

BURNAC PRODUCE LTD.

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT (AODA) POLICY

1. INTRODUCTION

Under the Accessibility for Ontarians with Disabilities Act (AODA), 2005, all public and private sector organizations must meet the requirements of accessibility standards. The Integrated Accessibility Standards Regulation within the AODA includes standards of Employment, Information and Communication, Customer Services and Design of Public Spaces. The Integrated Standards Regulation is designed to streamline, align and phase-in accessibility requirements. The long-term goal of this legislation is to achieve a barrier-free Ontario by 2025.

All our companies are committed to and guided by the four core principles of dignity, independence, integration and equal opportunity and supports the full inclusion of persons as set out in the Accessibility for Ontarians with Disabilities Act. We are committed to using every effort to ensure that it meets the needs of people with disabilities, in a timely manner, through the implementation of these policies, procedures, and practices.

2. PURPOSE

This policy is in accordance with the Integrated Accessibility Standards Regulation 191/11 under the AODA. All companies achieve accessibility through meeting the Regulation's requirements. This policy provides the overall direction we will follow to provide accessibility supports to Ontarians with disabilities.

The requirements of the Regulation include:

- 2.1 Establishment, implementation, maintenance and documentation of a multi-year accessibility plan, which outlines the strategies to prevent and remove barriers and meet its requirement under the regulation for all companies.
- 2.2 Incorporation of accessibility criteria and features when procuring or acquiring goods, services, or facilities.
- 2.3 Training.
- 2.4 Other specific requirements under the Information and Communication, Employment, Public Spaces and Customer Service Standards.

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3. DEFINITIONS

- 3.1 *Accessible Formats*: may include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.
- 3.2 *Accommodation*: individualized assistance, support or other help to assist a person in meeting requirements, employment requirements, or accessing our goods and services, without causing undue hardship for all companies.
- 3.3 *Career Development and Advancement*: providing additional responsibilities within an employee's current position and the movement of an employee from one job to another in an organization that may be higher in pay, provide greater responsibility or be at a higher level in the organization or any combination of them.
- 3.4 *Communication Supports*: may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.
- 3.5 *Communications*: the interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received.
- 3.6 *Conversion Ready*: an electronic or digital format that facilitates conversion into an accessible format.
- 3.7 *Exceptionality*: an area of functioning which is significantly different from the established norms; examples include specific learning disabilities, deafness, ASD. Individuals who have exceptionalities may also be referred to as "exceptional".
- 3.8 *Guide Dog*: a dog trained as a guide for a blind person and having the qualifications prescribed by the regulations.
- 3.9 *IAP*: Individualized accommodation plan.
- 3.10 *Information*: includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.
- 3.11 *Internet Website*: a collection of related internal and external web pages, images, videos, or other digital assets that are accessible to the public.
- 3.12 *Mobility Aid*: a device used to facilitate the transport, in a seated posture, of a person with a disability/exceptionality.
- 3.13 *Mobility Assistance Device*: a cane, walker, wheelchair, scooter or similar aid.
- 3.14 *New website*: either an external or internal website with a new domain name or an internal or external website with an existing domain name undergoing a significant revamp.
- 3.15 *Redeployment*: if an employee is reassigned to other departments or jobs within the organizations as an alternative to layoff, when a particular job or department has been eliminated.
- 3.16 *Service Animal*: A service animal is any animal used to assist a person with a disability. That typically means a guide dog for the visually impaired. However, the term applies to any type of animal that can be readily identified as a service animal by indicators such as a vest or harness,

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or for which the person provides documentation from a regulated health professional confirming that it is required for reasons relating to a disability.

3.17 *Support Person*: in relation to a person with a disability, another person who accompanies the person with a disability in order to help with communication, mobility, personal care or medical needs or with access to goods, services, or facilities.

3.18 *Unconvertible*: when it is not technically feasible to convert the information or communications because the technology to convert the information or communications is not readily available.

3.19 *Web Content Accessibility Guidelines*: The world-wide web consortium recommendation, dated December 2008, entitled "Web Content Accessibility Guidelines (WCAG) 2.0".

4. GENERAL REQUIREMENTS

4.1 Multi-year Accessibility Plan

Our Multi-Year Accessibility Plan outlines a phased-in strategy to prevent and remove barriers and addresses the current and future requirements of the AODA. We will review the progress of the plan and update its implementation every five years. We will also post the information on our website and will provide it in alternative formats upon request.

