



## Accessible Customer Service Policy

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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 National Steel Car Limited shall follow the principles of dignity, independence, integration and equal opportunity.

### **Scope**

This Policy applies to:

- a) The provision of goods and services at premises owned and operated by National Steel Car Limited.
- b) Employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of National Steel Car Limited, including when the provision of goods and services occurs off the premises of National Steel Car Limited.
- c) All persons who participate in the development of National Steel Car Limited's policies, practices and procedures governing the provision of goods and services to members of the public or third parties.

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 National Steel Car Limited.

### **Definitions**

Customers – means clients and members of the public and other third parties to whom National Steel Car Limited provides goods and services.

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.

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 Persons' 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
- 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 requires 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.

## 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

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

National Steel Car Limited 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;
- 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;
- Ensuring that people with disabilities have equal opportunities to others to obtain, use and benefit from National Steel Car Limited's goods or services;
- Taking into account individual needs when providing goods and services; and
- Communicating in a manner that considers the customer's disability.

B. Assistive Devices

People with disabilities may use their own assistive devices as required when accessing goods or services provided by National Steel Car Limited.

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.

It is the responsibility of the person with a disability to ensure that his or her assistive device is always operating in a safe and controlled manner.

### 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) National Steel Car Limited will offer alternative methods to enable the person with a disability to access goods and services, when possible. Such methods might include:

- Securing the animal in a safe location and offering the guidance of an employee
- Telecommunication where technology permits
- Other assistive measures available to deliver goods or services to ensure equality of outcome

#### Applicable Laws:

*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, National Steel Car Limited 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 always maintaining care and control of the animal.

#### Health and Safety Concerns:

If a health and safety concern presents itself, for example in the form of severe allergies to the animal, National Steel Car Limited 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, National Steel Car Limited will ensure that both people are allowed to enter the premises together and that the customer is not prevented from having access to the support person.

National Steel Car Limited does not charge fees for supporting people or if fees are charged for admission to the premises (e.g. special events), National Steel Car Limited shall provide notice of the amount in advance.

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

National Steel Car Limited may require a customer with a disability to be accompanied by a support person if, upon consulting with the person with the disability, it is determined that such accompaniment is the only means available by which to allow the customer access to the premises while simultaneously fulfilling National Steel Car Limited's obligations to protect the health or safety of the person with a disability or others on the premises.

National Steel Car Limited will consider requiring the attendance of a support person in situations where:

- There is a significant risk to the health and safety of the person with the disability or others;
- That risk is greater than the risk associated with other customers;
- That risk cannot be eliminated or reduced by other means;
- The assessment of the risk is based on consideration of the duration of the risk, the nature and severity of potential harm, the likelihood that the potential harm will occur, and the imminence of the potential harm; and,
- The assessment of the risk is based on the individual's actual characteristics, not merely on generalizations, misperceptions, ignorance or fears about a disability.

#### 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 National Steel Car Limited. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use National Steel Car Limited'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 facilities, if available

Notifications Options:

When disruptions occur National Steel Car Limited 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 National Steel Car Limited 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

National Steel Car Limited 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 phone and email, upon request. 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:

Jessica Carter, Vice President of Human Resources  
(905) 544-3311  
600 Kenilworth Avenue, North  
P.O Box 2450, Hamilton, L8N 3J4  
jessica.carter@steelcar.com  
www.steelcar.com

Customers who wish to provide feedback by completing an onsite customer feedback form or verbally can do so to any National Steel Car Limited employee in the Human Resources 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. National Steel Car Limited will review all feedback and consider associated areas and/or methods of improvement that may be warranted.

### Training

Training will be provided to:

- a) Every person who deals with members of the public or other third parties on behalf of National Steel Car Limited, whether they do so as an employee, agent, contractor, or otherwise.
- b) Every person 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:

- An overview of the purpose of the *Accessibility for Ontarians with Disabilities Act, 2005*.
- An overview 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.
- 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.
- National Steel Car Limited's policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

### Accessible Formats and Communication Supports for Customers:

National Steel Car is committed to providing accessible formats and communication supports for employees with disabilities.

Upon request, the Company will provide or arrange for the provision of accessible formats and communication supports for:

- Information that is needed in order to perform an employee's job; and
- Information that is generally available to all employees

Accessible formats and communication supports will be provided:

- In a timely manner
- At no additional cost to the employee
- In consultation with the employee making the request, to determine suitability

The Company will notify employees of the availability of accessible formats and communication supports through:

- Employee onboarding materials
- Internal policies
- Ongoing communications (e.g., intranet, HR notices)

Examples of Supports (if requested):

- Large print documents
- Accessible PDFs or Word documents
- Screen-reader compatible formats
- Verbal communication or plain-language summaries
- Captioning or sign language interpretation (where applicable)

Requests for accessible formats and communication supports will be handled in accordance with the organization's Accessible Formats and Communication Supports Procedure.

### Training Schedule:

National Steel Car Limited will provide training as soon as practicable. Training will be provided to new employees, agents, and contractors who deal with the public or act on National Steel Car Limited's behalf within a month of hiring or the date of engagement. Revised training will be provided in the event of changes to legislation, procedures and/or practices.

### Record of Training:

National Steel Car Limited will keep a record of training that includes the dates training was provided and the number of employees who attended the training.

### Notice of Availability and Format of Documents

National Steel Car Limited 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 a conspicuous place owned and operated by National Steel Car Limited, the National Steel Car Limited's website and/or any other reasonable method.

### Modifications to this or Other Policies

National Steel Car Limited respects the dignity and independence of people with disabilities. As such, this Policy will not be modified without considering the impacts on people with disabilities.

Any National Steel Car Limited policy that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

### Administration

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

Jessica Carter, Vice President of Human Resources  
(905) 544-3311  
600 Kenilworth Avenue North  
P.O. Box 2450, Hamilton, L8N 3J4  
jessica.carter@steelcar.com

This Policy and its related procedures will be reviewed as required in the event of legislative changes.

### Referenced Documents:

- Accessibility for Ontarians with Disabilities Act, 2005
- Accessibility Standards for Customer Service, Ontario Regulation 429/07
- Blind Person's Rights Act, 1990
- Dog Owners' Liability Act, Ontario
- Food Safety and Quality Act 2001, Ontario Regulation 31/05
- Health Protection and Promotion Act, Ontario Regulation 562
- Ontario Human Rights Code, 1990

NATIONAL STEEL CAR LIMITED



Jessica Carter  
Vice President  
Human Resources

Reviewed: March 20, 2026

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Acknowledgement & Agreement

I, \_\_\_\_\_ , acknowledge that I have read and understand the Accessibility  
(Name)

Standards for Customer Service Policy of National Steel Car Limited. Further, I agree to adhere to this Policy and will ensure that employees working under my direction adhere to these guiding principles. I understand that if I violate this Policy, I may face corrective action, up to and including termination of employment.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Witness: \_\_\_\_\_