

INTRODUCTION

The *Accessibility for Ontarians with Disabilities Act, 2005, (AODA)* was passed in June 2005, with the purpose of developing, implementing and enforcing accessibility standards for Ontarians. The goal of the AODA is for Ontario to be fully accessible by January 1, 2025, by implementing a series of accessibility standards. These standards focus on identifying, removing and preventing barriers for persons with disabilities.

STATEMENT OF COMMITMENT

Rowe Farm Meats Ltd. (“Rowe Farms” or “the Company”) is committed to providing goods and services in a way that respects the dignity and independence of persons with disabilities. This will be achieved by identifying and removing barriers that impede a person’s ability to access goods and services, ensuring everyone is provided with equal opportunities whenever they interact with us.

Approximately 1.8 million Ontarians have a disability, and this number is growing as the population ages. Rowe Farms has an important responsibility for ensuring a safe, respectful and welcoming environment for our team members, customers and third parties that do business with the Company.

Rowe Farms will strive to ensure that our policies, practices and procedures are consistent with the following core principles as outlined in the AODA:

Dignity – Goods and services are provided in a manner that is respectful to persons with disabilities and do not diminish the person’s importance.

Independence – Accommodating a person’s disability means respecting their right to do for themselves and to choose the way they wish to receive goods and services.

Integration – Wherever possible, services will be provided in a manner that enables people with disabilities to fully benefit from the same services, in the same place and in the same or similar way as other customers or third parties. This may require alternative formats and flexible approaches. It means inclusiveness and full participation. This is a fundamental human right.

Equal Opportunity – Service is provided to persons with disabilities in a way that their opportunity to access goods and services is equal to that given to others.

Under the AODA, the following accessibility standard requirements are applicable to Rowe Farms:

- Customer Service Standard
- General Requirements
- Information and Communications Standards
- Employment Standards

PART 1 – CUSTOMER SERVICE STANDARD

This section of the Regulation requires that Rowe Farms:

- Establish policies, practices and procedures on providing goods and/or services to people with disabilities
- Reasonably ensure that policies, practices and procedures are consistent with core principles of independence, dignity, integration and equality of opportunity
- Set a policy on allowing people to use their own assistive devices to access our goods and/or services
- Communicate with persons with disabilities in a manner that takes into account their disability
- Allow persons with disabilities to be accompanied by their service animal
- Permit persons with disabilities who use a support person to bring that person with them while accessing our goods and/or services
- Provide notice when facilities and services that people with disabilities rely on, are temporarily disrupted
- Train team members and third parties who act on our behalf about the customer service standard
- Establish a process for providing feedback on how we provide goods and/or services to people with disabilities

Regulatory Requirement	Compliance Deadline	Deliverables	Actions/Progress	Due Date	Status
Establish policies, practices and procedures on providing goods and/or services to people with disabilities	January 1, 2012	Complete	Complete	December 2011 Complete	<input type="checkbox"/> Incomplete <input type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete
Ensure policies are consistent with core principles of independence, dignity, integration and equality of opportunity	January 1, 2012	Complete	Complete	December 2011 Complete	<input type="checkbox"/> Incomplete <input type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete
Set a policy on allowing people to use their own assistive devices to access our goods and/or services	January 1, 2012	Complete	Complete	December 2011 Complete	<input type="checkbox"/> Incomplete <input type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete
Policy on communicating with persons with disabilities in a manner that takes into account their disability	January 1, 2012	Complete	Complete	December 2011 Complete	<input type="checkbox"/> Incomplete <input type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete

