



**AODA-Accessibility Policy and Multi-Year Integrated
Accessibility Standard Policy**

P-HR-023

Business Group

Mark “x” next to the box that represents which Give and Go Foods Business Group(s) this document applies to.

Give and Go Foods Business Group	Applies?
All Business Areas	X
Business Technology	
Engineering	
Finance	
Human Resources	
Maintenance	
Marketing	
Operations	
Quality Assurance	
Sales	
Supply Chain (Customer Service, Logistics, Planning)	
Other (Please specify here)	

Policy Approval	Date
Policy owner: Human Resources	June 1, 2021
Originated by: Riley Holloway	June 1, 2021
Reviewed by: Laura Fineberg	June 28, 2021
Approved by: Laura Fineberg	June 28, 2021
Next review date:	June 28, 2025



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Accessibility Standard Policy**

P-HR-023

SECTION	TABLE OF CONTENTS	PAGE
1.	Purpose	3
2.	Scope	3
3.	Responsibility	3
4.	Definitions	3
5.	Policy	4
6.	References	9
7.	Forms of Reference	9
8.	Change History	9



AODA-Accessibility Policy and Multi-Year Integrated Accessibility Standard Policy

P-HR-023

1. Purpose

- 1.1. To develop a standard accessibility policy and multi-year accessibility plan that outlines the current, ongoing and planned actions of Give & Go as it strives to ensure equality of opportunity for people with disabilities.

2. Scope

- 2.1. This policy applies to all permanent employees of Give and Go Prepared Foods Corp. (Give & Go), in addition to employees on contract and agency workers.

3. Responsibility

- 3.1. It is the responsibility of the Senior Management Team (MT) to govern the policy; to support and promote the policy in their area of direct report and throughout the organization; to drive the culture to a high level of understanding regarding disability and accommodation; to comply with legislation requirements, including fiscal responsibility, human costs, and human rights issues; to ensure resources are budgeted for identifying and preventing accessibility barriers (including attitudinal, systemic, information, communications and technology, and built environment and public space barriers) and for planning for barrier removal; to provide AODA compliance assurance when required.
- 3.2. It is the responsibility of Managers and Supervisors to foster open and constructive communication, demonstrating sensitivity to and respect confidentiality of information; to raise awareness and increase understanding of the policy among employees; to participate and co-operate in workplace accommodation; to monitor current practices and ensure that management and staff are held accountable for their responsibilities under the policy; to attend training and ensure staff receive training appropriate to the duties of their role, including any skills and competencies required to identify, prevent, and remove accessibility barriers.
- 3.3. It is the responsibility of HR to participate and cooperate with all parties; to act as a resource for all parties and participants; to support and educate managers in their obligations.
- 3.4. It is the responsibility of Employees to participate and cooperate with all parties to facilitate workplace accommodation; to be familiar with their rights and responsibilities under this policy; to provide a welcoming environment for people with disabilities, including any person with a disability using assistive devices or accompanied by a support person or service animal; to communicate with persons with disabilities in a manner that takes into account their disability; to serve customers who have accommodation needs with every effort to meet their needs according to the Ontario Human Rights Code and this policy; to request support from supervisors, managers, directors, or human resources when necessary; to attend mandatory training and any additional training appropriate to the duties of their role, which may include acquiring skills and competencies necessary to identify, prevent, and remove accessibility barriers.

4. Definitions

HR – Human Resources

Give & Go – Give and Go Prepared Foods

Corp. MT – Senior Management Team

Accessibility - A concept integral to human rights that refers to the absence of barriers that prevent individuals and/or groups from fully participating in all social, economic, political and cultural aspects of society. The term is often linked to people with disabilities and their rights to access, and also refers to design characteristics of products, devices, information, services, facilities or public spaces that enable independent use, or support when required, and access by people with a variety of disabilities.

