

SHEARER'S FOODS CANADA INC.

Multi-Year Accessibility Policy and Plan

1. BACKGROUND & PURPOSE

The purpose of the goal of the *Accessibility for Ontarians with Disabilities Act, 2005* (the "Act") is to create a more accessible Ontario, by identifying, and to the extent possible, preventing, and eliminating barriers experienced by persons with disabilities.

The *Integrated Accessibility Standards* (the "IAS") is a regulation under the Act the purpose of which is to ensure accessibility for persons with disabilities in the areas of (i) Information and Communication, (ii) Employment, (iii) Transportation and (iv) Design of Public Spaces.

Shearer's Foods Canada Inc. ("Shearer's or the "Company") has developed a policy that identifies how Shearer's currently achieves and will continue to achieve accessibility by meeting the requirements of the IAS and by preventing and eliminating barriers faced by persons with disability (the "Policy").

The purpose of this multi-year accessibility plan ("Accessibility Plan") is to create a roadmap that describes in more detail, the steps Shearer's will take to meet the accessibility objectives set out in the Policy and the timeline in which these steps will be taken. The Accessibility Plan will help Shearer's ensure accessibility is incorporated into its regular business operations and its future development plans.

2. STATEMENT OF COMMITMENT

Shearer's is committed to developing, implementing and maintaining policies, practices and procedures aimed at meeting the accessibility needs of persons with disabilities in a timely manner.

3. COMPLIANCE WITH EXISTING LAW

Nothing in the Accessibility Plan or Policy is intended to replace or negate existing laws regarding accessibility for persons with disabilities including but not limited to the *Human Rights Code* and the *Workplace Safety and Insurance Act* ("Accessibility Legislation").

The compliance deadlines established in this Accessibility Plan correspond with the deadlines set out in the IAS. Shearer's is working towards compliance in accordance with those deadlines. However, in advance of the compliance deadlines established by the IAS and this Accessibility Plan, Shearer's will continue to comply with its legal obligations under all applicable Accessibility Legislation.

4. REVIEW

The Accessibility Plan must be reviewed and updated at least once every 5 years but may be reviewed more frequently depending on need.

5. TRANSPARENCY

The Accessibility Plan is posted on Shearer's website. The Accessibility Plan will be provided upon request to any member of the public in a hard, electronic or other Accessible Format.

6. APPLICATION

Except as otherwise limited herein, this Accessibility Plan applies to Shearer's operations in Ontario including but not limited to:

- i. Shearer's employees in Ontario.
- ii. Any person who participates in the development of Shearer's policies, practices and procedures respecting Shearer's Ontario operations.

7. IMPLEMENTATION

Responsibility for the implementation, review and update of the Accessibility Plan is shared as follows:

- The **Human Resources Manager** is responsible for the development and maintenance of policies required by the Act and this Accessibility Plan.
- The **Human Resources Manager** is responsible for compliance with the Employment Standards and for developing and implementing the required training programs.
- The **Marketing & Communication Manager** is responsible for implementing the web accessibility requirements.
- The **Site Director** is responsible for compliance with the Information and Communications Standards.
- The **Director of Engineering** is responsible for compliance with the Design of Public Spaces Standards.

8. DEFINITIONS

- i. **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.

- ii. **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.
- iii. **Disability** – means:
 - 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 other remedial appliance or device,
 - b) a condition of mental impairment or a 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 or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997
- iv. **New Internet Website** - means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.
- v. **Performance Management** - means activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.
- vi. **Redeployment** - means the reassignment of employees to other departments or jobs as an alternative to layoff, when a particular job or department has been eliminated.
- vii. **Unconvertible Information or Communication** – means information or communication that it is not technically feasible to convert, or if it is technically feasible to convert, the technology required to do so is not readily available.
- viii. **World Wide Web Consortium Web Content Accessibility Guidelines (“WCAG”)** – means the international standard for making websites and web content accessible to people with a wide-range of disabilities. The WCAG contain two levels of compliance, Level A and Level AA.

9. ACCESSIBLE CUSTOMER SERVICE

Shearer’s strives to make its goods and services accessible to persons with disabilities. To this end Shearer’s has developed a policy that describes how it provides accessible customer service

to customers with disabilities and meets the accessibility requirements contained in the *Accessibility Standards for Customer Service* (“Customer Service Standards”).

