

# Integrated Accessibility Standards Policy

Brunswick Bierworks Inc. (the "**Company**") is committed to treating all people in a way that allows them to maintain their dignity and independence, and the Company believes in integration and equal opportunity.

This policy has been established by the Company to meet the requirements of Ontario Regulation 191/11 (the "**Regulation**"), under the Accessibility for Ontarians with Disabilities Act, 2005 (the "**AODA**").

This policy addresses how the Company will achieve accessibility by meeting the requirements set out in the Regulation. This policy provides the Company's overall approach with respect to providing accessibility supports to people with disabilities. These standards are developed to break down barriers and increase accessibility for persons with disabilities in the areas of information, communications, employment and customer service.

In meeting the accessibility needs of persons with disabilities, the Company is governed by this policy and the Accessibility Standards for Customer Service Policy, as well as any other requirements set out in the AODA and the Regulation.

## **GENERAL**

### ***Commitment***

The Company is committed to treating all people in a way that allows them to maintain their dignity and independence. The Company believes in integration and equal opportunity. The Company is committed to meeting the accessibility needs of persons with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the AODA.

### ***Definitions***

For the purpose of this policy, the following definitions shall apply:

"**accessible formats**" may include, but are not limited to, large print, recorded audio and

electronic formats, braille and other formats usable by persons with disabilities;

"**communication supports**" may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications;

- a "disability" means,
  - 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.

### ***Self-Service Kiosks***

The Company shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks. For this purpose, "kiosk" means an interactive electronic terminal, including a point-of-sale device, intended for public use that allows users to access one or more services or products or both.

### ***Training Employees***

The Company will ensure that training is provided on the requirements of the accessibility standards referred to in the Regulation (including, a review of the requirements set out in the *Customer Service Standards* section below), and on the *Human Rights Code* as it pertains to persons with disabilities, to:

- all its employees and volunteers;
- all persons who participate in developing the Company's policies; and,
- all other persons who provide goods, services or facilities on behalf of the Company.

The training will be appropriate to the duties of the employees and other persons, and will be provided as soon as practicable. Ongoing training will be provided in the event of changes to legislation and/or changes to the Company's policies.

The Company will keep a record of the training it provides, including the dates on which training was provided and the number of individuals who attended the training.

Further details about training are set out in the Company's Accessibility Standards for Customer Service Policy.

### ***Accessibility Report***

The Company will file an accessibility report with a director as required by the legislation.

## **INFORMATION AND COMMUNICATIONS STANDARDS**

### ***Feedback Process***

The Company will ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communication supports, upon request.

The Company will notify the public about its feedback process, including information about the availability of accessible formats and communication supports with respect to the feedback process, by posting this information on the Company's website.

### ***Accessible Formats and Communication Supports***

Upon request, the Company will provide, or will arrange for the provision of, accessible formats and communication supports for persons with disabilities 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 persons.

The Company will consult with the person making the request in determining the suitability of an accessible format or communication support.

The Company will notify the public about the availability of accessible formats and communication supports, by posting this information on the Company's website.

### ***Emergency Procedure, Plans or Public Safety Information***

If the Company prepares emergency procedures, plans or public safety information and makes the information available to the public, the Company will provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

## **EMPLOYMENT STANDARDS**

### ***Scope***

The Employment Standards apply in respect of employees only. They do not apply in respect of

volunteers and other non-paid individuals.

### ***Recruitment***

The Company will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

### ***Recruitment, Assessment or Selection Process***

The Company will notify job applicants, when they are individually selected to participate further in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used.

If a selected applicant requests an accommodation, the Company will consult with the applicant and provide, or arrange for the provision of, a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

### ***Notice to Successful Applicants***

When making offers of employment, the Company will notify the successful applicant about the Company's Accommodation Policy for Employees with Disabilities.

### ***Informing Employees of Supports***

The Company will inform its employees about the Company's Accommodation Policy for Employees with Disabilities, as well as any other Company policies or practices 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. The Company will provide its employees with updated information whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.

### ***Accessible Formats and Communication Supports for Employees***

Upon the request of an employee with a disability, the Company will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his/her job, and information that is generally available to other employees.

In determining the suitability of an accessible format or communication support, the Company will consult with the employee making the request.

