

Accessible Customer Service Policy

OWNER

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APPLICABLE TO

All employees, consultants, agents, representatives, independent contractors and contract workers when they are acting on behalf of Comtech Group – Canada and US

1. Purpose

This policy intends to meet the requirements of *Accessibility Standards for Customer Service, Ontario Regulation 429/07* under the *Accessibility for Ontarians with Disabilities Act, 2005*.

All goods and services provided by Comtech shall follow the principles of dignity, independence, integration and equal opportunity.

In accordance with the *Accessibility Standards for Customer Service, Ontario Regulation 429/07*, this policy addresses the following:

- The Provision of Goods and Services to Persons with Disabilities
- Assistive Devices
- The Use of Guide Dogs, Service Animals and Service Dogs
- The Use of Support Persons
- Notice of Service Disruptions
- Customer Feedback
- Training
- Notice of Availability and Format of Required Documents

2. Scope

The rules and obligations described in this policy apply to any employee, consultant, agent, representative, independent contractor and contract worker when they are providing goods or services on behalf of Comtech, wherever they may be located. While the *Accessibility for Ontarians with Disabilities Act* is Ontario-based legislation, Comtech's position is that anyone working on behalf of Comtech shall follow this policy.

3. Definitions

Disability: A physical or mental condition that limits a person's movements, senses or activities. The definition of disability under the *Accessibility for Ontarians with Disabilities Act* is the same definition of disability as the *Ontario Human Rights Code*.

Customers: Includes clients, stakeholders, general public and all individuals accessing Comtech offices.

4. Policy

4.1 The Provision of Goods and Services to Persons with Disabilities

Comtech 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 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.

4.2 Assistive Devices

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by Comtech. 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.

4.3 Guide Dogs, Service Animals and Service Dogs

An individual with a disability that is accompanied by a guide dog, service animal or service dog will be allowed access to premises unless otherwise excluded by law. If a guide dog, service animal or service dog is excluded by law, Comtech 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). 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 times.

4.3.1. 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 their disability, Comtech 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;
- A certificate of training from a recognized guide dog or service animal training school.

4.4 Support Persons

If a customer with a disability is accompanied by a support person, Comtech will ensure both persons are allowed to enter the premises together and that the customer is not prevented from having access to the support person.

4.5 Notice of Disruption of Services

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Comtech. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use Comtech'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. 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;
- A description of alternative services or options.

When disruptions occur, Comtech 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 Comtech website;
- Contacting customers with appointments;
- By any other method that may be reasonable under the circumstances.

4.6 Customer Feedback Process

Comtech 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 emailing Comtech People and Culture at PCteam@teamcomtech.com.

4.7 Training

Training will be provided to all employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of Comtech and those who are involved in the development and approval of customer service policies, practices and procedures.



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The training provided will follow the *Ontario Regulation 429/07* and will be provided to the individuals required during the onboarding process. Comtech will keep a record of training completed.

4.8 Notice of Availability and Format of Documents

All documents related to the Accessibility Standard for Customer Service are available upon request and in alternative format(s) as required and by request. To request a copy of this policy, please send an email to PCTeam@teamcomtech.com.

The training provided will follow *Ontario Regulation 429/07* and will be provided to the individuals required during the onboarding process. Comtech will keep a record of training completed.

5. Contact Information

Employees may ask questions, raise concerns or report instances of potential non-compliance with this policy by contacting a member of the People and Culture team or emailing PCteam@teamcomtech.com. If your concern is related to a member of the People and Culture team, please contact the CEO at Hugo.Blasutta@teamcomtech.com. If your concern is related to the CEO, please contact Comtech's Chair of the Board at Jason.Claxton@teamcomtech.com.

This policy will be reviewed on an annual basis and revised as necessary. Any changes to this policy will be communicated to all employees.

Failure to comply with this policy may be grounds for disciplinary actions, up to and including termination.