

DLF Multi-Year Accessibility Plan

February 2022 Update

Introduction

More than 6 million Canadians over the age of 15 have one or more disabilities of some kind, whether it's related to hearing, vision, mobility, memory or other. That's one in five, or 22%, of the country's population, according to Statistics Canada in 2021. For these individuals, being able to participate in society on par with their fellow citizens – shop in the same places, learn at the same schools, earn a living with work, read the same online information – is a fundamental right. Accessibility laws are written to protect and enforce those rights.

Disability laws and disability policy in Canada has evolved substantially over the years. Below is a list of Disability legislation in Canada:

- ❖ The Canadian Charter of Rights and Freedoms – All Canadians
- ❖ The Canadian Human Rights Act – Federal Sector
- ❖ The Employment Equity Act – Federal Sector
- ❖ Provincial Human Rights Legislation – Each Province has an Act
- ❖ Quebec's Act Respecting Equal Access to Employment in Public Bodies- Federal Sector
- ❖ The Accessible Canada Act - 2019 -fully in place by 2040- Federal Sector
- ❖ The Accessibility for Ontarians with Disabilities Act (AODA)- 2005- fully in place by 2021- Provincial Sector
- ❖ The Accessibility for Manitobans Act- 2013- fully in place by 2023- Provincial Sector
- ❖ The Nova Scotia Accessibility Act
- ❖ Accessibility 2024 British Columbia – not passed but in planning

DLF Plan Statement of Commitment

DLF Canada Inc. is committed to ensuring compliance with all provincial accessibility for people with disabilities acts. Some provinces have implemented acts and **DLF has developed one DLF program** to model Ontario's Accessibility of Ontarians with Disabilities Act (AODA). All provinces are reviewed to ensure their coverage is being honored.

Each province is outlined below.

Policy #HR5 Accessibility for Canadians with Disabilities Program [Policies \(sharepoint.com\)](#)

The Integrated Accessibility Standards Regulation (191/11) (IASR) under the AODA provides standards to increase accessibility for persons with disabilities.

The standards under this regulation that apply to DLF Canada Inc. are:

1. Customer Service
2. Information and Communication
3. Employment & Training
4. Built Environment /Design of Public Spaces
5. Transportation



DLF Multi-Year Accessibility Plan

DLF Canada Inc. seeks to ensure consistency with AODA's core principles of dignity, independence, integration, and equality of opportunity through the removal of barriers to individuals with disabilities in the context of the goods and services it offers.

Adherence to the Canadian Human rights Code is further supported by this program.

This program applies to all full-time, part-time, seasonal, casual, temporary employees, consultants, and independent contractors as well as all of our customers. Sub-contractors are afforded the same rights and protections provided by this policy, while performing authorized activities for DLF Canada Inc. This may include off-site job-related functions, social events, courses, and classes related to work and employment, or any other function where an employee is representing the Company on or off site.

DLF Canada Inc. will make every reasonable effort to ensure that its policies, practices, and procedures are consistent with the principles of dignity, independence, integration, and equal opportunity by:

- ensuring that all employees, visitors, and customers receive the same value and quality of goods and services as people without disabilities;
- allowing employees, visitors, and customers with disabilities to do things in their own way, at their own pace when accessing goods and services as long as this does not present a safety risk;
- using alternative methods when possible, to ensure that employees, visitors, and customers with disabilities have access to the same services, in the same place and in a similar manner. Accommodations will be considered;
- taking into account individual needs when providing goods and services; and
- communicating in a manner that takes into account a person's disability.

Ontario - Accessibility for Ontarians with Disabilities Act (AODA)

In 2005, the government of Ontario passed the Accessibility for Ontarians with Disabilities Act (the "AODA") Accessibility for Ontarians with Disabilities Act (AODA) . It is the goal of the Ontario government to make Ontario accessible by 2025. The Integrated Accessibility Standards Regulations ("IASR") under the AODA require that DLF establish, implement, maintain and document a multi-year accessibility plan which outlines the organization's strategy to prevent and remove barriers for persons with disabilities and to meet its requirements under the IASR.

