Multi-Year Accessibility Plan (Ontario) - SANREMO BAKERY INC.

Introduction and Statement of Commitment

The Ontario government passed the *Accessibility for Ontarians with Disabilities Act* (AODA) in 2005. It is the goal of the government of Ontario to make Ontario accessible by 2025. SANREMO BAKERY INC. is committed to complying with the *Accessibility for Ontarians with Disabilities Act, 2005* and all the standards under it in order to meet the accessibility needs of persons with disabilities in a timely manner.

The regulations associated with the Integrated Accessibility Standards (hereafter referred to as the "IASR") under the AODA require that effective January 1, 2014, SANREMO BAKERY INC. establish, implement, maintain and document a multi-year accessibility plan which outlines the organization's strategy to prevent and remove barriers for persons with disabilities and to meet its requirements under the Act.

Under the AODA, the following accessibility standards set certain requirements that are applicable to SANREMO BAKERY INC.:

- Customer Service.
- Information and Communications; and
- Employment

This multi-year plan outlines SANREMO BAKERY INC. strategy to prevent and remove barriers to address the current and future requirements of the AODA, and in order to fulfill our commitment as outlined in SANREMO BAKERY INC. Accessibility Policies.

Unless otherwise noted, this Multi-Year Accessibility Plan applies to SANREMO BAKERY INC. Ontario location.

In accordance with the requirements set out in the IASR, SANREMO BAKERY INC. will:

- Post this plan
- Provide this plan in an accessible format, upon request; and
- · Review and update this plan at least once every five years

Overview

- Accessibility Standards for Customer Service
- Integrated Accessibility Standards Regulations
 - 1. Emergency Procedure, Plans or Public Safety Information
 - 2. Workplace Emergency Response Information
 - 3. Training
 - 4. Information and Communication Standards
 - a. Feedback, Accessible Formats and Communication Supports
 - b. Accessible Websites and Web Content
 - 5. Employment Standards
 - a. Recruitment
 - b. Informing Employees of Supports
 - c. Documented Individual Accommodation Plans/Return to Work Process
 - d. Performance Management, Career Development and Redeployment



Accessibility Standards for Customer Service

Commitment:

The Accessibility Standards for the Customer Service Regulation were created to establish accessibility standards for customer service in Ontario. In keeping with this regulation, the organization is committed to providing respectful services that focus on the unique needs of the individual.

To achieve this, the organization makes reasonable efforts to ensure that its policies, procedures and practices pertaining to the provision of goods and services to the public and other third parties adhere to the following guiding principles as set out in Accessibility Standards for Customer Service: Ontario Regulation 429/07.

- Our goods and services must be provided in a manner that respects the dignity and independence of persons with disabilities.
- The provision of our goods or services to persons with disabilities and others must be
 integrated unless an alternate measure is necessary, whether temporarily or on a
 permanent basis, to enable a person with a disability to obtain, use or benefit from the
 goods or services.
- Persons with disabilities must be given an opportunity equal to that given to others to obtain, use and benefit from the goods or services.

SANREMO BAKERY INC. has been in compliance with the Accessible Customer Service Regulation under the AODA since January 1, 2012. Our location was built in _____ and has been assessed through with the accessibility requirements based on the act. We will accommodate as required by reviewing requirements and deemed not to cause financial hardship to our company.

Action Taken:

The following measures have been implemented by SANREMO BAKERY INC.:

- Ensuring all persons who, on behalf of SANREMO BAKERY INC., deal with the public
 or other third parties, and all those who are involved in the development and
 approvals of customer service policies, practices and procedures, as well as all others
 providing services to our customers, are trained to communicate and provide the best
 possible customer service to all customers, including persons with disabilities;
- Ensuring staff are trained and familiar with various assistive devices that may be used by customers with disabilities who are accessing the SANREMO BAKERY INC..' goods or services;
- Ensuring completion of accessibility training is tracked and recorded;
- Ensuring customers accompanied by a guide dog or other service animal in areas of SANREMO BAKERY INC. open to the public and other third parties, are accommodated;
- Ensuring that if a person with a disability is accompanied by a support person, the support person is accommodated.
- Issuing a public notice in a timely manner in the event of a planned or unexpected disruption of service or inaccessibility of facilities used by persons with disabilities.
 The notice must include the reason of the disruption, the anticipated duration, and a description of alternative facilities or service, if any, that may be available.
- Continuing to welcome and appreciate feedback from persons with disabilities through multiple communication methods;



 Reporting compliance with the customer service standard on the Accessibility Compliance Reporting tool at Service Ontario's One-Source for Business website.

Required compliance date: January 1, 2012 Status: Completed

Planned Action:

☐ Report continued compliance with the customer service standard on the Accessibility Compliance Reporting tool at Service Ontario's One-Source for Business website.