For a copy of this policy or for more information about Shearer’s policies practices and procedures for delivering accessible customer service contact:

Ms. Elaine Urschel
Human Resources Manager
745 Southgate Drive
Guelph, ON N1G 3R3
Tel: 519-746-0045 ext. 3038
Email: ElaineUrschel@shearers.com

10. GENERAL ACCESSIBILITY STANDARDS UNDER IAS

I. Training

Compliance Deadline: January 1, 2015

Policy Statement:

By January 1, 2015 (the “Compliance Deadline for Training”), Shearer’s will provide training to all existing employees and all persons who participate in the development of AODA Policies.

Training will be provided on:

- i. the requirements of the IAS;
- ii. the *Human Rights Code* as it pertains to persons with disabilities; and
- iii. the AODA Policies as required by the IAS.

The content of the training will be applicable to the individual’s duties.

Employees hired after the Compliance Deadline for Training will receive the required training as soon as practicable.

Shearer’s will keep a record of the training provided, including the dates on which the training is provided and the number of individuals to whom it is provided.

Accessibility Plan:

i. Content & Format of Training

Shearer’s is developing a single training program that address the *Human Rights Code* as it pertains to persons with disabilities and the requirements of the IAS. Specialized training will be provided as necessary (*i.e.* focused training on the Design of Public Spaces Standards will be provided to the Director of Engineering and any other individuals responsible for the construction or redevelopment of public spaces).

II. Self-Service Kiosk

Compliance Deadline: January 1, 2014

Policy Statement:

Shearer's will have regard to the accessibility for persons with disabilities when designing, procuring or acquiring Self-Service Kiosks.

Accessibility Plan:

Shearer's does not currently have any self-service kiosks. However, Shearer's is considering purchasing a computer kiosk which would enable its employees to have access to information about the Company during working hours ("Computer Kiosk"). Accessibility for persons with disabilities will be one of the factors considered if and when Shearer's decides what Computer Kiosk to purchase.

11. INFORMATION AND COMMUNICATION STANDARDS

I. Feedback Procedures

Compliance Deadline: January 1, 2015

Policy Statement:

By January 1, 2015 Shearer's will ensure that its processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of Accessible Formats and Communications Supports, upon request.

Shearer's will notify the public that Accessible Formats and Communications Supports are available in respect of its feedback procedures.

Accessibility Plan:

Shearer's accepts feedback from employees, customers and the public in a number of different ways and currently accommodates requests to provide or to receive responses to feedback in an Accessible Format or with Communication Supports.

II. Accessible Formats & Communication Supports

Compliance Deadline: January 1, 2016

Policy Statement:

By January 1, 2016 Shearer's will, upon request, provide or arrange for the provision of Accessible Formats and Communication Supports in order to make its communications or information about the goods, services and/or facilities it offers accessible to persons with disabilities.

Accessibility Plan:

i. Exempt Information

The Information and Communication Standards do not apply to (i) products and product labels; (ii) Unconvertible information or communications; and (iii) information that Shearer's does not control directly or indirectly through a contractual relationship.

Should Shearer's determine that information or a communication is Unconvertible it will explain why this is the case and provide the person making the request with a summary of the information or communication.

ii. Providing Accessible Formats At No Additional Cost

A Staff member who receives a request from a customer or the public for information in an Accessible Format or with Communication Supports consults with the requesting individual to determine how the information may best be made accessible.

Shearer's may not have Accessible Formats immediately available upon request. However, where such is the case, Shearer's endeavors to source the requested Accessible Format and provide it to the requesting individual at no additional cost.

III. Accessible Websites and Web Content

Initial Website Compliance Deadline: January 1, 2014

Final Website Compliance Deadline: January 1, 2021

Policy Statement:

By the Initial Website Compliance Deadline Shearer's will ensure that, where practicable, a New Internet Website and web content on such site(s) conforms with WCAG 2.0 Level A.

By the Final Website Compliance Deadline Shearer's will ensure that, where practicable, any website or content on that site(s) published after January 1, 2012 conforms with WCAG 2.0 Level AA to the extent required by the IAS.

When determining whether meeting the requirements of this section is practicable Shearer's will consider: i. the availability of commercial software or tools required to achieve web accessibility; and ii. the impact meeting the requirements of this section will have on projects planned before January 1, 2012.

