
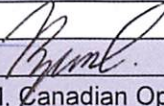
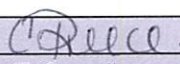


Title: Accessibility for Ontarians with Disabilities (AODA)		Document# HR01-16
		Effective Date 01-Jan-24
Approved by  CFO, Canadian Operations	 GM, Canadian Operations	 HR Coordinator

Revision History	
01-Mar-24	Replacing HR01-13 "Organizational Accessible Program" policy with HR01-16 "Accessibility for Ontarians with Disabilities"

Jungbunzlauer Accessibility Policy

Application

This Policy applies to all Jungbunzlauer ("the Company") employees and community members.

Purpose

Jungbunzlauer seeks to create an inclusive environment for our employees, customers, contractors, and visitors. This Policy and the responsibilities described in Section 5 apply to the Company's operations, with the goal of removing and preventing accessibility barriers.

This Policy is intended to comply with the principles and guidelines set out in the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*. The content is designed to meet the requirements of the Integrated Accessibility Standards, Ontario Regulation 191/11 (IASR) as well as Jungbunzlauer's accessibility and inclusion goals.

By following the standards outlined by the AODA and the procedures included in this Accessibility Policy, Jungbunzlauer will ensure equitable treatment regarding the goods, services, facilities, and employment opportunities we provide.

Statement of Commitment to Accessibility

Jungbunzlauer is committed to creating an inclusive environment for everyone. We seek to provide accessible, safe, dignified, and welcoming services for all employees, job applicants, customers, contractors, and visitors who use our goods, services, information, or facilities. We are committed to meeting the requirements of the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)* and all applicable accessibility and human rights legislation.

Definitions

The following terms are used in this policy and have the following meanings:

Accessible, Accessibility: products, services, facilities, or environments that can be accessed, used by, or understood by all persons, including those with disabilities

Accessible or Alternate Formats: include but are not limited to large print, recorded audio and accessible electronic formats, braille, and other formats usable by persons with disabilities.

Accommodation: efforts to ensure that people with disabilities are not denied jobs or services if they can be accommodated to the point of undue hardship through changes to a company's policies, practices, training, technology, or other reasonable supports

Assistive Devices: any device used to assist persons with disabilities in carrying out activities or in accessing services. Assistive devices include:

- Mobility assistive devices, such as a cane, walker, wheelchair, electronic scooter, or similar device used to assist with mobility.
- Communication devices, such as a hearing device, laptop computer, communication board, or similar device used to assist with communication; and
- Medical devices, such as a personal oxygen tank or similar device used to assist with medical requirements of a disability.

Barrier: anything that prevents a person with a disability from fully participating in all aspects of society because of their disability, including physical, architectural, information or communications, attitudinal, technological, or systemic policies or practices

Communication Supports: include but are not limited to captioning, alternative or additional communication methods or technology, and the use of plain language, sign language, or other supports that facilitate clear and effective communication.

Disability: This policy uses the AODA and *Ontario Human Rights Code* definition of Disability, which defines a disability as:

- a) 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;
- b) A condition of mental impairment or a developmental disability;
- c) A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- d) A mental disorder; or
- e) An injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

This definition includes disabilities that may be visible or not visible and disabilities that may be temporary, permanent, or episodic.

Information: includes data, facts and knowledge that exists in any format, including text, audio, images, digital or print, and that conveys meaning

Kiosk: an interactive electronic terminal, including a point-of-sale device, for public use that allows users to access one or more services or products

Public spaces: As defined by the AODA, public spaces include:

- Recreational trails/beach access routes;
- Outdoor public eating areas like rest stops or picnic areas;
- Outdoor play spaces, like playgrounds in provincial parks and local communities;
- Outdoor paths of travel, like sidewalks, ramps, stairs, curb ramps, rest areas and accessible pedestrian signals;
- Accessible off-street parking and accessible on-street parking; and
- Service-related elements like service counters, fixed queuing lines and waiting areas.

