



POLICIES & PROCEDURES

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Subject: Accessibility for Ontarians with Disabilities Act ("AODA")

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Accessibility for Ontarians with Disabilities Act ("AODA")

1. Purpose

The purpose of this policy is to set out the requirements outlined in the Accessibility for Ontarians with Disabilities Act (AODA) which Gate Gourmet Canada Inc. (the "Company") must comply with, for operations within the province of Ontario. These requirements reflect a number of accessibility standards that organizations, including Gate Gourmet Canada Inc., are required to meet.

The company is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the AODA.

The government enacted the AODA in 2005. This act lays the framework for the development of province-wide mandatory standards on accessibility in all areas of daily life.

2. Scope

This policy applies to the Company's Ontario based operations and employees, independent contractors, temporary personnel (employed by the company or by temporary agencies), individuals completing a practicum, co-op or placement as part of an academic program, volunteers; and persons who participate in developing the organization's policies.

2.1 Training

The Company shall ensure that the following persons have been trained on the requirements in the Integrated Accessibility Standards Regulation (IASR) and the *Ontario Human Rights Code*, as it pertains to persons with disabilities, as outlined above;

Training shall be appropriate to the duties of the employees, volunteers and other persons for whom it is intended

The training shall be appropriate to the duties of the employees, volunteers and other persons.

The Company will ensure that contractors and agents who provide goods, services or facilities on behalf of the Company have been trained.

3. Policy

Ontario has accessibility standards in five areas:

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- I. **Customer Service**
- II. **Employment**
- III. **Information and Communications**
- IV. **Transportation**
- V. **Design of Public Spaces**

3.1 Customer Service Standards

The Company is committed to excellence in serving all customers including people with disabilities and we will carry out our functions and responsibilities in the following areas:

- Communication

We will communicate with people with disabilities in ways that take into account their disability. We will train employees who communicate with customers on how to interact and communicate with people with various types of disabilities.

- Telephone services

We are committed to providing fully accessible telephone service to our customers. We will train, where applicable, employees to communicate with customers over the telephone in clear and plain language and to speak clearly and slowly. We will offer to communicate with customers by email, relay services or in person if telephone communication is not suitable to their communication needs or is not available.

- Assistive devices

We are committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our goods and services. We will ensure that our employees are trained and familiar with various assistive devices that may be used by customers with disabilities while accessing our goods or services.

- Invoicing

We are committed to providing accessible invoices to all of our customers. For this reason, invoices will, where applicable, be provided in the following formats upon request: (hard copy, large print, e-mail, etc.). We will answer any questions customers may have about the content of the invoice in person, by telephone or e-mail.

- Use of service animals and support persons

We are committed to welcoming persons with disabilities who are accompanied by a service animal on the parts of our premises that are open to the public and other third parties. We will also ensure that all staff, volunteers and others dealing with the public are properly trained in how to interact with persons with disabilities who are accompanied by a service animal.

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We are committed to welcoming persons 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 the company’s 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.

Notice of temporary disruption

The company will provide notice in the event of a planned or unexpected disruption in the facilities or services usually used by persons with disabilities. This notice will include information about the reason for the disruption, the anticipated duration, and a description of alternative facilities or services, if available. The notice will be placed at all public entrances and service counters on our premises.

If the company determines that information or communications are unconvertible, the Company shall provide the person requesting the information or communications with an explanation as to why the information or communications are unconvertible and a summary of the unconvertible information or communications.

Web Content

The Company shall work toward making its website and web content conform to the Worldwide Web Consortium’s Web Content Accessibility Guidelines, initially at level A and increasing to level AA in accordance with the timeframes set out in section 14 (4) of the IASR.

Feedback

The Company shall ensure that the processes for receiving and responding to feedback are accessible to people with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request.

Accessible formats and communication supports

The Company will notify the public about the availability of accessible formats and communication supports.


The Company will, upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities:

- in a timely manner that takes into account the person’s accessibility needs;
- by consulting with the person making the request to determine the suitability of an accessible format or communication support; and,
- at a cost that is no more than the regular cost charged to other persons.

