



AODA POLICY: ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT

At Eclipse, we are committed to providing equal treatment to those with disabilities who use or benefit from our goods and services. We are committed to providing exemplary service to all of our customers in accordance with the *Accessibility for Ontarians with Disabilities Act, 2005* and its associated regulations (collectively the “Act”).

The following policies, procedures and practices are guided by the fundamental principles underlying the Act. We are committed to ensuring that this policy is rigorously observed by all employees and any third party that provides goods and services on our behalf.

Objectives

The objective of this policy is to provide a framework through which Eclipse can achieve service excellence for those with disabilities. Eclipse is committed to providing a respectful, welcoming and inclusive environment to all individuals who seek access to our goods and services.

Application

This policy applies to all employees of Eclipse, as well as any third party providing goods and services on behalf of Eclipse and who may interact with Eclipse’s customers, the public or third parties.

Commitment

Eclipse is committed to providing accessible customer service to persons with disabilities. Eclipse will make reasonable efforts to ensure that this policy and related practices and procedures are consistent with the leading principles as prescribed in the Act:

- (i) We will provide goods or services in a manner that respects the dignity and independence of those with disabilities;
- (ii) We will provide integrated services to persons with disabilities wherever possible and will provide alternate measures where necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from Eclipse’s goods or services; and

- (iii) We will provide equal opportunity to persons with disabilities to obtain, use and benefit from Eclipse's goods or services.

Providing Goods and Services to Those with Disabilities

Communication

When communicating with persons with a disability, Eclipse will take into account the particular individual's needs and circumstances. Eclipse's employees, agents and third parties who communicate with customers will be trained on how to interact and communicate with people with various types of disabilities in order to ensure that the Company provides responsive and effective communication. All communication shall be provided in a manner that respects the dignity and independence of persons with disabilities.

Assistive Devices

Those with disabilities shall be permitted to obtain, use or benefit from Eclipse's goods or services through the use of their own assistive devices. Eclipse's employees, agents, and third parties will be trained to ensure they are familiar with various assistive devices that may be used by customers with disabilities while accessing the Company's goods or services.

In the event that a person with a disability is hindered from accessing any goods or services offered, Eclipse will use its best efforts to accommodate the person by offering the use of another assistive device that is available or attempt to deliver the same service in another way.

Eclipse will train employees, agents and third parties on how to use assistive devices that are available at the office for customers. Eclipse will also train employees, agents and third parties to inform customers that the assistive devices are available.

Telephone Services

Eclipse is committed to providing fully accessible phone services to our clients. Eclipse will train employees to communicate over the telephone in plain and clear language and to speak clearly and slowly. If telephone communication provides a barrier to a person with a disability, Eclipse will be available to communicate in writing, by e-mail, by fax or by other electronic means.

Billing

Eclipse is committed to providing accessible invoices and, upon request, our invoices will be provided in alternative formats. We will answer any questions our clients may have about the content of the statement in person, by telephone or via e-mail.

Use of Service Animals and Support Persons

Service Animals

Eclipse is committed to welcoming those with disabilities who are accompanied by a service animal on the parts of our premises that are open to the public. If a service animal is excluded by law, we will suggest appropriate alternatives and provide assistance in order to ensure that the person is able to access, obtain, use or benefit from Eclipse's services where possible. Eclipse will train employees on how to interact with customers who are accompanied by service animals.

Support Persons

Any person with a disability who is accompanied by a support person will be allowed to access any services provided by Eclipse with his or her support person. Eclipse will not prevent a person with a disability who is accompanied by a support person from having access to his or her support person.

Where there are barriers to access or attendance by a support person, Eclipse will seek to facilitate access to ensure the participation of persons with disabilities.

Notice of Temporary Disruptions

Although Eclipse is aware that the operation of its services is important to customers, temporary disruptions may occur from time-to-time.

Eclipse will provide notice when there is a temporary disruption in those services or facilities that persons with disabilities may rely on. This notice will include information about the reason for the disruption, its anticipated duration, and, if applicable, a description of alternative facilities or services that may be available. Notice of service disruptions will be provided as soon as reasonably practicable after we are made aware of the disruption, or in advance in the case of planned disruptions.

Notice will be provided by a variety of methods, depending on the circumstances, and may include postings in conspicuous places at the office, in other facilities of the building (i.e. the lobby) on Eclipse's website or by any other means that will reasonably ensure that the notice reaches those persons potentially affected by the temporary disruption in a manner that is accessible to them.

Training for Staff

As discussed above, Eclipse will ensure that all employees, agents and workers who interact with customers receive training on their obligations pursuant to the Act. Further, training shall be provided on an ongoing basis whenever changes to this policy occur to ensure that it is properly implemented at all times.

Training will include the following:

- (i) an overview of the Act and its requirements;
- (ii) training on how to interact and communicate with people with various types of disabilities;
- (iii) training on how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person;
- (iv) training on how to use equipment or assistive devices available at the office or otherwise provided by Eclipse that may help with the provision of goods or services to a person with a disability;
- (v) training on what to do if a person with a disability is having difficulty in accessing Eclipse's goods and services; and
- (vi) training on Eclipse's current policies, practices and procedures relating to the Act.

Eclipse will keep records of the training provided, including the dates on which training was received and the names and number of participants.

Feedback Process

In order to properly assess the needs of those with disabilities, Eclipse has created a feedback process and designated a member of staff as its AODA Compliance Officer.

Feedback may be provided by a person with a disability in the manner they deem most convenient to them. For example, a person may provide feedback by contacting the AODA Compliance Officer in person, by mail, phone or email. All feedback will be processed by the AODA Compliance Officer, kept in strict confidence and will be used to improve customer service.

Eclipse's AODA Compliance Officer is Robert Stroud - CEO, who can be reached at telephone # (905) 593-1775 or fax # (905) 593-1776.

If feedback raises serious concerns with respect to the delivery of goods and services to those with disabilities, Eclipse will provide a response to the concerns in a timely manner. The author of the feedback will be provided a response in the format requested (or the most appropriate format where no request was made) outlining actions taken. Eclipse shall make best efforts to respond to feedback within three business days.

Notice and Availability of Documents

This policy and any corresponding practices and procedures will be made available to any person upon request. Eclipse shall post notice of the availability of these documents in a conspicuous place at the office and on Eclipse's website.

Format of Documents

Upon request, Eclipse shall provide this policy in a format that takes into account the disability of the person making the request.

Modifications to the Policy and Related Policies

Eclipse is committed to developing policies that respect and promote the dignity and independence of people with disabilities. All of Eclipse's policies and procedures will be developed or updated in such a manner as to respect and promote the dignity and independence of those with disabilities.

Breach of Policy

Eclipse will not tolerate any unacceptable behaviour towards customers who have disabilities. Any employee or worker action with undermines or is in breach of this policy will be subject to disciplinary measures, up to and including termination of employment. If a third party is found to have violated this policy, Eclipse will remove them from the premises, and/or terminate their contract.