Accessible - Refers to products, devices, information, services, facilities or public spaces that provide for independent, equitable and dignified access for people with disabilities, including but not limited to those with visual, auditory, sensory, cognitive and mobility related



AODA-Accessibility Policy and Multi-Year Integrated Accessibility Standard Policy

P-HR-023

disabilities. The concept of accessible design ensures both “direct access” (i.e. unassisted) and “indirect access,” referring to compatibility with a person’s assistive technology.

Accommodation - In the context of Human Rights, accommodation means preventing and removing barriers caused by attitudinal, systemic, physical, information or communications, and technology barriers that unfairly exclude individuals or groups protected by Ontario’s Human Rights Code from having equal access to full benefits available to others. Principles of accommodation include dignity, individualization and inclusion or integration.

AODA – Accessibility for Ontarians with Disabilities Act (Legislation for Persons with Disabilities)

Assistive Device – A technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that members and guests bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering, and/or reading.

Barrier – A defined by the Ontarians with Disabilities Act, 2001, anything that prevents a person with a disability from fully participating in all aspects of society because of their disability. This includes:

- A physical barrier
- An architectural barrier
- An informational or communications barrier
- An attitudinal barrier
- A policy, practice, and procedure barrier

Career Development and Advancement - Defined by the AODA as the provision of additional responsibility within an employee’s current position or movement from one job to another within the organization that may be higher in pay, provide greater responsibility, or be at a higher level in the organization.

Communication Supports – Includes, but are not limited to, sign language, plain language, and other communication support that facilitate effective communications

Disability – Any degree of physical disability or disfigurement caused by bodily injury, birth defect or illness that includes, but is not limited to, diabetes, epilepsy, a brain injury, paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, hearing impairment, speech impediment, or physical reliance on a guide dog/other animal or on a wheelchair or other device.

5. Policy

5.1. General Policy Statement

- 5.1.1. Give & Go is committed to treating all people in a way that allows them to maintain their dignity and independence. Give & Go believes in integration and equal opportunity and is committed to meeting the needs of people with disabilities in a timely manner. This will be accomplished by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act (AODA).
- 5.1.2. In order to meet this commitment, Give & Go will comply with those provisions of the AODA that are in effect. Equally important, Give & Go has created a multi-year accessibility plan for the purposes of continuing to meet its commitments under the AODA.
- 5.1.3. This policy and plan will be reviewed once every five years. A review will be conducted more frequently in the event of legislative changes or changes to the work or the workplace that necessitates an earlier review.
- 5.1.4. Individuals can request a copy of this policy and plan at any time in a format or with communication supports that meet the needs of the individual.



AODA-Accessibility Policy and Multi-Year Integrated Accessibility Standard Policy

P-HR-023

5.2. Accessibility Policy

- 5.2.1. AODA requires Give & Go to maintain one or more policies governing how the organization will achieve the requirements of the Integrated Accessibility Standards Regulation (IASR). The Company must also make such documents available to the public, and in accessible formats upon request. The policy is adopted in compliance with this obligation.

5.3. Multi-Year Accessibility Plan

- 5.3.1. The AODA requires the Company to establish, implement, maintain, and make public a Multi-Year Accessibility Plan outlining the corporate strategy to identify, remove, and prevent barriers and to meet the legislated requirements of the IASR. The plan must be posted on the Company's website and made available in an accessible format, or with appropriate communications supports as soon as possible upon request.

5.4. Employment Standard Requirements

5.4.1. Recruitment, Assessment and Selection Process

- 5.4.1.1. Give & Go will foster an inclusive workforce and provide equitable treatment and accommodation to ensure barrier-free employment. Give & Go will post information about the availability of accommodations for internal and external job applicants with disabilities in its recruitment process. Job applicants who are individually selected for an interview and/or testing must be notified that accommodations are available on request. Give & Go must consult an accommodation that is in accordance with the Ontario Human Rights Code and the Company's policy and will provide or arrange for the provision of a suitable accommodation in a timely manner that takes into account the applicant's accessibility needs due to disability. Successful applicants must be notified about Give & Go's policies for accommodating employees with disabilities as part of their offer of employment.

