

# **TRUE RELIGION®**

CORPORATE PROCEDURES DOCUMENT

## **AODA – Customer Service & Accessibility Procedures**

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<b>Reference Policies</b>	AODA Accessible Customer Service Policy AODA Integrated Accessibility Standards Regulation Policy
<b>Related Guidelines</b>	Human Rights Code
<b>In Scope</b>	All Employees of True Religion Brand Jeans (Ontario)
<b>Stakeholders</b>	All employees of True Religion Brand Jeans (Ontario) and Human Resources

## 1. INTRODUCTION

The Accessibility for Ontarians with Disabilities Act, 2005 (AODA) was passed by the Ontario legislature with the goal of creating standards to improve accessibility across the province. The AODA allows the government to develop specific standards of accessibility that are designed to help make Ontario more accessible. One of the specific standards that has been developed, and made law, is the Accessible Customer Service Standard. This standard details specific requirements for all service providers. In general, providers must deliver service in a way that preserves the dignity and independence of people with disabilities. Providers must also integrate services and equal opportunity. The accessibility standards for customer service applied to the public sector on and after January 1, 2010 and to the private sector on and after January 1, 2012.

## 2. REQUIREMENTS UNDER THE AODA, REGULATION 429/07

True Religion Must:

1. Establish policies, practices and procedures on providing goods or services to people with disabilities.
2. Set a policy on allowing people to use their own personal assistive devices to access services and any other measures (assistive devices, services, or methods) to enable use of services.
3. Use reasonable efforts to ensure that policies, practices and procedures are consistent with the core principles of independence, dignity, integration and equality of opportunity.
4. Communicate with a person with a disability in a manner that takes into account his or her disability.
5. Train staff or other third parties, as outlined in the customer service standard.
6. Train staff and any others involved in developing policies, practices and procedures on the provision of services, as outlined in the customer service standard.
7. Allow people with disabilities to be accompanied by their guide dog or service animal in those areas of the premises the Company owns or operates that are open to the public, unless the animal is excluded by another law. If a service animal is excluded by law, other measures are to be utilized to provide services to the person with a disability.
8. Permit people with disabilities who use a support person to bring that person with them while accessing goods or services in premises open to the public or third parties.
9. Provide notice when services that people with disabilities rely on to access services are temporarily disrupted.
10. Establish a process for people to provide feedback on how True Religion provides services to people with disabilities and how True Religion will respond to any feedback and take action on any complaints. The information on the feedback process is to be readily available to the public.

### 3. INTENT

The purpose of this Customer Service Standards & Accessibility Procedures document is to fulfill the requirements set out in regulation 429/07 and establish policies and procedures for True Religion to govern the provision of its goods and services to persons with disabilities.

### 4. STATEMENT

True Religion shall use reasonable efforts to ensure that its policies, practices and procedures are consistent with the following principles;

- Our services will be provided in a manner that respects the dignity and independence of persons with disabilities.
- The services to persons with disabilities, and others, will be integrated unless an alternate measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from our services.
- Persons with disabilities will be given an opportunity equal to that given to others to obtain, use and benefit from our services.
- Persons with disabilities may use assistive devices and/or support persons in the access of our services.
- True Religion employees, when communicating with a person with a disability, shall do so in a manner that takes into account the person's disability.

### 5. APPLICATION

Our policies and procedures shall apply to every person who deals with members of the public or other third parties on behalf of True Religion, whether the person does so as an employee or otherwise.

### 6. DEFINITIONS

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
- 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 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.

## **7. ACCEPTABLE TERMS FOR USE WHEN TALKING ABOUT DISABILITIES**

Words can influence and reinforce the public's perception of people with disabilities. They can create either a positive view of people with disabilities or an indifferent, negative depiction.