4.2 Training

All companies will ensure that training is provided to all full-time, part-time, seasonal and contract employees, as well as all other persons who provide goods, services or facilities on behalf of the organization, on the requirements of the accessibility standards referred to in the regulation and in the Human Rights Code as it pertains to persons with disabilities. Training will be appropriate to the duties of the individuals being trained, and it will be provided as soon as practicable. Training will be provided on an ongoing basis with respect to any changes to this policy or the requirements. All organizations will maintain a record of the dates when training is provided and the number of individuals to whom it was provided.

All companies will prepare a document that describes its training policy, summarizes the content of the training and specifies when the training is to be provided, and on request, give a copy of the document to any person. Companies will also post notices in a conspicuous place indicating that this document is available upon request.

4.3 Emergency Information

All emergency procedures, plans or public safety information that are made available to the public, will be provided in accessible formats or with appropriate communication supports, upon request.

4.4 Feedback

Feedback on how the companies' goods and services are provided to people with disabilities is accepted through the following ways (these ways of communication are provided to the public via our websites).

-Email – info@burnacproduce.com

-Company Website

-905-856-9064

The company will make every effort to respond through the same form it received the feedback and will arrange for the provision of accessible formats and communication supports on request.

4.5 Accessible Formats and Communication Supports

We will provide persons with disabilities the accessible formats and communication supports that are available upon request. We as the employer are prepared to assist persons with disabilities through specific channels in a timely and reasonable manner. These accessible formats and communication supports will provide or arrange for accessible formats which cost is no more than the regular cost charged to other persons.

We will consult with the person making the request and determine suitability of an accessible format or communication support, as well as, notify the public about the availability of accessible formats and communication supports.

4.6 Website Accessibility

All companies will ensure the websites and its web content conform with the World Wide Consortium Web Content Accessibility Guidelines (WCAG) 2.0 initially at Level A and increasingly to Level AA.

Effective January 1, 2014, any new websites or new web content conforms with WCAG 2.0 Level A. By January 1, 2021, all company websites and web content will conform with WCAG 2.0 Level AA.

5.0 EMPLOYMENT STANDARD

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The Employment Standard builds upon the existing requirement under the Ontario Human Rights Code in relation to how to accommodate individuals with disabilities and addresses key processes throughout the entire life cycle of a job.

All companies shall use every reasonable effort to ensure that we meet the needs of people with disabilities, in a timely manner, through the implementation of this policy.

5.1 Recruitment, Assessment and Selection Process

All companies shall notify employees and the public about the availability of accommodations for job applicants with disabilities:

- During the recruitment process when job applicants are individually selected to participate in an assessment or selection process, and
- If a selected applicant requests an accommodation, the Human Resources department shall consult with the applicant and provide and arrange for provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to disability.

5.2 Notify Successful Applicants

When offering a job to a successful applicant, all companies shall inform them of our policies on accommodating employees with disabilities. This will be provided verbally, in person, by email, or in an offer letter.

5.3 Informing Employees of Supports

All companies shall inform employees of its policies used to support its employees with disabilities, including but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability:

- Provide the information required to new employees as soon as practicable after they begin their employment; and
- Whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability.

5.4 Accessible Formats and Communication Supports for Employees

In addition and where an employee with a disability requests it, we will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:

- Information that is needed in order to perform the employee's job,
- Information that is generally available to employees in the workplace, and

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- Consult with the employee making the request in determining the suitability of an accessible format or communication support.

5.5 Workplace Emergency Response Information

- All companies shall provide an individualized workplace emergency response information to employees who have a disability if the disability is such that the individualized information is necessary and the company is aware of the need for accommodation due to the employee's disability. If the employee who receives individual workplace emergency response information requires assistance, with the employee's consent, we shall provide the workplace emergency information to the person designated by all companies to provide assistance to the employee;
- We shall provide the information required under this section as soon as practicable after becoming aware of the need for accommodation due to the employee's disability; and
- Review the information when the employee moves to a different location in the organization, when overall accommodation needs or plans are reviewed and when all companies review its general emergency response policies.

Form 15.09.07 Employee Safety During Emergencies Questionnaire must be completed if there are any barriers that may impede a person with disabilities' safety during emergencies.

5.6 Documented Individual Accommodation Plans

All companies shall have in place a written process for developing a documented individual accommodation plan for employees with a disability.

