

	<p style="text-align: center;"><u>Human Resources Policies</u></p> <p style="text-align: center;">Accessibility Policy</p> <p style="text-align: right;">Category: Ethics and Value</p>
<p>Policy Statement</p>	<p>PBI always strives to provide services and information in a way that respects the dignity and independence of all customers including people with disabilities. We are also committed to giving people with disabilities the same opportunity to access our goods, services, and facilities, allowing them to benefit from the same services, in the same place and in a similar way as others.</p> <p>PBI is also committed to meeting the needs of people with disabilities in a timely manner and will do so by preventing and removing identified barriers to accessibility, educating employees, and meeting the accessibility requirements under the <i>Accessibility for Ontarians with Disabilities Act</i> and the related <i>Integrated Accessibility Standards</i>.</p>
<p>Purpose</p>	<p>This policy is intended to provide the support, direction, and framework to ensure compliance with the <i>Integrated Accessibility Standards</i> ("IAS"), Ontario Regulation 191/11 under the <i>Accessibility for Ontarians with Disabilities Act 2005</i>, S.O. 2005, c. 11. (the AODA).</p> <p>This policy is intended to meet the requirements of the IAS for the following five standards:</p> <ul style="list-style-type: none"> • Customer Service Standard. • Design of Public Spaces Standard. • Employment Standard. • Information and Communications Standard. • Transportation Standard. <p>The purpose of the AODA is to benefit all Ontarians through the development and enforcement of standards designed to achieve "accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures, and premises on or before January 1, 2025.</p> <p>The government of Ontario passed the Act in 2005 to remove barriers and make Ontario a welcoming and accessible place for persons with disabilities.</p>
<p>Application</p>	<p>This policy applies to all PBI employees, applicants for employment, visitors, and to any individual or organization that provides goods, services, or facilities to the public or other third parties on behalf of PBI in accordance with the legislation.</p>
<p>Guiding Principles</p>	<p>The provision of accessible customer service at PBI will be guided by the fundamental principles governing AODA.</p> <p>Dignity</p> <ul style="list-style-type: none"> • People with disabilities are treated as equally valued and respected as any other individuals. <p>Equal Opportunity</p> <ul style="list-style-type: none"> • Persons with disabilities have the same opportunities to benefit from the goods and services provided by PBI as other customers. This means taking the individual needs of a person with a disability into account, even if doing so results in different treatment.

	<p>Independence</p> <ul style="list-style-type: none"> • People with disabilities are free to choose the manner in which they are served. <p>Integration</p> <ul style="list-style-type: none"> • People with disabilities have full access to the goods and services provided by PBI. This principle includes the use of alternate measures in cases where full integration does not serve the best needs of a person with a disability.
Definitions	See Appendix 1
Compliance	<p>Service will be offered to those with disabilities in the same way as it is to others, unless a different way of offering the service is necessary on a temporary or permanent basis. PBI will use alternative methods, when possible, to ensure that those with disabilities have access to the same services, in the same place and in a similar manner, considering their individual needs.</p> <p>Those with disabilities will be offered a variety of ways to communicate to access goods and services that take into account the client's particular disability. (Appendix 2)</p> <p>PBI will ensure that those with disabilities continue to have the assistance of a support person, service animal, or personal assistive device as required.</p> <p>This policy will be reviewed annually and as required to reflect changes in legislation, regulations, and any other relevant changes as they arise.</p> <p><u>Establishment of Accessibility Policies & Plans</u></p> <p>PBI will:</p> <ul style="list-style-type: none"> • Include a statement of commitment to meeting the accessibility needs of persons with disabilities in a timely manner in its policies. These documents will be made publicly available in an accessible format, upon request. • Establish, implement, and maintain a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR. The multi-year accessibility plan will be made in accessible format upon request and is posted on our website. • Review and update the multi-year accessibility plan every five years. <p><u>Training Requirements</u></p> <p>PBI provides training for its employees and students regarding the ISAR and the <i>Ontario Human Rights Code</i> as they pertain to individuals with disabilities. Training will also be provided to all individuals who participate in the development of policies, practices, and procedures as well as any individual or organization that provides goods, services, or facilities to the public or other third parties on behalf of PBI in accordance with the legislation.</p> <p>Training on the IAS will be provided:</p> <ul style="list-style-type: none"> • In a way that best suits the duties of employees, students, and any other associated persons
General Requirements	

Feedback Process

- On an ongoing basis regarding changes to policy, procedures, and practices as required.
- to new employees who will receive training (review of policy at orientation) and online training within one month of commencing their duties.
- Training on any new or updated legislative changes will occur for all persons as soon as practicable.