Exceptions

The IASR does not apply to the following:

- product and product labels;
- unconvertible information or communications; and,
- Information that the company does not control directly or indirectly through a contractual relationship.

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Feedback Process

The ultimate goal of the Company is to meet and surpass customer expectations while serving customers with disabilities. Comments on our services regarding how well the expectations are being met are welcome and appreciated.

Feedback regarding the way the Company provides goods and services to persons with disabilities can be made in person, by email, by letter or telephone. All feedback will be directed to;

feedback@gategourmet.ca. Responses will be delivered within 5 business days after receipt.

3.2 Employment

Recruitment

The Company will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

Recruitment, Assessment or Selection Process

The Company will notify job applicants, when they are individually selected to participate further in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.

If a selected applicant requests an accommodation, the company 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 due to disability.

Notice to Successful Applicants

When making offers of employment, the company will notify the successful applicant of its policies for accommodating employees with disabilities.

Informing Employees of Supports

The Company will continue to inform its employees of its policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee’s accessibility needs due to disability. This information will be provided to new employees as soon as practicable after commencing employment.

3.3 Information & Communications

Accessibility for Ontarians with Disabilities Act (“AODA”)**Accessible Formats and Communication Supports for Employees**

Upon the request of an employee with a disability, the Company will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his/her job, and information that is generally available to other employees.

In determining the suitability of an accessible format or communication support, the Company will consult with the employee making the request.

Workplace Emergency Response Information

Where the Company is aware that an employee has a disability and that there is a need for accommodation, an individualized emergency response plan will be provided to the employee as soon as practicable. The information and plan will vary based on the nature of the employee’s disability and their requirements.

The process for the development of documented individual accommodation plans includes:

- How we include the employee in the development of the plan
- How we consider the employee on an individual basis
- How we would proceed in getting a medical or other expert’s opinion on the accommodation of the employee and at our own expense
- How other representatives or agents may or may not be involved
- How the employee’s personal information will be protected
- How often the plan will be reviewed and how it will be done
- How the plan will be provided in a format that respects the individual’s needs due to a disability

Any employee with a temporary or permanent disability, who requires assistance during an emergency, is requested to inform the Company via Human Resources to develop an Individualized Emergency Response Plan that will accommodate his/her needs in an emergency situation.

It is every employee’s responsibility to provide the Company with information on his/her support requirements in the case of an emergency to better assist employees with disabilities. Once the Company receives notification that an employee requires an individualized emergency response plan we will work with the employee to develop a plan and inform designated emergency support employees to assist in the event of an emergency.

Documented Individual Accommodation Plans

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The Company will maintain a written process for the development of documented individual accommodation plans for employees with disabilities.

If requested, information regarding accessible formats and communications supports provided will also be included in individual accommodation plans.

In addition, the plans will include individualized workplace emergency response information (where required), and will identify any other accommodation that is to be provided.

Return to Work Process

The Company maintains a documented 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 outlines the steps the company will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

This return to work process will not replace or override any other return to work process created by or under any other statute (i.e. the Workplace Safety Insurance Act, 1997).

The Return to Work Process will operate in accordance with the Company’s Employment Process – Modified Employment Policy.

Performance Management, Career Development and Advancement & Redeployment

The Company will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees

3.4 Transportation

NA

3.5 Design Of Public Spaces

The Company will incorporate accessibility requirements stipulated by the regulation when building or redeveloping a public space identified under Accessibility Standard for the Design of Public Spaces.

Gate Gourmet Canada Inc. is committed to breaking down barriers faced by people with disabilities. No changes will be made to this policy before considering the impact on people with disabilities. Any policy of the company that does not respect and promote the dignity and independence of people with disabilities will be modified or removed. Accessibility standards will be reviewed at least every five years. New requirements may be added over time. Whenever new or revised standards are developed under the AODA, this policy will be reviewed and updated as necessary to ensure consistency.