The commitment to provide accessible websites and web content only applies to websites and web content that Shearer's controls directly or indirectly through a contractual relationship that allows for modification of the website or web content in question.

Accessibility Plan:

Shearer's website is compliant with the WCAG 2.0 Level A requirements and will ensure its website is compliant with the WCAG 2.0 Level AA by the required deadline.

12. EMPLOYMENT STANDARDS

The Employment Standards only apply to employees of Shearer's. They do not apply to volunteers, other unpaid individuals or contractors.

I. Recruitment/Selection/Assessment

Compliance Deadline: January 1, 2016

Policy Statement:

By January 1, 2016 Shearer's will notify its employees and the public of the availability of accommodation during the recruitment process. Shearer's will further notify all job applicants who are individually selected to participate in an assessment or selection process that accommodation is available upon request in relation to the assessment or selection process if the applicant requires accommodation due to a disability.

If an applicant requests accommodation, Shearer's will consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs.

Accessibility Plan:

i. Notification to the Public & External Applicant: Accommodation During Recruitment

This Accessibility Plan posted on Shearer's website will serve as notice to the public of the availability of accommodation during the recruitment process. Shearer's posts open positions in various online and hardcopy publications. Such postings will include a notification of the availability of accommodation during the recruitment process.

ii. Notification to Employees: Accommodation During Recruitment

Shearer's will notify employees of the availability of accommodation during the recruitment process during employee training sessions.

iii. Notification: Accommodation During Assessment & Selection

Shearer's most commonly utilizes a standard interview process to assess candidates for employment. However, where an alternative assessment or selection process is used, Shearer's will notify the applicant of the availability of accommodation in respect of same.

Where, by reason of a disability, an applicant requests accommodation in respect an assessment or selection process, Shearer's will consult with the applicant for the purposes of determining an appropriate accommodation. Shearer's reserves the right to require the applicant to provide medical documentation in support of the need for accommodation.

Where Shearer's determines an applicant, due to a disability, does require accommodation during the assessment and selection process, Shearer's will provide accommodation up to the point of undue hardship.

iv. Use of External Recruitment Agencies

Shearer's occasionally uses recruitment agencies to recruit candidates for certain positions. Where Shearer's retains a recruitment agency it will ensure the agency notifies the applicant about the availability of accommodation during the recruitment, assessment and selection process on Shearer's behalf.

II. Notice to Successful Applicants

Compliance Deadline: January 1, 2016

Policy Statement:

By January 1, 2016 Shearer's will ensure that when making offers of employment, it notifies the successful applicant of its policies on accommodating employees with disabilities.

Accessibility Plan:

Shearer's will notify successful candidates for employment of its policy regarding the accommodation of employees with disabilities in its offer letters and/or contracts of employment.

III. Informing Employees of Supports

Compliance Deadline: January 1, 2016

Policy Statement:

By January 1, 2016 Shearer's will inform its existing employees of its policies on supporting 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.

Shearer's will provide employees with updated information whenever there is a material change to its policies on the provision of job accommodations for employees with disabilities.

Accessibility Plan:

Shearer's will notify employees of the availability of accommodation during employment as well as its policies for the development of documented individual accommodation plans during employee training sessions.

IV. Accessible Formats and Communication Supports for Employees

Compliance Deadline: January 1, 2016

Policy Statement:

By January 1, 2016 Shearer's will, upon the request of an employee with a disability, provide or arrange for the provision of Accessible Formats and Communication Supports in order to ensure that (i) information required by the employee to perform his/her job; and (ii) information generally available to employees in the workplace, is accessible to the employee with a disability.

Shearer's will consult with the employee making the request to determine the suitability of any Accessible Format or Communication Support. However, Shearer's reserves the right to determine the Accessible Format or Communication Support that will be provided in the circumstances.

Accessibility Plan:

A request for the provision of information in an Accessible Format and/or with a Communication Support may be made to the employee's immediate supervisor or the Human Resources Manager. Such requests will be addressed in accordance with Shearer's regular procedure for accommodating employees with disabilities which will include the development of a documented individual accommodation plan in consultation with the employee.

V. Workplace Emergency Response Information

Compliance Deadline: January 1, 2012

Policy Statement:

If an employee has a disability and Shearer's is aware that, due to that disability, the employee requires an individualized workplace emergency response, information addressing such response will be provided to the employee as soon as practicable after Shearer's becomes aware of such requirement.