Under the AODA, the following accessibility standards set certain requirements that are applicable to the DLF:

1. Customer Service;
2. Information and Communications;
3. Employment;
4. Accessibility Standards for the Built Environment
5. Transportation

DLF Multi-Year Accessibility Plan

This multi-year plan outlines DLF's current accessibility plan and its strategy to prevent and remove barriers and to address any future requirements of the AODA or other accessibility laws.

In accordance with the requirements set out in the AODA/IASR, DLF will:

- Establish, review and update this plan in consultation with persons with disabilities;
- Report as required on its website the implementation of this plan;
- Provide this plan in an accessible format, upon request; and
- Review and update this plan at least once every five years.

1. CUSTOMER SERVICE STANDARDS

Commitment:

DLF is committed to excellence in serving all customers, including persons with disabilities and it will carry out its functions in a manner which delivers an accessible customer service experience.

DLF's is committed to providing its goods and services in a way that respects the dignity and independence of persons with disabilities. This commitment will be integrated wherever possible and will ensure that persons with disabilities will benefit from the same services, in the same place and in a similar way as other customers.

Action Taken:

The following measures have been implemented by DLF:

Ensuring all persons who, on behalf of DLF, deal with the public or other third parties, and all those who are involved in the development and approvals of customer service policies, practices and procedures, as well as all others providing services to our customers, are trained to communicate and provide the best possible customer service to all customers, including persons with disabilities;

- Ensuring DLF will **support various assistive devices** that may be used by customers with disabilities who are accessing DLF's goods or services;
- Ensuring completion of accessibility **training** is tracked and recorded;
- Ensuring customers accompanied by **a service animal** in areas of DLF's open to the public and other third parties, are accommodated;
- Ensuring that if a person with a disability is accompanied by a **support person**, the support person is accommodated. If the support person is assisting the customer participating in an DLF's event or program, but that person is not participating in the event/program on his or her own behalf, the support person is not charged a fee to attend the event/program;
- Providing **public with notice in the event of a planned or unexpected disruption of service** or inaccessibility of facilities used by persons with disabilities, by placing such notices at all public entrances and service counters on DLF's premises. If the disruption is long-term, DLF's will post an announcement on its website informing customers of the location, duration of the disruption and alternate solutions;

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- Continuing to welcome and appreciate **feedback from** persons with disabilities through multiple communication channels; a feedback form is available on the website and each DLF location;
- An “Accessibility Canada” section has been added to the **DLF intranet** to communicate the accessible customer service policy, program and training; and
- An “Accessibility Canada” section has been added to the **DLF intranet** to communicate the accessible customer service policy, program and training; and
- Completing compliance reports for accessibility when required to do so.

EMERGENCY PROCEDURE, PLANS OR PUBLIC SAFETY INFORMATION

Commitment:

DLF is committed to providing and maintaining premises that respect the dignity and independence of persons with disabilities.

Action Taken:

The following measures are implemented by DLF:

Emergency procedures, plans and public safety information that are prepared by DLF and made available to the public, will be made available in an accessible format or with appropriate communication supports, as soon as practicable, upon request;

- An Accessible Format Request Form was developed and is available on-line on the DLF website. Upon receipt of a request from the public for such documentation for an accessible format DLF staff will accommodate accordingly.

WORKPLACE EMERGENCY RESPONSE INFORMATION

Commitment:

Where DLF is aware that an employee has a disability and that there is a need for accommodation, individualized workplace emergency response information will be provided to the employee as soon as practicable if such information is necessary given the nature of the employee’s disability.

Action Taken:

The following measures have been or will be implemented by DLF:

- Individualized workplace emergency response information procedures will be developed for employees with disabilities, as required;
- Workplace Emergency Response Information forms have been prepared for employees who have disclosed a disability and who are being accommodated according to their disabilities;
- Where required, DLF will provide assistance to disabled employees, with the disabled employees’ prior consent, to help them evacuate the workplace in case of an emergency or disaster.