### ***Workplace Emergency Response Information***

The Company will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if the Company is aware of the need for accommodation due to the employee's disability. The Company will provide this information as soon as practicable after becoming aware of the need for accommodation.

Where the employee requires assistance, the Company will, with the consent of the employee, provide the workplace emergency response information to the person designated by the Company to provide assistance to the employee.

The Company will provide the information required under this section as soon as practicable after it becomes aware of the need for accommodation due to an employee's disability.

The Company will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodations needs or plans are reviewed and when the Company reviews its general emergency response policies.

### ***Performance Management, Career Development and Advancement & Redeployment***

The Company will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.

For the purposes of this section, "performance management" refers to activities related to assessing and improving employee performance, productivity, and effectiveness, with the goal of facilitating employee success. For the purposes of this section, "career development and advancement" includes providing additional responsibilities within an employee's current position and the movement of an employee from one job to another in an organization that may be higher in pay, provide greater responsibility or be at a higher level in the organization or any combination of them and, for both additional responsibilities and employee movement, is usually based on merit or seniority, or a combination of them.

For the purposes of this section, "redeployment" means the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.

## **ACCESSIBLE PARKING**

### ***Types of Accessible Parking Spaces***

If the Company constructs new or redevelops off-street parking facilities that it intends to maintain, then two types of parking spaces for the use of persons with disabilities required: (i) Type A, a wider parking space which has a minimum width of 3,400 mm and signage that identifies the space as "van accessible"; and (ii) Type B, a standard parking space which has a minimum width of 2,400 mm.

### ***Access Aisles***

As well, the Company will provide access aisles which may be shared by two parking spaces for the use of persons with disabilities in an off-street parking facility. Access aisles must be provided for all parking spaces for the use of persons with disabilities in off-street parking facilities. The access aisles must (i) have a minimum width of 1500 mm; (ii) extend the full length of the parking space; and (iii) be marked with total tonal contrast diagonal lines, which discourages parking in them, where the surface is asphalt, concrete or some other hard surface.

### ***Minimum Number and Type of Accessible Parking Spaces***

Four percent of the total number of parking spaces must be for the use of persons with disabilities. When rounding up, if the number of parking spaces for the use of persons with disabilities results in an even number, then the Company will have an equal number of parking spaces that meet the requirements of Type A and Type B parking spaces. When rounding up, if the number of parking spaces for the use of persons with disabilities results in an odd number, the number of parking spaces for the use of persons with disabilities must be divided equally, with the additional space being a Type B parking space.

### ***Signage***

The Company will ensure that parking spaces for the use of persons with are distinctly indicated by erecting an accessible permit parking sign in according with section 11 of Regulation 581 of the Revised Regulations of Ontario, 1990 (Accessible Parking for Persons with Disabilities) made under the Highway Traffic Act.

## ***Exceptions***

If the Company can demonstrate that it is not practicable to comply with the required minimum number of parking spaces to be used by persons with disabilities, then they are exempted from the above requirement. If the Company claims this exemption, it will provide as close to as many parking spaces for the use of persons with disabilities that meet the requirements cited above and under the Act.

## **SERVICE COUNTERS**

The Company will provide at least one service counter that accommodates a mobility aid for each type of service provided. If more than one service counter exists, the service counter that can accommodate a mobility aid must be clearly identified with signage. The service counter that accommodates mobility aids will be at a height that is usable by a person seated in a mobility aid. The floor space will be sufficiently clear so as to accommodate a mobility aid.

## **CUSTOMER SERVICE STANDARDS**

### ***Establishment of Policies and Notification***

The Company has implemented the Accessibility Standards for Customer Service Policy, which governs the Company's provision of goods, services and/or facilities to persons with disabilities. Amongst other things, this policy deals with the use of assistive devices, support persons, guide dogs and other service animals, the provision of notice for temporary service disruptions, staff training and customer feedback processes.

## **QUESTIONS ABOUT THIS POLICY**

This policy has been developed to break down barriers and increase accessibility for persons with disabilities. This policy will be publicly available on the Company's website, and will be provided in an accessible format, upon request.

If anyone has any questions about this policy, or if the purpose of this policy is not understood, please contact Adrienne Cimer, Director of Human Resources.