5.4.2. Employee Supports

- 5.4.2.1. Give & Go will ensure employees are aware of the policies used to support employees with disabilities and accommodations available in accordance with the Ontario Human Rights Code and this policy. The Company will provide this information to new employees through employment agreements and orientation materials and will provide updated information to all employees 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 disability.

5.4.3. Performance Management, Career Development, and Redeployment

- 5.4.3.1. Give & Go will ensure employees with disabilities or individual accommodation plans are provided equitable access to career development, performance management, and redeployment opportunities.

5.5. Training

- 5.5.1. Give & Go will provide training to employees, volunteers, persons participating in the development and approval of policies, and others who provide goods, services or facilities on behalf of Give & Go on:
- the Integrated Accessibility Standards of the AODA; and
 - the *Human Rights Code* as it relates to people with disabilities.
- 5.5.2. Training will be appropriate to the duties performed by the individual. Training will be provided as soon as practicable after an individual begins working, volunteering or otherwise providing services necessitating training.
- 5.5.3. Give & Go will take the following steps to ensure employees are provided with the training needed to meet Ontario's accessibility laws by **January 1, 2023** and thereafter:
- 5.5.3.1. By January 1, 2022, Give & Go will assign its Human Resources Department to begin the process of developing appropriate training programs on the Integrated Accessibility Standards of the AODA. Such individual(s) will review and update existing training programs to ensure they integrate the *Human Rights Code* as it relates to people with disabilities.



AODA-Accessibility Policy and Multi-Year Integrated Accessibility Standard Policy

P-HR-023

- 5.5.3.2. Give & Go will begin providing the above-noted training by no later than December 31, 2022, in order to ensure that any individual requiring it will have received the necessary training before January 1, 2023.
- 5.5.3.3. Give & Go will keep and maintain a record of the training provided, including the dates that the training was provided and the number of individuals to whom it was provided.
- 5.5.3.4. Give & Go will ensure that training is provided on any changes to relevant policies on an ongoing basis.

5.6. Workplace Emergency Response Information

- 5.6.1. Give & Go is committed to providing its customers and clients with publicly available emergency information in an accessible format and/or with appropriate communication supports, upon request.
- 5.6.2. Give & Go will also provide individualized emergency response information to employees who, for reasons related to their disability, require such information.

5.7. Documented Individual Accommodation Plans

- 5.7.1. A written process for the development and maintenance of documented individual accommodation plans shall be developed for employees with disabilities. If requested, these plans shall include information regarding accessible formats and communication supports. If requested, the plans shall include individualized workplace emergency response information.

5.8. Communication

- 5.8.1. Give & Go is committed to meeting the communication needs of people with disabilities. Give & Go will consult with people with disabilities to determine their information and communication needs as requested or required.
- 5.8.2. Give & Go is aware that effective **January 1, 2023** it has obligations to ensure that new and existing websites meet the accessibility standards required by the AODA. For the purpose of this policy, a “new website” is defined as:
 - a website with new domain name; and
 - a website with an existing domain name that undergoes a significant refresh (e.g. more than 50% of its content is updated, whether by content or technological support).
- 5.8.3. Give & Go has instructed its BT department as to the requirement to make all new websites and content on those new websites conform with WCAG 2.0, Level A, and will continue to work closely with the BT department to ensure that any new websites and new content on those websites meet this standard.
- 5.8.4. Give & Go will work closely with its BT department to ensure that existing websites and web content will conform with WCAG 2.0, Level AA by **January 1, 2023** and will develop timelines to assist in the conversion of existing websites and web content.
- 5.8.5. Give & Go will take the following steps to ensure existing feedback processes are accessible to people with disabilities upon request by **January 1, 2023** and thereafter:
 - 5.8.5.1. Give & Go will review its existing processes for receiving feedback, to ensure that disabled individuals can provide feedback in a manner that meets their particular needs.
 - 5.8.5.2. Upon request and in a timely manner, Give & Go will provide an accessible format and/or communication support to enable an individual with a disability to provide feedback.
 - 5.8.5.3. Upon request and in a timely manner, Give & Go will arrange for its responses to feedback to be provided in an accessible format and/or with necessary communication supports.
 - 5.8.5.4. Give & Go will notify the public about the availability of accessible formats and communication supports.
- 5.8.6. Give & Go will take the following steps to make sure all publicly available information is made accessible to persons with disabilities upon request by **January 1, 2023** and thereafter:
 - 5.8.6.1. Give & Go will review its existing processes for providing the public with information, to ensure that disabled individuals can also receive such information in a manner that meets their particular needs.



