

Accessibility Policy

November 2020

This policy affirms George Weston Limited's ("GWL" or the "Company") commitment to meeting the accessibility needs of persons with disabilities in a timely manner and in a way that respects their dignity, independence, and rights of equal opportunity access.



Definitions

- a) "*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.
- b) "*Accommodation*" – means an arrangement made with, or assistance provided to, persons with disabilities, to ensure their equal access to GWL's services, employment and programs. Accommodation will vary depending on the person's unique needs.
- c) "*Barrier*" – means anything that prevents a person with a disability from accessing GWL's services, employment or programs, including physical, attitudinal and technological barriers, and inadequate information or communication.
- d) "*Communication*" - means the interaction between two or more persons where information is provided, sent or received.
- e) "*Communication supports*" – means supports that facilitate effective communication, and may include plain language formats, sign language and captioning.
- f) "*Disability*" – means any degree of physical, mental, emotional, 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).
- g) "*Information*" – means data, facts and knowledge that exists in any format, including text, audio, digital or images
- h) "*Mobility Aid*" - means a device used to facilitate the transport, in a seated posture, of a person with a disability.
- i) "*Mobility Assistive Device*" – means a cane, walker or similar aid.

GWL's Commitment to Accessibility

- GWL is 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 human rights and accessibility-related legislation. 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

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- accessibility is integrated into our regular workplace processes, thereby providing equal access and opportunity across all stages of the employment lifecycle for colleagues with disabilities

Further to these commitments, GWL’s 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.weston.ca) and will be provided in alternate formats upon request.
- The Plan will be reviewed and updated at least once every five years.

Accessible Information and Communication

Accessible Websites and Web Content

GWL’s website and web content will conform to level AA of the Worldwide Web Consortium’s (W3C) Web Content Accessibility Guidelines (WCAG). Conformance with level AA will be in place by December 31, 2020.

Accessibility is integrated into GWL’s communication methods as follows:

- a) Feedback GWL ensures its process for receiving and addressing feedback is accessible by providing or arranging for the provision of accessible formats and communication supports, upon request.
- b) Accessible Formats and Communication Supports GWL recognizes 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.

Employment

Emergency Response Plans

GWL provides workplace emergency response information to its colleagues. An alternative emergency preparedness plan will be completed, and updated as required, for each colleague with a disability for whom the Company is aware an individualized plan is necessary.

Accessibility is integrated into GWL’s employment-related practices as follows:

- a) Recruitment
 - GWL notifies all internal and external job applicants, in job postings 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 applicant to determine their specific accessibility needs.
 - When an offer of employment is made, GWL notifies the successful applicant of its policies for accommodating employees with disabilities.

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b) Workplace

- GWL informs its colleagues of its policies relating to accessibility for colleagues with disabilities, including during orientation and onboarding.
- In response to a colleague request, the Company will, in consultation with the colleague, provide or arrange for the provision of accessible formats and communication support for information that is required in order for the colleague to perform their job and access information that is generally available to colleagues in the workplace.
- GWL is committed to accommodating colleagues' disabilities. Colleagues requiring accommodation should advise their manager and/or Human Resources Business Partner (HRBP). Colleagues may be required to support their request with medical documentation. The Form for colleagues to take to their physician in this regard will be provided by the manager or HRBP. In Ontario, the Company will develop written individual accommodation plans for colleagues with disabilities.

c) Return to Work from Disability-Related Leave

- GWL maintains a documented return to work process outlining how the Company facilitates the return to work of colleagues who have been absent from work due to a disability and require accommodation in order to return. In Ontario, the process includes the use of a written individual accommodation plan.
- Colleagues should notify their manager and/or HRBP of an impending return to work as far in advance of the return to work as possible.

d) Performance Management and Career Development

- GWL will take the accessibility needs of colleagues with disabilities and individual accommodation plans into account in all performance management and career development processes.

e) Redeployment

- Where GWL redeploys a colleague with a disability, the colleague'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 GWL's training programs as follows:

GWL ensures training is provided to colleagues, 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:

- a) appropriate to the duties of the person undergoing training;
- b) provided before or as soon as possible after the person commences job duties and whenever GWL alters its policies or practices regarding accessibility.

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Multi-Year Accessibility Plan (Appendix "A")
Emergency Preparedness Plan

Medical Accommodation Plan

Final Say

Interpretation of this Policy rests jointly with the Vice President of Human Resources & Vice President, General Counsel.



Appendix “A”

GWL’s Multi-Year Accessibility Plan

Introduction

George Weston Limited (“GWL” or the “Company”) is committed to providing services and employment in an integrated and accessible manner that respects the dignity and independence of persons with disabilities. This *Multi-Year Accessibility Plan* (“Plan”) is an Appendix to our **Accessibility Policy**. It outlines GWL’s strategy to prevent and remove barriers to accessibility and describes the Company’s progressive 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 GWL’s accessibility strategy evolves.

