



## Accessibility for Ontarians with Disabilities Act (AODA) Policy

---

**Tradition Fine Foods Ltd** (the “Company”) is committed to meeting accessibility needs for persons with disabilities in a way that respects their dignity, independence and rights of equal opportunity access. We are committed to identifying, removing and preventing barriers to accessibility for persons with disabilities. We comply with applicable legal and regulatory requirements, including those set out in the Ontario Human Rights Code and Accessibility for Ontarians with Disabilities Act (AODA) and Ontario’s accessibility laws. We will ensure that: services, employment and programs are provided in a manner that respects the dignity and independence of persons with disabilities; information and communication are provided in accessible formats, where requested; and accessibility is integrated into our regular workplace processes, thereby providing equal access and opportunity across all stages of the employment lifecycle of employees with disabilities.

### SCOPE

This Policy applies to the province of Ontario.

For further clarity and understanding, the following definitions apply to this policy.

**“Accessible formats”** – means formats that are an alternative to standard print and are accessible to persons with disabilities. Accessible formats may include, but are not limited to, large print, braille, recorded audio and electronic formats.

**“Accommodation”** – refers to an arrangement made with, or assistance provided to, persons with disabilities, to ensure their equal access to our services, employment and programs. Accommodation will vary depending on the person’s unique needs. Accommodation may include, but are not limited to mobility aids and mobility assistive devices.

**“Barrier”** – refers to anything that prevents a person with a disability from accessing our services, employment or programs, including physical, attitudinal and technological barriers, and inadequate information or communication.

**“Communication”** – refers to the interaction between two or more persons where information is provided, sent or received.

**“Communication supports”** – means supports that facilitate effective communication, and may include plain language formats, sign language and captioning.

**“Disability”** – refers to any degree of physical, mental, developmental or learning impairment, and includes temporary and permanent disabilities, visible and invisible disabilities (e.g. visual, hearing or mental impairment, or learning or developmental disabilities).

**“Information”** – refers to data, facts and knowledge that exists in any format, including text, audio, digital or images.

**“Mobility Aid”** – refers to a device used to facilitate the transport, in a seated posture, of a person with a disability.

Date issued	Sept 1, 2022 Reviewed April 2 2025
Policy Owner	Marianna Agostino, VP Human Resources



## Accessibility for Ontarian with Disabilities Act (AODA) Policy

**“Mobility Assistive Device:** - refers to a cane, walker or similar aid.

### Accessible Information and Communication:

#### Accessible Websites and Web Content

The Company website and web content will conform to level 2.0 AA of the Worldwide Wb Consortium’s Web Content Accessibility Guidelines (WCAG).

Accessibility is integrated into our communication methods as follows:

A Feedback Process is established to receive and address feedback on accommodation. The process includes providing or arranging for accessible formats and communication supports, upon request.

**Accessible Formats and Communication Supports:** recognize that persons with disabilities may use alternative methods to access information or services and will upon request provide, or arrange for the provision of, information and communication in an alternative format. The Company will consult with the person making the request in determining the suitability of an accessible format or communication support.

### Emergency Response Plan

Alternative emergency preparedness plans are created, as required and as soon as practicable, for employees who the Company is aware are unable to follow the standard emergency plan in their Company work location, as a result of a permanent or temporary disability.

Accessibility is integrated into our employment-related practices as follows:

#### Recruitment:

Notifications are provided to internal and external job applicants, via the job posting and application process and when inviting an applicant to an interview or assessment, that accommodation is available upon request. When arranging accommodation, the Company will consult with the job application to determine their specific accessibility needs.

#### Onboarding:

Within the offer of employment, we provide the successful applicant with our policies for accommodating employees with disabilities. The Company informs employees of our policy relating to accessibility during the onboarding process.

#### Workplace Accommodation:

In response to an employee request in Ontario, the Company will, in consultation with the employee, provide or arrange for the provision of accessible formats and communication support for information that is required in order for the employee to perform their job and access information that is generally available to employees in the workplace.

Date issued	Sept 1, 2022	Revised April 29, 2025
Policy Owner	Vice President Human Resources	



## Accessibility for Ontarian with Disabilities Act (AODA) Policy

Employees requiring accommodation should advise their manager and/or Human Resources. Employees may be required to support their request with medical documentation. The Form for employees to take to their physician in this regard will be provided by Human Resources. Once established, a written individual accommodation plan will be provide in writing to the employee.

### Return to Work from Disability-Related Leave:

The Company maintains a documented return to work process outlining how the Company facilitates the return to work of employees who have been absent from work due to a disability and require accommodation in order to return. The process includes the use of a written individual accommodation plan. Employees should notify their manager and/or HR of an impending return to work as far in advance of the return to work as possible.

### Performance Management and Career Development:

The Company will take the accessibility needs of employees with disabilities and individual accommodation plans into account in all performance management and career development processes.

### Redeployment:

Where the Company redeploys a colleague with a disability, the employee's accessibility needs and individual accommodation plan will be taken into account, so that he colleague's accommodation needs are met.

### Training

Accessibility is integrated into our training programs as follows:

We ensure training is provided to all employees, and those who provide services on the Company's behalf on the standards set by applicable provincial legislation regarding accessibility as well as any aspect of human rights legislation relating to persons with disabilities.

Training is:

- Appropriate to the duties of the person undergoing training;
- Provided before or as soon as possible after the person commences job duties and whenever the Company alters its policies or practices regarding accessibility.

We maintain records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided.

### Interpretation

Interpretation of this Policy rests with the Vice President Human Resources.

### Multi-Year Accessibility Plan

Date issued	Sept 1, 2022	Revised April 29, 2025
Policy Owner	Vice President Human Resources	



## Accessibility for Ontarian with Disabilities Act (AODA) Policy

Further to our outlined commitments, Tradition Fine Foods Ltd Multi-year Accessibility Plan (the “Plan”; Appendix “A”), outlines the Company’s phased-in strategy for identifying, removing and preventing barriers to accessibility.

- The plan is posted on our website ([www.tradition.ca](http://www.tradition.ca)) and will be provided in alternate formats upon request.
- The Plan will be reviewed and updated at least once every five years.

Please see Tradition Multi-Year Accessibility Plan for further details.

### For Further Support

Requests for documents, alternative formats or communication supports should be directed to Marianna Agostino, VP Human Resources at 416-444-4777, or in writing to Tradition Fine Foods Ltd c/o Marianna Agostino, VP Human Resources, 663 Warden Avenue, Toronto, M1L 3Z5 or via email at [compliance@tradition.ca](mailto:compliance@tradition.ca)

Date issued	Sept 1, 2022	Revised April 29, 2025
Policy Owner	Vice President Human Resources	



## Accessibility for Ontarian with Disabilities Act (AODA) Policy

### ACKNOWLEDGEMENT OF RECEIPT

By my signature below, I acknowledge that I have received and reviewed a copy of this Policy and that I understand it and agree to comply with it.

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Employee Name (Print)

Date issued	Sept 1, 2022	Revised April 29, 2025
Policy Owner	Vice President Human Resources	