Policy

Pfenning's Organic Vegetables Inc. is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination. We are committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that supports their dignity and independence.

Pfenning's understands that obligations under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and its accessibility standards do not substitute or limit its obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law. We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and by meeting our accessibility requirements under Ontario's accessibility laws.

Pfenning's is committed to excellence in serving all customers including people with disabilities. Our Accessibility Policy is consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities. Our Accessibility Policy is aligned with our values of respect, integrity and accountability. We treat those we work with like family and we strive to provide excellent quality and service to all.

Definitions can be found in *Appendix A* and examples of different forms of barriers can be found in *Appendix B.* Our yearly plan can be found in *Appendix C.*

Scope

The Accessibility Policy is to be followed by all staff members of Pfenning's Organic Vegetables Inc. In general, our organization is not open to the public. However, on occasion a member of another organization may be on the premises. Examples include an external business meeting or interview, a farm tour, or a customer picking up their order. On these occasions, the individual's accessibility barriers will be accommodated according to our policy at their request.

Procedure

Assistive 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.

Communication

We will communicate with people with disabilities in ways that take into account their disability. When asked, we will provide information about our organization and its services, including public safety information, in accessible formats or with communication supports.

We will also meet internationally-recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario's accessibility laws.

We will work with the person with a disability to determine what method of communication works for them.

Employment
We will notify employees, potential hires and the public that accommodations can be made during recruitment and hiring.

We will notify staff that supports are available for those with disabilities. We will put in place a process to develop individual accommodation plans for employees.

Where needed, we will also provide customized emergency information to help an employee with a disability during an emergency.

Our performance management, career development and redeployment processes will take into account the accessibility needs of all employees.

Service animals
We welcome people with disabilities and their service animals. Service animals are allowed in specific parts of our premises – limited due to Food Safety protocols to the Office and the Parking lot/Yard area.

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

If service animals are prohibited by another law, we will do the following to ensure people with disabilities can access our goods, services or facilities:

- explain why the animal is excluded
- discuss with the customer another way of providing goods, services or facilities

Service animals are prohibited from the following areas:
By policy, any animals are prohibited from entering the Warehouse and Field and Production areas of the company for food safety regulations.

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

In certain cases, Pfenning's 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, Pfenning's 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

By policy, any individual who is not a staff member of Pfenning's is to be accompanied at all times on any part of the premises regardless of disability in compliance with food safety and health and safety regulations.

Training
We are committed to training staff in Ontario's accessibility laws and aspects of the Ontario Human Rights Code that relate to persons with disabilities.

We will train our employees and volunteers on accessibility as it relates to their specific roles. Staff will be trained on Accessibility during orientation.
Training will include:

- Related policies
- how to interact and communicate with people with various types of disabilities

- how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- what to do if a person with a disability is having difficulty in accessing Pfenning's goods, services or facilities

Staff will also be trained when changes are made to our accessible customer service policies.

Feedback process
Pfenning's welcomes feedback on our Accessibility Policies. Internal and external feedback will help us identify barriers and respond to concerns.

All feedback, including complaints, will be handled in the following manner:
- Human Resources will investigate each complaint
- Upon completion of the investigation, Human Resources will notify the complaintive of the results and a course of action, if any, to rectify the situation
- The complainant can expect to hear back in 10 days

Pfenning's will make sure our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request.

By phone: 519-662-3468
By fax: 519-662-3468
By email: racheal.d@pfenningsfarms.ca
By mail/in-person: 1209 Waterloo Street, New Hamburg ON N3A 1T1

Notice of availability of documents
This policy is posted at the front communication area, and is always available on the company server or in Human Resources. Pfenning's will provide this document in an accessible format or with communication support, on request. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and, at no additional cost.

Modifications to this or other policies
Any policies of Pfenning's that do not respect and promote the principles of dignity, independence, integration and equal opportunity for people with disabilities will be modified or removed.

Appendix A

Definitions

- Accessibility — The term accessibility means giving people of all abilities opportunities to participate fully in everyday life. It is used to describe how widely a service, product, device, or environment is available to as many people as possible. Accessibility can be seen as the ability to access and benefit from a system, service, product or environment.
- Barrier — Barriers are obstacles that limit access and prevent people with disabilities from fully participating in society. Most barriers are not intentional. Barriers usually arise because the needs of people with disabilities are not considered from the beginning.
- Disability — Ontario's accessibility law adopts the definition for disability that is in the Ontario Human Rights Code. It defines disability broadly:
  - "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."

Appendix B

Barriers and solutions

Some people see disabilities as the barrier. But that's not the case. For example, an individual has low vision and has a hard time reading some restaurant menus. Their low vision is not the barrier. It is the small print on the menus. When a restaurant gives them a large print menu, they can read it and place their order independently and barrier free.

The tables below illustrate the various types of barriers that exist and some possible solutions for their removal.

Attitudinal barriers may result in people with disabilities being treated differently than people without disabilities.