AODA-Accessibility Policy and Multi-Year Integrated Accessibility Standard Policy

P-HR-023

- 5.8.6.2. Upon request and in a timely manner, Give & Go will provide an accessible format and/or communication support to enable an individual with a disability to receive publicly available information.
- 5.8.6.3. Requested information will be provided in a timely manner that takes into account the person's accessibility needs due to disability, and at a cost no more than the regular cost charged to other persons.
- 5.8.6.4. Give & Go will consult with the person making the request to determine the suitability of the accessible format or communication support that is requested.
- 5.8.6.5. Give & Go will notify the public about the availability of accessible formats and communication supports.

5.9. Employment

- 5.9.1. Give & Go is committed to fair and accessible employment practices and commits to introduce all of the practices set out below by **January 1, 2023**.
- 5.9.2. Give & Go commits to undertake reviews of existing policies, to create new policies if required, and to revise document templates as required (e.g. for job postings, offer letters, etc.) **during the 2021 year** to ensure that the practices set out below will be in place by **January 1, 2023**.
- 5.9.3. Further to its objective of creating an inclusive workplace, Give & Go will take the following steps in respect of its recruitment processes:
 - 5.9.3.1. Give & Go will ensure that its website and any job postings will specify that accommodation is available for applicants with disabilities during the recruitment and interview/assessment processes.
 - 5.9.3.2. Give & Go will train its staff involved in recruitment and hiring to advise applicants verbally, at the time that they are offered interviews or other assessment processes, that accommodation is available for applicants with disabilities during the interview/assessment processes.
 - 5.9.3.3. If an applicant requests accommodation, Give & Go will consult with the applicant to determine the appropriate means of accommodation.
 - 5.9.3.4. Give & Go will inform candidates of this policy and accommodation of disability during the employment offer stage.
- 5.9.4. Give & Go will ensure that any employee with a disability, who makes a request to HR, will receive information (whether or not in writing, verbally communicated or in electronic form) in a format that is accessible or that provides communication supports to the employee. Information for the purpose of this policy includes (a) information that is required for an employee to do the job for which they were hired and (b) any other information that is generally available to employees in the workplace.
- 5.9.5. Give & Go will develop and put in place a process for developing individual accommodation plans and return-to-work plans for employees that have been absent from the workplace due to a disability. In accordance with this objective, Give & Go will undertake the following:
 - 5.9.5.1. By **January 1, 2022**, Give & Go will review its existing policies to ensure that they provide for the creation and use of individualized accommodation plans in both the accommodation and return-to-work processes.
 - 5.9.5.2. By **January 1, 2022**, and on an ongoing basis:
 - 5.9.5.2.1. Give & Go will ensure that an employee requesting accommodation can participate in the development of the individualized accommodation plan. Employees will be able to participate in the development of the individualized accommodation plan by (a) advising Give & Go of the limitations brought about by the nature of the disability; (b) suggesting methods of accommodating those limitations; (c) providing medical support for any accommodations requested. Employees will be able to participate in the development of the individual accommodation plan by meeting with human resources in person at a mutually convenient time or by providing written comments to human resources. Please note that human resources may require an employee to provide medical support for accommodations requested and/or a meeting in person in order to canvass options for accommodation.



