

Policy & Procedure Name **Multi-Year Accessibility Plan (Ontario)**

Revised and Approved December 2014

Introduction

VersaCold Logistics Services is committed to providing goods, services and employment in an integrated and accessible manner that respects the dignity and independence of persons with disabilities. This *Multi-Year Accessibility Plan* is in addition to our national **Accessibility Policy**. It outlines our strategy to prevent and remove barriers to accessibility and describes the Company's approach to meeting or exceeding applicable legal and regulatory requirements, including those set out in human rights and accessibility-related legislation. This Plan is a continually expanding and fluid document that will be updated at least every five years, as Loblaw's accessibility strategy evolves.

VersaCold welcomes feedback in relation to this Plan, in the format most convenient to the person providing feedback. Our Accessibility policies, *Multi-Year Accessibility Plan*, feedback and document request procedures are available under the "Careers" link on our corporate website at www.versacold.com.

Those who wish to provide such feedback are encouraged to do so in person, by telephone, in writing, by email or otherwise.

All feedback will be directed to Mitch Dankner, Vice-President, Human Resources and Occupational Health and Safety at mitch.dankner@versacold.com. Any feedback that is in the nature of a complaint will be addressed in accordance with VersaCold Logistics Services Complaint Management Procedure. The details of this Feedback Process will be provided on the VersaCold Logistics Services website and in a notice that will be posted at the entrance to VersaCold Logistics Services premises.

Integrated Accessibility Standards Regulation Policy

Purpose and Background

The Integrated Accessibility Standards Regulation (Regulation 191/11) (the "IASR") under the AODA provides standards for private sector organizations to increase accessibility for persons with disabilities specifically in the areas of:

- Information and Communications
- Employment

Accessibility Plan

In order to achieve our goals, VersaCold has developed a multi-year Accessibility Plan which documents VersaCold's strategy and commitment to meet the applicable standards of the IASR.

The Accessibility Plan was developed in consultation with a cross-functional team at VersaCold that helped to identify barriers that prevent a person with a disability from fully participating in aspects of society because of his or her disability (such as attitudinal, information or communication, technology, organizational and physical) within the stated goals of the IASR.

The Accessibility Plan will be reviewed and updated at least once every five years.

VersaCold will prepare an annual status report on the progress and measures taken to implement VersaCold's Accessibility Plan. The Accessibility Plan and annual report will be made available and can be provided in an accessible format on request.

(1) Training (to be effective in full by January 1, 2015)

VersaCold will ensure that timely training is provided to all necessary persons, that it aligns with the requirements of the accessibility standards referred to in the IASR, and VersaCold will continue to provide training on the Human Rights Code as it pertains to persons with disabilities. Appropriate records of training will be maintained, including dates that the training was provided.

Training, using the most appropriate methodologies, as appropriate, will be provided to the following person(s):

- all employees
- all persons who work under a contractual agreement directly with VersaCold

(2) Information and Communication Standards

(a) Feedback (to be effective in full by January 1, 2015)

VersaCold will ensure that its processes for receiving and responding to feedback are made available to persons with disabilities, whether members of the public, clients, customers or employees, in an appropriate, accessible format or communication support, upon their request, and that members of the public are notified of the availability of such an option. VersaCold will review its current feedback processes to ensure that it is accessible and make any changes necessary to ensure compliance with the IASR by 2015.

(b) Accessible Formats and Communication Supports (to be effective in full by January 1, 2016)

VersaCold will, upon request and consultation, endeavour to provide information and communications under our control about our goods and services to people with disabilities using the appropriate accessible format or communication support wherever possible, in a timely manner and on par with the fee charged to others for the same information. VersaCold will notify the public about the availability of accessible formats and communications supports. VersaCold will review and determine its current offerings of accessible formats and communications supports and will engage in an ongoing process of identifying additional accessible formats and communications supports that may be offered.

(c) Accessible Websites and Web Content

VersaCold will ensure that all of its new websites and content, like the existing websites, will be in conformance with Web Content Accessibility Guidelines (WCAG) 2.0 Level A as of January 1, 2014, as practicable.

VersaCold will ensure all of its websites, content, and applications directly controlled by VersaCold or through its contractual relationships, will be in conformity with WCAG 2.0 Level AA, as required by the IASR, by January 1, 2021, as practicable.

(d) Educational Materials (to be effective in full by January 1, 2020)

As applicable, VersaCold will upon request provide educational and training institutions with accessible or conversion-ready versions of its print-based supplementary educational resources.

(3) Employment Standards (to be effective in full by January 1, 2016)

(a) Recruitment

VersaCold will notify its employees and external applicants about the availability of accommodation for applicants with disabilities in its recruitment process.

(b) Recruitment, Assessment or Selection Process

VersaCold will ensure that job applicants are notified when they are individually selected to participate in the assessment or selection process and that accommodation for disabilities are made available upon request in relation to the materials or processes to be used. VersaCold will consult with individuals who request accommodations and will provide for appropriate accommodations.

(c) Notice to Successful Applicants

When presenting offers of employment, VersaCold will notify the successful applicant of its policies for accommodating employees with disabilities.

(d) Informing Employees of Supports

VersaCold will ensure that employees are informed of all accessibility policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practicable after commencing employment.

(e) Accessible Formats and Communication Supports for Employees

Upon request of an employee with a disability, VersaCold will consult with the employee to provide, or arrange for accessible formats and communication supports for information that is needed to perform his/her job, and information that is available to other employees. In order to determine the suitability of an accessible format or communication support, VersaCold will consult with the employee making the request. Accessible formats and communications supports regarding general workplace information will also be provided to employees with disabilities.

(f) Workplace Emergency Response Information

VersaCold provides employees with disabilities individualized workplace emergency response information when the employee's disability is such that the information is required and VersaCold has been informed of the need to accommodate the employee's disability.

(g) Documented Individual Accommodation Plans

VersaCold currently accommodates the needs of its employees with disabilities as required under the Ontario Human Rights Code. VersaCold will develop individualized accommodation plans for its employees with disabilities, as VersaCold is made aware. The process by which VersaCold will consult, develop, determine, document, review and routinely update the individualized accommodation plan will be formalized. VersaCold will implement and maintain measures effective to maintain the privacy of its employees with disabilities.

(h) Return to Work Process

VersaCold will maintain a documented return to work process for employees who have been absent from work due to a disability and who require disability-related accommodations and support in order to return to work. The return to work process clearly defines and outline the steps VersaCold will take to facilitate the return to work and will include documented accommodation plans for each individual as part of the process. The above stated return to work process will not replace, hinder or override any other return to work process created by or under any other statute (i.e., the Workplace Safety Insurance Act, 1997).

(i) Performance Management, Career Development and Advancement and Redeployment

VersaCold will continue to consider the accessibility needs of employees with disabilities as well as individual accommodation plans, when conducting performance management reviews, providing career development and advancement to employees and when redeploying employees.