

INTEGRATED ACCESSIBILITY STANDARDS POLICY

The following policy has been established by 2360083 Ontario Limited, operating as Coppa's Fresh Market ("**Coppa**") to govern the provision of goods, services and/or facilities in accordance with Regulation 191/11, "Integrated Accessibility Standards" ("Regulation"), under the *Accessibility for Ontarians with Disabilities Act, 2005*.

This policy has been prepared in accordance with the Regulation and addresses how Coppa will achieve accessibility by meeting the Regulation's requirements. This policy provides the company's overall approach with respect to providing accessibility supports to people with disabilities. These standards are developed to break down barriers and increase accessibility for persons with disabilities in the areas of information, communications and employment.

Coppa is governed by this policy as well as the Accessibility Standards for Customer Service Policy and the *Accessibility for Ontarians with Disabilities Act, 2005* in meeting the accessibility needs of persons with disabilities.

Commitment

Coppa is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of persons with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the *Accessibility for Ontarians with Disabilities Act, 2005*.

Definitions

For the purpose of this policy, the following definitions shall apply:

"accessible formats" may include, but are not limited to, large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities;

"communication supports" may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications;

"disability" means,

- (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*

Accessibility Plan

Coppa will develop, implement, maintain and document an Accessibility Plan outlining the company's strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities.

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

Training Employees

Coppa will ensure that training is provided on the requirements of the accessibility standards referred to in the Regulation and continue to provide training on the *Human Rights Code* as it pertains to persons with disabilities, to:

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

The training will be appropriate to the duties of the employees and other persons and will be provided as soon as practicable.

Updated training will be provided when changes are made to the legislation and/or to Coppa's policies.

Coppa will keep a record of the training it provides, including the dates on which training is provided and the number of individuals to whom it is provided.

Accessibility Report

Coppa shall file an accessibility report with a director annually or as otherwise specified by the legislation.

INFORMATION AND COMMUNICATIONS STANDARDS

Feedback

Coppa will continue to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communication supports, upon request.

Coppa will also ensure that its process for receiving and responding to feedback includes an opportunity to provide feedback about the manner in which Coppa provides goods, services or facilities to persons with disabilities, as well as an opportunity to provide feedback as to whether the feedback process is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communication supports, upon request.

Accessible Formats and Communication Supports

Upon request, Coppa will provide, or will arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability and at a cost that is no more than the regular cost charged to other persons.

Coppa will consult with the person making the request in determining the suitability of an accessible format or communication support.

Coppa will also notify the public about the availability of accessible formats and communication supports.

Emergency Procedure, Plans or Public Safety Information

If Coppa prepares emergency procedures, plans or public safety information and makes the information available to the public, the company will provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

Accessible Websites and Web Content

Coppa will ensure that its Internet websites, 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.

EMPLOYMENT STANDARDS

Scope

The employment standards apply in respect of employees only. They do not apply in respect of volunteers and other non-paid individuals.

Recruitment

Coppa will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

Recruitment, Assessment or Selection Process

Coppa will notify job applicants, when they are individually selected to participate further in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used.

If a selected applicant requests an accommodation, Coppa will consult with the applicant and provide, or arrange for the provision of, a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

Notice to Successful Applicants

When making offers of employment, Coppa will notify the successful applicant of its policies for accommodating employees with disabilities.

Informing Employees of Supports

Coppa will continue to inform its employees of its policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practicable after commencing employment. Coppa will provide its employees with updated information whenever there is a change to existing policies.

Accessible Formats and Communication Supports for Employees

Upon the request of an employee with a disability, Coppa will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his/her job, and information that is generally available to other employees.

In determining the suitability of an accessible format or communication support, Coppa will consult with the employee making the request.

Workplace Emergency Response Information

Coppa will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if Coppa is aware of the need for accommodation due to the employee's disability. Coppa will provide this information as soon as practicable after becoming aware of the need for accommodation.

Where the employee requires assistance, Coppa will, with the consent of the employee, provide the workplace emergency response information to the person designated by Coppa to provide assistance to the employee.

Coppa will provide the information required under this section as soon as practicable after it becomes aware of the need for accommodation due to an employee's disability.

Coppa will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodation needs or plans are reviewed and when the company reviews its general emergency response policies.

Documented Individual Accommodation Plans

Coppa will maintain a written process for the development of documented individual accommodation plans for employees with disabilities. The process for the development of documented individual accommodation plans will include the following elements:

1. The manner in which the employee requesting accommodation can participate in the development of the plan;
2. The means by which the employee is assessed on an individual basis;
3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved;
4. The manner in which the employee can request the participation of a representative from the workplace in the development of the accommodation plan;
5. The steps taken to protect the privacy of the employee's personal information;
6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done;
7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee; and
8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

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

In addition, the 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

Coppa 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 accommodations in order to return to work.

The return to work process outlines the steps Coppa 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.

Performance Management, Career Development and Advancement & Redeployment

Coppa will 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 to employees, or when redeploying employees.

Questions about this policy

This policy has been developed to break down barriers and increase accessibility for persons with disabilities. This policy will be provided in an accessible format, upon request.

If anyone has any questions about the policy, or if the purpose of a policy is not understood, an explanation will be provided by Human Resources.