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- Individualized emergency plans will be communicated to the employees' respective managers and Safety personnel, on an 'as needed' basis;
- On an ongoing and regular basis, and as per the applicable terms of the IASR, DLF will review and assess general workplace emergency response procedures and individualized emergency plans to ensure accessibility issues are addressed. AODA compliance has also been added to the Joint Health and Safety Committee agenda.

TRAINING

Commitment:

DLF is committed to implementing a process to ensure that all employees and persons participating in the development and approval of DLF's policies, are provided with appropriate training on DLF policy and the requirements of the

IASR / Ontario Human Rights Code as it pertains to persons with disabilities, and are provided with such training as soon as practicable.

Training is performed with all new employees and yearly with all other employees. The Employee Handbook and DLF Intranet section also provides the AODA/IASR program outline and resources to supporting individuals with disabilities.

Action Taken:

The following measures have been implemented by DLF:

- Determine and ensure that appropriate training on the requirements of the IASR and on the Ontario Human Rights Code as it pertains to persons with disabilities, is provided to all employees;
- Ensure that the training is provided to persons referenced above as soon as practicable;
- Keep and maintain a record of the training provided, including the dates that the training was provided and the number of individuals to whom it was provided;
- Ensure that training is provided on any changes to the prescribed policies on an ongoing basis.

2. INFORMATION AND COMMUNICATION STANDARDS

Commitment:

DLF is committed to making company information and communications accessible to persons with disabilities. DLF will incorporate new accessibility requirements under the information and communication standard to ensure that its information and communications systems and platforms are accessible and are provided in accessible formats that meet the needs of persons with disabilities.

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1. Feedback, Accessible Formats and Communication Supports

Action Taken:

The following measures were implemented by the DLF:

- Ensure that existing and new processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request and in a timely manner;
- More broadly, as a general principle where accessible formats and communication supports for persons with disabilities are requested:
 - Provide or arrange for the provision of such accessible formats and communication supports;
 - Consult with the person making the request to determine the suitability of the accessible format or communication support;
 - Provide or arrange for the provision of accessible formats and communication supports in a timely manner that takes into account the person's accessibility needs due to disability, and at a cost no more than the regular cost charged to other persons;
 - Notify the public about the availability of accessible formats and communication supports.

Feedback communication platforms include suggestions boxes, the website feedback form, at training events, during performance reviews, during safety inspections and during the interview process.

2. Accessible Websites and Web Content

- DLF public website www.dlfpickseed.com will meet AODA/IASR compliance when next website upgrade is implemented. Expected time frame in 2022.
- New website content will be coded in a compliant fashion to empower third-party consumer tools.
- Adoption of standards in Internet technology to ensure the public websites are compatible with the above-mentioned tools will be implemented.
- AODA compliance is included as criteria in selecting technology vendors for new website development initiatives.
- DLF public website will host an area for "Accessibility Canada". Attached to that link will display DLF Multi year plan, Feedback form, and Accessible Format Form.

Planned Action:

In accordance with the IASR, DLF will:

- Ensure development of its next generation digital platform for public websites, mobile applications, in-store media and information technology infrastructure meet AODA/IASR and that partnering vendors have necessary expertise with such technology;

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- Use guiding principles in the development of new corporate intranet applications as outlined by the Ontario Government's new Online Design Program standard, which specifies compliance with international accessibility guidelines, WCAG 2.0;
- Expand awareness of requirements for compliance with Information and Communication Standards of AODA.

3. EMPLOYMENT STANDARDS

1. Recruitment

Commitment:

DLF is committed to fair and accessible employment practices that attract and retain employees with disabilities. This includes providing accessibility across all stages of the employment cycle.