Attitudinal Barriers	Possible Solutions
Thinking that people with intellectual disabilities are not able to make decisions.	Do not assume what employees or customers with disabilities can or cannot do. Ask them.
Assuming that a person who has a speech impairment cannot understand you.	Train staff to interact and communicate with people with different types of disabilities.
Believing a person who has a mental health disability or someone who uses a wheelchair would not be a good employee.	Learn about ways you can accommodate employees with disabilities.
Assuming that a person with vision loss cannot enjoy movies, TV or concerts.	Learn about the different ways and available technologies that help people with vision loss enjoy movies, TV and concerts.
Avoiding a person with a disability in fear of saying the wrong word or offending them.	Train staff to interact and communicate with people with different types of disabilities.
Thinking that every person with a disability will need costly accommodation.	Learn about the types of accommodations for people with disabilities. Many are low cost.

Informational and communication barriers arise when a person with a disability cannot easily receive and/or understand information that is available to others.

Informational and Communication Barriers	Possible Solutions
Print that is too small to read.	Make everyday documents, like signs and menus, easy to read by making sure that the print is legible for most people.
Presentation materials for meetings, such as slide decks and videos are not accessible to employees with low vision or who have	Develop a template for slide decks using large fonts, high contrast colours and clean layout. Provide a verbal description of the slides when

hearing loss.	making a presentation.
Include captions for videos. When this is not possible, provide a text transcription of the video.	Provide descriptions or alt tags for pictures for people with vision loss.
Brochures, guides and advertisements are not clear or easily understood.	Use plain language, symbols and pictures to get your message across.
Website pictures don't have descriptions.	Provide descriptions or alt tags for pictures for people with vision loss.
Complicated, busy or confusing signs.	Keep signs clean and clear. Make information available in another form, such as a chart or pictogram.
Seating arrangements make it difficult for people who have hearing loss to fully participate in meetings.	Arrange seating at a round table to facilitate lip reading. Use assistive listening or amplification devices as appropriate.
Marketing and communications are not inclusive, either in depicting people with disabilities, including them as a potential target audience, or in considering them.	Check that your marketing and communications efforts reach people with disabilities. Include people with disabilities of all generations in photos, testimonials and other communications. Ensure marketing collateral such as flyers, brochures, podcasts and YouTube videos, are accessible.

Technological barriers occur when technology or the way it is used does not meet the needs of people with disabilities.

Technological Barriers	Possible Solutions
Emails or other electronic communications are not accessible to people who use screen readers.	Make sure every email is accessible to people who use screen readers and offer alternative methods of communication.
Having only one way for your customers to reach you, for example, by telephone only.	Allow customers to contact you in a variety of ways including telephone, email, TTY or train your staff on using the relay service over the phone.
Accepting only online job applications.	Welcome job applications in a number of formats.

Systemic barriers in policies, practices and procedures and result in people with disabilities being treated differently than others or sometimes excluded altogether.

Systemic Barriers	Possible Solutions
People with disabilities are excluded from events, or included as an after-thought when planning	Make sure that accessibility is considered when making plans for events and invite

events.	attendees to tell you if they have different needs. Consider using an accessibility checklist for events.
Not knowing about the different types of accommodations an employee might need to return to work after an absence due to a disability.	Learn about the types of accommodations employees might need. Talking with employees about their specific needs is a good first step.
There is no leadership or accountability for issues related to accessibility for people with disabilities.	Designate a point person to implement accessibility policies and procedures.
Hiring policies do not encourage applications from people with disabilities.	Review current hiring processes to identify and remove barriers such as inaccessible locations for interviews.
Procedures may exclude some employees, such as directing maintenance/housekeeping staff to only use certain cleaning products that can cause allergic reactions.	Implement a "fragrance-free" policy.

Physical and architectural barriers in the environment and prevent access for people with disabilities.

Physical/Architectural Barriers	Possible Solutions
Aisles are blocked by displays or merchandise making them too narrow for a person using a wheelchair or walker.	Consider the paths that your employees and customers take when creating displays or storing merchandise.
Event or meeting spaces are inaccessible.	Think about potential barriers when selecting a venue. Do not just look for a ramp. Consider the washrooms, lighting and signage.
Accessibility features such as power-operated doors are broken and not fixed promptly.	Develop a maintenance plan and ensure prompt response times when equipment is broken.

Appendix C

As per AODA Regulations, Pfenning's has developed a plan regarding accessibility. The plan has phases that have been implemented, are ongoing and planned.

Implemented:
1. Accessible entrances and exits for those with accessibility needs. This includes specific parking places for individuals with disabilities and accommodation needs
2. Creation of Accessibility Policy
3. Recruitment options to meet all accessibility needs.
4. Written records of training are kept in a training matrix and are accessible
5. Company specific policies are accessible
6. Employee and customer feedback surveys have been distributed and results have been used to make changes where necessary
7. Creation of comment cards for employees, visitors and customers to provide feedback

Ongoing:
1. Creation of evacuation maps that comply with accessibility standards and are accessible to all employees and visitors
2. Creation of individualized evacuation plans for employees with disabilities
3. Creation of a website that meets all accessibility standards according to WCAG 2.0 guidelines

Planned:
1. Accessibility laws training provided to all employees through orientation and annual refresher training sessions