

Customer Service Policy

Intent

This policy is intended to meet the **Customer Service Standard** requirements set forth under the *Accessibility for Ontarians with Disabilities Act, 2005*. This policy applies to the provision of customer service when providing goods and services to persons with disabilities.

All customer service provided by Pivotal Payments (“Pivotal”) shall follow the principles of dignity, independence, integration and equal opportunity. Pivotal is also committed to the following:

1. Pivotal’s goods and services will be provided in a manner that respects the dignity and independence of persons with disabilities.
2. The provision of goods or services to persons with disabilities and others will be integrated, so that persons with disabilities can obtain, use or benefit from Pivotal’s goods or services.
3. Persons with disabilities will be given an opportunity equal to that given to others to obtain, use and benefit from Pivotal’s goods or services.

In accordance with the *Ontario Regulation 429/07 Accessibility Standards for Customer Service* (“Regulation”) under the *Accessibility for Ontarians with Disabilities Act, 2005* (“Act”), this policy addresses the following:

- I. Communication
- II. Guide Dogs and Support Persons
- III. Service Disruptions
- IV. Training
- V. Feedback

I. Communication

When communicating with customers and third parties with disabilities, Pivotal will ensure that its employees will do so in a manner that takes into account that person’s disability. Employees will use the most appropriate method of communication, depending on the person’s disability. When unsure of the most appropriate method of communication, employees will ask customers, third parties and all other persons with disabilities of the most appropriate method to communicate.

Pivotal will train employees on various communication methods and how best to interact with customers and third parties with disabilities, such as: how to communicate with customers in person, by telephone, by mail, using e-mail or other electronic means.

Pivotal will make customers and third parties aware that accessible communication methods are available to customers and third parties with

disabilities. Pivotal will provide assistive devices when deemed reasonable and ensure training on such devices are given in order to ensure effective communication.

II. Guide Dogs and Support Persons

Pivotal will ensure that persons accompanied by service animals, guide dogs or support persons can access all service areas open to the public and that such accessibility is made aware to customers and third parties with disabilities.

III. Temporary Disruptions

Pivotal will provide reasonable notice where there is a disruption in access to any of its facilities or services. The notice will include the reason for the disruption, its anticipated duration and a description of the alternate facilities or services, if available. Moreover, Pivotal will ensure that this notice will be posted in a conspicuous area and by reasonable methods in the circumstances.

IV. Training

Pivotal will provide training to all employees, volunteers and contractors who deal with the public or third parties. Training will also be provided to persons responsible for the development of our customer service policies, practices and procedures. Training will include:

1. A review of the purposes of the *Accessibility for Ontarians with Disabilities Act, 2005* and requirements of the Regulation.
2. How to interact with persons with various types of disability.
3. 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.
4. What to do if a person with a particular type of disability is having difficulty accessing the provider's goods or services.

Pivotal will provide training on an on-going basis and will ensure that new employees, volunteers or others who do work on behalf of Pivotal will also receive training as soon as reasonably possible.

V. Feedback

Pivotal encourages customers and third parties to provide feedback on any topic related to Pivotal's Customer Service Policy by contacting Pivotal's Human Resources Department at:

- 1) Telephone: (866) 364-9806
- 2) Email: hr@pivotalpayments.com
- 3) Mail: 1100 Rene Levesque West, Suite 900
Montreal, Quebec, Canada, H3B 4N4
Attention: Human Resources Department

A copy of the present policy, in addition to any documents required under the Regulation, is available to anyone in accessible format, upon request.

Information and Communications & Employment Policy

Intent

This policy is intended to meet the **Information and Communications Standard** and the **Employment Standard** requirements in the *Integrated Accessibility Standards, Ontario Regulation 191/11* set forth under the *Accessibility for Ontarians with Disabilities Act, 2005*. This policy applies to the provision of information and communications services and materials as well as accessible employment services for people with disabilities.

All information and communications materials and employment services provided by Pivotal Payments (“Pivotal”) shall follow the principles of dignity, independence, integration and equal opportunity.

Definitions

Accessible Formats – Include but are not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.

Communication Supports – Include but are not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Conversion Ready – An electronic or digital format that facilitates conversion into an acceptable format.

Performance Management – Activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success.

Redeployment – The reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.

