

ACCESSIBLE CUSTOMER SERVICE POLICY FOR MANITOBA

In fulfilling its mission to Do: what's right and Think: customers first, Gap (Canada) Inc. strives to provide its services in a way that respects the dignity and independence of all people, including people with disabilities.

Gap (Canada) Inc. is dedicated to excellence in serving all employees, customers, and contractors.

This policy establishes accessibility standards at Gap (Canada) Inc. in accordance with the Manitoba Human Rights Code.

Gap (Canada) Inc. is 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 accessibility requirements under the *Manitobans with Disabilities Act*.

Gap (Canada) Inc. strives to provide people with disabilities, equitable access to goods, services facilities and/or employment provided by Gap (Canada) Inc., taking into account the person's disability.

We are committed to complying with the Accessibility Standard for Customer Service under The Accessibility for Manitobans Act. Our policies, practices and measures reflect the principles of dignity, independence, integration, and equal opportunity for people with disabilities. If a barrier to accessing our goods or services cannot be removed, we seek to provide alternate ways to access the goods or services.

This policy applies to the provision of goods and services at premises owned and operated by Gap Canada Inc. This policy applies to all employees, agents and/or contractors, including those who deal with the public or other third parties that act on behalf of Gap Canada Inc, such as when the provision of goods and services occurs off the premises of Gap Canada Inc which includes stores.

- 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 Gap Canada Inc.
- This policy shall also apply to all persons who participate in the development of Gap Canada Inc's policies, practices and procedures governing the provision of goods and services to members of the public or third parties.

General Principles

In accordance with the Accessibility Standard for Customer Service under The Accessibility for Manitobans Act., this policy addresses the following:

- Gap (Canada) Inc. will have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.
- Meet the communication needs of customers, clients or members.
- Allow assistive devices, such as wheelchairs, walkers and oxygen tanks.

- Welcome support people, who are there to assist.
- Welcome people with service animals.
Ensure accessibility is maintained as intended (ramps, wide aisles, removal of clutter) and that existing accessibility features are maintained so that they are available for use as intended
- Let customers know when accessible features and services are not available.
- Invite customers to provide feedback.
- Train staff on accessible customer service, including reasonable accommodations under The Human Rights Code (Manitoba).
- Keep a written record of accessibility and training policies

1. Communication: We meet the communication needs of our customers.

a. Practices and Measures:

- To meet communication needs, when appropriate we offer to communicate in different ways, such as writing things down, reading things out loud, and taking extra time to explain things.

We also:

- Keep paper and pens available to write things down.
- Offer a chair when longer conversations are needed.
- Offer a quieter space.
- Sit down to engage with someone using a wheelchair.
- We use signs and documents that are easy to read, including using larger fonts and colour contrast.
- We write signs and documents in plain language.

2. Assistive Devices Persons: with disabilities may use their own assistive devices as required when accessing goods and/or services provided by Gap Canada Inc.

a. Practices and Measures:

- We do not touch or move customers' assistive devices without permission.
- In cases where the assistive device presents significant and unavoidable health or safety concerns, we attempt to use other measures to ensure the person with disabilities can access our goods, services, or facilities.
- We welcome support persons and we let the public know in advance if support persons must pay admission or service fees.

b. Practices and Measures:

- If a customer with a disability is accompanied by a support person, Gap Canada Inc will ensure that both persons are allowed to enter the premises together and that the customer is not prevented from having access to the support person.

- There may be times where seating and availability prevent the customer and support person from sitting beside each other. In these situations, Gap Canada Inc will make every reasonable attempt to resolve the issue.
- In situations where confidential information might be discussed, consent will be obtained from the customer, prior to any conversation where confidential information might be discussed.

3. Service Animals: We allow service animals on our premises.

a. Practices and Measures:

We:

- Treat a service animal as a working animal.
- Do not distract a service animal from its job by petting, feeding, or playing with it, unless given permission by the person with the service animal to do so.
- Know how to identify a service animal by its harness or vest and by the assistance the animal is providing.
- If we have concerns, we may ask if the animal has been trained to help a person with a disability-related need.
- We expect the person who is handling the service animal to maintain control of the animal physically or through voice, signal or other means. If the service animal is showing signs of not being controlled (i.e., by barking, whining or wandering), we may provide a warning to the handler to control the animal.
- If the service animal continues to misbehave, we may ask the handler to leave.
- If another law prohibits service animals (e.g., food preparation areas), we explain why the animal cannot enter the space and discuss with the person another way of providing goods or services.