Service Animal: An animal is a service animal for a person with a disability if:

- a) The animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, because of visual indicators such as an identifying vest or harness worn by the animal;
- b) The person provides documentation from a regulated health professional confirming that the person requires the animal for reasons relating to a disability; or
- c) The animal is a trained guide dog, trained as a guide for a person who is blind, having qualifications required by guide dog regulations.

Support Person: in relation to a person with a disability, a support person is any person who accompanies a person with a disability in order to help with communication, mobility, personal care, or medical needs or with access to goods, services or facilities

Web Content Accessibility Guidelines: refers to the World Wide Web Consortium (W3C) recommendations, the Web Content Accessibility Guidelines (WCAG)

Responsibilities

The following Jungbunzlauer responsibilities describe procedures and commitments made by the Company and its employees. All procedures incorporate the following four AODA principles:

- **Dignity** – The Company is committed to respecting and treating every person as valued and deserving of effective and full service as any other customer.
- **Independence** – The Company makes every effort to ensure that persons with disabilities have the freedom and resources available to make choices and decisions without the control or influence of others.
- **Integration** – The Company is committed to making its goods, services, facilities, and employment opportunities available to persons with disabilities in an inclusive and integrated manner. If complete integration is not possible, alternate measures will be determined to ensure that persons with disabilities receive, use and benefit from goods and services in an equally effective way.
- **Equality of Opportunity** – The Company will ensure that persons with disabilities are given equal opportunities to obtain, use and benefit from the goods, services, and employment opportunities it provides.

Information and Communication

Jungbunzlauer encourages open communication throughout the organization. The Company makes every effort to provide information and communication in an accessible format. Persons with disabilities

are encouraged to communicate their feedback and their requests for accommodation or assistance if barriers exist.

Information

Jungbunzlauer will provide information about the Company and its services, including public safety information, in accessible formats or with communication supports, upon request.

The Company will meet or exceed internationally recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements as required by the AODA, for any web content that Jungbunzlauer controls or manages.

Jungbunzlauer's Statement of Commitment to Accessibility and accompanying contact information will be posted in our facility reception areas and on the [Accessibility](#) page of our Company website.

Communication

Jungbunzlauer is committed to communicating with persons with disabilities in ways that take into consideration their disability and any individual needs or requirements. To ensure communication is as accessible and inclusive as possible, the Company is committed to the following:

- Training employees in how to interact and communicate with persons with disabilities guided by the principles of dignity, independence, and equality in a timely manner;
- Considering the person's accessibility needs and providing services at no additional cost to that charged to other customers;
- Consulting with persons with disabilities regarding how to communicate with them to ensure their needs are met in a respectful, considerate manner;
- Not making assumptions or generalizations about individual needs and consulting with individuals to understand their unique needs and circumstances;
- Considering and using appropriate language when communicating (e.g., plain language that is easily understood);
- Considering and using appropriate method of communication and meeting individual requests for alternate format wherever possible (e.g., phone, email, large print, audio formats); and
- Using appropriate assistive devices or services when required (e.g., amplifying devices, magnifying devices, sign language interpreter, etc.).

Training

Jungbunzlauer will provide AODA and accessibility training as required under legislation. This training will include, at minimum:

- The purpose and principles of the *Accessibility for Ontarians with Disabilities Act* and applicable accessibility legislation;
- An overview of the requirements of the AODA's Customer Service standard;
- Information on how to interact with persons with disabilities;
- Information on how to interact with people who use an assistive device or require the assistance of a service animal or support person;
- Information on what to do if a person with a disability is having difficulty accessing Jungbunzlauer's services, goods, or facilities;
- Applicable *Human Rights Code* content, as it relates to persons with disabilities;

- Role-specific responsibilities of the AODA standards related to individual departments; and
- An overview of Jungbunzlauer's Accessibility Policy and related procedures.

This training will be provided by Human Resources and management:

- During the onboarding period for new employees;
- When changes are made to the AODA or other applicable accessibility or human rights legislation; and
- When changes are made to Jungbunzlauer's accessibility policies or procedures.

The Company will also ensure that those who are involved in the development and approval of accessibility-related policies, practices, and procedures are trained on the AODA and *Ontario Human Rights Code* content that relates to persons with disabilities.

