

VENTURA FOODS CANADA

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Etobicoke, ON

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www.venturafoods.ca**AODA – Integrated Accessibility Standards Policy****Background**

This Integrated Accessibility Standards Policy (the “Policy”) has been established to meet the requirements of the Integrated Accessibility Standards (Regulation 191/11) (“IASR”) set forth under the Accessibility for Ontarians with Disabilities Act, 2005 (“AODA”).

The IASR establishes standards to address barriers that persons with disabilities face in the areas of information and communications, employment and transportation. The requirements under the IASR are not a replacement or substitution for the requirements of the Ontario Human Rights Code.

Purpose

Ventura Foods Canada (“Ventura”) is committed to providing persons with disabilities the same opportunity to access our resources and services, in a manner consistent with the principles of dignity, independence, integration, and equal opportunity.

Furthermore, Ventura shall use every effort to ensure that we meet the needs of persons with disabilities, in a timely manner, through the implementation of this policy in accordance with the spirit and intent of all applicable legislation including the AODA, the Ontario Human Rights Code, and the Occupational Health and Safety Act.

Application and Scope

Ventura is committed to achieving an inclusive culture by preventing and removing barriers for persons with disabilities. Where it is not possible to remove barriers, Ventura will make efforts to accommodate persons with disabilities in a timely, effective and suitable manner. Ventura is guided by the core principles of the AODA, including dignity, independence, integration and equal opportunity.

This Policy applies to anyone dealing with members of the public or other third parties on behalf of Ventura, whether the person is an employee (full-time or part-time, temporary or

permanent) and all individuals paid by or under contract with Ventura including but not limited to consultants and independent contractors, agents, volunteers or otherwise.

This Policy should be read in conjunction with Ventura multi-year accessibility plan (the “Accessibility Plan”), which outlines the specific measures taken by Ventura to achieve compliance with the requirements under the AODA and its regulations.

Application and Scope

For the purpose of this policy, the following terms are defined as:

Accessible Formats:

Refers to materials that have been converted to accessible formats which include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

Barrier:

Refers to anything that prevents a person with a disability from fully participating in one or more aspects of society, including a physical barrier, an architectural barrier, information or communications barrier, attitudinal barrier, technological barrier, policy or practice.

Communication Supports:

Refers to supports that persons with disabilities may need to access information. These include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Disability:

Disability is defined under the AODA and the Human Rights Code as:

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

Information:

Refers to data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.

Operating Principles

Multi-Year Accessibility Plan

Ventura shall create a multi-year Accessibility Plan outlining a phased-in approach to prevent and remove barriers and address the current and future requirements of the AODA.

Ventura will review and update the Accessibility Plan at least once every five (5) years and will post the Accessibility Plan on its website. Upon request, Ventura will provide a copy of the Accessibility Plan in an accessible format.

Training

Ventura will ensure that training is provided on the requirements of the IASR as set out in this Policy and will continue to provide training on the Ontario Human Rights Code as it pertains to persons with disabilities, to:

- all of its employees and volunteers;
- all persons who participate in developing Ventura's policies regarding the provision of Ventura's services; and
- all other persons who provide goods, services or facilities on behalf of Ventura.

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

New employees will be trained as soon as practicable after assuming responsibilities of the job. Training records will be kept in the employee files.

Training will be updated in respect to any changes to the policies, practices or procedures relating to the AODA.

Customer Service

Ventura strives to provide its goods and services in a way that respects the dignity and independence of people with disabilities. We have always been committed to giving people with disabilities the same opportunity to access our goods and services and allowing them to benefit from the same services, in the same place and similar way as other customers and will continue to do so.

Information and Communication Standards

Ventura shall create, provide and receive information and communication in methods that are accessible to persons with disabilities and shall do so in a manner that takes into account the person's disability. We will work with the person with a disability to determine what methods of communication works for them.

If it is determined that it is not technically feasible to convert the information or communication, or the technology to convert the information or communication is not readily available the person requesting the information shall be provided with:

- an explanation as to why the information or communication is not convertible;
- a written summary of the information or communication.

Emergency Information

Ventura shall prepare emergency procedures, plans or public safety information and make the information available in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

Feedback Process

Ventura shall establish a process for receiving and responding to feedback from individuals about the manner in which it conducts business with persons with disabilities. Information about this process shall be made readily available in an accessible format or with appropriate communication supports.

The feedback process shall permit persons to provide their feedback in person, by telephone, in writing, or by delivering an electronic text by email or on diskette or otherwise.

The feedback process shall specify the actions to be taken by Ventura in the event that a complaint is received. An acknowledgment of receipt of feedback received shall be provided to the person making the complaint within 10 business days.

Accessible formats and communication supports will be provided upon request.

Accessible Formats and Communication Supports

Ventura shall provide or arrange for accessible formats and communication supports for persons with disabilities:

- Upon request, and in a timely manner that takes into account the person's accessibility needs due to a disability;
- At a cost that is no more than the regular cost charged to another person; and
- In consultation with the person making the request determine the suitability of an accessible format or with appropriate communication supports.

Education, Training and Materials

Ventura shall provide access to or prepare for the provision of access to accessible materials where they exist, make information about the availability of accessible materials publicly available, and provide the information in an accessible format or with appropriate communication supports, upon request.