Required compliance date: In 2014 Status: Future-dated

Integrated Accessibility Standards Regulation

1. Emergency Procedure, Plans or Public Safety Information

Commitment:

SANREMO BAKERY INC. is committed to complying with the provisions of the AODA in respect of this requirement, with the objective of making our company premises safer for persons with disabilities during emergency circumstances.

Action Taken:

The following measures were implemented by SANREMO BAKERY INC. effective January 1, 2012:

□ Emergency procedures, plans and public safety information that are prepared by SANREMO BAKERY INC. and made available to the public, will be made available in an accessible format or with appropriate communication supports, as soon as practicable, upon request;

Required compliance date: January 1, 2012 Status: Completed

2. Workplace Emergency Response Information

Commitment:

Where SANREMO BAKERY INC. is aware that an employee has a disability and that there is a need for accommodation, individualized workplace emergency response information will be provided to the employee as soon as practicable if such information is necessary given the nature of the employee's disability.

Action Taken:

The following measures were implemented by SANREMO BAKERY INC. effective January 1, 2012:

- Where the organization becomes aware of the need to accommodate an employee's
 disability, and if the employee's disability is such that the individualized emergency
 response information is necessary, SANREMO BAKERY INC. will provide
 individualized workplace emergency response information to the employee with the
 disability as soon as practicable after it becomes aware of the need.
- If an employee who receives individualized workplace emergency response information requires assistance, with te employee's consent, SANREMO BAKERY INC. will provide the workplace emergency response information to the person designated by the organization to provide assistance to the employee.



- SANREMO BAKERY INC. will review the individualized workplace emergency response information when:
- the employee moves to a different location in the organization;
- the employee's overall accommodations need, or plans are reviewed; and/or □ SANREMO BAKERY INC. reviews its general emergency response policies.

Required compliance date: January 1, 2012 Status: Completed

3. Training

Commitment:

SANREMO BAKERY INC. is committed to implementing a process to ensure that all employees, volunteers, and all other persons who provide goods, services and facilities on SANREMO BAKERY INC. behalf, and persons participating in the development and approval of SANREMO BAKERY INC. policies, are provided with appropriate training on the requirements of the IASR and on the Ontario Human Rights Code as it pertains to persons with disabilities, and are provided with such training as soon as practicable.

Planned Action:

In accordance with the IASR, SANREMO BAKERY INC. will:

- Determine and ensure that appropriate training on the requirements of the IASR and on the Ontario Human Rights Code as it pertains to persons with disabilities, is provided to all employees, volunteers, third-party contractors who provide goods, services and facilities on SANREMO BAKERY INC. behalf, and persons participating in the development and approval of the SANREMO BAKERY INC. policies;
- Ensure that the training is provided to persons referenced above as soon as practicable;
- Keep and maintain a record of the training provided, including the dates that the training was provided and the number of individuals to whom it was provided;
- Ensure that training is provided on any changes to the prescribed policies on an ongoing basis.

Required compliance date: January 1, 2015 Status: In process

4. Information and Communication Standards

Commitment:

SANREMO BAKERY INC. is committed to complying with the provisions of the AODA in respect of this requirement, with the objective of making applicable company information and communications accessible to persons with disabilities.

(i) Feedback, Accessible Formats and Communication Supports

Planned Action:

4

In accordance with the IASR, SANREMO BAKERY INC. will:

Ensure that feedback processes are accessible to persons with disabilities by
providing or arranging for the provision of accessible formats and communications
supports, upon request. The organization will notify the public about the availability of
accessible formats and communication supports.



- Except as otherwise provided for under the IASR, provide or arrange for the provision of accessible formats and communication supports upon request for persons with disabilities in a timely manner that takes into account the person's accessibility needs.
- Consult with the person making the request in determining the suitability of an accessible format or communication support.
- Notify the public about the availability of accessible formats and communication supports.

Required compliance date:

January 1, 2015 – Feedback-related provisions January 1, 2016 – Accessible formats & Communication Supports-related

Status: In process

(ii) Accessible Websites and Web Content

Planned Action:

In accordance with the IASR, SANREMO BAKERY INC. will ensure that SANREMO BAKERY INC. public websites and online content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, Level A (new websites and online content) by January 1, 2014, to Level AA for all content by January 1, 2021.

Required compliance date: January 1, 2014 – WCAG 2.0 Level A – new Internet websites and web content, January 1, 2021 – WCG 2.0 Level AA – all Internet websites and web content, except for exclusions set out in the IASR.

Status: In process

5. Employment Standards

(i) Recruitment

Commitment:

SANREMO BAKERY INC. is committed to complying with the provisions of the AODA in respect of this requirement, with the objective of making the recruitment process accessible to persons with disabilities.