A record of training provided will be maintained by Human Resources and will include the date of training and the names of the participants in attendance.

Emergency or Evacuation Support for on-site visitors

All Jungbunzlauer facility visitors are requested to notify the person they are meeting with if they might require accommodation or support during a meeting or during an emergency or evacuation situation while visiting Jungbunzlauer facilities.

Human Resources and Joint Health and Safety team members are trained on how to arrange accommodations for any emergency or evacuation support requests, as well as requests for information in alternate formats.

Accessible or Alternate Formats and Communication Supports

Upon request, Jungbunzlauer will provide or arrange for the provision of accessible or alternate formats and communication supports for persons with disabilities, in a timely manner and at no additional cost to the individual. The Company will take into account the person's accessibility needs when responding to individual requests.

If Jungbunzlauer determines information or communications cannot be provided in the format requested, the Company will provide the individual making the request with an explanation. For example, Jungbunzlauer product information that is produced outside of the Company may not be available in an accessible format. In such cases, when requested and wherever possible, the Company will provide a summary version of the information or communication provided.

Assistive Devices

Jungbunzlauer is committed to serving persons with disabilities who use assistive devices to obtain, use or benefit from the Company's goods and services. Staff will be trained how to interact with persons with disabilities who use an assistive device.

Wherever possible, Jungbunzlauer will ensure that the access, use and benefit of goods and services are not compromised for persons with disabilities who require assistive devices or who are accompanied by a service animal or support person.

Persons with disabilities shall be permitted to obtain, use, or benefit from goods and services using their own assistive devices. The Company emphasizes that it is the responsibility of the person with disability to ensure that their assistive device is operated in a safe and controlled manner at all times.

Service Animals

Service animals include but are not limited to guide dogs and other trained or certified service animals.

Jungbunzlauer employees will be trained how to interact with persons with disabilities who require the assistance of a guide dog or other service animal. Service animals can often be identified through visual indicators (for example, a harness or a vest with a certification badge). If a service animal cannot be identified easily, Jungbunzlauer staff may request that a person accompanied by an animal provide documentation from a regulated health professional to confirm that the animal is required for reasons relating to their disability.

Wherever possible, Jungbunzlauer is committed to welcoming persons with disabilities who are accompanied by a service animal on Company premises that are open to the public and other third parties. This excludes areas prohibited by law (for example, in an area where food is being prepared in a commercial kitchen).

Support Persons

The Company is committed to welcoming persons with disabilities who are accompanied by a support person. A support person may be a paid professional, a volunteer, a friend, or a family member. As with all Jungbunzlauer facility visitors, support persons must abide by Company rules and regulations.

Staff will be trained how to interact with persons with disabilities who require the assistance of a support person.

Any person with a disability who is accompanied by a support person will be allowed to access Jungbunzlauer premises that are open to the public and other third parties. At no time will a person with a disability who is accompanied by a support person be prevented from having access to their support person while on the premises. Fees will not be charged to support persons for admission to Company premises.

Persons with disabilities shall determine whether a support person is necessary and are required to provide their own support person. They are asked to inform the Company that they will be accompanied by a support person upon entering the premises.

In some cases, a support person may need to sign a confidentiality agreement dependent on the information to be discussed (for example, where confidentiality is essential for the Company or for the customer being served).

Notice of Temporary Disruption of Accessible Services or Facilities

The Company will provide notice in the event of a planned or unexpected disruption in accessible services or accessible facilities usually used by persons with disabilities. This notice will include information about:

- the reason for the disruption;
- its anticipated duration;
- a description of alternate facilities or services, if available; and
- contact information for questions or follow-up regarding the disruption.

Notice of the disruption of facilities or services will be announced and posted as soon as possible after becoming aware of a disruption.

Notice will be posted at the location of the disruption, and at the main Jungbunzlauer facility entrance affected by the disruption. Notices will be announced through Jungbunzlauer's email systems.

For lengthy or planned disruptions, notice may also be posted on the Jungbunzlauer [Accessibility](#) page.