The following guidelines apply at True Religion:

- Never use terms that are demeaning and disrespectful to people with disabilities.
- Remember to put people first. It is proper to say *person with a disability*, rather than *disabled person*.
- If you don't know someone or if you are not familiar with the disability, it's better to wait until the individual describes his/her situation to you, rather than to make your own assumptions. Many types of disabilities have similar characteristics and your assumptions may be wrong.

## **8. DOCUMENTATION**

True Religion shall, upon request, supply a copy of the policies, practices and procedures required under the Ontario Regulation 429/07 – Accessibility Standards for Customer Service.

## **9. CUSTOMER FEEDBACK**

Feedback from our customers provides True Religion with opportunities to learn and improve. True Religion recognizes the right of our customers to make a complaint, comment, or suggestion on ways to improve our services. To assist True Religion in ensuring that the delivery of our service to those with disabilities is provided in an effective and timely manner, customers are invited to provide their feedback in writing, in person, e-mail, telephone, or any other means that are accessible to:

### **Operations Accessibility Coordinator**

True Religion Brand Jeans  
2263 East Vernon Avenue  
Vernon, CA 90058  
Email: [OAC@truereligionbrandjeans.com](mailto:OAC@truereligionbrandjeans.com)  
Phone: 323-266-3072  
Fax: 323-266-6422

All feedback will be directed to the Accessibility Coordinator. Customers can expect to hear back within ten (10) business days any action to be taken in response to the feedback received.

## **10. ASSISTIVE DEVICES**

True Religion provides customers with stores with wide travel space and large accessible change rooms. In addition, staff is trained on assisting customers with disabilities. True Religion employees shall use reasonable efforts to allow persons with disabilities to use their own assistive devices to access our goods and services.

## **11. SERVICE ANIMALS AND SUPPORT PERSONS**

- True Religion employees shall allow persons with disabilities to be accompanied by their guide dog or service animal unless the animal is excluded by law.
- Where an animal is excluded by law from the premises, the reason why the animal is excluded shall be explained to the persons with the disability and other reasonable arrangements to provide services shall be explored with the assistance of the person with the disability.
- Persons with disabilities are more than welcome to be accompanied by their support person while accessing our goods and services.

## **12. SERVICE DISRUPTION – NOTICE**

It is possible that from time to time, there will be disruptions in service. True Religion will provide customers with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. This notice will include information about the reason for the

disruption, its anticipated duration, and a description of alternative facilities or services, if available. The notice will be prominently located within the store.

### **13. TRAINING REQUIREMENTS**

- Every person who participates in the development of the policy, practices and procedures under Ontario Regulation 429/07 – Accessibility Standards for Customer Service must be trained appropriately in relation to this Policy.
- Every person who deals with the public on behalf of True Religion, must complete training in relation to this Policy.
- New employees and management shall receive training as soon as practically feasible.
- Ongoing training with respect to changes to policies and procedures shall be provided.
- Training records shall be kept.

### **14. BEST PRACTICES**

Accessible Customer Service follows four principles:

- Dignity
- Independence
- Integration
- Equal Opportunity

“What can I do to help people with disabilities access our goods and services?”

- Ask how you can help
- Offer a variety of methods of communication
- Understand the nature and scope of the goods and service True Religion offers

### **15. PROVIDING CUSTOMER SERVICE FOR PERSONS WITH DISABILITIES**

**Physical** – Physical disabilities include a range of functional limitations from minor difficulties in moving or coordinating one part of the body, through muscle weakness, tremors, and paralysis. Physical disabilities can be congenital such as Muscular Dystrophy; or acquired, such as tendonitis. A physical disability may affect an individual’s ability to:

- Perform manual tasks such as holding a pen, turning a key or gripping a door knob
- Move around independently
- Control the speed or coordination of movements
- Reach, pull, or manipulate objects
- Have strength or endurance

There are many types and degrees of physical disabilities, and not all require a wheelchair. It may be difficult to identify a person with a physical disability. If you suspect someone has a disability:

