

ACCESSIBILITY POLICY

PROVIDING GOODS, SERVICES AND OPPORTUNITY TO PEOPLE WITH DISABILITIES

PURPOSE

Rowe Farm Meats Ltd. (“Rowe Farms” or “the Company”) is committed to excellence in serving all of our customers, and we strive at all times to meet the accessibility needs of persons with disabilities in a timely manner, and to provide our goods and services in a way that respects the dignity and independence of people with disabilities.

In addition, Rowe Farms is committed to equal treatment with respect to employment.

It is the responsibility of all team members of Rowe Farms to comply with this Accessibility Policy, to treat all people with dignity and respect, and to provide additional assistance where and when necessary in order to assist those requiring accommodation.

Upon request, this policy will be made available in accessible formats.

DEFINITION

As outlined in the Ontario Human Rights Code, a disability is:

- 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

About 15.5 % of Ontario’s population or 1.8 million people are reported as having a disability (Stats Canada, 2006) and that number is expected to grow significantly.

ACCESSIBILITY PLAN

Rowe Farms has developed and will maintain and documented Accessibility Plan outlining our strategy to prevent and remove barriers and to improve opportunities for persons with disabilities.

The Accessibility Plan will be reviewed and updated at least once every five (5) years, and will be posted on the company's website. Upon request, Rowe Farms will provide a copy of the Accessibility Plan in an accessible format.

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PROVIDING GOODS AND SERVICES TO CUSTOMERS WITH DISABILITIES

Rowe Farms will make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- Ensuring that all customers receive the same value and quality;
- Allowing customers with disabilities to do things in their own way, at their own pace when accessing Rowe Farms' goods and/or services as long as this does not present a safety risk;
- Using alternative methods when necessary to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner;
- Ensuring the provision of goods or services to persons with disabilities and others are 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.
- Taking into account individual needs when providing goods and/or services; and
- Communicating in a manner that takes into account a person's disability.

INFORMATION AND COMMUNICATION STANDARD

Rowe Farms will communicate to those with disabilities in ways that takes into account their disability. We will train our team members on how to effectively interact and communicate with our diverse community and people with various types of disabilities.

FEEDBACK

Rowe Farms has established a process to ensure customers with disabilities are able to provide us with feedback on our products/services and how we deliver them to those with disabilities.

Feedback is always welcome and appreciated and can be submitted in the following formats:

- in person,
- by telephone,
- by mail, or
- by email

Rowe Farms will continue to ensure that all customers are able to provide feedback and if the stated methods of feedback do not for some reason accommodate a person who would like to provide feedback, we are willing to arrange for other methods based on request (i.e. accessible formats, communication supports etc.)

If a complaint is received, we will work with the person making the complaint to determine a way that we can improve our procedures to better accommodate them in the future. We will welcome their suggestions, and take them into consideration when updating our policies and procedures as related to disability accommodation.

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ACCESSIBLE FORMATS AND COMMUNICATION SUPPORTS

Upon request, Rowe Farms will provide, or will arrange to provide information in an accessible format and with communication supports in a timely manner that takes into account a person's accessibility needs due to his or her disability.

Rowe Farms will consult with the person making the request in determining the suitability of an accessible format or communication support. Some examples of accessible formats and communication supports that Rowe Farms is willing to provide in order to best accommodate a person with a disability, include:

- accessible electronic formats such as HTML and MS Word
- Braille
- large print
- reading the written information aloud to the person directly
- exchanging hand-written notes
- drawing pictures and showing photographs
- repeating, clarifying, or restating information

Rowe Farms will provide formats and supports in a timely manner, and will notify the public of the availability of this accommodation.

ACCESSIBLE WEBSITES AND WEB CONTENT

Rowe Farms is working to ensure that its website, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA except where this is impracticable.

TELEPHONE SERVICES

Rowe Farms is committed to providing fully accessible telephone service to all persons. Rowe Farms will train team members to communicate with persons over the telephone in plain language while speaking clearly and slowly. Rowe Farms will offer to communicate with customers by email or letter if telephone communication is not suitable to their communication needs or is unavailable.

The Company will communicate with customers by TTY (the special device that allows people who are deaf, hard of hearing, or speech-impaired to use the telephone to communicate, by allowing them to type messages back and forth) if telephone communication is not suitable to their communication needs or is not available.

USE OF ASSISTIVE DEVICES

An assistive device is one or more devices used by a person with a disability to help him/her independently complete everyday tasks. Accessibility devices include mobility aids (e.g. wheelchairs and walkers), portable communication devices, head-wands, hearing aids, white canes used by people who are blind or who have low vision, note-taking devices and personal oxygen tanks to assist breathing, etc.

