



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.

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“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.



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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 the 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 jointly with the Vice President Human Resources.

Multi-Year Accessibility Plan



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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) 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 416-444-4777, or in writing to Tradition Fine Foods Ltd c/o Human Resources, 663 Warden Avenue, Toronto, M1L 3Z5.



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Appendix A : Multi Year Accessibility Plan

This *Multi-Year Accessibility Plan* is an appendix to our Accessibility for Ontarians with Disabilities Act Policy. It outlines our strategy to prevent and remove barriers to address the current and future requirements of the Accessibility for Ontarians with Disabilities Act (the “AODA”), and in order to fulfill our commitment as outlined in our AODA policy.

Customer Service Accessibility

Tradition Fine Foods Ltd. (“the Company”, or “Tradition”) complies with the Accessible Customer Service Regulation under the AODA. Among the measures that have been implemented are the following:

- We have ensured that training has been provided to every person who interacts with the public on the Company’s behalf, as well as to all those who are involved in the development of our policies, procedures and practices governing the provision of goods or services to the public. This training includes the purpose of standards regarding accessibility set by provincial legislation and related requirements, as well as how to communicate, interact and support persons with disabilities in a way that takes into account their disability. The training is delivered as soon as practicable after hire and on an ongoing basis as our policies or procedures governing the provision of goods or services to persons with disabilities, are updated;
- Persons with disabilities are permitted to use their own assistive devices to obtain, use or benefit from our goods and/or services;
- Persons accompanied by a service animal are permitted to enter areas of our premises that are open to the public, except in those areas in which the animal is excluded by law;
- Where a person with a disability is accompanied by a support person, both the person with the disability and the support person are provided equal access to our goods and services;
- Notice is provided to the public of any temporary or other disruptions to facilities or services usually used by persons with disabilities, including information about the reason for and expected length of the disruption and a description of any alternative facilities and/or services that are available;
- We welcome feedback about how we provide goods or services to persons with disabilities through multiple communication channels .

Self-Service Kiosks

Following the review of our operations, it has been determined that we do not maintain self-service kiosks. However, to the extent that self-service kiosks are acquired or operated in the future we will consider accessibility issues and requirements at that time.



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AODA Policy

Our AODA Policy affirms our commitment to meeting the accessibility needs of persons with disabilities in a timely manner and governs the way we will achieve accessibility;

We updated this *Multi-Year Accessibility Plan* outlining our phased-in strategy for identifying, removing and preventing barriers to accessibility;

The Policy and 5-Year Plan are posted on our corporate website (www.tradition.ca) and will be provided in alternate formats upon request;

This Plan will be updated at least once every five years or as our accessibility strategy evolves.

Communication & Information

Tradition is committed to making company information and communications accessible to persons with disabilities.

Websites and Web Content:

We will continue to monitor the creation of any new websites and web content, including those websites undergoing a significant refresh to ensure they comply with WCAG 2.0 Level AA as currently required by AODA. On an ongoing basis, we will ensure a process is in place to confirm that websites and content continue to meet required WCAG conformance levels currently in effect.

Feedback, Accessible Formats and Communication Supports:

Our processes for receiving and responding to feedback are accessible, by providing or arranging for the provision of accessible formats and communication supports, upon request. Upon request, we provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, in a timely manner and at no extra cost.

Requesting persons will be consulted as to the suitability of an accessible format or communication support. Feedback will be accepted by HR at [416-444-7777](tel:416-444-7777), or in writing to Tradition Fine Foods Ltd. c/o Human Resources, 663 Warden Avenue, Scarborough, ON, M1L 3Z5.

The public will be notified about the availability of accessible formats and communication supports by a notification on www.tradition.ca.

Training

We are committed to implementing a process to ensure that all employees, and those who provide services on the our behalf, and persons participating in the development and approval of our policies are provided with appropriate training on the requirements of the AODA and any aspect of human rights legislation relating to persons with disabilities.



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We have conducted training appropriate to the duties of the person and in 2024 will continue to refresh this training. We will continue to develop processes to provide training in a timely manner, maintain records of the training provided including training dates, and the number of individuals to whom it was provided.

Employment

We are committed to accessible employment practices and to removing any barriers that prevent or hinder the recruitment, retention and career development of employees with disabilities. Accessibility is integrated into Tradition's employment-related practices, and has implemented the following:

Emergency Response Plans:

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.

The employee and, if the employee consents, any designated assistant(s) are provided with the alternative emergency preparedness plan. Alternative emergency preparedness plans are stored with the standard Emergency Plan(s) in the employee's work location.

Recruitment:

Notification of job applicants that accommodation is available during the recruitment process on request, by specifying same in job postings and on the careers section of the corporate website.

We specify that accommodation is available for applicants with disabilities in recruitment-related materials and during scheduling of interviews and assessments.

If an applicant requests accommodation, we consult with the applicant and arrange for the provision of suitable accommodation that takes into account the applicant's needs due to disability.

When making offers of employment, the successful applicant is notified of our policies for accommodating employees with disabilities within our offer letter.

We provide appropriate training to employees responsible for recruitment, assessment, selection and on-boarding to ensure these planned actions are delivered, and accommodation requests are fulfilled in an effective and timely manner.

Workplace:

We review and, as necessary, modify existing orientation and on-boarding processes to ensure new employees are provided information about the Company's accessibility policies.

We outline procedures for documenting and updating, as required, documented individual accommodation plans. We provide for the method(s) by which requesting employees will be assessed and represented, how they can participate in the plan's development, and the method by which a copy of the plan will be provided to the employees in a format that takes their accessibility needs into account.



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We provide appropriate training to managers and employees responsible for supporting the individualized accommodation plan process, and a training schedule that will ensure the efficacy of the process on a continuing basis.

Return to Work from Disability-Related Leaves:

We review and, as necessary, modify and document existing return to work processes for employees who have been absent from work due to a disability and require accommodation in order to return to work.

We ensure documented individual accommodation plans comprise part of the return to work process.

We develop and provide training to managers and other employees responsible for supporting the return to work process for employees who require accommodation in order to return to work, and a training schedule for same that will ensure effective execution of the return to work process on a continuous basis.

Performance Management:

We take into account the accessibility needs of employees with disabilities when providing career development and advancement to our employees with disabilities, including notification of the ability to provide accommodations on internal job postings.