In such a case, with the employee's consent, Shearer's will designate a colleague(s) to provide such individualized assistance and will ensure that this colleague is provided with a copy of employee's individualized emergency response information.

Shearer's will review the individualized workplace emergency response information when (i) the employee moves to a different work location; (ii) the employee's overall accommodations needs or plans are reviewed; and (iii) when Shearer's reviews its general emergency response policies.

Accessibility Plan:

i. Existing Employees

Shearer's conducts safety talks with all employees once every month as part of its health and safety program. Shearer's will continue to utilize this process to periodically notify employees about the availability of individualized emergency response information if an employee is unable to respond to an emergency situation due to a disability. Shearer's will develop individualized emergency response information for any employee that requires same due to a disability.

ii. New Employees

New employees participate in a health and safety orientation. Shearer's will utilize this process to notify new employees about the availability of individualized emergency response information if an employee is unable to respond to an emergency situation due to a disability. Shearer's will develop individualized emergency response information for any employee that requires same due to a disability.

Documented Individual Accommodation Plans

Compliance Deadline: January 1, 2016

Policy Statement:

By January 1, 2016, Shearer's will have in place a written process for the development of documented individual accommodation plans for employees with disabilities. The process will include the following elements:

- i. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
- ii. The means by which the employee is assessed on an individual basis.
- iii. The manner in which Shearer's can request an evaluation by an outside medical or other expert, at its own expense, to assist in determining if accommodation can be achieved and, if so, how accommodation can be achieved.
- iv. The manner in which the employee can request the participation of a representative from the workplace in the development of the accommodation plan.
- v. The steps Shearer's will take to protect the privacy of the employee's personal information.
- vi. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
- vii. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
- viii. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

Where requested, an employee's individual accommodation plan will include any information regarding the provision of Accessible Formats and Communications Supports.

Where required, an employee's individual accommodation plan will include individualized workplace emergency response information.

Accessibility Plan:

Shearer's is in the process of creating a written policy on the development of Individual Accommodation Plans and will have completed this policy by the Compliance Deadline.

VI. Return to Work Process

Compliance Deadline: January 1, 2016

Policy Statement:

By January 1, 2016, Shearer's will have a documented a return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

The return to work process will outline the steps Shearer's will take to facilitate the employee's return to work and will consider any documented individual accommodation plan that may exist.

Accessibility Plan:

Shearer's currently has a written process for returning employees to work who are absent due to a workplace illness or injury. This existing process will be amended where necessary and will be used to facilitate the return to work of any employee who is absent due to a disability.

VII. Performance Management

Compliance Deadline: January 1, 2016

Policy Statement:

By January 1, 2016, Shearer's will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when applying its performance management process.

Accessibility Plan:

Managers are responsible for evaluating employee performance. Managers will receive training with respect to their obligation under the *Human Rights Code* not to discriminate against an employee on the basis of disability.

VIII. Career Development and Advancement

Compliance Deadline: January 1, 2016

Policy Statement:

By January 1, 2016, Shearer's will take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing opportunities for career development and advancement to its employees with disabilities.

Accessibility Plan:

Managers are responsible for evaluating employee performance and when opportunities arise, identifying candidates deserving of consideration for career advancement.

Managers will receive training with respect to their obligation under the *Human Rights Code* not to discriminate against an employee on the basis of disability.

IX. Redeployment

Compliance Deadline: January 1, 2016

Policy Statement:

By January 1, 2016, Shearer's will take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.

Accessibility Plan:

Staff responsible for Redeployment will receive training with respect to their obligation under the *Human Rights Code* not to discriminate against an employee on the basis of disability.

13. DESIGN OF PUBLIC SPACES STANDARDS

Compliance Deadline: January 1, 2017

Policy Statement:

Shearer's will comply with the accessibility requirements of the Design of Public Spaces Standards when redeveloping or constructing new public spaces on or after January 1, 2017. For further information on existing or planned projects to redevelop or construct new public spaces see Shearer's Accessibility Plan.

Accessibility Plan:

Shearer's does not have current plans to construct or redevelop any public spaces covered by the IAS. However, Shearer's will ensure that any future plan(s) to do so will incorporate the requirements of the IAS.

14. QUESTIONS ABOUT THE POLICY OR ACCESSIBILITY PLAN

For more information about the Policy or Shearer's Accessibility Plan please contact:

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