



HIGH LINER FOODS

Corporate Human Resources Policy
Policy 658 – Multi-Year Accessibility Plan
Effective Date: 01/01/2014 Approval Date: 12/16/2013

Summary

The **Accessibility for Ontarians with Disabilities Act, 2005** (“The Act”) requires that, effective **January 1, 2014**, under the Integrated Accessibility Standards Regulations, High Liner Foods establish, implement, maintain and document a multi-year accessibility plan that outlines how we will meet our requirements to prevent and remove barriers for persons with disabilities. The Act applies to every person or organization in the public and private sectors of the Province of Ontario.

High Liner is committed to our multi-year accessibility plan, outlined below that 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.

Customer Service Standard

High Liner Foods has been in compliance with the *AODA* Accessible Customer Service Standard since **January 1, 2012** and will continue to comply with that regulation.

Workplace Emergency Response Information

High Liner Foods is committed to providing individualized workplace emergency response information to our employees who have a disability, if the disability is such that the individualized information is necessary and we are aware of the need for accommodation due to the employee’s disability.

Customer Service Policy

High Liner Foods developed and implemented Policy #655 Accessible Customer Service Policy & Procedures, Providing Goods & Services to People with Disabilities. The policy is posted on our High Liner Foods corporate website and will be provided in an accessible format upon request.

Customer Service Training

High Liner Foods developed and implemented a training program for employees, agents and contractors who deal with Customers on behalf of High Liner and those involved in the development of policies, procedures and practices pertaining to the provisions of goods and services to our customers. Our Customer Service training program includes:

- Review of the purposes of the Act and requirements of the Customer Service Standard;
- Instruction on how to interact and communicate with people with various types of disabilities;

- Instruction on how to interact with people with disabilities who use assistive devices or require the assistance of a guide dog, other service animal or a support person;
- Instruction on how to use equipment or devices available at your premises or that you provide otherwise, that may help people with disabilities access your services, such as TTY telephones, elevators, lifts, accessible interactive kiosks or other technology;
- Instruction on what to do if a person with a disability is having difficulty accessing your services.
- Training will be provided to each person as soon as practical after being assigned the applicable duties.
- Training will be provided on an ongoing basis in connection with changes to the policies, practices and procedures governing the provision of goods and services to persons with disabilities.
- High Liner will keep a log of all the training it provides, documenting who was trained, on what and when.

Integrated Accessibility Standards

The Integrated Accessibility Standard combines standards relating to Information, Communication and Employment.

Information & Communications Standard

High Liner Foods is committed to making company information and communications accessible to persons with disabilities. High Liner will incorporate new accessibility requirements under the information and communication standard to ensure that its information and communications systems are accessible and are provided in accessible formats that meet the needs of persons with disabilities.

Feedback, Accessible Formats & Communication Supports:

High Liner is committed to providing high quality goods and services to all of its customers. We welcome feedback from individuals on how effectively we are accommodating people with disabilities in the provision of our goods and services. Feedback may be provided verbally, in writing, in electronic format, or through other methods, using the contact information outlined in the Administration section. If an individual wishes to be contacted about their feedback, he or she must provide his or her name and contact information.

High Liner will provide information and communicate in an accessible manner about our goods, services or facilities to people with disabilities, upon request. The information will be provided in a timely manner and at a cost that is no more than the regular price charged to others.

Planned Action:

The following measures will be implemented by High Liner Foods to meet the **January 1, 2015** deadline:

- High Liner will make our processes for receiving and responding to feedback available to people with disabilities in accessible formats or with appropriate communication supports, upon request.
- Documentation that describes our accessibility commitments will be maintained on High Liner's website and provided to individuals, upon request, in a format that takes into account their disability and is mutually agreed upon with High Liner and the person requesting the documentation.
- High Liner will address complaints that arise through the feedback process in a timely manner.

Accessible Websites & Web Content:

High Liner will commit to making our internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level A and increasing to Level AA, in accordance with the schedule set out in the Integrated Accessibility Standard.

Web Content Accessibility Guidelines (WCAG) 2.0 is an international standard for making websites and web content accessible to a broader range of users with disabilities.