GWL welcomes feedback in relation to this Plan, in the format most convenient to the person providing feedback. Our *Accessibility Policy*, *Multi-Year Accessibility Plan*, feedback and document request procedure are available under the *Accessibility* link on our corporate website at www.weston.ca.

Where this Plan specifies that documents, alternative formats or communication supports are available upon request, such requests can be directed to GWL Human Resources, human.resources@weston.ca or in writing to George Weston Limited c/o Human Resources, 22 St. Clair Ave East, Suite 700, Toronto, Ontario, M4T 2S5.

Statement of Commitment

- GWL is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the accessibility needs of people with disabilities in a timely manner, and will do so by identifying and removing barriers to accessibility and meeting the requirements under the *Accessibility for Ontarians with Disabilities Act, 2005* and its regulations (collectively, the “AODA”).

Emergency Procedures, Public Emergency Safety Information

- Emergency procedures, procedures for dealing with temporary disruptions when accessible elements required are not in working order, and public emergency safety information are prepared by GWL and made available to the public in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

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Workplace Emergency Response Information

- Alternative emergency preparedness plans are created and updated, as required and as soon as practicable, for colleagues who GWL 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 colleague and, if the colleague 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 colleague's location.

Kiosks

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

Accessibility Policy and Multi-Year Accessibility Plan

- GWL's Policy affirms the Company's commitment to meeting the accessibility needs of persons with disabilities in a timely manner and governs the way that GWL will achieve accessibility;
- GWL created this *Multi-Year Accessibility Plan* outlining the Company's strategy for identifying, removing and preventing barriers to accessibility;
- The Policy and Plan are posted on our corporate website (www.weston.ca) and will be provided in alternate formats upon request;
- The Plan will be reviewed and updated at least once every five years.

Information and Communication

Accessible websites and web content:

- GWL will monitor the creation of any new websites and web content, including those websites undergoing a significant refresh and as applicable will make those websites conform to WCAG 2.0 Level A as required by AODA. GWL has also implemented a plan to ensure that its website complies with WCAG 2.0 Level AA by January 1, 2021. On an ongoing basis, GWL will ensure a process is in place to confirm these obligations as any new content or sites are created or existing content is significantly refreshed and to meet 2021 obligations.

Feedback, Accessible Formats and Communication Supports:

- GWL's processes for receiving and responding to feedback are accessible, by providing or arranging for the provision of accessible formats and communication supports, upon request; and
- Upon request the Company provides or arranges 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.

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Employment

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

Recruitment

- Notifies all job applicants and the public 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;
- Specifies that accommodation is available for applicants with disabilities in recruitment-related materials and during scheduling of interviews and assessments;
- If an applicant requests accommodation, consults with the applicant and arranges for the provision of suitable accommodation that takes into account the applicant's needs due to disability;
- When making offers of employment, notifies the successful applicant of GWL's policies for accommodating colleagues with disabilities; and
- Provides appropriate training to colleagues 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

- Reviews and, as necessary, modifies existing orientation and on-boarding processes to ensure new colleagues are provided information about GWL's accessibility policies;
- Outlines procedures for documenting and updating, as required, documented individual accommodation plans, which will provide for the method(s) by which requesting colleagues 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 colleague in a format that takes his or her accessibility needs into account;
- Provides appropriate training to managers and colleagues 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

- Review and, as necessary, modifies and documents existing return to work processes for colleagues who have been absent from work due to a disability and require accommodation in order to return to work;
- Ensures documented individual accommodation plans comprise part of the return to work process;
- Develops and provides appropriate training to managers and other colleagues responsible for supporting the return to work process for colleagues 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.

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Performance Management, Career Development and Redeployment

- Reviews and, as necessary, modifies existing performance management, career development and redeployment processes to ensure that the accessibility needs and individual accommodation plans of colleagues with disabilities are taken into account;
- Develops and provides appropriate training to managers and other colleagues responsible for supporting or impacting performance management, career development and advancement, and redeployment processes, and a training schedule for same that will ensure compliance with the processes on a continuous basis.

Integrated Accessibility Standards Training

- GWL is committed to providing training to all employees and staff (including all persons who participate in the development of our policies or provide services on the Company's behalf) regarding AODA and the *Ontario Human Rights Code* as it pertains to individuals with disabilities as required by AODA. The content and delivery of such training is determined based on the job duties of employees and other staff and in consultation with the Company's Human Resources department. On a periodic basis, training will be delivered through an e-learning format that will allow us to track completion of the tracking program.
- Training is completed as soon as practicable after hire and on an ongoing basis in connection with changes to GWL's policies or procedures governing the provision of goods or services to persons with disabilities.

Accessible Culture

Through ongoing education, resource development and tools, GWL continues to highlight how to create an inclusive and accessible culture. The legislation requirements have been implemented and GWL continues to evaluate its procedures and implement new technologies to build a workforce that is reflective of the Canadian population at all levels of the organization.

Modification of the Plan

This Plan will be reviewed and updated by GWL at least every five years. At the time of revision, information regarding any new accessibility policies and practices adopted by GWL in accordance with the Plan or otherwise will be included in the revised Plan.