

Customer Service Standard Policy

The following is a copy of the Customer Service Standard Policy that is in effect for our operating companies, namely, North American Development Group and Related Companies. A copy of the policy may be requested by contacting the Company at hr@nadg.com, or by phone at 905-477-9200.

Purpose and Background

The purpose of this Policy is to provide guidelines in accordance with the Accessibility Standards for Customer Service (O. Reg. 429/07) for the delivery of goods and services to people with disabilities in a manner that accommodates disability related needs and reflects the principles of independence, dignity, integration and equality of opportunity. This Policy applies in the Province of Ontario to:

- all people who access our services;
- all co-workers, volunteers, consultants and others working on behalf of the Company who provide services to third parties; and,
- people who accompany individuals with disabilities who use our services.

The Accessibility for Ontarians with Disabilities Act, 2005 (the 'AODA') has the purpose of implementing and enforcing accessibility standards in Ontario to achieve accessibility for Ontarians with disabilities with respect to products, services, facilities, accommodation, employment, building structures and premises, thereby creating a full accessible Ontario on or before January 1, 2025.

Our Philosophy

The Company, as a long serving leader in the industry of retail commercial real estate has an unwavering commitment to delivering excellent service. This is a commitment shared by Senior Management and every member of the team.

Statement of Organizational Commitment

The Company is committed to meeting its current and ongoing obligations under the *Ontario Human Rights Code* respecting non-discrimination. Our Company understands that obligations under the AODA and its accessibility standards do not substitute or limit its obligations under the *Ontario Human Rights Code* or obligations to people with disabilities under any other law. The Company is committed to complying with both the *Ontario Human Rights Code* and the principles outlined in the AODA.

The Company strives to provide our products and services in a manner that is accessible to all of our customers, and respects the dignity and independence of people with disabilities. The Company is committed to excellence in serving all customers including persons with disabilities. We are committed to offering equal opportunity access to our products and services, and to providing the benefit of the same services, in the same place and in a similar way, to all customers, without discrimination in accordance with the provisions of the Ontario Human Rights Code. The Company will do this by:

1. Establishing policies, practices and procedures on providing goods or services to people with disabilities.
2. Using reasonable efforts to ensure that our policies, practices and procedures are consistent with the core principles of independence, respect, dignity, integration and equality of opportunity.

The sections below are means by which the company will demonstrate its commitment to meeting the needs of people with disabilities.

Assistive Devices

We are committed to serving persons with disabilities who use assistive devices to obtain, use or benefit from our products and services. Accordingly, we have established a policy on allowing people to use their own, personal assistive devices to access the company's goods and services.

The Company will ensure that its co-workers¹ are trained and familiar with various assistive devices that may be used by customers with disabilities while accessing our good and services.

In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, the Company will consult with the person with the disability to ensure their access to our goods, services or facilities.

Communication

We will communicate with people with disabilities in ways that take into account their disability. This may include the following:

- We will train co-workers to communicate with our customers in an accessible manner in clear and plain language and to speak clearly and slowly
- We will offer to communicate with customers in alternate formats, ex., email, writing, fax, etc.

We will also work with the person with a disability to determine what method of communication works for them.

Self-Serving Kiosk

The Company does not offer products and/or services through self-service kiosks at this time. If required in the future, the Company will consider accessibility features that could be built into self-service kiosks to best meet the needs of its customers. The Company will ensure compliance when designing, procuring, or adding self-serve kiosks (ex. ATMs) to fulfill future needs.

Service Animals

With certain types of disabilities, an animal may be more of an assistive form of aid rather than a device. These services animals are trained to carry out certain tasks that help people with disabilities. There are three types of assistive animals that have been categorized by the international assistance animal community:

1. Guide Animals: Used to guide the blind
2. Hearing Animals: Used to help signal the hearing impaired
3. Service Animals: Used to do work for persons with disabilities other than blindness or deafness

The Company will welcome people with disabilities and their service animals into our workplace when 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 the need for a service animal for reasons relating to the disability. We will also ensure that all co-workers are properly trained in how to interact with persons with disabilities who are accompanied by a service animal.

Service animals are excluded in food production areas as required by the *Health Protection and Promotion Act* and the *Food Safety and Quality Act, 2001*, Ontario Regulation 562. If a service animal is excluded by law, we will use other measures to provide services to the person with a disability.

