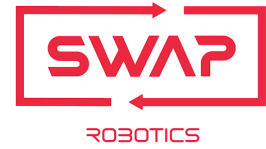




AODA POLICY AND PROCEDURES

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1. PURPOSE

In compliance with the *Accessibility for Ontarians with Disabilities Act, 2005*, the purpose of this policy is to outline responsibilities of staff personnel (employees, volunteers and other third parties) in providing services and opportunities to people with disabilities.

2. SCOPE

This policy applies to all staff personnel (employees, volunteers and other third parties).

3. POLICY

3.1 Our Commitment

Swap Robotics and its subsidiaries ("Swap Robotics, Inc.") are committed to excellence in its services and maintaining an accessible environment for persons with disabilities. We believe that the key to creating an inclusive and barrier-free work environment is the identification, removal and prevention of barriers to accessibility. We will take all reasonable efforts to do so, where possible, and take all necessary actions to meet our accessibility requirements under Ontario's accessibility laws.

3.1.1 Communication

We communicate with people with disabilities in ways that take into account their disability and train staff personnel on how to interact and communicate with people with disabilities. We will work with any persons with disabilities to determine what method of communication works for them. Upon request, Swap Robotics shall provide a copy of this policy or any other information to any person in accessible formats or with communication support.

3.1.2 Service Animals

Persons with disabilities may enter Swap Robotics' facilities accompanied by a service animal and keep the animal with them, if the public has access to such premises, and the animal is not otherwise excluded by law. It is the responsibility of the person with a service animal to control the animal at all times. Swap Robotics will also ensure that all staff

personnel are properly trained on how to interact with people with disabilities who are accompanied by a service animal.

3.1.3 Support Persons

A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises and have access to that person at all times.

3.1.4 Notice of Temporary Disruption

We will make reasonable efforts to provide clients with notice in the event of a disruption in the services usually used by people with disabilities. This notice will include information about the reason for the disruption, its expected duration, and referrals to alternative facilities or services, if available. Although Swap Robotics cannot provide the same guarantee in emergency temporary disruption situations, every reasonable effort will be made to give adequate notice.

3.1.5 Employment

Swap Robotics is an equal opportunity/affirmative action employer. We are committed to an inclusive, barrier-free recruitment and selection process and work environment. If contacted for a job opportunity, candidates are advised to let us know if any accommodation is needed to ensure they have access to a fair and equitable process. Any information received relating to accommodation is kept confidential.

4. PROCEDURE

4.1 Training for Staff

We are committed to training all staff and volunteers in accessible customer service, other Ontario's accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities.

Training of our employees on accessibility relates to their specific roles. Training includes:

- Purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the integrated standards.
- How to interact and communicate with people with various types of disabilities

- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- What to do if a person with a disability is having difficulty in accessing our organization's facilities.

Training is provided as part of new employee orientation. We maintain records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided. Staff personnel will also be trained on an ongoing basis when changes are made to these policies, practices and procedures.

4.2 Modifications to This or Other Policies

All Swap Robotics policies and procedures will be developed or updated so as to respect and promote the dignity and independence of persons with disabilities.

4.3 Feedback Process

Swap Robotics welcomes feedback regarding this policy or other Accessibility for Ontarians with Disabilities initiatives. Feedback will help us identify barriers and respond to concerns. Feedback may be directed to our Human Resources department at hr@swaprobotics.com and will be responded to in a timely and thorough manner.