



## Accessibility Policy

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### Policy

Pfenning's Organic Vegetables Inc. is committed to fulfilling its obligations under the **Ontario Human Rights Code** regarding non-discrimination and to ensuring **equal access and participation for people with disabilities**. We are dedicated to treating people with disabilities in ways that respect their **dignity, independence, and inclusion**.

We recognize that our responsibilities under the **Accessibility for Ontarians with Disabilities Act, 2005 (AODA)** and its associated standards do not replace or limit our obligations under the Ontario Human Rights Code or any other applicable legislation protecting the rights of people with disabilities.

Pfenning's believes in **integration and timely accommodation**. We are committed to identifying, removing, and preventing barriers to accessibility and to meeting all requirements set out under Ontario's accessibility laws.

We are dedicated to excellence in serving **all customers**, including those with disabilities. Our Accessibility Policy is guided by the principles of **independence, dignity, integration, and equal opportunity**. It reflects our core values of **respect, integrity, and accountability**, and our commitment to treating everyone we work with—employees, customers, and partners—like family while providing high-quality service.

Definitions of key terms are provided in **Appendix A**, examples of common barriers in **Appendix B**, and our **annual accessibility plan** can be found in **Appendix C**.

### Scope

This Accessibility Policy applies to **all staff members** of Pfenning's Organic Vegetables Inc.

Although our organization is generally **not open to the public**, there are occasions when individuals from outside organizations may be present on our premises. Examples include **external business meetings, interviews, farm tours, or customers picking up orders**.

In such cases, any accessibility barriers experienced by these individuals will be **accommodated in accordance with this policy**, upon request.

### Procedure

#### **Assistive devices**

People with disabilities are welcome to **use their personal assistive devices** when accessing our goods, services, or facilities.

If an assistive device **poses a significant and unavoidable health or safety risk**, or cannot be used for any other valid reason, **alternative measures** will be provided to ensure that the individual can still access our goods, services, or facilities.



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### Communication

We are committed to communicating with people with disabilities in ways that **consider their specific needs**. Upon request, we will provide information about our organization and its services—including public safety information—in **accessible formats** or with **appropriate communication supports**.

Our website will comply with the **Web Content Accessibility Guidelines (WCAG) 2.0 Level AA**, in accordance with Ontario's accessibility laws.

We will **collaborate with the individual** to determine the method of communication that works best for them.

### Employment

We are committed to ensuring **equal employment opportunities** for people with disabilities.

- We will **inform employees, potential hires, and the public** that accommodations are available during the recruitment and hiring process.
- We will **notify staff** that support and accommodations are available for those with disabilities.
- We will establish a process to **develop individual accommodation plans** for employees as needed.
- Where required, we will provide **customized emergency information** to assist employees with disabilities during emergencies.
- 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 permitted in specific areas of our premises, **limited by Food Safety protocols**, including the **Office** and the **Parking Lot/Yard area**.

When it is not immediately obvious that an animal is a service animal, staff may ask the individual to provide **documentation from a regulated health professional** confirming that the animal is required for reasons related to their disability.

A service animal can often be identified through **visual indicators**, such as wearing a harness or vest, or by performing tasks to assist the person.



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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 ensure that people with disabilities can still access our goods, services, or facilities by:

- **Explaining why the animal is excluded**, and
- **Discussing alternative ways** to provide goods, services, or facilities.

**Service animals are prohibited** in the following areas due to food safety regulations:

- Warehouse
- Field and Production areas

### 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 may require a person with a disability to be accompanied by a support person for **health or safety reasons** affecting:

- The person with a disability, or
- Others on the premises

Before making such 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



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- **Determine** if there is no other reasonable way to protect the health or safety of the individual or others on the premises

By policy, any individual who is **not a staff member** must always be accompanied in any part of the premises, regardless of disability, in compliance with **food safety and health and safety regulations**.

### Training

Pfenning's is committed to **training all staff in Ontario's accessibility laws** and relevant aspects of the **Ontario Human Rights Code** as they relate to people with disabilities.

We provide training to employees and volunteers on accessibility **as it relates to their specific roles**, and all staff receive accessibility training **during orientation**.

Training will cover:

- Related **policies**
- How to **interact and communicate** with people with various types of disabilities
- How to **interact with people who use assistive devices, service animals, or support persons**
- Steps to take if a person with a disability is **having difficulty accessing our goods, services, or facilities**

Staff will also receive **additional training whenever 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 complainant 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.



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By phone: 519-662-3468 x37

By fax: 519-662-3468

By email: [kelly@pfenningsfarms.ca](mailto:kelly@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.



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### **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."



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### 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 cannot make decisions.                                           | Do not assume what employees or customers with disabilities can or cannot do. Ask them.                                    |
| If a person who has 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.                                                          |
| If 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.



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### 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 hearing loss.                       | Develop a template for slide decks using large fonts, high contrast colours and clean layout. Provide a verbal description of the slides when making a presentation.                                                                                                                           |
| Include captions for videos. If this is not possible, provide a text transcription of the video.                                                                     | Provide descriptions or 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 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. |

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*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. | Ensure all emails are accessible and offer alternative methods of communication when needed. |
|------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|

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Only one method of contact is available (e.g., telephone only).

Job applications are accepted only online.

Provide multiple ways to connect, such as telephone, email, TTY, or relay services.

Accept applications in a variety of accessible formats.

**Systemic barriers** occur when policies, practices, or procedures result in people with disabilities being treated differently or excluded altogether.

### Systemic Barriers

People with disabilities are excluded from events, or included as an after-thought when planning events.

A lack of knowledge about the types of accommodations an employee may need can hinder their return to work after a disability-related absence.

Lack of leadership or accountability can hinder accessibility, and hiring policies should actively encourage applications from people with disabilities.

Procedures should be reviewed to prevent excluding employees, such as requiring certain cleaning products that may cause allergic reactions

### Possible Solutions

Ensure accessibility is considered when planning events and invite attendees to share any accommodation needs. Use an accessibility checklist when appropriate.

Learn about the types of accommodations employees might need. Talking with employees about their specific needs is a good first step.

Designate a point person to implement accessibility policies and review hiring practices to identify and remove accessibility barriers, such as inaccessible interview locations.

Implement a "fragrance-free" policy.

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

### Physical/Architectural Barriers

Aisles are blocked by displays or merchandise making them too narrow for a person using a

### Possible Solutions

Consider the paths that your employees and customers take when creating displays or



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wheelchair or walker.

Event or meeting spaces are inaccessible.

storing merchandise.

When selecting a venue, consider all potential barriers—not just ramps—but also 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.



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### **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