In addition, ISAR customer service training includes a review of the purposes of the Act and instruction about the following matters:

- how to interact and communicate with persons with various types of 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 provided by the provider that may help with the provision of goods, services, or facilities to a person with a disability i.e., wheelchair, walker, cane.
- What to do if a person with a type of disability is having difficulty accessing PBI's goods, services, or facilities.
- The process to provide feedback to PBI about the provision of goods and services for people with disabilities and how we respond and take action on a complaint.

Training Records

Records are kept by Human Resources on the training provided (both AODA and Ontario Human Rights Code), the names of attendees, and the dates that training took place. A master file is kept along with copies of all certificates of course completion in employee files.

PBI ensures that all feedback processes are made accessible to customers or employees, upon request, by arranging for accessible formats or communication supports.

PBI welcomes customer feedback on our efforts to ensure accessible customer service to people with disabilities. PBI will collect and respond to customer feedback regarding the manner in which it provides goods, services, or facilities to persons with disabilities.

Customers who wish to provide feedback on their customer experience are encouraged to speak directly with staff. Any verbal feedback will be directed to HR and the President/CEO.

In addition, feedback regarding the way PBI provides good and services to people with disabilities can be made by email (to the President/COE and HR through HR@pbiinc.ca), telephone, using paper form (available at our reception desk) and using the online feedback form (Appendix 3) found on our websites.

All customer feedback will be reviewed by the President and HR. Replies will be provided within five business days.

Additionally, any complaints related to the provision of customer service for people with disabilities can be addressed by making an appointment with the President/CEO of PBI.

<p>Communication, Accessible Formats & Communication Supports</p>	<p>PBI will make every reasonable effort when communicating with a person with a disability to:</p> <ul style="list-style-type: none"> • take into account their disability to ensure accessibility. • Provide a suitable method of communication that is agreed upon with the client. • Train our staff who communicate with customers on how to interact and communicate with people of all abilities. <p>Communication methods may include the use of email or relay services (Bell relay service, 1-800-855-0511) if telephone communication is not suitable to the customer's needs or is not available. See Appendix 2.</p> <p>Request for Alternate Format Form (Appendix 4) will be made accessible at Reception and on the PBI Website and reasonable effort will be made to meet the request.</p> <p>PBI shall, upon request, and in consultation with the person making the request, provide or make arrangements to provide accessible formats and communication supports for persons with disabilities <i>unless the information is deemed unconvertible</i>. Accessible formats and communication supports shall be provided in a timely manner and at a cost that is no more than the regular cost charged to other persons.</p> <p>PBI will:</p> <ul style="list-style-type: none"> • Take into account the person's accessibility needs when customizing individual requests and shall consult with the individual making the request to ensure suitability. • Make the availability of accessible formats and communication supports publicly known. <p>If it is determined that information or communications are unconvertible, PBI shall provide the person requesting the information or communication with:</p> <ul style="list-style-type: none"> • an explanation as to why the information or communications are unconvertible. • a summary of the unconvertible information or communications
<p>Service Animals</p>	<p>PBI will welcome customers with disabilities who are accompanied into the building by a guide dog or service animal.</p> <p>The IASR states in Section 80.45 (4) that an animal is a service animal for a person with a disability if,</p> <ol style="list-style-type: none"> a) the animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the vest or harness worn by the animal; or b) the person provides documentation from a list of regulated health professionals confirming that the person requires the animal for reasons relating to the disability. <p>If it is not apparent that an animal accompanying a person with a disability is a service animal, PBI may require the person to produce documentation from a list of regulated health professionals in Ontario confirming that the person needs the service animal for reasons relating to their disability:</p> <ul style="list-style-type: none"> • Audiologist • Speech-Language Pathologist • Chiropractor • Nurse • Occupational Therapist

- Optometrist
- Physician
- Physiotherapist
- Psychologist
- Psychotherapist
- Mental Health Therapist.

Service animals and guide dogs accompanying persons with disabilities are welcome on PBI premises that are open to the public unless the animal is otherwise excluded by law. For example, certain dog breeds may be excluded by the provincial *Dog Owners' Liability Act* or by municipal by-laws. Service Animals would not be allowed in PBI's manufacturing warehouse due to HACCP (Hazardous Analysis and Critical Control Points) certification with our manufacturing of food packaging.

Additionally, there may be circumstances whereby allowing a service animal to accompany a person with a disability on PBI premises might compromise the health and safety of another person. A common example would be allowing a guide dog near a person with a severe allergy to dogs. In such circumstances, PBI will provide an explanation to the customer and consider all relevant information to come up with a solution that meets the needs of both parties.