Planned Action:

The following measures have been implemented by High Liner Foods to meet the **January 1, 2014** and **January 1, 2021** deadlines:

- Our Canadian internet websites and web content have been assessed and evaluated for accessibility to ensure conformance with the WCAG 2.0 Level A requirements to meet the **January 1, 2014** deadline.
- We have plans in place to further assess and evaluate for accessibility to ensure conformance with the WCAG 2.0 Level AA requirements by **January 1, 2021**.

Training

High Liner Foods has been in compliance with the AODA Accessible Customer Service Standard since 2012 and will continue to provide Customer Service training to employees and new hires and will enhance the training program to comply with the Integrated Accessibility Standard by **January 1, 2015**.

Planned Action:

The following measures will be implemented by High Liner Foods to meet the **January 1, 2015** deadline:

High Liner will enhance our existing AODA Customer Service training program to include and ensure that our employees, agents and contractors understand the:

- Integrated Accessibility Standards, and
- Ontario Human Rights Code (as it relates to people with disabilities)

High Liner will provide this training to all employees, volunteers, third-party contractors who provide goods, services and facilities on High Liner's behalf and persons participating in the development and approval of High Liner's policies as soon as practicable. We will keep and maintain a record of the training provided, including the dates that the training was provided and individuals who participated.

Employment Standard

High Liner Foods will achieve compliance with requirements as set out in the Employment section of the legislation which include Recruitment & Selection, Interviews, Notice to Successful Employees, Informing Employees of Support, Accessible Formats and Communication support, Return to Work Process, Accommodation Process, Performance Management, Career Development and Advancement, Redeployment, Retention, Diversity and Inclusion. We will achieve these goals by **January 1, 2016**.

The following measures will be implemented by High Liner Foods to meet the **January 1, 2016** deadline:

Recruitment:

High Liner is committed to fair and accessible employment practices that attract and retain employees with disabilities. This includes providing accessibility across all stages of the employment cycle.

Recruitment, Assessment & Selection:

- Notify internal and external job applicants that accommodation for disabilities will be provided to support their participation in the recruitment process, upon request
- Selected applicants will be notified that accommodations are available upon request
- Successful applicants will be advised of High Liner's policies for accommodating employees with disabilities

Informing Employees of Supports:

- Inform employees of our policies used to support 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 a disability:
- As required to new employees as soon as practicable after they begin their employment
- 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
- Inform new and existing employees of our policies for supporting employees with disabilities, including employment-related accommodation for disabilities
- Consult with our employees with disabilities in order to provide them with the accessible formats and communications supports they require to do their jobs effectively and to be informed of information that is generally available to all employees in that workplace.

Documented Individual Accommodation Plans & Return to Work Process:

- High Liner will develop written individual accommodation plans for employees with disabilities.
- We will have a documented process in place for supporting employees who return to work after being away for reasons related to their disabilities and require disability-related accommodation in order to return to work and will outline the steps that High Liner will take to facilitate the return to work and include an individual accommodation plan.
- The return to work process referenced in this section does not replace or override any other return to work process created by or under any other statute.

Performance Management, Career Development & Redeployment:

High Liner will take into account the accommodation needs and/or individual accommodation plans of employees to provide employee with disabilities with the opportunities to advance within the organization.

- We will use performance management processes that take into account the accessibility needs of employees with disabilities.
- Our career development and advancement opportunities will take into account the accessibility needs of our employees who have disabilities.
- Our redeployment processes will consider the accessibility needs of employees with disabilities before moving them to other positions, so that employees can continue to have their accommodation needs met.

Built Environment

The Accessibility Standards for the Built Environment focus on removing barriers in two areas: public spaces, and buildings. This standard for the design of public spaces applies only to new construction and major changes to existing features.

Planned Action:

High Liner will meet the requirements, if applicable, in accordance with the Built Environment standard schedule. High Liner will seek consultation before making any built environment changes and will meet the specific requirements depending on the nature of the changes.

Accessible Formats

High Liner will provide or arrange for a provision of accessible formats and communication supports, upon request, for persons with disabilities in a timely manner, 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 Foods 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 Foods Policy #657 Accessibility

High Liner has a separate policy to support our long term commitment to accessibility – [Policy #657 Accessibility](#). We are committed to ensuring that the requirements set out in the Accessibility for Ontarians with Disabilities Act are met and observed.

Administration

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

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