Planned Action:

In accordance with the IASR, SANREMO BAKERY INC. will do the following:

Recruitment General

SANREMO BAKERY INC. will notify employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process. This will include:

- A review and, as necessary, modification of existing recruitment policies, procedures, processes and templates.
- Specifying that accommodation is available for applicants with disabilities, on SANREMO BAKERY INC. website and on job postings.

Recruitment, Assessment and Selection

SANREMO BAKERY INC. will notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon



request in relation to the materials or processes to be used in the assessment/selection process. This will include:

- A review and, as necessary, modification of existing recruitment policies, procedures, processes and templates;
- Inclusion of availability of accommodation notice as part of the script in the scheduling of an interview and/or assessment;
- If a selected applicant requests an accommodation, consult with the applicant and arrange for provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to disability.

Notice to Successful Applicants

When making offers of employment, SANREMO BAKERY INC. will notify the successful applicant of its policies for accommodating employees with disabilities. This will include:

- A review and, as necessary, modification of existing recruitment policies, procedures, processes and templates;
- Inclusion of notification of SANREMO BAKERY INC. policies on accommodating employees with disabilities in offer of employment letters.

Required compliance date:

January 1, 2016 Status: Future-dated

(ii) Employee Supports

Commitment:

SANREMO BAKERY INC. is committed to complying with the provisions of the AODA in respect of this requirement, with the objective of informing employees of available accessibility supports.

Planned Action:

In accordance with the IASR, SANREMO BAKERY INC. will:

- Inform its employees of its policies used to support its 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 disability.
- Provide the information required to new employees as soon as practicable after they begin their employment.
- Provide updated information to its employees 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 disability.
- Where an employee with a disability requests it, 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 employee's job; and ☐ Information that is generally available to employees in the workplace.
- SANREMO BAKERY INC. will consult with the employee making the request in determining the suitability of an accessible format or communication support.



Required compliance date:

January 1, 2016 Status: Future-dated

c. Documented Individual Accommodation Plans/Return to Work Process

Commitment:

SANREMO BAKERY INC. is committed to complying with the provisions of the AODA in respect of this requirement, with the objective of improving accommodation and return to work processes in the workplace.

Planned Action:

SANREMO BAKERY INC. existing policies will be reviewed to include processes that SANREMO BAKERY INC. will follow to accommodate an employee with a disability and to facilitate an employee's return to work after absenteeism due to disability.

SANREMO BAKERY INC. will review and assess the existing policies to ensure that they include a process for the development of documented individual accommodation plans for employees with a disability, if such plans are required.

SANREMO BAKERY INC. will ensure that the process for the development of documented individual accommodation plans includes the following elements:

- The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
- The means by which the employee is assessed on an individual basis.
- The way SANREMO BAKERY INC. can request an evaluation by an outside medical or other expert, at SANREMO BAKERY INC. expense, to assist SANREMO BAKERY INC. in determining if accommodation can be achieved and, if so, how accommodation can be achieved.
- The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.
- The steps taken to protect the privacy of the employee's personal information.
- The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
- If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
- The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

Individual accommodation plans will:

- If requested, include any information regarding accessible formats and communications supports provided, as required in the Standard;
- If required, include individualized workplace emergency response information, as required in the Standard; and
- Identify any other accommodation that is to be provided.

SANREMO BAKERY INC. will ensure that the return to work process as set out in its existing policies outlines the steps SANREMO BAKERY INC. will take to facilitate the employee's return to work after a disability-related absence, outlines the development of a written



individualized return to work plan for such employees, and requires the use of individual accommodation plans, as discussed above, in the return to work process.

Required compliance date: January 1, 2016 Status: Future-dated

d. Performance Management, Career Development and Redeployment

Commitment:

SANREMO BAKERY INC. will consider the accessibility needs of employees with disabilities, as well as individual accommodation plans:

- When using its performance management process in respect of employees with disabilities;
 when providing career development and advancement to its employees with
 - ☐ when redeploying employees with disabilities.

Planned Action:

disabilities:

In accordance with the IASR, SANREMO BAKERY INC. will:

- Review, assess and, as necessary, modify existing policies, procedures, practices and templates to ensure compliance with the IASR;
- Take the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account when:
 - Assessing performance
 - Managing career development and advancement
 - o Redeployment is required

Company Representative (Print Name):

Required compliance date: January 1, 2022 Status: Future-dated

Rob Bozzo - Owner	
Company Representative Signature:	
Date: January 4, 2024	
Authorized Reviewer: Aldo Carinci, is	Source Solutions Inc. Safety Advisor
Authorized Reviewer Signature:	
Date: January 3, 2024	•