Potential barriers to the use of support persons or service animals will be removed wherever possible (Appendix 2)

An individual that is accompanied by a guide dog and /or service animal is responsible for maintaining care and control of the animal at all times.

Support Persons

PBI welcomes customers with disabilities who are accompanied into the building by a support person. Where a person with a disability accessing PBI goods or services is accompanied by a support person, PBI employees, volunteers and third-party contractors shall ensure that both persons are permitted to enter the premises together and shall ensure that the person with a disability can access the support person while on the premises.

Generally, the presence of a support person will only be required in situations where there is a significant health and safety risk that cannot be mitigated by other means.

Assistive Devices

PBI will make every effort to accommodate any customers who use an assistive device to access services on PBI premises.

Customers with disabilities may use their own assistive devices as required. If the device is not allowed by law, PBI will provide an explanation to the customer and seek other ways to provide services. Potential barriers to the use of assistive devices will be removed wherever possible (Appendix 2)

Job positions that may require knowledge regarding how to use the devices to help acquire services will be trained as necessary. (i.e., reception). When training occurs, a list of the date of training and the particular device will be recorded).

PBI will inform customers with disabilities of available assistive devices by sign and subsequently on the websites.

<p>Notice of Temporary Disruption</p>	<p>PBI will promptly notify all customers by about any temporary disruptions to services or facilities by posting a written notice as soon as possible on its websites, voicemail, at the reception counter, on the central PBI information bulletin board and at main front doors of its building. Some examples of temporary disruptions may include, but are not limited to evacuations due to fire, flood, etc., road closures, mechanical failures, failure of telephone or technological equipment.</p> <p>If appropriate, voice-mail messaging or other methods which are reasonable under the circumstances may be used, taking into account those customers with disabilities who may be most affected and matching the method of communication to their needs.</p> <p>Appendix 5 – sample of temporary notice of disruption.</p>
<p>Establishment of Multi-Year Accessibility Plan and Policies</p>	<p>PBI has a multi-year Accessibility Plan. The plan is posted on the PBI website and will be made available in an accessible format and with communication supports, upon request.</p> <p>The Accessibility Plan will be reviewed and, if necessary, updated at least once every five (5) years.</p> <p>PBI maintains policies governing how PBI shall meet its requirements under the AODA, and PBI will provide policies in an accessible format, upon request.</p>
<p>Formats</p>	<p>If required to give a copy of a document to a person with a disability, PBI shall, upon request, provide or arrange for the provision of the document, or the information contained in the document, to the person in an accessible format or with communication support. This will be done:</p> <ul style="list-style-type: none"> • 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 people. <p>PBI will consult with the individual making the request in determining the suitability of an accessible format or communication support.</p>
<p>Emergency Procedures, Plans or Public Safety Information</p>	<p>PBI will ensure that all publicly available safety and emergency information i.e., evacuation procedures, floor plans, etc. are provided in an accessible format or with appropriate communication supports, upon request.</p>

<p>Accessible Websites and Web Content</p>	<p>PBI will ensure that its websites and all web content published after Jan. 1/2012, conforms to the Web Content Accessibility Guidelines (WCAG) 2.0 in accordance with the schedule set out in the IASR. WCAG 2.0 is an industry standard which covers a wide range of recommendations for making website content more accessible.</p>
<p>Exceptions</p>	<p>The Information and Communications Standard does not apply to:</p> <ul style="list-style-type: none"> • Product and product labels • Unconvertible information or communications or • Information that the company does not control either directly or indirectly through a contractual relationship. <p><u>Unconvertible Information or Communications</u></p> <p>If it is determined, in consultation with the requesting party, that information or communications are unconvertible, PBI will ensure that the individual who made the request is provided with an explanation and a summary of the information.</p> <p>PBI will classify information or communications as unconvertible where:</p> <ul style="list-style-type: none"> • It is not technically practicable to convert or • The technology required to make the conversion is not readily available.
<p>Recruitment, Assessment and Selection</p>	<p>PBI shall post information about the availability of accommodation for applicants with disabilities in its recruitment process. Job applicants who are individually selected for an interview and/or testing shall be notified that accommodations for material to be used in the process are available, upon request. Where accommodation is requested, PBI shall consult with any applicant and provide or arrange for suitable accommodation in a manner that takes into account the applicant's accessibility needs due to their disability. Successful applicants shall be notified about PBI's policies and supports for accommodating employees with disabilities as part of their offer of employment. Employees will be kept up to date on any changes to these policies as they occur.</p>
<p>Accessible Formats & Communication Supports for Employees</p>	<p>Upon an employee's request, PBI shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:</p> <ul style="list-style-type: none"> • Information that is needed in order to perform the employee's job; and • Information that is generally available to employees in the workplace. <p>PBI will consult with the employee making the request in determining the suitability of an accessible format or communication support.</p> <p>PBI will provide updated information to all employees whenever there is a change to existing policies on the provision of job accommodation that take into account an employee's accessibility needs due to disability.</p>