There may be rare circumstances where, for the reasons of health and safety of another person, allowing a person with a disability to enter a premises and be accompanied by their service animal needs to be considered. In the rare situation where another person's health and safety could be seriously impacted by the presence of a service animal on premises open to the

¹ The term 'Co-Worker' as referred to in this policy means 'employee' as such term is defined in relevant legislation.

public the Company shall be immediately notified. The Company shall fully analyze all options for safely allowing the service animal and must consider all relevant factors and options in trying to find a solution that meets the needs of both individuals.

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 allowed to enter the Company's premises with his or her support person. 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 certain cases, the Company might require a person with a disability to be accompanied by a support person for the health or safety reasons of:

- The person with a disability; or
- Others on the premises

Before making a decision, the Company will:

- Consult with the person with a disability to understand their needs;
- Consider health or safety reasons based on available evidence; and
- Determine if there is no other reasonable way to protect the health or safety of the person or others on the premises.

Notice of Temporary Disruption

Persons with disabilities often rely on specific facilities and services at the Company premises and as such, disruption in their operations may negatively affect the customer experience while visiting the centre. Perimeter access, barrier free washrooms, water, heating & air-conditioning, and elevators, are among those services. A disruption in the operations of these types of services and facilities must be communicated appropriately.

In the event of a planned or unexpected (emergency or unexpected) disruption to services or facilities for customers with disabilities the Company will notify customers promptly. Individual tenants will communicate internally to its staff and advise staff to contact stakeholders and clients scheduled for appointments about the service disruption as applicable. (Tenant contacts are responsible for their respective internal communication). A clearly posted notice will include information about the reasons for the disruption, its anticipated length of time and a description of alternative facilities or services, if available. The notice will be posted at the point of service or facility disruption. The notice will be placed at all public entrances on our premises or via another method of communication depending on what it pertains to.

Emergency Procedures, Plans and Public Safety Information

Emergency procedures, plans and public safety information that are available to the public, including any relevant updates, will be made available to the public and in an accessible format or via accessible communication support upon request. Timeframes for provision of this information will be dependent upon the format requested but will be provided within five (5) business days. Our Co-Workers will be trained in emergency response policies and procedures as they relate to people with disabilities, including how to communicate emergency information, how to offer evacuation assistance to people with disabilities and how to identify accessible and safe evacuation routes. In addition to the existing plans, it is prudent to maintain some basic equipment on site that may be of use to persons needing assistance because of disabilities.

Training

Under the Customer Service Standard, the Company will provide training to all employees, volunteers and others (including anyone involved in developing our policies, and anyone who provides goods, services, or CSS Policy (Website Version) - Page 4 of 4 Policy Dated: November 2016 facilities to our customers on our behalf) regardless of their role in interacting with our customers with disabilities.

Our training will include:

- An overview of the Accessibility for Ontarians with Disabilities Act, 2005, and the requirements for the Customer Service Standard
- The Company's policies related to the Customer Service Standard
- 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 any equipment or devices available at a site to assist with providing goods or services to persons with disabilities
- What to do if a person with a disability is having difficulty accessing our Company's goods or services

Co-Workers will also be trained on an ongoing basis when changes are made to these policies, practices and procedures. The HR department will track and record when co-workers receive training. New Co-workers will be trained within thirty (30) days after their start date and retrained in the event that changes are made to the plan.

In addition to the above training, management and supervisory staff will be trained in our obligations under the Ontario Human Rights Code.

Feedback Process

The ultimate goal of the Company is to meet and surpass customer expectations while servicing customers with disabilities. Comments on our services regarding how well those expectations are being met are welcome and appreciated. The Company's customers who wish to provide feedback on the way we provide goods and services to people with disability can provide feedback via email, verbally or feedback card.

All feedback, including complaints, will be handled by the Human Resources Department who can be reached by email at hr@nadg.com or phone at 905-477-9200. Customers can expect to hear back within a reasonable timeframe according to the circumstances, in the same manner by which the feedback was originally communicated. The Company will make sure the feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports on request. Complaints will be addressed according to the Company's regular complaint management procedures.

Modifications to This or Other Policies

Any policy of the Company's that does not respect and promote the principles of respect, dignity, independence, integration, and equal opportunity for people with disabilities will be modified or removed. This customer service policy is available in alternative formats upon request. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner, and at no additional cost.

At minimum this policy will be reviewed annually. The review process however, may be affected by AODA Regulations as they are announced. The policy may be reviewed and modified to ensure full compliance with the AODA, 2005.

Questions About This Policy

The purpose of this policy is to provide a framework through which the Company can achieve service excellence for all customers including customers with disabilities. Questions regarding this policy can be directed to:

HR Vice President

Main line phone: 905-477-9200

Email: hr@nadg.com