If a disruption occurs, persons with disabilities will be accommodated using other possible means to deliver the goods and services. Accommodation options will be discussed with those involved and alternate service methods may include:

- Using an alternative place and time to provide the goods or services to persons with disabilities.;
- Conducting the goods or services in another format (such as arranging a consultation or meeting with a client over the phone, online, or in person); or
- Using other appropriate measures available to deliver goods and services.

Accessibility Feedback

Feedback regarding accessibility to goods and services and the way Jungbunzlauer employees interact with others is welcome and appreciated. Our goal is to meet the needs of all of our customers and visitors.

Feedback can be provided in person, by phone, by email, or by using a Company Accessibility Feedback Form that is available upon request and on the Jungbunzlauer [Accessibility](#) page.

The Company will provide an initial response to accessibility feedback within five business days. Concerns will be addressed according to the Company's complaint management procedures. Where necessary, management will work with the person who submitted the feedback to address and resolve complaints.

Establishment of Accessibility Plans

Jungbunzlauer will create and maintain a multi-year accessibility plan outlining its strategy to identify, prevent, and remove barriers and to meet its requirements under the AODA. The Company will post its accessibility plan on the [Accessibility](#) page and will provide the plan in an alternate format upon request.

The Company will review and update its accessibility plan once every five years, in consultation with Jungbunzlauer Human Resources and senior management.

Procuring or Acquiring Self-Service Kiosks

Jungbunzlauer currently does not provide self-service kiosks to members of the public. If the Company plans to procure or acquire self-service kiosks, it will incorporate accessibility criteria and features, except where it is not possible or practical to do so. If it is not possible and practical to incorporate accessibility criteria, the Company will provide an explanation upon request.

Hiring (for applicants)

Jungbunzlauer is committed to being inclusive in our hiring policies. We will notify the public that we will accommodate the needs of persons with disabilities throughout our selection and hiring process. During the selection process, we will include the following paragraph in print and online job postings:

Jungbunzlauer is committed to inclusive recruitment and employment practices. If you require an accommodation during the selection process, please inform us as soon as possible at accessibility@jungbunzlauer.com and we will make every effort to fulfill your request.

When scheduling an interview, we will ask applicants if they have any accommodation requests. If an interview candidate requests an accommodation, we will discuss their request with them and make every effort to fulfill their accommodation requests.

Workplace information (for employees)

Upon request by an employee, the Company will provide workplace information in an accessible or alternate format or offer communication supports when needed. Workplace information includes:

- Any information employees need to perform their jobs (for example, job descriptions and manuals);
- Emergency and public safety information, including WHMIS, Jungbunzlauer Standard Operating Procedures (SOPs) and Emergency and Evacuation Procedures; and
- General information that is available to all employees at work (for example, the Company's Accessible Employment Policy and corporate newsletters and memos).

The Company will work with employees who request accommodations to determine how best to meet their needs and to provide accessible workplace information in a timely manner.

Jungbunzlauer will work with employees with disabilities to develop individual accommodation plans. Where necessary, these plans will also include individual emergency response plans and information to assist during an emergency or evacuation.

The Company will take into account any accessibility needs or barriers identified by employees during performance management, career development and redeployment processes.

Design of Public Spaces

When building or making major changes to public spaces of its facilities, the Company will ensure that accessible designs are incorporated wherever possible.

Communication of Policies, Plans and Procedures

The Company will inform all employees about policies to support persons with disabilities. Our Accessibility Policy will be reviewed with new employees when they are hired, and updates will be announced when revised.

The current Jungbunzlauer Accessibility Policy, Multi-year Accessibility Plan, and other public accessibility policies and procedures are posted on the Jungbunzlauer [Accessibility](#) page.

To view the official wording of the AODA and the Integrated Accessibility Standards under Ontario Regulation 191/11, visit <https://www.ontario.ca/laws/regulation/110191>.

Changes to Existing Company Policies

The Company will modify or remove any existing policies that do not respect and promote the dignity and independence of persons with disabilities.

Contact Information

Human Resources
Jungbunzlauer Canada Inc.
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accessibility@jungbunzlauer.com
905-835-3271

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