**Workplace
Emergency
Response
Information**

When required, PBI will create individual workplace emergency response information for employees with disabilities. Information requiring assistance is given to employees at orientation (Appendix 6, this memo is also placed on the HR Communication Board). This information will take into account the unique challenges created by the individual's disability and the physical nature of the workplace and will be created in consultation with the employee. (Appendix 7 – Employee Emergency Information Worksheet). From the information gathered, an Employee Emergency Response Information Template (individualized) is created. (Appendix 8). If the employee requires assistance and gives consent, PBI will provide the workplace emergency response information to the person designated by PBI to provide assistance to the employee. The information shall undergo review when the employee moves to a different location, when the employee's overall accommodation needs or plans are reviewed and when PBI reviews its general emergency response plan.

**Documented
Individual
Accommodation
Plans**

A written process for the development and maintenance of documented individual accommodation plans shall be developed for employees with disabilities. If requested, these plans shall include information regarding accessible formats and communications supports. If requested, the plans shall include individualized workplace emergency response information.

The IAP Process:

PBI is committed to accommodating employees with disabilities and will use the following process to identify and meet employee accommodation needs. This process may require modification to take into account the particular circumstances and needs of the individual employee.

1. Recognize the need for accommodation.

Accommodation can be:

- Requested by the employee.
- Requested by PBI (employee's manager or hiring manager) – if they know or reasonably ought to know an employee requires accommodation, they have an obligation to make appropriate enquiries.

The employee request for accommodation shall be submitted in writing (preferably), to their immediate supervisor. The request shall:

- Describe the condition or circumstances causing the accommodation issue and
- Describe in detail the accommodation sought to address the need.

2. Gather relevant information and assess individual needs.

The supervisor will consult with the employee seeking accommodation to understand the nature and basis of the request, as well as any suggestions or recommendations the employee may have regarding accommodation. The accommodation process is a collaborative one and the employer and employee all have a role to play in the process.

- Information will be collected on the employee's functional abilities, not the nature of the employee's disability.

- The employee's personal information, including medical information, is kept secure and dealt with in a confidential manner. It will only be disclosed to individuals who need it to perform the accommodation process.
- The employee and their manager will work together to find the most appropriate accommodation.
 - An outside medical expert or other expert may be engaged (at PBI's expense) to help determine if/how the employee's needs can be accommodated.
 - The employee may request a representative from the workplace to assist in the development of the IAP.

Employees seeking accommodation are required to:

- Provide their fullest cooperation in providing any necessary, sufficiently detailed information and medical assessments describing the employee's needs which are relevant to determination of the accommodation request.
- Provide the necessary information within the specified time following PBI's request unless a legitimate justification for extending the timeline exists.
- Make best efforts to perform work assigned by PBI.
- Promptly notify PBI and provide updated medical or other information if there is a change to the employee's medical needs or prognosis.

Failure to meet the above mandatory obligations i.e., failure to cooperate and/or participate in the development of the IAP is considered a breach of the policy and could result in employment/disciplinary consequences.

3. Write an individual accommodation plan.

After identifying the most appropriate accommodation(s), the details will be documented in a written plan, including:

- What accommodation(s) will be provided.
- How to make information accessible to the employee, including accessible formats and communication supports.
- Employee emergency information and/or emergency response plan (if applicable).
- When the plan will be reviewed and updated.

The supervisor will give the employee in an accessible format (if required), a copy of the individual accommodation plan (Appendix 9), or written reasons for denying the accommodation (see step 5).

4. Implement, monitor, and update the plan.

After implementing the accommodation plan, the employee and their supervisor will monitor and review the plan to ensure that it is effective. Formal reviews and updates will take place on the mutually agreed upon, predetermined schedule in the employee's accommodation plan. If the accommodation is no longer appropriate, the employee and the manager will reassess the situation (step 2) and update the plan.

The accommodation plan will also be reviewed and updated if:

- The employee's work location or position changes
- The nature of the employee's disability changes and requires further or less accommodation. The employee is obligated to notify their supervisor and

provide updated medical information if the employee experiences a change in their disability that necessitates a review of the IAP.

- The employee is having performance issues.