General Principles

In accordance with the *Integrated Accessibility Standards, Ontario Regulation 191/11*, this policy addresses the following:

- A. General Requirements for all Standards
- B. Requirements under the Information and Communications Standard
 - a. Feedback Process
 - b. Accessible Formats and Communication Supports
 - c. Accessible Websites and Web Content

- d. Exceptions
- e. Review
- C. Requirements under the Employment Standard
 - a. Recruitment, Assessment and Selection
 - b. Accessible Formats and Communication Supports for Employees
 - c. Workplace Emergency Response Information
 - d. Documented Individual Accommodation Plans
 - e. Performance Management and Career Development and Advancement
 - f. Return to Work
 - g. Redeployment
 - h. Review
 - i. Effective Date

A. General Requirements for all Standards

General requirements for all four (4) standards Information and Communications, Employment, Transportation and Design of Public Spaces, are outlined as follows, where applicable to Pivotal.

Establishment of Accessibility Policies and Plans

Pivotal will develop, implement and maintain policies governing how it will achieve accessibility through these requirements.

Pivotal will include a statement of its commitment to meeting the accessibility needs of persons with disabilities in a timely manner in its policies (see Annex I). These documents will be made publicly available in an accessible format, upon request.

Pivotal will establish, implement, maintain and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR (see Annex I). Accessibility plans will be made available in an accessible format, upon request, and will be posted on our website.

Pivotal will review and update its accessibility plan once every five (5) years and will establish, review and update our accessibility plans in consultation with persons with disabilities or an advisory committee. Annual status reports will be prepared that will report on the progress of the steps taken to implement Pivotal’s accessibility plan. This status report will be posted on our website. If requested, the report shall be created in an accessible format.

Procuring or Acquiring Goods and Services, or Facilities

Pivotal will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities. The only exception is in cases where it is impracticable to do so.

Training Requirements

Pivotal will provide training for its employees and volunteers regarding the IASR and the *Ontario Human Rights Code* as they pertain to individuals with disabilities. Training will also be provided to individuals who are responsible for developing Pivotal's policies and all other persons who provide goods, services or facilities on behalf of Pivotal.

Training will be provided as soon as it is reasonably practicable, but no later than December 31, 2014. Training will be provided on an ongoing basis to new employees and as changes to Pivotal's accessibility policies occur.

Records

Pivotal will maintain records on the training provided, when it was provided and the number of employees that were trained.

B. Requirements under the Information and Communications Standard

a. Feedback Process

Pivotal will ensure that all feedback processes (both internal and external) are made accessible to clients/customers or employees, upon request.

In accordance with the *Accessibility Standards for Customer Service, Ontario Regulation 429/07*, Pivotal will make the availability of accessible feedback formats publicly known.

b. Accessible Formats and Communication Supports

Unless deemed unconvertible, Pivotal will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, upon request. Accessible formats and communication supports will be provided in a timely manner and at no additional cost to the individual.

Pivotal will take into account the person's accessibility needs when customizing individual requests and shall consult with the individual making the request to ensure suitability.

Pivotal will make the availability of accessible formats and communication supports publicly known.

c. Accessible Websites and Web Content

Pivotal will ensure that our website and all web content published after January 1, 2012, conform to the Web Content Accessibility Guidelines (WCAG) 2.0 in accordance with the schedule set out in the IASR, except where this requirement is impracticable. All new websites and refreshed websites created after 2014 will also conform to the Web Content Accessibility Guidelines (WCAG) 2.0., except where this requirement is impracticable.

d. Exceptions

The Information and Communications Standard does not apply to:

- Products and product labels;
- Unconvertible information or communications; or
- Information that the organization does not control either directly or indirectly through a contractual relationship.

Unconvertible Information or Communications

If it is determined, in consultation with the requesting party, that information or communications are unconvertible, Pivotal will ensure that the individual who made the request is provided with an explanation and a summary of the information.

Pivotal will classify information or communications as unconvertible where:

- It is not technically practicable to convert; or
- The technology required to make the conversion is not readily available.

e. Review

This policy will be reviewed regularly to ensure that it is reflective of Pivotal's current practices and legislative requirements.

C. Requirements under the Employment Standard

a. Recruitment, Assessment and Selection

Pivotal will notify employees and the public about the availability of accommodation for job applicants who have disabilities. Applicants will be informed that these accommodations are available, upon request, for the interview process and for other candidate selection methods. Where an accommodation is requested, Pivotal will consult with the applicant and provide or arrange for suitable accommodation.

Successful applicants will be made aware of Pivotal's policies and supports for accommodating people with disabilities.

b. Accessible Formats and Communication Supports for Employees

Pivotal will ensure that employees are aware of our policies for employees with disabilities and any changes to these policies as they occur.

If an employee with a disability requests it, Pivotal will provide or arrange for the provision of accessible formats and communication supports for the following:

- Information needed in order to perform his/her job; and
- Information that is generally available to all employees in the workplace.

