance with applicable legislation, to:

- Ensure that all customers receive the same value and quality of customer service experience, regardless of any disability;
- Allow customers with disabilities to do things in their own ways, at their own pace when accessing goods, services and facilities as long as this does not present a safety risk;
- Use 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;
- Take into account individual needs when providing goods, services and facilities; and
- Communicate in a manner that takes into account the customer's disability.

## **Assistive Devices**

Persons with disabilities may use their own assistive devices when accessing goods or services by **Hallmark Canada**.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used, as mandated by applicable legislation, to ensure the access to goods, services and facilities. For example, if an aisle isn't wide enough for a customer to maneuver their wheelchair, a sales associate would assist by asking if help is required and by bringing the goods to the customer so they are accessible for viewing.

## **Service Animals**

**Hallmark Canada** will ensure that a customer with a disability who is accompanied by a guide dog, service animal or service dog will be permitted access to the Company's retail premises that are open to the public, unless the presence of the animal is 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, **Hallmark Canada** will offer alternative methods to enable the person with a disability to access goods, services and facilities (for example, securing the animal in a safe location and offering the guidance of an employee).

If there is a conflict that arises concerning a service animal on site (e.g., with another staff member who is allergic or fearful about an animal), managers will work with the parties to find an acceptable solution. The best solution will be one that respects each individual's right to a safe, secure and accessible environment.

#### Recognizing a Guide Dog, Service Dog and/or Service Animal:

In Ontario, if it is not readily apparent that an animal is being used by the customer for reasons relating to his or her disability, **Hallmark Canada** may request verification from the customer in the form of documentation from a regulated health professional identified in the IASR, confirming that the person requires the animal for reasons related to their disability.

#### **Support Persons**

**Hallmark Canada** will ensure that, where any person with a disability is accompanied by a support person, both persons will together be permitted to enter **Hallmark Canada's** premises that are open to the public (or, as the case may be, open to other similarly situated third parties. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises.

In situations where third-party confidential information might be discussed, consent must be obtained from the third-party, prior to any discussion or other disclosure of their confidential information taking place in the presence of the support person.

If **Hallmark Canada** charges an admission fee in connection with a support person's presence at an event or function, notice will be given in advance as to the amount, if any, that is payable in respect of the support person accompanying a person with a disability.

When support persons are required (e.g., sign language interpreters, real-time captioners, attendants) for the Company's sponsored meetings, consultations or events, **Hallmark Canada** will arrange to pay support persons directly for their time.

**Hallmark Canada** may require a person with a disability to be accompanied by a support person when on the premises, but will only do so if, after consulting with the person with a disability and considering the available evidence, **Hallmark Canada** determines that a support person is necessary to protect the health or safety of the person with a disability and/or the health or safety of others on the premises and there is no other reasonable way to protect the health or safety of the person with a disability and/or the health or safety of others on the premises. In such circumstances, **Hallmark Canada** will waive payment of the amount, if any, payable in respect of the support person's admission to the premises.

#### **Notice of Service Disruptions**

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of **Hallmark Canada**. In the event of a planned temporary disruption to facilities or services that customers with disabilities rely on to access or use **Hallmark Canada's** goods or services, **Hallmark Canada** will provide advance notice of the disruption. Where the temporary disruption is unplanned, advance notice

may not be possible but notice will be provided when **Hallmark Canada** becomes aware of the disruption.

In the event that a notification needs to be posted, the following information will be included:

- Goods or services that are disrupted or unavailable
- Reason for the disruption
- Anticipated duration
- A description of alternative services or options, if available

When disruptions occur, **Hallmark 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 and on the **Hallmark Canada** website; or
- By any other method that may be reasonable under the circumstances.

## **INFORMATION AND COMMUNICATON SUPPORT STANDARDS**

### **Accessible Formats and Communication Supports**

**Hallmark Canada** will, upon request, and in consultation with the person making the request, provide or make arrangements to provide accessible formats and communication supports for persons with disabilities. Accessible formats and communication supports will be provided in a timely manner, and at no greater cost than that charged, if any, to other persons, taking into account the person's accessibility needs

### **Communication**

When communicating with a person with a disability, employees, volunteers and third party contractors will do so in a manner that takes into account a person's disability.

