

ACCESSIBLE CUSTOMER SERVICE POLICY

Cooper Lighting Canada Limited (“Cooper”) is committed to providing goods and services to persons with disabilities in a way that is consistent with the principles of independence, dignity, integration and equal opportunity. Our goal is to provide all customers/clients, including those with disabilities, with the same opportunity to access and use Cooper’s goods and services. If a barrier to accessing our goods and services cannot be removed, we will seek alternative ways to access the goods and services.

The following policies and practices are intended to meet the requirements of the *Accessibility for Ontarians with Disabilities Act, 2005* and its Customer Service Standards.

COMMUNICATION

Cooper will communicate with customers/clients with disabilities in ways that take their disability into account. We will work with the person with a disability to determine what method of communication works for them.

Upon request, Cooper will provide or arrange for accessible formats and communication supports for persons with disabilities. The information and/or documentation will be provided as soon as is practicable, but specific timeframes may vary depending on the format requested.

ASSISTIVE DEVICES

Cooper is committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our goods and services. We will ensure that our employees are trained and familiar with various assistive devices that may be used by customers/clients with disabilities when visiting our facilities.

SERVICE ANIMALS

Cooper welcomes service animals that accompany people with disabilities. Service animals are free to access all areas of our premises that are open to the public except as otherwise disallowed by law. If a service animal is excluded from the premises by law, then Cooper will ensure that other measures are made available to enable the customer/client with a disability.

Cooper will ensure that all staff dealing with the public are properly trained in how to interact with people with disabilities who are accompanied by a service animal.

SUPPORT PERSONS

Support persons that accompany someone with a disability are permitted the same access to our facilities as the person they are accompanying. Any person with a disability who is accompanied by a support person will be allowed to enter Cooper's premises with their support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to their support person while on Cooper premises.

NOTICE OF TEMPORARY SERVICE DISRUPTION

Cooper will make reasonable effort to provide customers with notice in the event of a disruption in the facilities or services usually used by people with disabilities. This notice will include information about the reason for the disruption, its expected duration, and referrals to alternative facilities or services, if available. In the event of an unplanned or emergency disruption, Cooper may not be able to provide advance notice.

Notice of any temporary service disruption may be posted in a conspicuous place on the premises as soon as practicable; on the company website; or by other methods that are reasonable considering the circumstances. Notices will also be available in an accessible format upon request.

TRAINING

To create awareness and ensure compliance, Cooper will provide customer accessibility training to all of its employees who work in Ontario and provide goods or services, and all those who are involved in the development and approvals of customer service policies, practices and procedures.

Training will include the followings:

- The purposes of the *Accessibility for Ontarians with Disabilities Act, 2005* and the 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 an assistive device or require the assistance of a service animal or support person.
- How to use personal assistive devices on premises to help with the provision of goods or services to people with disabilities.
- What to do if a person with a disability is having difficulty accessing Cooper's goods and services.

Training will be provided during orientation and on an ongoing basis when changes are made to these policies, practices and procedures.

Design of Public Spaces

Cooper will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces, including the followings:

- Outdoor public eating areas
- Outdoor paths of travel, including sidewalks, ramps, stairs, curb ramps, and rest areas
- Accessible off-street parking
- Reception and waiting areas

FEEDBACK

The ultimate goal of Cooper is to meet and surpass customer expectations. Comments on our services regarding how well those expectations while serving customers with disabilities are being met are welcome and appreciated.

Feedback regarding the way Cooper provides goods and services to people with disabilities can be made by mail or phone.

Phone: (+1) 800-863-1354

Mail: Customer Service at 5925 McLaughlin Rd, Mississauga ON L5R 1B8

All feedback shall be directed to LightingServices@cooperlighting.com. Cooper will respond to feedback requests within Three (3) business days.

To view Cooper Multi-Year Accessibility Plan, please [click here](#).

Last Update: June 2021

EMPLOYEES' INTEGRATED ACCESSIBILITY STANDARDS POLICY

Cooper Lighting Canada Limited (“Cooper”) has established this Integrated Accessibility Standards Policy (this “Policy”) in order to meet the requirements under the Integrated *Accessibility Standards* Regulation enacted pursuant to the *Accessibility for Ontarians with Disabilities Act, 2005* (the “AODA”).

Integrated Accessibility Standards have been developed to break down barriers and increase accessibility for persons with disabilities in the area of employment (among other areas). The requirements set out in this regulation are not a replacement or a substitution for the requirements established under the Human Rights Code nor do the standards limit any obligations owed to persons with disabilities under any other legislation.

COOPER’S STATEMENT OF COMMITMENT

Cooper is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the accessibility needs of persons with disabilities in a timely manner, through the implementation of the requirements of the AODA, and its applicable regulations.

ACCESSIBILITY PLAN

Cooper has developed and documented a Multi-year Accessibility Plan which outlines the company’s strategy to prevent and remove barriers from its workplace and also to improve opportunities for persons with disabilities. The Multi-Year Accessibility Plan will be reviewed, maintained and updated at least once every three years, and will be posted on Cooper website. This plan will also be made available in an accessible format upon request.

