

CUSTOMER SERVICE POLICY STATEMENT

Effective January 1, 2012

1. POLICY

1.01 For the purposes of this policy, Wolf Steel Ltd., and Napoleon Home Comfort will be referred to as "The Company." The Company strives to provide a barrier free work- environment for its Associates and visitors. We are committed to providing accessible customer service to people with disabilities in a manner that is consistent with the principles of independence, dignity, integration and equality. The guidelines outlined in this document represent acceptable service practices for The Company. This policy is to act as a guide in establishing the requirement and responsibilities for all Associates who have interactions with external clients, contractors, vendors, and such, to ensure services provided are in a manner that takes into account a person's disabilities.

2. PURPOSE

2.01 The purpose of this Customer Service policy is to act as a guideline in establishing the requirement and responsibilities for all Associates who have interactions with external clients, contractors, vendors, and such, to ensure all services provided are in a manner that takes into account a persons disability.

3. SCOPE

3.01 This Customer Service policy applies to all Associates of The Company including contracts and temporaries.

4. RESPONSIBILITY

- 4.01 Senior Management
Senior Management shall:
- a) Plan for the necessary accommodations to ensure customer service standards are maintained.
 - b) Encourage the consistent application of this policy to eliminate barriers.
- 4.02 Supervisors and Managers
Supervisors and Managers shall:
- a) Ensure that elements of this policy are being followed.

- b) Ensure that each Associate under their supervision is delivering an accessible and exceptional level of customer service in their dealings with any external persons with disabilities and providing service in a manner that is consistent with principles of independence, dignity, integration and equality.
- c) Initiate corrective action for violations of this standard.

4.03 Human Resources Department

The Human Resources Department shall:

- a) Ensure that the requirements for this standard practice are communicated for the purpose of assisting the management team to be compliant with the applicable legislative requirements.
- b) Maintain documented records of feedback.
- c) Assist in providing accommodations.

4.04 Associates

Associates Shall:

- a) Follow the requirements of this policy.
- b) Obtain any accommodation information from contacts prior to them coming onto the premises of the Company, and notify their Supervisor or Manager of the accommodations required so necessary arrangements can be made.
- c) Participate in training initiatives that support this policy.
- d) Notify Supervisor or Manager of any issues identified.

5. DEFINITIONS (TERMS)

5.01 For the purpose of this standard, the following terms will apply:

Assistive Devices: a technical aid, communication device, or medical aid modified or customized, that is used to increase, maintain, or improve the functional abilities of people with disabilities.

Barrier: anything that prevents a person with disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, an

information or communications barrier, an attitudinal barrier, a technological barrier, a policy or practice.

Disability: (a) 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 remedial appliance or device,
(b) a condition of mental impairment or developmental disability
(c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
(d) a mental disorder, or
(e) an injury.

Service Animal: 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 regarding to the disability.

Support Person: 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 or medical needs or with access to goods or services.

6. PROCEDURE

6.01 The guidelines outlined in this document represent acceptable service practices for The Company. All Associates are encouraged to take personal initiative in following the procedures outlined in this document and to

continually contribute to a high level of exceptional customer service.

- 6.02 **Communication:**
 Associates of The Company will communicate with people with disabilities in ways that take into account their disability and with dignity. We will train Associates who communicate with external persons on how to interact and communicate with people with various types of disabilities.
- 6.03 **Telephone services:**
 The Company is committed to providing fully accessible telephone services to our customers. We will train Associates to communicate with customers over the telephone in clear and plain language and to speak clearly and slowly, ensuring a persons disability is taken into account. We will offer to communicate with customers by email if telephone communication is not suitable to their communication needs or is not available.
- 6.04 **Assistive devices:**
 The Organization is committed to serving people with assistive devices to obtain, use or benefit from our goods and services. We will ensure that our Associates are trained and familiar with various assistive devices that may be used by customers with disabilities while accessing our goods or services. Associates are expected to provide accommodations that meet the needs of the individual.
- 6.05 **Support persons:**
 The Company will continue to welcome people with disabilities who are accompanied by a 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. All persons entering The Company premises must be accompanied by Company Associates, in accordance with our visitor’s policy.
- 6.06 **Service animals:**
 Persons with disabilities, accompanied by a service animal on the areas of our premises that are open to the public. We will also ensure that all Associates who interact with external persons are properly trained in how to interact

with people with disabilities who are accompanied by a service animal. We will also ensure that Associates are properly trained to interact with the service animal. Under no circumstances should Associates interact with the service animal without prior consent from the individual in charge of or having ownership of the service animal.

6.07 Notice of temporary disruption:

In the event of a planned service disruption, Associates should notify any external contacts with disabilities in advance of the disruption. The notice will include information about the reason for the disruption, the anticipated duration and a description of alternate services that may be available. In the event of an unexpected disruption, notice shall be provided as soon as possible to prevent any hardships and posted in conspicuous places (i.e. at the main entrance).

6.08 Feedback process:

The ultimate goal of The Company is to meet and surpass customer expectations while serving persons with disabilities. Comments on our services regarding how well those expectations are being met are welcome and appreciated and can provide feedback by:

- **Email** Human Resources at generalhris@napoleonproducts.com.
- **Mail** at 24 Napoleon Road, Barrie, ON, L4M 0G8.
- Verbally in person or by telephone to 705-721-1212.
- Feedback form that is located at reception.

Feedback that is received must be forwarded to Human Resources the day it is received so that any follow up that is required can be completed within 48 hours to the customer. Complaints will be addressed according to The Company's regular customer complaint management procedures.

7. TRAINING

- 7.01 All Associates, including contract and temporaries.
- 7.02 Training sessions on recommended customer service practices will be held at our Corporate Orientation sessions for new hires to ensure expected standards are communicated to all affected parties.

- 7.03 Revised training will be provided in the event of changes to legislation, procedures or practices.
- 7.04 The Company will keep a record of training that includes the dates training was provided and the number of Associates who attended training.
- 7.05 The agency will be responsible for training of the temporary associates, consistent with the legislative requirements.

8. EVALUATION

- 8.01 This standard shall be reviewed annually by The Company and compliance to this standard will be monitored on an ongoing basis.

9. FORMS

- 9.01 Customer Feedback Form.