Rowe Farms welcomes the use of assistive devices by our customers and third parties to access our goods and/or services. We will ensure our team members are trained on how to interact with individuals using various assistive devices and how team members can provide alternative or supplemental service

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methods to those requesting them, such as reaching items on high shelves and passing them to customers, pushing or directing wheelchairs, reading labels aloud, etc.

BILLING/INVOICES

Rowe Farms is committed to providing accessible billing/invoices to all our customers and third party business partners. Rowe Farms will answer any questions customers may have about the content of the billing and will be responsible for ensuring that the alternative formats are available upon request.

USE OF SERVICE ANIMALS AND SUPPORT PERSONS

SERVICE ANIMALS

An animal is a service animal for a person with a disability if, (a) it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or (b) the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

Ontario Regulation 562 under the *Health Protection and Promotion Act* states that animals are not allowed in places where food is manufactured, prepared, processed, handled, served, displayed, stored, sold or offered for sale. It does make an exception for service dogs to allow them to go where food is normally served, sold or offered for sale. Other types of service animals are not included in this exception.

Similarly, Ontario Regulation 31/05 under the *Food Safety and Quality Act, 2001* states that animals not intended for slaughter or to be euthanized are not allowed in any area or room of a meat plant. It also makes an exception for service dogs to allow them in those areas of a meat plant where food is served, sold or offered for sale to customers and in those areas that do not contain animals or animal parts and are not used for the receiving, processing, packaging, labeling, shipping, handling or storing of animals or parts of animals.

Thus, Rowe Farms welcomes service dogs to the front service areas of their stores, and all Rowe Farms team members will be made aware that service dogs are permitted in the front service areas. For the purpose of this policy, service dogs will include service dogs-in-training.

In the rare situation where another person's health and safety could be seriously impacted by the presence of a service dog, the Company will review all options for safely allowing the service animal, by working with both affected parties to meet their individual needs.

No service animal may enter the back area/areas of the store where meat is handled. However, if a third party requiring a service dog has approved business that must be conducted in the back/where meat is handled, following approval by that person, the store manager shall provide physical assistance by escort to them. If the person requiring assistance has other suggestions on the best way to assist them without their service dog, Rowe Farms will work with the person one-on-one.

SUPPORT PERSONS

A support person is an individual who accompanies a customer (or third party doing business with Rowe Farms) with a disability to help the customer meet his or her communication, mobility, personal care or medical needs or to assist the customer in accessing goods and/or services. A customer or third party

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with a disability who is accompanied by a support person will be allowed to enter Rowe Farms' premises together with the support person, and will not be prevented from having access to the support person while on the premises.

All support persons are welcome at all Rowe Farms properties.

NOTICE OF DISRUPTION OF SERVICES

In the event of a planned or unexpected temporary disruption to accessing our goods and services, Rowe Farms is committed to providing timely notice to our customers. Temporary service disruptions may result due to many different situations. The following is a list of some common circumstances that may result in a temporary service disruption. This list is not exhaustive:

- Automatic Door Malfunction
- Power Failure
- Phone Lines Down
- Internet Down

Notice of a temporary service disruption shall be posted at a conspicuous place on the premises as soon as practicable. The notice will include:

- Reason for the disruption
- Which goods/services are disrupted
- Expected duration
- List of other store locations

Every effort will be made to provide customers information as quickly as possible.

In the event of a snow storm or city-wide power outages, it is also encouraged that prior to visiting one of our locations, customers requiring assistance call to ensure Rowe Farms is best prepared to accommodate them.

The following are the Rowe Farms Store Locations:

Roncesvalles
105 Roncesvalles Avenue
Toronto, ON
(416) 588-4383
@RoweRoncy

Uptown
2503 Yonge Street
Toronto, ON
(647) 352-4383
@RoweUptown

Bloor West Village
2230 Bloor Street West
Toronto, ON
(416) 766-4383
@RoweBloorWest

Annex
468 Bloor Street West
Toronto, ON
(416) 530-4383
@RoweAnnex

Leslieville

Bayview

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893 Queen Street East
Toronto, ON
(416) 461-4383
@RoweLeslieville

1617 Bayview Ave.
Toronto, ON
(647) 350-4383
@RoweBayview

The Beach
2126 Queen Street East
Toronto, ON
(416) 699-4383
@RoweTheBeach

Guelph
1027 Gordon Street
Guelph, ON
(519) 822-2171
@RoweGuelph

EMPLOYMENT STANDARDS

RECRUITMENT

Rowe Farms notifies our team members and the public about the availability of accommodation for applicants with disabilities in our recruitment process.