- Speak normally and directly to them. Don’t speak to someone who is with them
- Ask before you help. People with physical disabilities often have their own way of doing things

- Understand that wheelchairs and other mobility devices are part of a person's personal space - don't touch, move or lean on them
- Provide them with information about the accessible features of the immediate environment (automatic doors, accessible washrooms, etc.)
- Keep ramps and corridors free of clutter
- Provide seating for those that cannot stand in line
- Be Patient

**Hearing** – Hearing loss can cause problems in distinguishing certain frequencies, sounds or words. A person who is deaf, deafened or hard-of hearing may be unable to:

- Use a public telephone
- Understand speech in noisy environments
- Pronounce words clearly enough to be understood by strangers

Like other disabilities, hearing loss has a wide variety of degrees. Remember, customers who are deaf or hard of hearing may require assistive devices when communicating. Remember to:

- Attract the customer's attention before speaking. The best way is a gentle touch on the shoulder or gently waving your hand
- Always ask how you can help. Don't shout. Speak clearly
- Be clear and precise when giving directions, and repeat or rephrase if necessary. Make sure you have been understood
- Face the person and keep your hands and other objects away from your face and mouth
- Deaf people may use a sign language interpreter to communicate- always direct your attention to the Deaf person –not the interpreter
- Any personal (e.g. financial) matters should be discussed in a private room to avoid other people overhearing
- If the person uses a hearing aid, try to speak in an area with few competing sounds
- If necessary, write notes back and forth to share information
- Don't touch service animals – they are working and have to pay attention at all times

**Deaf - Blindness** – Deaf – Blindness is a combination of hearing and vision loss. A person who is deaf-blind can have significant difficulty accessing information and performing daily activities. Deaf-blindness interferes with communication, learning, orientation and mobility. People who are deaf-blind communicate using various sign language systems, Braille, telephone devices, and communication boards, so please remember:

- Many people who are deaf-blind use the services of an Intervener, a professional that helps with communicating, by relaying information and facilitating auditory and visual information and acting as a sighted guide
- Interveners are trained in special sign language that involves touching the hands of the client in a two-hand manual alphabet or finger spelling and serve to guide and interpret
- Do not assume what a person can or cannot do. Some people who are deaf-blind have some sight or hearing while others do not

- A customer who is deaf-blind is likely to explain to you how to communicate with them or give you an assistance card or a note explaining how to communicate with them
- Do not touch or address service animals – they are working and have to pay attention at all times
- Never touch a person who is deaf-blind suddenly or without permission unless it's an emergency
- Understand that communication can take some time- be patient
- Direct your attention to your customer, not the Intervener

**Vision** – Vision disabilities reduce one's ability to see clearly. Very few people are totally blind; many have limited vision such as tunnel vision, where a person has a loss of peripheral or side vision, or a lack of central vision, which means they cannot see straight ahead. Some can see the outline of objects while others can see the direction of light.

Vision loss may result in:

- Difficulty reading or seeing faces
- Difficulty maneuvering in unfamiliar places
- An inability to differentiate colors or distances
- A narrow field of vision
- The need for bright light or contrast
- Night blindness

Vision disabilities may restrict your customers' abilities to read signs or their customer statement. In some cases, it may be difficult to tell if a person has a vision disability, while others may use a guide dog and/or white cane. Remember the following:

- Verbally identify yourself before making physical contact
- If the person uses a service animal- do not touch or approach the animal- it is working.
- Offer your arm to guide the person. Do not grab or pull
- Never touch your customer without asking permission, unless it is an emergency
- Don't leave your customer in the middle of a room. Show them to a chair, or guide them to a comfortable location
- Don't walk away without saying good-bye

**Intellectual** – Intellectual disabilities affect a person's ability to think and reason. It may be caused by genetic factors such as Downs Syndrome, exposure to environmental toxins such as Fetal Alcohol Syndrome, brain trauma, or psychiatric disorders.