Process to include:

- The manner in which the employee requesting the accommodation can participate in the development of the plan;
- The means by which the employee is assessed on an individual basis;
- Identification of the accommodation to be provided;
- Timelines for the provision of accommodations;
- The ways an employee can request an evaluation by an outside medical professional, or other professionals (at the employer's expense) to determine if accommodation can be achieved, or how it can be achieved;
- The frequency which the individual accommodation plan should be reviewed or updated determined, and how it should be done;
- The means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs;

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- The manner in which the employee can request the participation of a representative from their union representative;
- The steps taken to protect the privacy of the employee's personal information; and
- If an individual accommodation plan is denied, the manner in which the reasons for denial will be provided to the employee.

5.7 Return to Work Processes

All companies shall develop and have return to work processes in place for employees who are absent from work due to a disability and require disability-related accommodations, in order to return to work. All companies will document these processes.

The return to work process shall include an outline of the steps of all companies will take to facilitate the employee's return to work and use documented individual accommodation plans.

5.8 Performance Management, Career Development, Redeployment and Advancement

All companies will take into account the accessibility needs of employees with disabilities and/or individual accommodation plans of employees when:

- Using talent and performance management processes,
- Providing career development and advancement functions, and
- Using redeployment procedures.

6.0 DESIGN OF PUBLIC SPACES STANDARD

All companies shall incorporate accessibility into public spaces that are newly constructed or redeveloped on and after January 1, 2016. We will ensure that existing requirements stated under the Design of Public Spaces Standards (Accessibility Standards for the Built Environment) are followed for recreational trails, outdoor public use eating areas, exterior paths of travel, accessible parking, and service related elements.

If/When developing recreational trails we shall consult with the public and persons with disabilities. All companies shall also provide maintenance and restoration of public spaces, where applicable, by ensuring the multi-year accessibility plan includes procedures for preventative and emergency maintenance of accessible elements in public spaces and procedures for dealing with temporary disruptions when accessible elements required under this section are not in working order.

All companies shall provide notice to the public when there is a temporary disruption to facilities or services persons with disabilities usually use in order to obtain, use or benefit from a company's goods, services or facilities. Notice will include the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available. All companies will post notices in a conspicuous place indicating to the public that information regarding the steps which will be taken in connection with a temporary disruption is available upon request.

7.0 INFORMATION AND COMMUNICATION STANDARD

We are committed to providing and receiving information and communications in way that are accessible to people with disabilities.

If/when any company determines that it is not technically feasible to convert the information or communications or the technology to convert the information or communication is not readily available, we will provide the person that requests the information with:

An explanation as to why the information and communications are unconvertible; and,

A summary of the unconvertible information or communications.

8.0 ASSISTIVE DEVICES

The use of assistive devices by people with disabilities to access goods, services, and facilities provided by the organization are permitted in all areas that the public have access to.

We are also committed to welcoming people with disabilities who are accompanied by a service animal on the parts of our premises accessible to the public or other third parties.

EXCLUSIONS

*At our Ontario Food Terminal wholesaler warehouses (Provincial Fruit Co. Limited and Rite Pak Produce Co. Limited), Burnac Produce Ltd., Pro Pak Packaging Ltd., and NRV Distributors, service dogs are not permitted under the Health Protection and Promotion Act and the Food Safety and Quality Act, 2001.

Ontario Regulation 562 under the Health Protection and Promotion Act states that:

"...animals are not allowed in places where food is manufactured, prepared, processed, handled, served, displayed, stored, sold or offered for sale. It does make

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an exception for service dogs to allow them to go where food is normally served, sold or offered for sale. Other types of service animals are not included in this exception.”

In these cases, accommodations can be made if need be. If, where and when an animal is excluded by law from our premises, we will still take steps to make sure that we can provide our goods or services to the person with a disability. We will explain to the individual why the animal is excluded and see what other arrangements can be made to provide them with our goods or services.

If the person with the service animal agrees, this might mean leaving the animal in a secure area where it is permitted by law. It might also mean offering to serve the person outside or in another location where the animal is permitted. All alternatives will consider the needs of the person with a disability if his or her service animal is excluded.

All companies are committed to welcoming people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter all premises with his or her 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.

Customers with any disabilities are allowed to use support persons while accessing company goods, services, or facilities on the parts of the premises the public or third parties have access to, and will be granted access to an assigned company support representative upon their request.

See policy 15.05.03 – “Hosting a Visitor” for more details.

9.0 ACCOUNTABILITY

All staff members as applicable are responsible for ensuring that the AODA legislation is complied with by acting in accordance with this policy and the training they have been provided.

10.0 QUESTIONS ABOUT THIS POLICY

This policy exists to provide customer service excellence to people with disabilities. If anyone has a question about the policy or if the purpose of a policy is not understood, inquiries should be referred to our Risk Management Dept.

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