Self-service Kiosk

Ventura will have regard to accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.

Website Accessibility

Ventura shall make their company Internet and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 initially at Level A and increasing to Level AA. By January 1, 2014, any new web content shall conform to WCAG 2.0 Level A. By January 1, 2021 all website and web content shall conform to WCAG 2.0 Level AA. As of October 2023, Ventura is conformant with WCAG 2.1 level AA.

Assisted Devices

People with disabilities may use their personal assistive devices when accessing our goods, services or facilities. In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with a disability can access our goods, services or facilities.

We will ensure that our staff are trained and familiar with various assistive devices that we have on site or that we provide that may be used by customers with disabilities while accessing our goods, services or facilities.

Use of Service Animals and Support Persons

Ventura welcomes people with disabilities and their service animals. Service animals are allowed on parts of our premises that are open to the public.

When we cannot easily identify that an animal is a service animal, our staff may ask a person to provide documentation (template, letter or form) from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.

A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

A regulated health professional is defined as a member of one of the following colleges:

- College of Audiologists and Speech-Language Pathologists of Ontario
- College of Chiropractors of Ontario
- College of Nurses of Ontario
- College of Occupational Therapists of Ontario
- College of Optometrists of Ontario
- College of Physicians and Surgeons of Ontario
- College of Physiotherapists of Ontario
- College of Psychologists of Ontario
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises.

We will notify customers of this by posting a notice in the following location:

- 50 Torlake Cres, Etobicoke, ON – Front Entrance/Reception

In certain cases, Ventura might require a person with a disability to be accompanied by a support person for the health or safety reasons of:

- the person with a disability
- others on the premises

Before making a decision, Ventura will:

- consult with the person with a disability to understand their needs
- consider health or safety reasons based on available evidence
- determine if there is no other reasonable way to protect the health or safety of the person or others on the premises

Notice of Temporary Disruption

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities (i.e. elevator, washroom, ramp) Ventura will notify customers promptly. This clearly posted notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available. A notice will be posted outside of the affected area.

EMPLOYMENT STANDARDS

The Employment Standards builds upon the present requirements under the Human Rights Code in relation to whereby accommodate persons with disabilities through the job application process and the employment relationship. It applies in respect to employees and does not apply to volunteers and other non-paid individuals.

Recruitment and Selection

Ventura shall notify internal and external job applicants about the availability of accommodations upon request for applicants with disabilities. This may take the form of a notice posted to the company website or a statement on a job posting for which “accommodation for applicants with disabilities is available upon request.” In addition, job applicants who have been selected to participate in an assessment or selection process shall be notified that accommodations are available. The related materials or processes required specific to the job applicant’s disability shall be discussed in consultation with the applicant.

Employee Notification

Ventura shall inform employees of policies and procedures including those on the provision of job accommodation that take into account an employee’s accessibility needs. The information can be provided to employees as required. Ventura shall determine the best way to accommodate the employee when necessary.

Accessible Formats and Communication Supports for employees

In addition, and where an employee with a disability requests it, Ventura shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:

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

Individual Accommodation Plan

Ventura will maintain a written process for the development of documented individual accommodation plans for employees with disabilities as required.

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

In addition, the accommodation 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

Ventura 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 accommodation in order to return to work.

The return-to-work process outlines the steps Ventura 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 (such as the Workplace Safety Insurance Act, 1997).

Performance Management, Career Development, Advancement, and Redeployment

Ventura will, as required, 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 opportunities to employees, or when redeploying employees.

Workplace Emergency Response

Where the employee with a disability requires assistance, Ventura shall, in consultation with the employee, provide an assigned support person(s) to assist during emergency situations that require evacuation of the premises. The individualized workplace emergency plan or process shall be shared with the support person(s), only with full agreement by the employee ensuring their privacy at all times. Ventura shall review the individual workplace emergency information when or if the employee moves to a different location or workgroup, or there is a change to their disability, with the reporting supervisor, human resources specialist and the employee.

In addition, a general, emergency evacuation process shall be in place for any facility that may have visitors with disabilities that require further assistance. This process shall be communicated to all employees.

Policy Administrative Controls

Reporting

Ventura will file an accessibility report regarding its compliance with the IASR, annually or at such other times as specified under the AODA. All filed accessibility reports will be made available to the public, upon request.

Questions

If anyone has a question about this Policy, or if the purpose of the Policy is not understood, an explanation will be provided by contacting us:

Ventura Foods Canada
17800 Laguna Canyon Rd Suite 300
Irvine, CA 92603
Contact:

VFaccessibility@rescocompany.com

Phone: 888-500-0086

Hours: 9am – 5pm PT

Compliance

Compliance with this Policy is mandatory, and any violations of this Policy will be treated seriously and may result in disciplinary action, up to and including termination of employment or termination of contractual relationship and/or legal action, as applicable, depending on the severity of the incident.

Related Documents

Available upon request. Contact: VFaccessibility@rescocompany.com

- Multi-Year Accessibility Plan
- Emergency Response Plan

Issue Date – November 2014

Last Review Date – February 2026

Next Review Date – April 2028