

	Title: Customer Service Accessibility Policy - HR003	
	Status: Released	Type: Policy/Procedure
Document No.: 16367	Effective Date: Dec 1, 2011	Revision: 0
Plant: Fergus Plant, 2500; Stratford Plant, 2000	Department: Human Resources; Sales & Customer Service	

Customer Service Accessibility Policy – Providing Goods & Services to Persons with Disabilities

At A.O. Smith, we follow a core set of values and guiding principles when we conduct our business activities. We act with integrity, we treat each other with respect and dignity at all times, we will adhere to all legislative and regulatory requirements, and we are fair in our dealings with our customers, team members or citizens of the communities in which we work.

COMMITMENT

A.O. Smith is committed to meeting the requirements of *Accessibility Standards for Customer Service, Ontario Regulation 429/07* under the *Accessibility for Ontarians with Disabilities Act, 2005*. We seek to recognize and remove the obstacles faced by traditionally under-represented groups to facilitate their access to our products and services. The Company commits to providing goods and services in a way that respects the dignity and independence of persons with disabilities. We are also committed to giving persons with disabilities the same opportunity to access our goods and services and allowing them to benefit from the same services, in the same place(s) and in similar ways.

DEFINITIONS

Assistive Device – is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of persons 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 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;
- 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

	Title: Customer Service Accessibility Policy - HR003	
	Status: Released	Type: Policy/Procedure
Document No.: 16367	Effective Date: Dec 1, 2011	Revision: 0
Plant: Fergus Plant, 2500; Stratford Plant, 2000	Department: Human Resources; Sales & Customer Service	

- an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

Guide Dog – is a highly-trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Person's Rights Act*, to provide mobility, safety and increased independence for people who are blind.

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.

Service Dog – as reflected in *Health Protection and Promotion Act, Ontario Regulation 562* a dog other than a guide dog for the blind is a service dog if:

- it is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability;
- or the person who required the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.

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.

PROVIDING GOODS & SERVICES TO PERSONS WITH DISABILITIES

A.O. Smith is committed to serving all customers including persons with disabilities and we will carry out our functions and responsibilities in the following areas:

a) **Communication**

We will communicate with persons with disabilities in ways that take into account their disability.

We will train staff who communicate with customers on how to interact and communicate with persons with various types of disabilities.

b) **Telephone Services**

We are committed to providing fully accessible telephone service to our customers. We will train staff to communicate with customers over the telephone in clear and plain language and to speak clearly and slowly. We will offer to communicate with customers by

	Title: Customer Service Accessibility Policy - HR003	
	Status: Released	Type: Policy/Procedure
Document No.: 16367	Effective Date: Dec 1, 2011	Revision: 0
Plant: Fergus Plant, 2500; Stratford Plant, 2000	Department: Human Resources; Sales & Customer Service	

e-mail and/or other services if telephone communication is not suitable to their communication needs.

c) Assistive Devices

We are committed to serving persons with disabilities who use assistive devices to obtain, use or benefit from our goods and services. We will ensure that applicable staff members are trained and familiar with various assistive devices that may be used by customers with disabilities while accessing our goods and services.

We will also ensure that relevant staff receives training on how to use assistive devices available on our premises for customers (examples: wheelchair, walker, etc.)

d) Billing

We are committed to providing accessible invoices to all of our customers. For this reason, invoices will be provided in the following formats upon request: hard copy, large print, e-mail. We will answer any questions that customers may have about the content of the invoice in person, by telephone or e-mail.

USE OF GUIDE DOGS, SERVICE DOGS & SERVICE ANIMALS

A.O. Smith welcomes persons with disabilities who are accompanied by a guide dog, service dog or service animal on the parts of our premises that are open to the public and other third parties. We will also ensure that all staff, volunteers and others dealing with the public are properly trained in how to interact with persons with disabilities who are accompanied by a 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, A.O. Smith may request verification from the customer.

The customer that is accompanied by a guide dog, service dog or service animal is responsible for maintaining care and control of the animal at all times.

If a health and safety concern presents itself for example in the form of a severe allergy to the animal, A.O. Smith will make all reasonable efforts to meet the needs of all individuals.