TRAINING

Cooper will ensure that training is provided on the requirements of the accessibility standards referred to in the Integrated Accessibility Standards Regulation and continue to provide training on the Human Rights Code as it pertains to persons with disabilities. The training will be appropriate to the duties of the employees of Cooper.

Cooper will take the following steps to ensure employees are provided with the training needed to comply with AODA:

- Employees will be trained when changes are made to the accessibility policy.
- New employees will be trained when hired.
- Ensure that training records are maintained and kept on file.

INFORMATION AND COMMUNICATIONS

Feedback

Cooper is committed to meeting the communication needs of persons with disabilities. Cooper will ensure that its processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and with communication supports upon request.

Accessible Formats and Communication Supports

Cooper, upon the request of an employee with a disability, consults with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform the employee's job, and employment-related information that is generally available to other employees.

EMPLOYMENT STANDARDS

Recruitment

Cooper is committed to fair and accessible employment practices. Cooper will notify its employees and the public about the availability of accommodation for applicants and employees with disabilities in its recruitment process as follows:

- During the recruitment process, when job applicants are individually selected to participate in an assessment or selection process
- If a selected applicant requests an accommodation, Cooper 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
- When making offers of employment to a successful applicant

Informing Employees of Support

When making offers of employment, Cooper will notify successful applicants of its policies for accommodating employees with disabilities. Cooper will continue to inform employees of its policies and any updates to policies that support employees with disabilities.

Individual Accommodation Plans ("IAP")

Each Cooper employee with a disability is considered individually, on a case-by-case basis, in order to determine accommodation requirements. If requested, information regarding accessible formats and communications supports provided will also be included in individual accommodation plans. Accommodation plans will include individualized workplace emergency response information (where required), and will identify any other accommodation that is to be provided. Third-party expertise will be consulted where appropriate. The IAP process will be kept as confidential as possible. No information will be released to other team members without the permission of the employee, except as where required for reasonable operational purposes. Those who are informed will be advised on a "need to know" basis only (e.g., direct supervisor of the employee).

The IAP process is as follows:

- Employee advises their manager or HR Services that they require an accommodation due to a disability. If the employee advises his or her manager, the manager is responsible for contacting HR Services to engage this IAP Process.
- Employee participates in the development of the IAP with their manager and HR Services.
- Employee provides HR Services with information and documentation regarding the employee's functional limitations and advises how Cooper may be able to accommodate the disability. Cooper will consider the employee's proposals; however, ultimately it is up to Cooper to determine what, if any, reasonable accommodations will be provided, based on the documentation submitted by the employee and the company's operational needs.
- Cooper can, at its discretion, request an evaluation by an outside medical or other expert, at the company's expense, to assist in assessing potential options to accommodate the employee.

- HR Services documents the accommodation requirements in the IAP, including any workplace emergency response information that may be required.
- Cooper will provide the employee with a copy of the IAP in a format which takes into account the individual's disability. A copy is placed in the employee's file and a copy will be provided to the employee's direct supervisor.
- The employee's manager takes responsibility for ensuring the plan of action outlined in the IAP is in place.
- Each IAP is reviewed when Cooper receives information suggesting that the employee's disability-related needs have changed.

If Cooper determines that accommodation is not required or if Cooper cannot accommodate the employee without undue hardship, the employee will be provided with the reasons for this decision.

Workplace Emergency Response Information

Cooper is committed to providing employees with disabilities with individualized emergency response information and plans as required, in accordance with the following elements:

- If the disability is such that the individualized information is necessary and Cooper is aware of the need for accommodation due to the employee's disability.
- If the employee who receives an individual workplace emergency response information requires assistance, and with the employee's consent, Cooper shall provide the workplace emergency information to the person designated by Cooper to provide assistance to the employee.
- As soon as practicable after becoming aware of the need for accommodation due to the employee's disability.
- Cooper will review the individualized workplace emergency response information when the employee moves to a different location in the organization.

Return to Work

Cooper will continue to maintain its current return to work policies and provide reasonable accommodations to employees returning to work from disability-related absences. Such processes shall be documented and must outline the steps that Cooper will take to facilitate the return to work and include an IAP as described above.

Performance Management

Cooper will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans when:

- conducting performance management,
- providing career development and advancement to employees
- redeploying employees.

To view Cooper Multi-Year Accessibility Plan, please [click here](#).

Last updated: June 2021

MULTI-YEAR ACCESSIBILITY PLAN

The purpose of the Cooper Lighting Canada Limited (“Cooper”) Multi-Year Accessibility Plan is to outline the company’s strategy to prevent and remove barriers and meet the requirements of the *Accessibility for Ontarians with Disabilities Act, 2005* (the “AODA”) and the Integrated Accessibility Standards Regulation (the “Regulations”).