<p>Policy and procedure on allowing persons with disabilities to be accompanied by their service animal</p> <ul style="list-style-type: none"> • In those areas of premises Rowe Farms operates that are open to the public • Unless the animal is excluded by another law • If animal cannot access parts of our premises, use other measures to provide services to the person with the disability 	<p>January 1, 2012</p>	<p>Complete</p>	<p>Complete</p>	<p>December 2011 Complete</p>	<p><input type="checkbox"/> Incomplete <input type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete</p>
<p>Policy and procedure on permitting persons with disabilities to use a Support Person</p>	<p>January 1, 2012</p>	<p>Complete</p>	<p>Complete</p>	<p>December 2011 Complete</p>	<p><input type="checkbox"/> Incomplete <input type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete</p>
<p>Policy and procedure on temporary disruptions</p>	<p>January 1, 2012</p>	<p>Complete</p>	<p>Complete</p>	<p>December 2011 Complete</p>	<p><input type="checkbox"/> Incomplete <input type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete</p>
<p>Train team members and third parties who act on our behalf about the customer service standard</p>	<p>January 1, 2012</p>	<p>Complete</p>	<p>Complete</p>	<p>December 2011 Complete</p>	<p><input type="checkbox"/> Incomplete <input type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete</p>
<p>Establish a process for receiving and responding to feedback on how we provide goods and/or services to people with disabilities, and how we respond to complaints</p>	<p>January 1, 2012</p>	<p>Complete</p>	<p>Complete</p>	<p>December 2011 Complete</p>	<p><input type="checkbox"/> Incomplete <input type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete</p>

PART 2 – GENERAL REQUIREMENTS

This section of the Regulation requires that Rowe Farms:

- Develop accessibility policies and a multi-year accessibility plan
- Report on the progress of the multi-year plan
- Ensure team members have been trained on the Integrated Accessibility Standards Regulation (“IASR”) and the Ontario Human Rights Code

Regulatory Requirement	Compliance Deadline	Deliverables	Actions/Progress	Due Date	Status
<p>Develop accessibility policies</p> <ul style="list-style-type: none"> • Develop, implement and maintain policies about what your organization will do to meet the IASR requirements and become more accessible • Statement of commitment • Make policies available to the public 	<p>January 1, 2014</p>	<ul style="list-style-type: none"> • Update current AODA Customer Service Standard Policy to incorporate our statement of commitment and how we will meet the IASR requirements 	<ul style="list-style-type: none"> • Customer Service Standard Policy updated and posted on company website • Statement of Commitment posted on company website 	<p>December 2013 Complete</p>	<p><input type="checkbox"/> Incomplete <input type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete</p>
<p>Develop a multi- year accessibility plan</p> <ul style="list-style-type: none"> • Establish, implement, maintain and document a multi-year accessibility plan • Post multi-year accessibility plan on website and provide in an accessible format, upon request 	<p>January 1, 2014</p>	<ul style="list-style-type: none"> • A multi-year accessibility plan that sets out how Rowe Farms will comply with requirements of IASR will be developed and posted on the website 	<p>Multi-year accessibility plan developed and posted on company website</p>	<p>December 2013 Complete</p>	<p><input type="checkbox"/> Incomplete <input type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete</p>

<p>Self-service kiosks</p> <ul style="list-style-type: none"> Incorporate accessibility features when designing, procuring or acquiring self-service kiosks. Large organizations and small organizations shall have regard to the accessibility for persons with disability when designing, procuring or acquiring self-service kiosks. 	<p>January 1, 2014</p>	<ul style="list-style-type: none"> If we do purchase self-serve kiosks, we will develop a plan on the procuring/acquiring of accessible self-serve kiosks 	<p>Currently N/A</p>	<p>Currently N/A</p>	<p>Currently N/A</p>
<p>Training</p> <ul style="list-style-type: none"> Ensure that training on the IASR and the Human Rights Code as it pertains to persons with disabilities is provided to team members, third parties acting on behalf of the Company; and persons who participate in developing our policies and others who provide goods, services or facilities on behalf of the Company. 	<p>January 1, 2015</p>	<ul style="list-style-type: none"> Modify current Team Member Training Workbooks to include IASR and Human Rights Code training Will be revising our HR guidelines to include AODA review 	<ul style="list-style-type: none"> Training program will continue to be updated as policies are revised or new policies are added. Managers to track the training in a spreadsheet at their locations. 	<p>December 2014 Complete and as policies change and new team member join, will provide training</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Incomplete <input checked="" type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete

PART 3 – INFORMATION AND COMMUNICATION STANDARD

This section of the Regulation includes requirements related to:

- Accessible websites and web content using the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level A and AA
- Accessible feedback processes
- Accessible formats and communication

Regulatory Requirement	Compliance Deadline	Deliverables	Actions/Progress	Due Date	Status
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<p>Accessible websites and web content</p> <ul style="list-style-type: none"> • Websites and web content to conform to WCAG 2.0 Level A and AA if/when our website undergoes a significant refresh or web content changes. 	<p>January 1, 2014- January 1, 2021</p>	<ul style="list-style-type: none"> • Train all key team members on WCAG 2.0 guidelines as part of the IASR Training • Run website through an AODA reader • Identify website content to be updated • Provide information to web developer for updating 	<ul style="list-style-type: none"> • In progress until our site is refreshed • Will work with web builder to meet the requirements 	<p>As web content changes, and final deadline of January 1, 2021</p>	<p><input type="checkbox"/> Incomplete <input checked="" type="checkbox"/> In progress <input type="checkbox"/> Complete</p>
<p>Feedback processes</p> <ul style="list-style-type: none"> • Ensure that processes for receiving and responding to feedback are accessible to persons with disabilities by providing/arranging for accessible formats and communication supports, upon request • Notify the public about the availability of accessible formats and communication supports 	<p>January 1, 2015</p>	<ul style="list-style-type: none"> • Document processes • Ensure Rowe Farms website incorporates an on-line feedback process and that it is available in other formats, upon request 	<ul style="list-style-type: none"> • Website has feedback policy posted and provides various ways to contact the Company. 	<p>December 2014 Complete</p>	<p><input type="checkbox"/> Incomplete <input type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete</p>
<p>Accessible formats and communication supports</p> <ul style="list-style-type: none"> • Upon request, provide for provision of accessible formats and communication supports for persons with disabilities • Notify the public about the availability of accessible formats and communication supports 	<p>January 1, 2016</p>	<ul style="list-style-type: none"> • Rowe Farms to provide accessible formats and communication supports in a timely manner upon request 	<p>In progress</p>	<p>December 2015</p>	<p><input type="checkbox"/> Incomplete <input checked="" type="checkbox"/> In progress <input type="checkbox"/> Complete</p>

PART 3 – EMPLOYMENT STANDARDS

This section of the Regulation includes requirements related to:

- Recruitment, assessment and selection
- Accessible formats and communication supports for team members
- Workplace emergency response information
- Return to work process
- Performance management, career development/advancement and redeployment

Regulatory Requirement	Compliance Deadline	Deliverables	Actions/Progress	Due Date	Status
<p>Recruitment</p> <ul style="list-style-type: none"> • Notify team members and the public about the availability of accommodation for applicants with disabilities in the recruitment process 	<p>January 1, 2016</p>	<ul style="list-style-type: none"> • Notify team members and the public of the availability of accommodation for applicants with disabilities in the recruitment process • Existing recruitment policies, procedures and processes be reviewed/revised • Update job posting templates to include accessibility statement 	<p>In progress</p>	<p>December 2015</p>	<p><input type="checkbox"/> Incomplete <input checked="" type="checkbox"/> In progress <input type="checkbox"/> Complete</p>
<p>Recruitment, assessment, or selection process</p> <ul style="list-style-type: none"> • Notify job applicants when they are individually selected to participate in an assessment/selection process that accommodations are available upon request in relation to the materials or processes used during the recruitment process. 	<p>January 1, 2016</p>	<ul style="list-style-type: none"> • Review existing recruitment policies, procedures and processes • Update recruitment process to ensure applicants are notified if selected for an interview or assessment that accommodations are available, upon request 	<p>In progress</p>	<p>December 2015</p>	<p><input type="checkbox"/> Incomplete <input checked="" type="checkbox"/> In progress <input type="checkbox"/> Complete</p>

