



HIGH LINER FOODS

Corporate Human Resources Policy

Policy 657 – Accessibility

Effective Date: 01/01/2014 Approval Date: 12/16/2013

Summary

High Liner Foods recognizes that the Government of Ontario supports the full inclusion of persons with disabilities as set out in the Human Rights Code and the **Accessibility for Ontarians with Disabilities Act, 2005** (“The Act”). The Act applies to every person or organization in the public and private sectors of the Province of Ontario.

The purpose of the Act is to develop, implement and enforce accessibility standards in order to achieve accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises and to make Ontario accessible by 2025. Accessibility means giving people of all abilities opportunities to participate fully in everyday life.

The Act requires that, effective **January 1, 2014**, under the Integrated Accessibility Standards Regulations, High Liner Foods establish, implement, maintain and document a statement of commitment to accessibility, an accessibility policy and a multi-year accessibility plan that outlines how we will meet our requirements to prevent and remove barriers for persons with disabilities.

AODA Accessibility Standards are a set of requirements for the identification, removal and prevention of barriers to accessibility. The following requirements are applicable to High Liner Foods:

- Customer Service Standard
- Integrated Accessibility Standard
 - Information and Communication
 - Employment
- Built Environment

Statement of Commitment

High Liner Foods is committed to providing an accessible environment where all individuals have equal access to High Liner’s goods and services in a way that respects the dignity and independence of people with disabilities. High Liner is committed to providing equitable treatment with respect to employment and services to employees and customers, providing accommodation where required. We will identify, remove and prevent barriers for persons with disabilities and meet the needs of persons with a disability in a timely manner.

Definition of a Disability

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;
- a condition of mental impairment or a developmental disability;
- a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- a mental disorder; or
- an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997* (“handicap”).

Definition of a Barrier

A barrier is anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, an information and/or communication barrier, an attitudinal barrier, a technological barrier, a policy or a practice.

Assessing the Need for Accommodation

Employees who request an accommodation on the basis of disability will be referred by management or Human Resources to Sun Life. Sun Life will review the accommodation request in accordance with the applicable process and procedures outlined in the High Liner Foods Short Term Disability Policy (# 401) and High Liner Foods Accommodation Policy (#221).

High Liner Foods will work with the employee and Sun Life to find the most appropriate accommodation short of the point of undue hardship. Undue hardship describes the limit beyond which employers are not expected to accommodate. It is usually reached when an employer cannot sustain the economic or efficiency costs of the accommodation or where the proposed accommodation results in safety issues or is otherwise unreasonable to implement.

Sun Life has a right to objective medical documentation from a treatment provider outlining functional limitations and restrictions so that an appropriate accommodation can be arranged. If an employee does not cooperate by providing objective medical documentation in a timely manner, an accommodation may not be put in place until medical information is received confirming a disability and outlining the functional limitations that need to be accommodated. Where the functional limitations are unclear or additional information is required, Sun Life will follow up with the employee for additional information. Sun Life will assess the information provided based on the essential duties and tasks required of the employee and may ask to follow up with the employee’s treating physician or specialist to identify functional limitations. Sun Life may also engage management and Human Resources for assistance to determine, in consultation with the employee, what further information is required for assessment.

Employees may be asked to sign a consent form to permit the sharing of medical information between Sun Life, agents acting on behalf of Sun Life and the employee’s health care providers.

No medical information will be shared with High Liner Foods. Only information related to the ability to perform job duties or with respect to the accommodation will be shared.

Sun Life and High Liner Foods, in consultation with the employee and other experts as necessary, will identify and assess as many accommodation solutions as possible. The aim of employment accommodation is to address disability related barriers that impact an employee's ability to perform the essential duties of their job. Accommodations will be developed to meet individual needs in a way that is least disruptive to the employee and to High Liner Foods' operations. Employees are required to remain flexible and consider reasonable accommodation solutions.

Achieving Accessibility Objectives

This policy applies to all individuals entitled to the protections set out in the AODA and its regulations, including customers and employees of High Liner Foods. High Liner's strategy and actions planned to prevent and remove barriers to accessibility and for achieving our accessibility objectives are outlined in our Accessible Customer Service Policy #655 and our Multi-year Accessibility Plan - Policy #658.

Where required, High Liner will consult with the disabled individual to understand his or her specific accessibility needs and make all reasonable efforts to meet those needs in a timely manner. All documents mentioned above are available in accessible formats, upon request.

Accessible Formats

High Liner will provide or arrange for a provision of accessible formats and communication supports in a timely manner, upon request, for persons with disabilities, taking into account the person's accessibility needs.

Accessibility Report

High Liner Foods will file accessibility reports outlining their progress towards becoming accessible for persons with disabilities, as required, with the Ontario Ministry of Economic Development, Trade and Employment.

High Liner Policy #655 Accessible Customer Service Policy & Procedure

High Liner has a separate policy to support our commitment to the AODA Customer Service Standard – Policy #655 Accessible Customer Service Policy & Procedure, Providing Goods & Services to People with Disabilities. We are committed to ensuring that the requirements set out in the Act and the Customer Service Standard are met and observed.

High Liner Policy #658 Multi-Year Accessibility Plan

High Liner has a separate policy to support our long term commitment to accessibility – Policy #658 Multi-Year Accessibility Plan which describes our strategy to identify, remove and prevent barriers for persons with disabilities. This accessibility plan outlines the policies and actions that High Liner Foods will put in place to improve opportunities for all. Our accessibility plan is posted on our High Liner Foods corporate website and will be provided in an accessible format upon request. High Liner will review and update our accessibility plan at least once every five years.

Administration

If you have any questions or concerns regarding this policy or its related procedures, please contact:

Corporate Human Resources
1-888-846-0306

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