Pivotal will consult with the employee making the request to determine the best way to provide the accessible format or communication support.

c. Workplace Emergency Response Information

Where required, Pivotal will create individual workplace emergency response information for employees with disabilities. This information will take into account the unique challenges created by the individual's disability and the physical nature of the workplace, and will be created in consultation with the employee.

This information will be reviewed when:

- The employee moves to a different physical location in the organization;
- The employee's overall accommodation needs or plans are reviewed; and/or
- Pivotal reviews general emergency response policies.

d. Documented Individual Accommodation Plans

Pivotal must also develop and have in place written processes for documenting individual accommodation plans for employees with disabilities. The process for the development of these accommodation plans should include specific elements, including (but not limited to):

- The ways in which the employee can participate in the development of the plan;
- The means by which the employee is assessed on an individual basis;
- The ways that an employee can request an evaluation by an outside medical expert, or other experts (at the employer's expense) to determine if accommodation can be achieved, or how it can be achieved;
- The steps taken to protect the privacy of the employee's personal information;
- The frequency with which the individual accommodation plan should be reviewed or updated and how it should be done; and
- The means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs.

e. Performance Management and Career Development and Advancement

Pivotal will consider the accessibility needs of employees with disabilities when implementing performance management processes, or when offering career development or advancement opportunities.

Individual accommodation plans will be consulted, as required.

f. Return to Work

Pivotal will develop and implement return to work processes for employees who are absent from work due to a disability and require disability-related accommodation(s) in order to return to work.

The return to work process will outline the steps Pivotal will take to facilitate the employee's return to work and shall use documented individual accommodation plans.

g. Redeployment

The accessibility needs of employees with disabilities will be taken into account in the event of redeployment.

Individual accommodation plans will be consulted, as required.

h. Review

This policy will be reviewed regularly to ensure that it is reflective of Pivotal's current practices as well as legislative requirements.

i. Effective Date

Pivotal will adhere to requirements outlined in Section C., paragraphs a. to i., excluding paragraph d., no later than December 31, 2015.

Annex I

Pivotal Payments - Statement of Commitment

Pivotal Payments' vision is focused on making meaningful contributions to its clients, partners, employees, suppliers and shareholders. In pursuing this vision, we are 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 needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting the accessibility requirements under the *Accessibility for Ontarians with Disabilities Act (2005)*.

Pivotal Payments - Integrated Accessibility Standards Multi-Year Accessibility Plan

In 2005, the government of Ontario enacted the *Accessibility for Ontarians with Disabilities Act* ("Act"), which set out a clear goal and timeframe to make Ontario accessible by 2025. The Act provides a framework for the development of province-wide mandatory standards on accessibility in all areas of daily life. This 2014-2025 Multi-Year Accessibility Plan illustrates how Pivotal Payments will improve opportunities for people with disabilities.

	Initiative	Requirements	Details	Status	Compliance Date
General Requirements	<i>Accessibility Policies and Plans</i>	Develop, implement and maintain policies governing how it will achieve accessibility through these requirements.	Drafted policy and ready for approval.	Completed	January 1, 2014
		Create a written statement of commitment.	Drafted.	Completed	January 1, 2014
		Make the written statement of commitment available upon request in accessible format.	Posted on website	Ongoing	
		Establish, implement, and maintain a Multi-Year Accessibility Plan	Meetings between departments to identify barriers; drafted accessibility plan. Seek management approval. Notify IT and/or Human Resources	Completed Completed Completed	January 1, 2014
		Provide the plan in an accessible format upon request		Completed	

	<i>Review</i>	Review the plan and policies at least once every 5 years		Ongoing	
	<i>Procuring or Acquiring Goods and Services, or Facilities</i>	Pivotal will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities. Exception: where it is impracticable to do so.		Ongoing	
	<i>Training</i>	Develop training on Ontario's accessibility laws (IASR) and the Human Rights Code as it relates to people with disabilities.	Training process developed.	Completed	January 1, 2015
		Ensure training is implemented on IASR and on the Human Rights Code as it relates to people with disabilities.	Implement training process. In cases where accessibility prevents a person from using our training process, alternative training will be customized practicably to the person with disabilities.	Ongoing	January 1, 2015
		Ensure that training is provided on any changes to the prescribed policies.		Ongoing	
	<i>Record</i>	Implement and maintain a record for training.		Ongoing	
	<i>Kiosks</i>	Not Applicable			January 1, 2014
Information and Communications Standard Requirements	<i>Feedback Process</i>	Ensure existing feedback processes are accessible to people with disabilities (externally and internally) upon request.		Completed	January 1, 2015

