

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:

- a. 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;
- b. Incorporation of accessibility criteria and features when procuring or acquiring goods, services, or facilities;
- c. Training;
- d. Other specific requirements under the Information and Communication, Employment, Public Spaces and Customer Service Standards.

3. GENERAL REQUIREMENTS

3.1 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.

3.2 Training

Gambles will ensure that training is provided to all full-time and part-time 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.

Gambles will prepare training derived from the 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.

3.3 Emergency Information

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.

3.4 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).

- a. Email
- b. Company Website
- c. 416-259-6391

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.

3.5 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.

3.6 Website Accessibility

All companies will ensure the websites and its web content conform to the World Wide Consortium Web Content Accessibility Guidelines.

4. EMPLOYMENT STANDARD

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.

Gambles 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.

4.1 Recruitment, Assessment and Selection Process

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

- a. During the recruitment process when job applicants are individually selected to participate in an assessment or selection process, and;
- b. If a selected applicant requests an accommodation, the Human Resources/People Development 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.

4.2 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.

4.3 Informing Employees of Supports

Gambles 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:

- a. Provide the information required to new employees as soon as practicable after they begin their employment and;
- b. 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.

4.4 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:

- a. Information that is needed in order to perform the employee's job;
- b. Information that is generally available to employees in the workplace and;
- c. Consult with the employee making the request in determining the suitability of an accessible format or communication support.

4.5 Workplace Emergency Response Information

- a. Gambles shall provide 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 Gambles to provide assistance to the employee;
- b. 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;
- c. 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.

4.6 Documented Individual Accommodations Plans

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

Process to include:

- a. The manner in which the employee requesting the accommodation can participate in the development of the plan;
- b. The means by which the employee is assessed on an individual basis;

- c. Identification of the accommodation to be provided;
- d. Timelines for the provision of accommodations;
- e. 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;
- f. The frequency which the individual accommodation plan should be reviewed or updated determined, and how it should be done;
- g. The means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs;
- h. The manner in which the employee can request the participation of a representative from their union representative;
- i. The steps taken to protect the privacy of the employee's personal information; and
- j. If an individual accommodation plan is denied, the manner in which the reasons for denial will be provided to the employee.

4.7 Return to Work Processes

Gambles 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. Gambles will document these processes.

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

4.1.1 Performance Management, Career Development, Redeployment and Advancement

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

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

5. DESIGN OF PUBLIC SPACES STANDARD

Gambles 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. Gambles 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.

Gambles 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. Gambles 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.

6. 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:

- k. An explanation as to why the information and communications are unconvertible;
and
- l. A summary of the unconvertible information or communications.

7. 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.

At The Ontario Food Terminal as well as our Dwight Ave. facility, since they are wholesaler warehouses, service dogs are 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:

59. Every operator of a food premise shall ensure that in respect of the food premise,

(e) every room where food is manufactured, prepared, processed, handled, served, displayed, stored, sold or offered for sale is kept free from,

(ii) subject to section 60, live birds and animals;

60. (1) Sub clause 59 (e) (ii) does not apply to,

(a) a service dog serving as a guide for a blind person or for a person with another medical disability who requires the use of a service dog, if the service dog is in an area of the food premise where food is served, sold or offered for sale;

(2) A dog other than a guide dog for the blind is a service dog for the purposes of clause (1) (a) if,

(a) it is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability; or

(b) the person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog. O. Reg. 74/04, s. 4 (2).

Gambles 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.

1.0 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.

2.0 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 People Development department.