

ACI Brands Inc.

Accommodation Policy – Section 10 - April 17, 2020

Intent

ACI Brands is committed to providing equal treatment with respect to employment without discrimination because of race, ancestry, place of origin, citizenship, creed, sex, sexual orientation, age, record of offence(s), marital status, family status, disability, color or ethnic origin as described by the Human Rights Code.

ACI Brands has adopted this policy to ensure that our staff are provided with meaningful employment that is ethical and fair, and is in compliance with all applicable employment, and human rights legislation.

This Policy Shall:

1. Discuss the Principles of this Policy;
2. Examine the Purpose of this Policy;
3. Determine the Duty to Accommodate;
4. Define Employment / Reasonable Accommodation;
5. Provide the parameters for Persons with Disabilities;
6. Define Religious Observance as used in this Policy;
7. Discuss overall Responsibility regarding accommodation;
8. Outline Roles and Responsibilities;
9. Provide procedures for Accommodating Employees with Disabilities;
10. Outline requirements for Recording an Accommodation Plan;
11. Discuss alternatives In the Event an Employee Cannot be Accommodated in Their Current Position;
12. Examine the options provided by, and procedures for Job Redesign;
13. Provide information regarding Responsive Dispute Resolution;
14. Determine Financing for Accommodation;
15. Discuss procedures for Accommodating Employees for Religious Observance;
16. Provide procedures for Accommodating Job Applicants;
17. Identify and define Undue Hardship in accommodation.

Principles

The approach taken by ACI Brands in the provision of reasonable accommodation shall include:

- Personalized plans designed to meet the specific needs of individuals.
- Collaborative practices in the creation and implementation of accommodation plans through consultation of all relevant stakeholders, the person to be accommodated and medical professionals.
- An approach that ensures confidentiality and dignity.

Purpose

ACI Brands will support the accommodation of employees and job applicants who require workplace accommodation under any of the grounds described in the Human Rights Code.

ACI Brands will work to achieve a workplace free of barriers by providing accommodation for the needs of those individuals covered by the Code, up to the point where it causes undue hardship for ACI Brands. Every effort will be made such that the impact of accommodation will not discriminate against another group protected by the Code.

Duty to Accommodate

ACI Brands will work to ensure that individuals protected under the Code are able to work effectively, by making adjustments or modifications to the work, or the work environment, up to the point of undue hardship.

ACI Brands will work with the individual that requests accommodation in an effort to ensure that the measures taken are both effective and mutually agreeable. ACI Brands encourages individuals to make any needs for accommodation known to their immediate supervisor, and to work with them in addressing the issue(s).

Accommodation

Accommodation shall be provided for individuals where a disability or religious requirement requires that the work be modified or adjusted to address the needs of the individual, based on protected grounds of discrimination under Human Rights legislation.

ACI Brands shall provide accommodation as appropriate, using a consultative approach that involves the company, the individual, and as appropriate, healthcare professionals, and other third parties that are required to assist in the accommodation process.

Accommodation may be temporary, or permanent, based on the requirements of the individual.

Persons with Disabilities

The following definitions for a Person with a disability are sourced from the Ontario Human Rights Code:

- 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, including diabetes mellitus, epilepsy, and any degree of paralysis, amputation, lack of physical coordination, blindness or visual impediment, deafness or hearing impediment, or physical reliance on a guide dog or on a wheelchair or other remedial appliance or device;
- b) A condition of mental impairment or 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 Workplace Safety and Insurance Act.

Responsibility

The process of accommodating individuals is a shared obligation of ACI Brands and the employee. Management staff should be the first point of contact for employees when requesting a form of accommodation. Together, in consultation with Human Resources, and, where

appropriate, healthcare practitioners and other required third parties, they will work to determine the most appropriate form(s) of accommodation to meet the needs of the individual.

Accommodating Employees with Disabilities

Any employee requesting accommodation must make a request to their Manager or Immediate Supervisor. The Manager is responsible for ensuring that a written description of the accommodation plan is prepared for any employee.

ACI Brands shall create an accommodation plan and attempt to determine methods of achieving the requirements for success in the position in alternative manners.

In the creation of an accommodation plan, ACI Brands shall:

1. Identify the need for accommodation.
2. Determine objectives for performance in the role, and potential barriers.
3. Create a plan for achieving the objectives in an alternative manner.
4. Examine the options for accommodation, and select the most appropriate avenue for accommodation.
5. Implement the accommodation process.
6. Provide training as appropriate.
7. Review and revise based on feedback.

In the Event an Employee Cannot be Accommodated in Current Position

In some cases, it will be reasonable to accommodate an individual in another position. The Human Resources Department, working with appropriate ACI Brands officers and the employee, will attempt to place the employee in another available position. This may require the assistance of third parties with specialized expertise.

Where an employee is placed in an alternate position, ACI Brands shall ensure that the employee has the requisite qualifications and skill-sets necessary for success in the position, is capable of performing the tasks associated with the position, and that the employee agrees that the alternate work is acceptable.

Job Redesign

In the event that the accommodation requires a substantial change in the position, involving duties or hours, the position may be redesigned.

Financing the Accommodation

Where the accommodation required necessitates an investment in materials, equipment or increased budget for the position, requests for financing must be directed to Human Resources.

Accommodating Job Applicants

ACI Brands will meet all legislative requirements in providing accommodation to job applicants as well as employees.

Any applicant to ACI Brands that communicates the need for accommodation shall be considered in a manner that is non-discriminatory, and respectful of our Human Rights obligations.

Undue Hardship

ACI Brands shall work to provide workplace accommodation up to the point of undue hardship. Undue hardship may occur where it is established that no forms of appropriate accommodation exist, or where the creation of accommodation would cause excessive costs that create undue hardship for the organization, or where the accommodation would create a health and safety hazard.

Non-Compliance

Failure to comply with this policy may result in disciplinary action up to and including termination.