### **Accessible Websites and Web Content**

Internet websites and web content controlled directly by **Hallmark Canada** or through a contractual relationship that allows for modification of the product will conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level A and AA in accordance with the schedule set out in the AODA Integrated Accessibility Standards. The **Hallmark Canada** website is [www.hallmark.ca](http://www.hallmark.ca).

### **Emergency Procedures, Plans and Information**

**Hallmark Canada** will provide all existing public emergency procedures, plans and public safety information, upon request in an accessible format or with appropriate communication supports in a timely manner.

## **EMPLOYMENT STANDARDS**

### **Recruitment**

**Hallmark Canada** will notify its employees and the public about the availability of accommodations for applicants with disabilities in its recruitment process. Job applicants who are individually selected for an interview will be notified that accommodations for material to be used in the process are available, upon request. The Company will consult with any applicant who requests an accommodation in a manner that takes into account the applicant's disability. Successful applicants will be notified about the policies for accommodating employees with disabilities as part of their offers of employment.

### **Accessible Formats and Communication Supports for Employee**

**Hallmark Canada** will inform its employees of its policies that are in place for the support its employees with disabilities. Such information will be provided as soon as is practicable after the start of employment, and updated information will also be provided when there is a change to these policies.

Upon an employee's request, the Company will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:

- Information that is needed in order to perform the employee's job; and
- Information that is generally available to employees in the workplace.

**Hallmark Canada** will consult with the employee making the request in determining the suitability of an accessible format or communication support.

### **Workplace Emergency Response Information**

If an employee's disability is such that workplace emergency response information is necessary and the Company is aware of the need for accommodation, individualized information will be provided to the employee. In addition, this information will be provided, with the employee's consent, to the person designated to provide assistance. The information will undergo review when the employee moves to a different location, when the employee's overall accommodation needs or plans are reviewed and when the Company reviews its general emergency response plan.

### **Documented Individual Accommodation Plans**

The Company has a written process for the development and maintenance of documented individual accommodation plans for employees with disabilities. If requested, these plans will include information regarding accessible formats and communication supports. If requested, the plans will include individualized workplace emergency response information.

### **Return to Work Process**

The Company has a documented return to work process for employees returning to work due to disability and requiring disability-related accommodations. This return to work process outlines the steps that the Company will take to facilitate the return to work.

### **Performance Management, Career Development and Redeployment**

The Company will take into account the accessibility needs of its employees with disabilities (as well as any individual accommodation plans) when providing career development and performance management, and when considering redeployment.

### **BUILT ENVIRONMENT STANDARDS**

As required by applicable legislation, **Hallmark Canada** will comply with the AODA Design of Public Spaces Standards (Accessibility Standards for The Built Environment) and any analogous Standards under the Manitoba Act when undertaking new construction and redevelopment of public spaces in the following areas:

- Exterior paths of travel
- Accessible parking
- Obtaining services
- Maintenance of accessible elements

The Company will ensure that the Accessibility Design Standards reflect the AODA Built Environment Standards and any analogous Standards under the Manitoba Act

### **RESPONSIBILITIES**

**Hallmark Canada** has an Accessibility Committee that is responsible for reviewing this Policy annually and recommending amendments to ensure ongoing compliance with regulated accessibility standards and legislated obligations.

### **REFERENCES**

[Ministry of Community and Social Services \(AODA\)  
The Accessibility for Manitobans Act](#)

### **AVAILABILITY OF DOCUMENTS**

Any questions about this policy or the availability of documents can be directed to:

Lori Pavely, **Hallmark Canada** Accessibility Officer  
Phone: 905-752-7124  
Mail: 3762 14<sup>th</sup> Avenue, Markham, ON L3R 0G7  
Email: lori.pavely@hallmark.com  
Fax: 905-752-7220