**Integrated Accessibility Standards Regulations**

December 2014

**Policy Statement and Organizational Commitment**

JE Russell Produce Ltd.is committed and guided by the four (4) core principles of Dignity, Independence, Integration and Equal Opportunity and supports inclusion of persons as set out in Canadian Charter of Rights and Freedoms, and the Accessibility for Ontarians with Disabilities Act, 2005.

JE Russell Produce Ltd. shall use every effort to ensure that we meet the needs of people with disabilities, in a timely manner, through the implementation of this policy.

**General Provisions**

This section covers the general requirements of the Integrated Accessibility Standards Regulation.

Multi-Year Accessibility Plan

JE Russell Produce Ltd.’s Multi-Year Accessibility Plan outlines preventive measures to remove barriers and address the requirements of the Accessibility for Ontarians with Disabilities Act (AODA), 2005. JE Russell Produce Ltd. will report annually on the progress and implementation of the plan, post the information on our website as deemed appropriate, and will provide it in alternative formats upon request. The plan will be reviewed and updated at least once every five years.

Training

JE Russell Produce Ltd. will ensure that training is provided to employees and management who directly interact with our customers on the requirements of the accessibility standards referred to in the regulation and on the Human Rights Code as it pertains to persons with disabilities. If any changes are made to this policy or the requirements, training will be provided. We shall maintain a record of the dates when training is provided and the individuals to whom it was provided.

Information and Communications Standard

JE Russell Produce Ltd. will create, provide and receive information and communications in ways that are accessible to people with disabilities. If JE Russell Produce Ltd. determines that it is not technically feasible to convert the information or communications or the technology to convert the information or communications is not readily available, we will be obligated to provide the person that requires the information with an explanation as to why the information or communications are unconvertible; and a summary of the unconvertible information or communications.

If JE Russell Produce Ltd. prepares emergency procedures, plans or public safety information and is required to make the information available to the public, we shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

Feedback

JE Russell Produce Ltd. has a process in place for receiving and responding to feedback and will ensure that those processes are provided in accessible formats and with communication supports upon request (please refer to the Customer Service Standards policy dated 2012).

Accessible Formats and Communication Supports

JE Russell Produce Ltd. shall be obligated to provide or arrange for accessible formats and communication supports for persons with disabilities for the three situations listed below:

i. Upon request in a timely manner that takes into account the persons’ accessibility needs due to a disability;

ii. At a cost that is no more than the regular cost charged to other persons;

iii. Consult with the person making the request and determine suitability of an accessible format or communication support.

Website Accessibility

JE Russell Produce Ltd. shall make their internet website and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 initially at Level A and increasing to Level AA. By January 1, 2015, any new web content will conform with WCAG 2.0 Level A. By January 1, 2021 all internet website and web content will conform with WCAG 2.0 Level AA.

Employment Standard

The Employment Standard builds upon the existing requirements under the Ontario Human Rights Code in relation to how we will provide accessibility throughout the entire employment cycle. It applies in respect to employees and does not apply to volunteers and other non-paid individuals.

The requirements of the Employment Standard shall be met by JE Russell Produce Ltd.by January 1, 2015 unless otherwise specified.

Recruitment

JE Russell Produce Ltd. shall notify employees and the public about the availability of accommodations for applicants with disabilities for the three (3) situations below:

i. During the recruitment process when job applicants are individually selected to participate in an assessment or selection process;

ii. If a selected applicant requests an accommodation, JE Russell Produce Ltd.shall consult with the applicant and provide or arrange for the provision of a suitable accommodation that takes into account the applicant’s disability;

iii. Notify successful applicants of the policies for accommodating employees with disabilities.

Employee Notification

JE Russell Produce Ltd. shall inform its employees of its policies used to support its employees with disabilities, including but not limited to, policies on the provision of job accommodations that take into account an employee’s accessibility needs due to a disability for the two situations below:

i. As required to new employees as soon as practicable after they begin their employment;

ii. 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 a disability.