<p>Notice to successful applicants</p> <ul style="list-style-type: none"> When making an offer of employment, notify successful applicants of policies for accommodating team members with disabilities 	<p>January 1, 2016</p>	<ul style="list-style-type: none"> Create an accommodation procedure to include delivering the message when making the verbal offer of employment 	<p>In progress</p>	<p>December 2015</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Incomplete <input checked="" type="checkbox"/> In progress <input type="checkbox"/> Complete
<p>Informing team members of support</p> <ul style="list-style-type: none"> Inform team members of policies used to support team members with disabilities (ex. Provisions of job accommodations that take into account team member's accessibility needs) as soon as practicable Information shall be provided to new team members as soon as practicable after they begin their employment Employers shall provide updated information whenever there is a change to existing policies on the provision of job accommodation that take into account an team member's accessibility needs due to disability 	<p>January 1, 2016</p>	<ul style="list-style-type: none"> Create accommodation procedure Inform team members of policies to support team members with disabilities Providing information regarding accommodation as the new team member begins employment (during the orientation training) Keeping team members up to date on changes to existing policies re: job accommodations with respect to disabilities 	<p>In progress</p>	<p>December 2015</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Incomplete <input checked="" type="checkbox"/> In progress <input type="checkbox"/> Complete

<p>Accessible formats and communication supports for team members</p> <ul style="list-style-type: none"> When requested by an team member with a disability, employers shall provide or arrange for the provision of accessible formats and communication supports for information needed to perform the team member's job, and information generally available to team members in workplace 	<p>January 1, 2016</p>	<ul style="list-style-type: none"> Rowe Farms to provide accessible formats and communication supports in a timely manner to requested team members 	<p>In progress</p>	<p>December 2015</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Incomplete <input checked="" type="checkbox"/> In progress <input type="checkbox"/> Complete
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<p>Workplace emergency response information</p> <ul style="list-style-type: none"> • Provide individualized workplace emergency response information to team members who have a disability as required • If a team member requires assistance, with their consent, provide the response information to a person who will provide that assistance • Provide the information as soon as practicable upon finding out about the accommodation requirement • The emergency response information will be reviewed: <ol style="list-style-type: none"> (1) When the team member transfers (2) When their needs or plans are reviewed (3) When all emergency response policies are reviewed 	<p>January 1, 2012</p>	<ul style="list-style-type: none"> • Review Rowe Farms emergency information • Upon request or when it is determined that team members require accommodation, provide individualized emergency response information • Develop individualized workplace emergency response information procedures for team members with disabilities 	<ul style="list-style-type: none"> • To ask new team members when hired as part of orientation 	<p>Initial phase: December 2011 Complete</p> <p>In progress: To be adjusted on an ongoing basis as new team members start, or as part of any change to policies and procedures</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Incomplete <input checked="" type="checkbox"/> In progress <input checked="" type="checkbox"/> Complete
<p>Documented individual accommodation plans</p> <ul style="list-style-type: none"> • Develop and have in place a written process for the development of documented individual accommodation plans for team members with disabilities 	<p>January 1, 2016</p>	<ul style="list-style-type: none"> • Expand on current accommodation policy • Add applicable components to existing forms • Document individual procedures 	<p>In progress</p>	<p>December 2015</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Incomplete <input checked="" type="checkbox"/> In progress <input type="checkbox"/> Complete

<p>Return to work process</p> <ul style="list-style-type: none"> Develop and have in place a return to work process for team members who have been absent from work due to a disability and require disability related accommodations to return to work 	<p>January 1, 2016</p>	<ul style="list-style-type: none"> Review, update and document existing return to work process 	<p>In progress</p>	<p>December 2015</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Incomplete <input checked="" type="checkbox"/> In progress <input type="checkbox"/> Complete
<p>Performance management, career development and redeployment</p> <ul style="list-style-type: none"> Take into account accessibility needs of team members with disabilities and individual accommodation plans as part of performance management processes, when providing career development opportunities and considering redeployment 	<p>January 1, 2016</p>	<ul style="list-style-type: none"> Create accessible employment procedure 	<p>In progress</p>	<p>December 2015</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Incomplete <input checked="" type="checkbox"/> In progress <input type="checkbox"/> Complete