

BartekTM

TO: All Salaried Employees

SUBJECT: AODA Policy

ISSUED

BY: Human Resources

SIGNED:



CREATED: June 11, 2021

REVIEWED

1. Purpose and Scope

The purpose of this document is to define the corporate policies and procedures that Bartek Ingredients Inc. has undertaken to make their services accessible to people with disabilities in accordance with the requirements under the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA). AODA applies to the private sector, public sector, and non-profits. By 2025, the province of Ontario is to become fully accessible to people with disabilities.

This policy applies to all Bartek Ingredients Inc. employees who are employed on either a paid or volunteer basis and it applies to all the facilities owned or operated by Bartek Ingredients Inc. in the province of Ontario.

2. Statement of Commitment

Bartek Ingredients Inc. recognizes the history of discrimination and exclusion against people with disabilities and the company is committed to ensuring all services are accessible by adhering to the accessibility standards as outlined in the AODA legislation and the regulations found in the *Integrated Accessibility Standards O.Reg. 191/11* (IAS).

Bartek Ingredients Inc. is committed to maintaining an inclusive environment where the AODA's principles of dignity, independence, integration, and equal opportunity are upheld. Persons of all abilities are encouraged to assist Bartek Ingredients Inc. in removing barriers to accessibility through consultations and by participating in their feedback process.

3. Communication and Accessible Formats

Bartek Ingredients Inc. strives to communicate with people with disabilities in a format that is accessible to them. Accessible formats and communication supports will be made available to the public and employees upon request. Requests for alternative formats should be directed to Human Resources and all requests will be responded to as quickly as reasonably possible. Some examples of accessible formats include large print, recorded audio, electronic formats and braille. Bartek Ingredients Inc. will consult with the requestor to determine the best format based on their accessibility needs.

4. Temporary Disruption in Services

Disruptions to services or facilities that are accessible to the public will be communicated in multiple formats that are deemed reasonable depending on the nature of the disruption. Some examples of the communications include but are not limited to: posting large print signage in a conspicuous place, posting a notice on the website, or leaving a voicemail on the main telephone line. Human Resources is to be notified of the disruption as soon as possible to coordinate the notices.

The notice of the disruption will be communicated to the public as soon as reasonably possible. This notice will include the following information if it is available: the reason for the disruption, the duration of the disruption, if any alternative facilities are available during the disruption.

5. Assistive Devices

A person with a disability may bring their own assistive device such as a cane or walker to Bartek Ingredients Inc.'s facilities that are open to the public. Bartek Ingredients Inc. will only prohibit the use of an assistive device if it poses a clear safety risk. If this occurs, Bartek Ingredients Inc. will consult with the individual to determine an alternative, if one is available. Bartek Ingredients Inc. does not supply assistive devices.

6. Service Animals

A person with a disability may bring their own service animal to Bartek Ingredients Inc.'s facilities that are open to the public. It is advised that the person ensure that the animal is identified as a service animal either by wearing a vest or with supporting documentation from a health professional if it is not apparent.

As per the *Health Protection and Promotion Act, 1990 O. Reg. 493/17, s. 14 (1) and (2)*, service animals are not permitted in the manufacturing plant or the shipping department. They are permitted in other areas that are open to the public.

7. Support Persons

A person with a disability may bring a support person to any Bartek Ingredients Inc. facilities that are open to the public. Bartek Ingredients Inc. will ensure that the person with the disability will have access to the support person while they are on the premises.

If the support person is required to accompany the individual but poses a safety risk for either the person with the disability or others, Bartek Ingredients Inc. will consult the with the individual to determine an alternative, if one is available.

8. Training for Staff

Bartek will provide AODA and Human Rights Code training that is applicable to the following people:

- all employees and volunteers
- all newly hired employees and volunteers as soon as practicable
- anyone involved in developing the organization's policies.
- anyone who provides goods, services or facilities to customers on Bartek Ingredients Inc.'s behalf

The level of training will vary from employee to employee based on their roles and responsibilities. Training shall also be provided each time there is a change to this policy, especially if it is triggered by a legislative or regulatory change.

Training records containing the name of the trainees, the content covered, and date completed will be recorded by Human Resources.

The AODA training content will consist of:

- i. The AODA Policy
- ii. The purpose of the AODA
- iii. How to communicate with people with different types of disabilities
- iv. How to interact with people with disabilities who use either an: assistive device, support animal or support person
- v. What to do when a person with a disability is having trouble accessing Bartek Ingredients Inc.'s goods, services or facilities

9. Accommodation for Job Applicants

Bartek Ingredients Inc. will notify the public and job applicants that accommodations are available upon request during the recruitment, assessment, and selection process. Bartek Ingredients Inc. will consult with the individual once a request is made and provide suitable accommodations that consider the individual's unique accessibility needs that result from their disability.

Bartek Ingredients Inc. will post a notice of the availability of these accommodations in the job ad and in an email when the offer is made to the successful applicant.