Accessible Formats

In addition and where an employee with a disability requests it, JE Russell Produce Ltd. will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for the three points below:

i. Information that is needed in order to perform the employee’s job;

ii. Information that is generally available to employees in the workplace; and

iii. Consult with the employee making the request in determining the suitability of an accessible format or communication support.

Individual Accommodation Plan (IAP)

JE Russell Produce Ltd. shall have in place a written process for developing a documented individual accommodation plan for employees with a disability.

Process to include the following points below:

i. The employee’s participation in the development of the IAP;

ii. Assessment on an individual basis;

iii. Identification of accommodations to be provided;

iv. Timelines for the provision of accommodations;

v. JE Russell Produce Ltd. may request an evaluation by outside medical or other expert, at our expense, to assist with determining accommodation and how to achieve accommodation;

vi. Steps taken to protect the privacy of the employee’s personal information;

vii. Frequency with which the IAP will be reviewed and updated and the manner in which it will be done;

viii. If denied, the reasons for denial are to be provided to the employee;

ix. A format that takes into account the employee’s disability needs;

x. If requested, any information regarding accessible formats and communication supports provided;

xi. Identification of any other accommodation that is to be provided.

Individual Accommodation Process

Management will work alongside the employee through all steps of the process. When an employee with a disability requests an accommodation, the following process will be followed:

Step 1: Recognize the Need for Accommodation

* The need for accommodation can be: requested by the employee through their supervisor or through human resources; or identified by the employee’s manager or the hiring manager.

Step 2: Gather Relevant Information and Assess Needs

* The employee is an active participant in this step:
* JE Russell Produce Ltd. does not require details on the nature of the employee’s disability to provide an accommodation; it needs to know only about the employee’s functional abilities.
* The manager may ask for a functional abilities assessment at the organization’s expense.
* The employee and manager evaluate potential options to find the most appropriate measure.
* An external expert may be involved, at the organization’s expense.
* The employee can request the participation of a representative a different representative from the workplace if required.

Step 3: Write a Formal, Individual Accommodation Plan

* Once the most appropriate accommodation has been identified, the accommodation details are written down in a formal plan, (please refer to the Employee Individual Accommodation Plan form) including:
* accessible formats and communication supports, if requested;
* workplace emergency response information, if required;
* any other accommodation that is to be provided.
* The accommodation plan is provided to the employee in a format that takes into account the accessibility needs due to the disability:
* The employee’s personal information is protected at all times.

If an individual accommodation is denied, the manager provides the employee with the reason for the denial, in an accessible format (if required).

Return to Work

JE Russell Produce Ltd. has in place a return to work process for employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work. Such processes must be documented and must outline the steps that the JE Russell Produce Ltd. will take to facilitate the return to work and include an individual accommodation plan.

Performance Management, Career Development and Advancement

JE Russell Produce Ltd. will take into account the accommodation needs and/or individual accommodation plans of employees for the following points below when:

i. Using performance management processes;

ii. Providing career development and advancement information.

Workplace Emergency Response Information

JE Russell Produce Ltd. shall provide individualized workplace emergency response information to employees who have a disability for the four points below:

i. If the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee’s disability;

ii. If the employee who receives an individual workplace emergency response information requires assistance and with the employee’s consent, JE Russell Produce Ltd. shall provide the workplace emergency information to the person designated by the organization to provide assistance to the employee;

iii. As soon as practicable after becoming aware of the need for accommodation due to the employee’s disability;

iv. Review the individualized workplace emergency response information when the employee moves to a different location in the organization, when overall accommodations needs or plans are reviewed and when the employer reviews its general emergency response policies.

Emergency and Public Safety Information

JE Russell Produce Ltd. shall establish, implement, maintain and document emergency preparedness and response policy for the safety of persons with disabilities and shall make those policies available to the public in an accessible format upon request.

Questions about this policy

This policy exists to achieve service excellence to customers with disabilities. Any questions about the policy, or if the purpose of a policy is not understood, queries may be referred to Hutch Morton at:

Email: hutch@jerussell.ca

Tel: 416-252-2211 ext. 228

Fax: 416-252-0165

Mail: 165 The Queensway, Suite 332

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