RECRUITMENT, ASSESSMENT OR SELECTION PROCESS

The Company is an equal opportunity employer committed to hiring a diverse workforce and sustaining an inclusive culture. As part of our accessibility commitment, there are alternative ways to interview with us in order that we may accommodate people of all abilities.

The Company notifies potential job applicants of the ability to accommodate in writing, through posting this policy on our website, and as part of all job postings on external websites.

In addition, job applicants selected to participate in an assessment or selection process (interview) are advised verbally over the telephone that accommodations are available upon request relating to the materials or processes to be used.

If a successful candidate requires accommodation and they advise Rowe Farms, we will consult with them one-on-one in order to best assist them in taking into account their accessibility needs as related to their disability.

NOTICE TO SUCCESSFUL APPLICANTS

When making offers of employment, Rowe Farms notifies successful applicants of our policies for accommodating team members with disabilities.

TRAINING AND JOB INFORMATION

Rowe Farms will provide training for all team members and third parties that engage with Rowe Farms' customers on behalf of the Company, on how to effectively interact with persons with disabilities. In addition, everyone who is involved with and/or influences customer service policies and procedures will receive this training. Training records will be logged, and training will be provided on an ongoing basis as changes to the policies, practices, or procedures surrounding accessibility for persons with disabilities are made. Initial training will be provided within the first week of employment, and will include:

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- Purposes of the Accessibility for Ontarians with Disabilities Act and requirements of the customer service standard
- All information outlined in this policy
- How to interact and communicate with persons with disabilities in a manner that takes into account his or her disability
- How to interact with persons with disabilities who use an assistive device or require the assistance of a service animal or a support person
- How to use equipment or devices available that may help with the provisions of goods and/or services
- What to do if a person with a particular type of disability is having difficulty accessing goods and/or services
- Workplace emergency response information
- Return to work process
- Recruitment, including how to accommodate the candidates and team members with disabilities during the hiring process and employment

Rowe Farms will provide accessible workplace information when an employee with a disability asks for it. This includes:

- any information that employees need to perform their jobs
- performance management related information
- training materials
- general information that is available to all employees at work (e.g., company newsletters, bulletins about company policies and health and safety information)
- information about emergency procedures

INFORMING TEAM MEMBERS OF SUPPORT

Rowe Farms will continue to inform its team members of its policies (and any updates to those policies) written to support team members with disabilities, including policies on the provision of job accommodations that take into account a team member's accessibility needs due to disability. This information will be provided to new team members as soon as practicable after commencing employment.

WORKPLACE EMERGENCY RESPONSE

Rowe Farms will provide individualized workplace emergency response information to any team member who has a disability, if the disability is such that the individualized information is necessary, and if Rowe Farms is aware of the need for accommodation due to the team member's disability. Rowe Farms will provide this information as soon as practicable after becoming aware of the need for accommodation.

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Rowe Farms recognizes how an individual's disability, as well as the physical nature of the workplace, may create unique challenges in emergency situations.

For example:

A team member who has a hearing disability may not hear an alarm and may need to be notified by other means, such as flashing lights or another team member physically notifying them. Or,

A team member with a visual disability may be unable to identify the escape routes, or obstructions to the escape routes.

Rowe Farms will consult with team members who have disabilities so that the individualized workplace emergency response information meets the team member's specific needs.

A wide range of potential emergencies will be considered, including but not limited to, the following:

- fire
- power outages
- severe weather
- natural disasters
- security incidents

Where the team member requires assistance, Rowe Farms will, with the consent of the team member, provide the workplace emergency response information to the person designated by Rowe Farms to provide assistance to the team member.

Rowe Farms will review the individualized workplace emergency response information when the team member moves to a different location in the organization, when the team members overall accommodations needs or plans are reviewed, or when Rowe Farms reviews its general emergency response policies.

DOCUMENTED INDIVIDUAL ACCOMODATION PLANS

Rowe Farms has a program in place for the creation of individual custom accommodation plans for team members who may need accommodation due to a disability.

The following is the outline of the process for creating accommodation plans:

1. A team member requiring an accommodation plan must advise his or her manager of the need for a plan as soon as possible.
2. The team member will provide an Abilities and Restrictions Form as completed by their medical practitioner, outlining where there are restrictions, and what their capabilities for work are.
3. The team member and their manager meet to go through the A&F Form to ensure they both understand the nature of the accommodation required.
4. The team member advises their manager verbally if they would like assistance of another team member, or the Health and Safety Representative in the creation of the plan.