10. Accommodation for Employees

New employees will be made aware of available accommodations during the orientation process. To heighten the awareness of the accommodations that may be made available to employees with disabilities, Bartek Ingredients Inc. will post the policy on the website and on the communication boards in their facilities. Below are some of the accommodations that are offered upon request:

- Bartek Ingredients Inc. will provide accessible formats and communication supports for information that is either generally available to employees and/or information that is required for an employee with a disability to perform their job.
- Bartek Ingredients Inc. will offer and document individualized accommodation plans for employees that have restrictions due to a disability.
- Bartek Ingredients Inc. will take into consideration accessibility needs of employees with disabilities with respect to performance management, career development and advancement, or the reassignment of employees to different departments or roles in the organization.
- Bartek Ingredients Inc. will provide assistance to employees during an emergency if the employee requires it due to a disclosed restriction due to a disability.
- Bartek Ingredients Inc. will offer and document a return-to-work process for employees who have been absent from work due to a short-term or long-term disability.

11. Individualized Accommodation Plan Process

Below is the process that an employee must undergo if they require an accommodation due to a disability:

- i. The employee must self-disclose and notify Human Resources that they require an accommodation due to a short-term or long-term disability. The request will be reviewed as soon as reasonably possible.
- ii. Before a request is submitted, a medical note signed by a health professional indicating the employee's restrictions and the duration of the restrictions will be required.
- iii. Human Resources will document the details of the request and meet with the employee. All documentation related to the accommodation will be placed in the employee's file. The employee may request access to this information at any time.
- iv. The employee's accommodation requirements will be assessed on an individual basis and feedback will be sought from the following parties: the employee, the medical practitioner, and any other person or persons that can assist with the employee's accommodations. The employee is permitted to request a representative assist them with the development of their accommodation plan. This representative may be a bargaining agent or other member of the workplace, if applicable.
- v. Human Resources may request follow-up from the employee's medical professional for additional information or clarification regarding the restrictions or physical abilities. Furthermore, Human Resources may request an independent medical evaluation to determine the employee's restrictions and how accommodations can be implemented. If the latter is requested, it will be done at the expense of Bartek Ingredients Inc.
- vi. The employee's privacy is important and restrictions will only be shared on a need-to-know basis. For example, functional abilities and restrictions will be shared as applicable for job completion.
- vii. Due to the individualized nature of the accommodation plan, it will be reviewed, updated, and documented as frequently as the medical practitioner considers appropriate. The medical practitioner advising the update could be the employee's doctor or a medical practitioner assigned by Bartek Ingredients Inc. if deemed necessary.
- viii. Individualized workplace emergency response accommodations are available as required.

12. Individualized Workplace Emergency Response Information

Bartek Ingredients Inc. will provide and document individualized emergency response information to any employee with a disability who self-discloses that they require an accommodation during a workplace emergency. This information can be provided in an accessible format by request.

If the employee with a disability requires assistance during a workplace emergency, Bartek Ingredients Inc. will designate another employee to assist during the emergency. With the accommodated employee's consent, Bartek Ingredients Inc. will provide the assisting employee with the emergency information necessary to properly assist.

The individualized workplace emergency response information will be reviewed if the accommodated employee moves to a different location in the organization, when the employee's overall accommodation needs or plans are reviewed, or when Bartek Ingredients Inc. reviews their general emergency response policies.

The accommodated employee's privacy is important and their individualized emergency response information will only be shared with their consent and only to the employees that are required to know.

13. Return to Work Process

Below is the process that an employee must undergo if they intend to return to work from a non-work related short-term or long-term disability but still require accommodation:

- i. The employee must request the accommodation by contacting Human Resources as soon as they know the return-to-work date.
- ii. A medical note signed by a health professional indicating the employee's functional abilities or physical restrictions and the duration of the restrictions must be provided to Human Resources as soon as practicable. A diagnosis or the full details of the disability will not be requested. Human Resources cannot approve a return to work in the absence of a medical note.
- iii. Human Resources will request to meet with the employee either in-person, or if that is not possible, virtually, to gather basic information for the accommodation plan. All documentation related to the accommodation will be placed in the employee's file. The employee may request access to this information at any time.
- iv. The remainder of the process is detailed in steps iv to viii found in Section 11.

14. Feedback Process

Bartek Ingredients Inc. strives for exceptional customer service and welcomes feedback from people of all abilities to make their services inclusive and accessible. Submissions can be made in the following ways:

- Through the Social Responsibility contact form on Bartek Ingredients Inc.'s website
- By emailing codeofconduct@bartek.ca
- By calling 905-662-3292 and requesting to speak with Human Resources
- By speaking with a member of the Human Resources team in-person

Once feedback is received, it will be reviewed by Human Resources. If it is necessary, Human Resources will follow-up with the individual who made the submission as soon as practicable. For this reason, a name and contact information is required in order for a follow-up to be possible. After consulting the individual, Human Resources will evaluate the information available and arrive at a conclusion in a reasonable timeframe. The individual submitting the feedback will receive a response from Human Resources in the same format that it was received.

15. AODA Plan

Bartek Ingredients Inc.'s AODA Plan consists of the actions that have been completed and are set to be completed in order to remove accessibility barriers and meet the requirements under the IAR and AODA. The plan is posted on the Bartek website and the internal communication boards. It will be reviewed and updated at least once every five years. Accessible formats of the plan will be made available upon request.