If a health and safety concern presents itself, for example in the form of a severe allergy to the animal, Gap Canada Inc will make all reasonable efforts to meet the needs of all individuals

b. Practices and Measures:

- We organize our space so that there is room for people with wheelchairs, electric scooters and walkers.
- Our seating accommodates people of varying sizes and abilities.
- We keep our entrance area clear of ice and snow.
- We place standing signs out of the way to avoid tripping hazards.
- We use both audio and visual cues to inform customers it is their turn to be served.
- Alternatives to our accessibility features include our online service (where applicable).

4. Notice of Disruptions in Service: We let the public know when and why an accessibility feature is temporarily unavailable, how long it will be unavailable, and other ways to access our goods and services.

a. Practices and Measures:

- Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Gap Canada Inc. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use Gap Canada Inc'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 options

Notifications Options: When disruptions occur, Gap Canada Inc will provide notice by:

- Posting notices at the main entrance and the nearest accessible entrance to the service disruption and/or on Gap Canada Inc website; Verbally notifying customers when they are making an appointment; or SBy any other method that may be reasonable under the circumstances.

5. Feedback: We welcome and respond promptly to feedback we receive on the accessibility of our goods and services. We document the actions we take to respond to the feedback we receive, and that information is available on request in a format that meets the individual's communication needs. Gap (Canada) Inc. will ensure the feedback process outlined in the Customer Service Policy is accessible to persons with disabilities and will notify the public of the accessible feedback process.

a. Practices and Measures:

- Gap Canada Inc 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 on the premises.
- We invite feedback in the following ways: Visit our checkout or service desk, or contact us by phone, email, website or feedback form.
- In addition, Customers who wish to provide feedback by completing an onsite customer feedback form or want to complete it verbally can do so with any Gap Canada Inc employee. Customers that provide formal feedback with any concerns or complaints will be addressed.

6. Training: Gap (Canada) Inc. will provide training to employees based on individuals' needs and duties within the business unit and as soon as is practical after they are assigned the applicable duties. *Training is also provided to persons who develop or implement Gap Inc's measures, policies, and practices.* Training may be in the form of a group session, a brochure, web-based

training modules and/or as a component of the New Hire Orientation. Training records will be kept according to normal Gap, Inc. retention guidelines. Training will include the requirements of the Accessibility Standards as outlined in the Manitoba Human Rights Code as it relates to people with disabilities.

We provide the required training on accessible customer service to employees and management. We are trained on:

- How to interact and communicate with people who face barriers to accessing goods and services, use assistive devices, are assisted by a support person and/or are assisted by a service animal.
- How to use any equipment or assistive devices that are available on-site.
- An overview of The Accessibility for Manitobans Act, The Human Rights Code (Manitoba), and the Customer Service Standard.
- Our organizational policies, practices and measures, including updates or changes.
 - a. Practices and Measures:
 - Gap Canada Inc will provide training as soon as practicable. Training will be provided to new employees, agents and/or contractors who deal with the public or act on our behalf. Revised training will be provided in the event of changes to legislation, procedures and/or practices.
 - Gap Canada Inc will keep a record of training that include the dates the training was provided and the number of employees who completed the training.

7. Record of Policies: We keep a written record of our accessibility and training policies. Our written documents include a summary of our training material and when training is offered. We let the public know that our written policies are available on request.

- a. Practices and Measures:
 - We let the public know that our accessibility and training policies are available in the following ways:
 - Posted on website.
 - Posted at our building entrance or reception desk and/or in high traffic areas.
 - Through employees or management (in person or by phone).
 - We provide our policies within a reasonable timeframe, at no cost, and in a format that meets the needs of the individual. This policy and its related procedures will be reviewed as required in the event of legislative changes.

References:

Accessibility for Manitobans Act; Manitoba Human Rights Code; Manitoba Regulation 171/2015: The Customer Service Standard Regulation. AODA and AMA – Customer Service Policy (reviewed May 2024)



BANANA REPUBLIC