Initiative	Requirement	Action Plan	Owner/Staff	Status
Establishment of Accessibility Policies	Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this Regulation.	<ul style="list-style-type: none"> • Developed and implemented following policies: <ol style="list-style-type: none"> a. Accessible Customer Service Policy; b. Employees’ Integrated Accessibility Standards Policy. 	Legal & Digital	Completed
Accessibility Plans	Large organizations shall, (a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization’s strategy to prevent and remove barriers and meet its requirements under this Regulation; (b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and (c) review and update the accessibility plan at least once every five years.	<ul style="list-style-type: none"> • Establish multi-year plan • Post completed plan and policy to company website. • Plan to review multi-year plan every three years 	Legal & Digital	Completed
Training	Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to, (a) all employees, and volunteers; (b) all persons who participate in	<ul style="list-style-type: none"> • Training plan includes an E-learning Module named “The Accessibility For Ontarians With Disabilities Act” which covers the Integrated Standards and Ontario Human Rights Code • Conduct training for existing employees and customer facing roles. • Training plan in place to train new hires. 	HR	Completed

	<p>developing the organization's policies; and</p> <p>(c) all other persons who provide goods, services or facilities on behalf of the organization.</p>			
Feedback	<p>Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request.</p>	<ul style="list-style-type: none"> Convert existing information into a format that will allow it to be made available in accessible formats, upon request. Implement process to provide feedback to be directed thru various methods (in-person, phone, email) Staff and management are aware of the need to accommodate upon request through training. 	Customer Service & Digital	Completed
Accessible Formats and Communication Supports For Customers	<p>Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, (a) in a timely manner that takes into account the persons' accessibility needs due to disability; and (b) at a cost that is no more than the regular cost charged to other persons.</p>	<ul style="list-style-type: none"> Develop a process for responding to requests for supports and services Post a notice on the website and on premises that information is available in a variety of accessible formats Train the staff on how to handle accessibility requests. 	Customer Service & Digital	Completed
Recruitment, General	<p>Notify the public, employees and potential candidates with disabilities that accommodations can be made in recruitment and assessment processes.</p>	<ul style="list-style-type: none"> Inform Applicants Implement Accommodations 	HR	Completed
Recruitment, Assessment or Selection Process	<p>During a recruitment process, an employer shall 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</p>	<ul style="list-style-type: none"> Job postings and job offers to include statement that accommodation for applicants with disabilities is available upon request Train recruiting staff on how to handle accommodation requests 	HR	Completed

	materials or processes to be used.			
Notice to Successful Applicants	Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	Incorporate a statement in offer letter/agreement.	HR	Completed
Accessible Formats and Communication Supports For Employees	Where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for, (a) information that is needed in order to perform the employee's job; and (b) information that is generally available to employees in the workplace.	Educate employees and managers on the availability and process to request accessible formats and communication supports.	HR & Digital	Completed
Documented Individual Accommodation Plans	Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.	<ul style="list-style-type: none"> Established written process to provide individualized accommodation plan to employees with disabilities upon need Implement Accommodations 	HR	Completed
Return-to-Work Process	Every employer, other than an employer that is a small organization, (a) shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and (b) shall document the process.	<ul style="list-style-type: none"> Establish Procedure Implement the return-to-work program 	HR	Completed
Workplace Emergency Response Information	Every employer shall provide individualized workplace emergency response information to employees who	<ul style="list-style-type: none"> Inform employees of Emergency Response assistance. Upon request, the worker's manager or Human 	HR	Completed

	<p>have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability.</p>	<p>Resources will work with the individual to provide Individual Workplace Emergency Response Information</p> <ul style="list-style-type: none"> Individualized workplace emergency response information reviewed with worker when workplace circumstances change (new role, temporary assignments, new work location, etc) 		
Performance Management	<p>An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.</p>	<p>Review performance management, career development and redeployment policies or other written documentation to ensure that they do not contain any barriers or unreasonable requirements in relation to employees with disabilities, and to ensure that, where applicable, they incorporate accessibility as part of the performance management, career development and redeployment process.</p>	HR	Completed
Career Development & Advancement	<p>An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.</p>		HR	Completed
Redeployment	<p>An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.</p>		HR	Completed
Design Of Public Spaces Standards	<ul style="list-style-type: none"> Incorporate accessibility requirements under 	<ul style="list-style-type: none"> To make any modification, Cooper Real Estate department engages 	Procurement	Completed

	<p>the Accessibility Standard for the Design of Public Spaces</p> <ul style="list-style-type: none"> Consider accessibility when designing, procuring, or acquiring self-service kiosks. 	<p>licensed Architects / Engineers who employ all applicable provincial and national requirements, including safety, building, disabilities and access requirements. Such Architects/Engineers shall carry appropriate standard insurance for their designs, errors, and omissions.</p> <ul style="list-style-type: none"> Where possible, incorporate requirements into development contracts. 		
Accessible Websites & Web Content	<p>Large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A.</p>	<ul style="list-style-type: none"> Conduct website accessibility audit Review compliance with Cooper website in relation to the WCAG 2.0 Level A standards. 	Digital	Completed
Accessibility Report	<p>Complete and submit an Accessibility Report</p>	<p>Accessibility reports will be filed in timely compliance with this Regulation.</p>	Legal	Completed

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