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5. The manager advises the team member verbally if they believe they need assistance from an outside person to assist with creating the plan. (E.g. if a specialist paid for by the Company or a Human Resources representative will need to be involved.)
6. The parties work together to put together a draft accommodation plan.
7. The manager will ask the team member whether or not they would like to keep the details of their accommodation plan confidential and private, or whether they would like other team members to be made aware.
8. The manager will explain where other team members may be required to have some information (e.g. in the case where the team member needing the accommodation plan has difficulty hearing, and they may need assistance in knowing when an emergency alarm is sounding. Or, if the cost associated with implementing the plan exceeds the allowable store-level budget or will change the nature of how the business must operate, and must be reviewed at the CEO level.)
9. The manager will respect the privacy of the team member, and comply with their request for a particular level of privacy. Only those parties who absolutely must, for the safety of the team member, their own safety, or due to company benefit program, policy, budget or operational reasons be made aware, will be advised of the accommodation plan, but only in as much detail as is absolutely necessary.
10. The plan will be finalized by the manager, and presented to the team member no later than one (1) week after it was first drafted by the participating parties.
11. In addition to providing the finalized plan to the team member, the manager will provide a schedule for when and how the plan will be reviewed and updated. This will be determined based on the nature of the disability and the necessity for updated abilities and restriction information.
12. If a team member requests an accommodation plan and there is no medical evidence (via an A&F Form) to support the need, or if a plan has been rejected by the CEO because of undue hardship to the Company or for other reasons deemed serious enough, the manager will immediately advise the team member. They will meet and come to a mutually agreeable alternative plan.
13. If the team member requires the plan to be available in an accessible format, the manager will work with the team member to determine the most appropriate format, and ensure the team member receives a copy in that format.
14. All individual accommodation plans will include:
 - a. A section that outlines how workplace information will be made available in an accessible format if requested
 - b. A section that outlines how emergency information will be provided in an accessible format if needed
 - c. Any additional accommodation that is to be provided to the team member.

RETURN TO WORK PROCESS

Rowe Farms has an Early and Safe Return to Work Process for team members who have been absent from work due to a disability and who require disability related accommodations to return to work.

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The return to work process outlines the steps Rowe Farms will take to facilitate the return to work and will include documented individual accommodation plans/modified duties schedule as part of that process.

This return to work process is consistent with the process followed for team members who have experience workplace injuries or illnesses, as outlined in the Workplace Safety Insurance Act, 1997.

PERFORMANCE MANAGEMENT

When the Company has been made aware of a team member's disability, each individual's needs will be considered when determining how to best accommodate them in any performance management related process.

Rowe Farms will provide performance management related documentation in accessible formats to team members who request them due to a disability.

Managers will also provide informal and formal coaching and feedback in a manner that takes into account their disability, such as using plain language for an individual with a learning disability.

CAREER DEVELOPMENT AND ADVANCEMENT

When providing career development and advancement opportunities, Rowe Farms will take into account what accommodations team members with disabilities may need to succeed elsewhere in the organizations or to take on new responsibilities in their current position.

For example, a team member may receive a promotion which includes new responsibilities. In this case, Rowe Farms and the team member may review the individual accommodation plan to learn what adjustments may be needed for the new responsibilities.

REDEPLOYMENT

Should Rowe Farms decide to use redeployment processes, the Company will consider the accessibility needs of team members with disabilities when moving them to other positions so that those team members can continue to have their accommodation needs met.

MODIFICATIONS TO THIS AND OTHER POLICIES

Rowe Farms is committed to developing accessibility policies that respect and promote the dignity and independence of persons with disabilities. Therefore, no changes will be made to this policy before considering the impact on persons with disabilities. Any policy of Rowe Farms that does not respect and promote the dignity and independence of persons with disabilities will be modified or removed. This policy and its related procedures will be reviewed as required in the event of legislative changes.

QUESTIONS ABOUT THIS POLICY

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If you have a question about the policy, please contact us using any of the following methods:

In Person or by Mail:

Rowe Farm Meats Ltd.

Attn: Chief Executive Officer

105 Roncesvalles Avenue

Toronto, ON M6R 2K9

By Telephone:

416-532-3738

By E-mail:

hr@rowefarms.ca

REVISION CONTROL

DATE	COMMENTS
December 2011	Policy Issued
December 2014	Policy Revised
December 2015	Policy Revised