**AODA-Accessibility Policy and Multi-Year Integrated
Accessibility Standard Policy**

P-HR-023

- 5.9.5.2.2. Give & Go will support the ongoing assessment of employees for the purpose of developing individualized accommodations based on any medical information provided by the employee and any medical information requested based upon objective observations and criteria that may necessitate an initial or ongoing physical or mental assessment.
- 5.9.5.2.3. Give & Go may request an independent medical examination to assist in the accommodation process. Any request for an independent medical examination will be made in writing and the cost of the examination will be incurred by Give & Go or its insurer, as the case may be.
- 5.9.5.2.4. An employee's privacy, as it relates to any personal information disclosed as a result of the need for an individualized accommodation plan, will be safeguarded. HR will keep any information disclosed in the offices of human resources and will not share that information (except as required to implement the individual accommodation plan, including with medical consultants retained by Give & Go) with any third party without the consent of the employee.
- 5.9.5.2.5. Individualized accommodation plans will be reviewed once every two years or upon the provision of new, objective medical information that necessitates an earlier review. HR will undertake the review and will consult with the employee if it is determined that amendments to the plan are required. An employee can request a review of the individualized accommodation plan at any time, understanding that such requests must be objectively necessary and based upon a change in the employee's accommodation needs, the workplace duties being assigned and/or the physical layout of the workplace.
- 5.9.5.2.6. In the event that a request for an individualized accommodation plan is denied (in whole or in part, including requests to amend the plan), Give & Go will (a) notify the employee in writing and, with reference to the employee's disability, provide the employee with alternate notification in a manner that takes into account the employee's disability.
- 5.9.5.2.7. Individualized accommodation plans will be provided to an employee in writing and, with reference to the employee's disability, in an alternate format that takes into account the employee's disability.
- 5.9.5.2.8. Individualized accommodation plans can include any information regarding accessible formats and communication supports that are required and that have been provided, upon the request of the employee; can include individualised workplace emergency response information, if that information exists; and may identify other accommodations that have been provided to an employee.
- 5.9.6. Give & Go will take the following steps to ensure the accessibility needs of employees with disabilities needs are taken into account if Give & Go uses performance management, career development and redeployment processes:
 - 5.9.6.1. By **January 1, 2023**, Give & Go will review and, if necessary, modify existing policies, procedures and practices relating to performance management, career development and redeployment.
 - 5.9.6.2. Give & Go will take the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account in assessments of performance.
 - 5.9.6.3. Give & Go will take into account the accessibility needs of employees with disabilities when providing career development and advancement to its employees with disabilities, including notification of the ability to provide accommodations on internal job postings.
 - 5.9.6.4. Give & Go will take into account the accessibility needs of employees with disabilities when redeploying employees, as that term is understood in the *AODA*.
- 5.9.7. Give & Go is committed to returning employees who have been absent from the workplace to work, with or without accommodation, at the earliest opportunity. To do so, Give & Go has developed the following return to work process:
 - 5.9.7.1. An employee who makes a request to return to the workplace after a period of disability, may be returned to work (with or without accommodations) at the earliest opportunity;



AODA-Accessibility Policy and Multi-Year Integrated Accessibility Standard Policy

P-HR-023

- 5.9.7.2. Give & Go reserves the right to require an employee to provide objective medical information confirming his or her ability to return to work;
- 5.9.7.3. Give & Go will implement its individualized accommodation plan policy for any employee who requires accommodations upon his or her return to work; and
- 5.9.7.4. Give & Go will allow the employee to provide input into his or her return to work plan, subject at all times to the right of Give & Go to request objective medical information in support of a particular request.

6. References

- 6.1. Accessibility for Ontarians with Disabilities Act, 2005
- 6.2. Integrated Accessibility Standards Regulations Policies (IASR)
- 6.3. Ontario Human Rights Code

7. Forms of Reference

The following are referenced in this document:

Name	File Name
Code of Ethics and Business Conduct Policy	P-HR-004_ Code of Ethics and Business Conduct Policy
AODA – Customer Service Plan & Policy	P-HR-022_AODA Customer Service Plan & Policy
AODA Customer Feedback Form	F-HR-022_AODA Customer Feedback Form
Workplace Accommodation Policy	P-HR-024_Workplace Accommodation Policy

8. Change History

Update the following table each and every time this document is changed. Please be specific!

Date	Name	Change Description
June 1, 2021	Riley Holloway	Policy Creation