

Accessible Customer Service Policy

Our Responsibilities

As the owner and operator, it is our responsibility to ensure our parking lots and common facilities provide ready access to all who use the facilities, including those with disabilities. In Ontario, the Accessibility for Ontarians with Disabilities Act requires each of the individual businesses that provide services in our shopping centres and other properties to have their own policies and procedures and to train their employees in providing services to persons with disabilities. The policies and procedures set out in this policy apply to (i) those areas of our shopping centres and other properties that are common to all the businesses and services in the properties in question and (ii) First Capital's (and its affiliates') offices and customer service locations. However, anyone concerned with a particular business or service within the property(ies) must refer to the Accessibility Policy of that business or service. In Ontario, each of them is required by law to develop a policy best suited to its particular business or service. This policy deals only with those facilities and common areas that are directly under the control of First Capital.

The requirements outlined in this policy are consistent with our philosophy of providing the best positive experience to our customers, tenants and employees. We will apply this policy to all of our facilities across Canada because we are committed to providing accessible customer service to our customers, tenants and employees, including those with disabilities. We will comply with changes in accessibility legislation in other provinces and in Ontario when and if required. In addition, this policy was developed to comply with the Accessibility for Ontarians with Disabilities Act (AODA), 2005, and the Ontario Regulation 429/07, Accessibility Standards for Customer Service.

Objective

The objectives of this policy are to:

1. Identify the core principles and practices that First Capital has adopted to ensure the delivery of accessible customer service in the areas of shopping centres and other properties under our direct control.
2. Comply with the Accessibility for Ontarians with Disabilities Act (AODA), 2005 and the Ontario Regulation 429/07, Accessibility Standards for Customer Service.
3. Inform all tenants and customers of our shopping centres and other properties as well as our own employees and applicable third-party service providers of First Capital's Accessible Customer Service Policy.

Implementation

Principles

First Capital is committed to the following core principles when providing customer service to anyone with a disability:

1. Dignity of the individual
2. Independence of the individual
3. Integration

Equal opportunity

The Company will deliver goods and services in a manner that respects the dignity of our tenants, customers and employees with disabilities.

First Capital will provide customer service using an integrated model that creates an inclusive environment.

Communication

We will communicate with people with disabilities in ways that take into account their disability.

Use of Personal Assistive Devices

We will ensure our staff members are trained and familiar with various assistive devices that may be used by tenants or customers while accessing our facilities. In addition, we will ensure that our common areas have the necessary facilities, such as ramps, elevators or other accommodations as may be required to provide access to persons with disabilities.

Use of Guide Dogs or Service Animals

First Capital will welcome a guide dog or other service animal to accompany and stay with a person with a disability on all portions of the common areas that are open to the public. Some business or services in our shopping centres and other properties may have restrictions on such service animals and anyone intending to use such facilities may wish to check with the particular service or business to obtain their policy and any such restrictions that may apply.

Use of Support Persons

First Capital will welcome a support person to accompany and stay with person with a disability when visiting our properties and will charge no fee for such support person. Some of the businesses and services in our properties may charge extra for such support persons and anyone intending to use such facility may wish to check with the particular service or business with respect to their policy in this regard.

If it is necessary to protect the health or safety of a person with a disability or the health or safety of others on the property, First Capital may require a support person to accompany and stay with the person with the disability.

Employees of the Company will:

1. Consider specific factors rather than assumptions when dealing with such a situation.
2. Seek guidance and direction from the person with the disability to ensure confidentiality is maintained during the process.
3. Obtain permission from the person prior to disclosing information on all matters in the presence of other persons including his or her support person.

Service or Facility Disruptions

First Capital will provide a notice of any permanent, temporary, planned or unplanned service or facility disruption to the common areas in any of our shopping centres and other properties (including our offices and customer service locations). This notice will contain the following information:

1. The reason for the disruption.
2. The anticipated duration of the disruption.
3. Alternative facilities or services that our customers, tenants and employee can access, if available.

The Company will provide this notice in a conspicuous location in advance of all scheduled service or facility disruptions. In cases of an unplanned service or facility disruption, the Company will make this information available to our customers, tenants and employees as soon as practicable after having been notified of the unplanned disruption.

Customer Information and Feedback

First Capital will post a copy of this policy on its website.

We recognize that customer feedback is a way to ensure our continued success in service delivery. We will accept feedback in numerous ways: in person, by telephone, in writing, by email or otherwise. We will review and respond to all feedback or complaints concerning our delivery of accessible customer service within a reasonable time.

Training

The Company will train all employees who may be required to interact with tenants, customers or other members of the public on how to communicate and provide services to persons with disabilities specifically addressing the following topics:

1. First Capital's policies related to accessibility.
2. Requirements of the Accessibility for Ontarians with Disabilities Act (AODA), 2005, and the Ontario Regulation 429/07, Accessibility Standards for Customer Service;
3. Training will include:
 - a. How to interact and communicate with persons who have disabilities;
 - b. How to interact with persons who use a variety of assistive devices, or who require the assistance of a guide dog, other animal or support person;
 - c. How to assist a person with a disability having difficulty accessing our goods or services and how to use the equipment or devices available on site or otherwise, that may help provide services or access to them; and
 - d. How and when to notify and communicate any planned or unplanned service or facility disruption.

Staff will also be trained as necessary when any changes are made to this policy.