A person with an intellectual disorder may have difficulty with:

- Understanding spoken and written information
- Conceptual information
- Perception of sensory information
- Memory

People with intellectual or developmental disabilities may have difficulty doing many things that most of us take for granted. These disabilities can mildly or profoundly limit one's ability to learn. You may not

be able to know that someone has this disability unless you are told, or you notice the way people act, ask questions or use body language. As much as possible, treat customers with an intellectual or developmental disability like anyone else. They may understand more than you think, and they will appreciate your treating them with respect. Remember the following:

- Do not assume what a person can or cannot do
- Use clear, simple language
- Be prepared to explain and provide examples regarding information
- Remember that the person is an adult and unless you are informed otherwise, can make their own decisions
- Be patient and verify your understanding
- If you can't understand what is being said, don't pretend. Just ask again
- Provide one piece of information at a time
- Speak directly to the customer, not to their companion or attendant

**Speech** – Speech disabilities involve the partial or total loss of the ability to speak.

Typical disabilities include problems with:

- Pronunciation
- Pitch and loudness
- Hoarseness or breathiness
- Stuttering or slurring

Some people have problems communicating. It could be the result of cerebral palsy, hearing loss, or another condition that makes it difficult to pronounce words, causes slurring or stuttering, or not being able to express oneself or understand written or spoken language. Some people who have severe difficulties may use communication boards or other assistive devices. Remember the following:

- Where possible, communicate in a quiet environment
- Give the person your full attention. Don't interrupt or finish their sentences
- Ask them to repeat as necessary, or to write their message
- If you are able, ask questions that can be answered 'yes' or 'no'
- Verify your understanding
- Patience, respect, and a willingness to find a way to communicate are your best tools

**Learning** – Learning disabilities include a range of disorders that affect verbal and non-verbal information acquisition, retention, understanding and processing. People with a learning disability may have average or above average intelligence, but take in and process information and express knowledge in different ways.

Learning disabilities may result in difficulties with:

- Reading
- Problem solving
- Time management

- Finding their way
- Processing information

Learning disabilities are generally invisible and the ability to function varies greatly. Remember to:

- Respond to any requests for verbal information, assistance in filling in forms, etc. with courtesy
- Allow extra time to complete tasks, if necessary

**Mental Health** – Mental Health disabilities include a range of disorders, however there are three main types of mental health disabilities including:

- Anxiety
- Mood
- Behavioral

People with mental health disabilities may seem edgy or irritated, act aggressively, be perceived as pushy or abrupt, be unable to make a decision, start laughing, or get angry for no apparent reason. Remember to:

- Treat each person as an individual. Ask what would make him/her the most comfortable and respect his/her needs to the maximum extent possible
- Try to reduce stress and anxiety in situations
- Stay calm and courteous, even if the customer exhibits unusual behavior, focus on the service they need and how you can help

**Smell** – Smell disabilities can involve the inability to sense smells or a hypersensitivity to odors and smells. A person with a smelling disability may have allergies to certain odors, scents or chemicals or may be unable to identify dangerous gases, smoke, fumes and spoiled food.

**Touch** – Touch/Tactile disabilities can affect a person’s ability to sense texture, temperature, vibration or pressure. Touch sensations may be reduced or heightened resulting in a hypersensitivity to touch, temperature, or the opposite, numbness and the inability to feel touch sensations.

**Taste** – Taste disabilities can limit the experience of the four primary taste sensations; sweet, bitter, salty and sour. A person with a taste disability may be unable to identify spoiled food or noxious substances.

**Other** – Other disabilities may result from a range of other conditions, accidents, illnesses and diseases including ALS, asthma, diabetes, cancer, HIV/AIDs, environmental sensitivities, seizure disorders, heart disease, stroke and joint replacement.

Remember that disabilities are not always visible or easy to distinguish. When communicating with a person with a disability, think about how you can help and find a way to get the information or services they need.