	<i>Accessible Formats and Communication Supports</i>	Ensure all publicly available information is made accessible upon request; consult with the person making the request in determining the suitability of an accessible format or communication support; Notify public about availability of accessible formats and communication supports.	Determine what accessible formats and communication supports we will provide to persons with disabilities upon request. Ensure these formats and supports can be provided in a timely manner Ensure staff and management is aware of the need to accommodate upon request through training. Requests managed by Human Resources, Web Development and Marketing	Ongoing	January 1, 2016
	<i>Accessible Emergency Information</i>	Provide publicly available emergency information upon request in accessible format (not applicable at this time)			January 1 2012
	<i>Accessible websites and content</i>	Review website and upgrade as needed: (1) To make all new websites/refreshed website conform to WCAG 2.0, Level A. (2) To ensure all new content on existing websites published after 2012 also conform. (3) Increase to Level AA in accordance with the schedule set out in this section of the IASR.	Ongoing communication/meetings between Human Resources, Web Development and Marketing Departments Ongoing review of WCAG guidelines to be informed of changes and updates.	Ongoing	(1)January 1, 2014 (2)January 1, 2012 (3)January 1, 2021
	<i>Review</i>	Review policies	Reviewed periodically to ensure that it is reflective of Pivotal's current practices and legislative requirements.	Ongoing	

Employment Standard Requirements	<i>Recruitment, Assessment and Selection</i>	<p>Pivotal will 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 materials or processes to be used in the assessment/selection process.</p> <p>Inform all employees of policies that support employees with disabilities, including, policies on the provision of job accommodation that take into account an employee's accessibility needs due to a disability.</p> <p>Ensure Pivotal's recruitment process provides for accommodations for those with disabilities.</p>	<p>Notify applicants (telephone, email, letter, etc.) based on required accommodations advised.</p> <p>Identify barriers: location of interview room, room set up for in person interviews, interviewing timelines, supports, paperwork, etc.</p> <p>Develop interview guidelines.</p>	In Progress	January 1, 2016
	<i>Hiring</i>	Pivotal will notify employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process;	Statement will be included in job postings.	In progress	January 1, 2016
	<i>Notice to Successful Applicants</i>	When making offers of employment, Pivotal will notify applicants of its policies for accommodating employees with disabilities.	Put statement in hire letter/agreement.	In Progress	January 1, 2016
	<i>Informing Employees of Supports</i>	<p>Inform its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.</p> <p>Employer shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.</p>	<p>Circulate policy, training, and staff announcements.</p> <p>Provide employees with information about accommodation supports during the on-boarding process.</p>	In Progress	January 1, 2016
	<i>Accessible Formats and Communication Supports for Employees</i>	Where an employee with a disability so requests it, Pivotal will provide or arrange for provision of accessible formats and communication supports for: (1) Information that is needed in order to perform the employee's job; (2) Information that is generally available to employees in the workplace	<p>Functional audit of information specific to departments.</p> <p>Audit of regular communications.</p>	In progress	January 1, 2016
	<i>Workplace Emergency Response Information</i>	Implement a system in order to address and develop individualized emergency response information.	Developed process with Human Resources Department	Completed	January 1, 2012

	<i>Individual Accommodation</i>	Where Pivotal is aware that an employee has a disability and there is a need for accommodation, individualized workplace emergency response information will be provided as soon as practicable, if such information is necessary given the nature of the employee's disability	Integrated into emergency process	Ongoing	
	<i>Performance management, Career Dev., Advancement</i>	Pivotal will take accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans into account when: (1) Assessing performance (2) Managing career development and advancement	Review and update current process accordingly	In Progress	January 1, 2016
		Develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.	Review and update current process accordingly	In Progress	
	<i>Return to Work</i>	Develop and have in place a return to work process for employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work.	Review and update current process accordingly	In Progress	January 1, 2016
	<i>Redeployment</i>	Pivotal will take accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans into account when assessing redeployment	Review and update current process accordingly	In Progress	January 1, 2016
	<i>Review</i>	Review individualized emergency response information on a yearly basis		Ongoing	January 1, 2016

A copy of the present policy is available in accessible format, upon request.

For more information or to provide feedback on any topic related to the present policy, Multi-Year Accessibility Plan and/or its requirements, please contact Pivotal Payments' Human Resources Department at:

Telephone: (866) 364-9806 **Email:** hr@pivotalpayments.com **Mail:** 1100 Rene Levesque West, Suite 900, Montreal, Quebec, Canada, H3B 4N4, Attention: Human Resources Department **Fax:** (866) 364-9807