USE OF SUPPORT PERSONS

We are committed to welcoming persons with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be welcome to enter A.O. Smith's premises. Customers will be informed of this by a notice that will be posted in A.O. Smith's premises as well as on our website. In situations where confidential information

	Title: Customer Service Accessibility Policy - HR003	
	Status: Released	Type: Policy/Procedure
Document No.: 16367	Effective Date: Dec 1, 2011	Revision: 0
Plant: Fergus Plant, 2500; Stratford Plant, 2000	Department: Human Resources; Sales & Customer Service	

might be discussed, consent will be obtained by the customer prior to any conversation where confidential information might be discussed.

If payment is required by a support person for admission to the premises, meetings, events, etc., A.O. Smith will ensure that notice is given in advance.

NOTICE OF TEMPORARY DISRUPTION

- A.O. Smith will provide customers with notice in the event of a planned or unexpected interruption in the facilities or services usually used by persons with disabilities. This notice will include information about the goods or services that are disrupted or unavailable, the reason for the disruption, the anticipated duration, and a description of alternative facilities or services, if available. The notice will be placed at all public entrances and service counters on our premises.

FEEDBACK PROCESS

At A.O. Smith we believe we can deliver total satisfaction to all of our customers, including those with disabilities. Comments on our services regarding how well those expectations are being met are welcome and appreciated. Information about the feedback process as well as access to a feedback form will be made available to all customers via our website or directly from a Customer Service representative. Alternative methods of providing feedback such as verbally or written (handwritten or email) are also welcome.

All feedback will be directed to our Customer Service department. Responses can be expected within 30 days.

TRAINING FOR STAFF

A.O. Smith WPC Canada will provide training to all relevant and applicable employees, volunteers and others who deal with the public or other third parties on their behalf, and all those who are involved in the development and approvals of customer service policies, practices and procedures. Applicable staff will be trained on policies and/or procedures that affect the way goods and services are provided to persons with disabilities. Training will also be conducted on an ongoing or as needed basis when changes are made to these policies, practices and procedures.

Training will include the following:

- The purposes of the *Accessibility for Ontarians with Disabilities Act, 2005* and the requirements of the customer service standard;
- Recognize various types of disabilities;

	Title: Customer Service Accessibility Policy - HR003	
	Status: Released	Type: Policy/Procedure
Document No.: 16367	Effective Date: Dec 1, 2011	Revision: 0
Plant: Fergus Plant, 2500; Stratford Plant, 2000	Department: Human Resources; Sales & Customer Service	

- How to interact and communicate with people with various types of disabilities;
- How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog, service dog, service animal or a support person;
- How to use the various assistive devices and/or equipment available at our facility that may help with the provision of goods or services to persons with disabilities;
- What to do if a person with a disability is having difficulty in accessing A.O. Smith's goods and services;
- A.O. Smith's policies, practices and procedures relating to the customer service standard.

A.O. Smith will provide training as soon as is practicable. Training will be provided to new employees, volunteers, contractors, etc. who deal with the public or act on our behalf at appropriate times such as new hire/contractor orientation. Revised training will be provided in the event of changes to legislation, procedures and/or practices.

A record of all training will be maintained and will include the dates training was provided as well as the names of all participants and the number of those who participated.

QUESTIONS ABOUT THIS POLICY

This policy exists to achieve service excellence for all of our customers including those with disabilities. If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation will be provided by a representative of our Customer Service department.

MODIFICATIONS TO THIS OR OTHER POLICIES

At A.O. Smith we are committed to developing customer service policies that respect and promote the dignity and independence of persons with disabilities. Therefore, no changes will be made to this policy before considering the impact on those with disabilities.

Any policy of A.O. Smith that does not respect and promote the dignity and independence of persons with disabilities will be modified or removed.

REFERENCES

- Accessibility for Ontarians with Disabilities Act, 2005

	Title: Customer Service Accessibility Policy - HR003	
	Status: Released	Type: Policy/Procedure
Document No.: 16367	Effective Date: Dec 1, 2011	Revision: 0
Plant: Fergus Plant, 2500; Stratford Plant, 2000	Department: Human Resources; Sales & Customer Service	

- Accessibility Standards for Customer Service, Ontario Reg. 429/07
- Blind Person's Rights Act, 1990
- Dog Owners' Liability Act, Ontario
- Food Safety and Quality Act, 2001, Ontario Reg. 31/05
- Health Protection and Promotion Act, Ontario Reg. 562
- Ontario Human Rights Code, 1990