5. If the accommodation is denied, the following factors must have been considered and reasons why a particular conclusion was reached:

- The employee's regular position:
 - Can the employee perform their existing job?
 - If the answer is "no", can the employee perform the job in a modified form i.e., modified scheduling, use of supportive devices, etc.
 - If the answer is "no", PBI will proceed to the second stage of the assessment process – looking at other available positions in the workplace.
- Other positions in the workplace:
 - A thorough review of the workplace and open positions. If the employee cannot perform any other existing position in the workplace, PBI will look at considering the "bundling" of duties.
- Bundling of Duties:
 - Can the employee perform tasks and responsibilities from various positions across the company which can be "bundled" together to provide the employee with an opportunity to perform a productive and useful job.
 - Consider whether it is possible to, absent undue hardship, to "create" a position by rebundled duties and responsibilities.

The CEO/President and Manager will jointly finalize a decision regarding the accommodation issue.

6. Accessible format in communicating the accommodation decision to the employee.

- Whether the IAP is granted or denied, the supervisor will consult with the employee regarding accessible formats and communicate the decision in writing to the employee (or other formats as required by the employee's disability), and the reason(s) for the decision, and in a timely manner.
- PBI has the right to select a preferred format if more than one format is available. An employee is not entitled to their *preferred* method of accommodation. The duty to accommodate simply requires PBI to provide an employee with *reasonable* accommodation, up to the point of undue hardship.
- Where it is determined an employee cannot be accommodated because no suitable work is available or because to do so would cause the employer undue hardship, objective evidence should be gathered and recorded in support of such a conclusion.
- PBI recognizes that the duty to accommodate is an ongoing duty which requires PBI to periodically revisit whether accommodation is possible, either because of changes in the workplace or because of changes in the employee's restrictions.

<p>Performance Management, Career Development and Redeployment</p> <p>Return to Work Process</p> <p>Policy Modifications</p>	<p>7. Appealing the IAP decision</p> <ul style="list-style-type: none"> • If the employee is not satisfied with the written decision regarding the request for accommodation, the employee may appeal the decision to the President/CEO for further review. The decision of the President/CEO shall be final and binding upon the parties. <p>PBI will consider the accessibility needs of employees with disabilities when implementing performance management processes, or when offering career development or advancement opportunities. Individual accommodation plans will be consulted, as required.</p> <p>In the event that PBI uses redeployment, PBI will take into account the accessibility needs of its employees with disabilities, along with individual accommodation plans, when redeploying employees with disabilities. Individual accommodation plans will be consulted, as required.</p> <p>PBI has a documented return to work process for employees returning to work due to disability and require disability-related accommodation(s) as set out in the Ontario Human Rights Code, Workplace Safety & Insurance Act (WSIA), and the AODA and related IAS in order to return to work.</p> <p>PBI's goal is to ensure an early and safe return to work following any work and nonwork-related injury or illness. The return-to-work process outlines the steps PBI takes to facilitate an employee's return to work and shall use documented individual accommodation plans (as described in Section 28 of the IAS regulation and the processes set out in the Documented Individual Accommodation Plan Section.</p> <p>See Appendix 10 – Return to Work Process/ Work Accommodation Guidelines</p> <p>PBI will modify or repeal any policy that is inconsistent with the principles set out in AODA or the <i>Accessibility Standards for Customer Service</i>.</p> <p>Any questions about this policy, or if the purpose of this policy is not understood, an explanation will be referred to and provided by a member of the PBI management.</p>
<p>Approvals</p>	<p>Len Larose, Ralph Misale</p>
<p>Date Approved</p>	<p>November 18, 2017</p>
<p>Revised</p>	<p>November 8, 2023</p>

Related Links	Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11 Accessibility Standards for Customer Service, O. Reg. 429/07 Integrated Accessibility Standards, O. Reg. 191/11 Human Rights Code, R.S.O. 1990, c. H.19 Ontarians with Disabilities Act, 2001 Blind Person's Rights Act, RSO 1990 Dog Owners' Liability Act, RSO 1990, c D.16 Guide Dogs, RRO 1990, Reg 58
Attachments	Appendix 1 – Definitions Appendix 2 – Communication Guidelines Appendix 3 – Customer Service Feedback Form Appendix 4 – Request for Documentation in Alternate Format Form Appendix 5 – Notice of Disruption Form Appendix 6 – Assistance Memorandum Appendix 7 – Employee Emergency Information Worksheet Appendix 8 – Individualized Employee Emergency Information Template Appendix 9 – Individual Accommodation Plan Appendix 10 – Return to Work / Work Accommodation Guidelines