Action Taken:

The following measures are implemented by DLF:

Recruitment General

DLF will notify employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process. This will include:

- A review and, as necessary, modification of existing recruitment policies, procedures and processes;
- Specifying that accommodation is available for applicants with disabilities, on the DLF website and on job postings;

Recruitment, assessment and selection

DLF will notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used in the assessment/selection process. This will include:

- A review and, as necessary, modification of existing recruitment policies, procedures and processes;
- Inclusion of availability of accommodation notice as part of the script in the scheduling of an interview and/or assessment;
- If a selected applicant requests an accommodation, consult with the applicant and arrange for provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to disability.

Notice to Successful Applicants

When making offers of employment, DLF will notify the successful applicant of its policies for accommodating employees with disabilities. This will include:

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- A review and, as necessary, modification of existing recruitment policies, procedures and processes;
- Inclusion of notification of DLF's policies on accommodating employees with disabilities in offer of employment letters.

2. Informing Employees of Supports

In accordance with the IASR, DLF will inform all employees of policies that support 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.

Action Taken:

The following measures are implemented by DLF:

- Informing current employees and new hires of DLF policies, including provisions of job support and accommodations that take into account an employee's needs due to disability;
- Providing information under this section as soon as practicable after the new employee begins employment, specifically in the orientation process;
- Keeping employees up to date on changes to existing policies on job accommodations with respect to disability;
- Where an employee with a disability so requests it, DLF will provide or arrange for provision of suitable accessible formats and communications supports for:
 - Information that is needed in order to perform the employee's job;
 - Information that is generally available to employees in the workplace.
- In meeting the obligations to provide the information that is set out in the paragraph above, DLF will consult with the requesting employee in determining the suitability of an accessible format or communication support.

3. Documented Individual Accommodation Plans/Return to Work Process

Commitment:

DLF will incorporate new accessibility requirements under the IASR to ensure that barriers in accommodation and return to work processes are eliminated and corporate policies surrounding accommodation and return to work are followed, where applicable.

Action Taken:

The following measures have been implemented by DLF:

DLF existing policies include steps that DLF will take to accommodate an employee with a disability and to facilitate an employee's return to work after absenteeism due to disability.

DLF will review and assess the existing policies to ensure that they include a process for the development of documented individual accommodation plans for employees with a disability, if such plans are required.

DLF will ensure that the process for the development of documented individual accommodation plans includes the following elements, in accordance with the provisions of the IASR:

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- Include in the process the manner in which the employee requesting accommodation can participate in the development of the plan;
- Include in the process the means by which the employee is assessed on an individual basis;
- Include in the process the manner in which DLF can request an evaluation by an outside medical or other expert, at DLF's expense, to assist DLF in determining if and how accommodation can be achieved;
- Steps are in place to protect the privacy of the employee's personal information;
- Outline the frequency in which individual accommodation plans will be reviewed and updated and the manner in which this will be done;
- Provide the employee with the reasons for the denial if an individual accommodation plan is denied;
- Include in the process the means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs;
- If individual accommodation plans are established, ensure that they include:
 - Individualized workplace emergency response information that is required;
 - Any information regarding accessible formats and communication supports that have been provided for or arranged, in order to provide the employee with:
- Information that is needed in order to perform the employee's job;
- Information that is generally available to employees in the workplace.
- Identify any other accommodation that is to be provided to the employee.

DLF will ensure that the accommodation and return to work process outline the steps the DLF will take to facilitate the employee's return to work after a disability-related absence, outlines the development of a written individualized return to work plan for such employees, and requires the use of individual accommodation plans, as discussed above, in the return to work process.

4. Performance Management and Career Development

Commitment:

DLF will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans:

- When using its performance management process in respect of employees with disabilities;
- When providing career development and advancement to its employees with disabilities;

Action Taken:

The following measures have been implemented by DLF:

- Review, assess and, as necessary, modify existing policies, procedures and practices to ensure compliance with the IASR;
- Take the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account when:
 - Assessing performance
 - Managing career development and advancement

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- Review, assess and, as necessary, include in Performance Management, accessibility criteria;
- Take into account the accessibility needs of employees with disabilities when providing career development and advancement to its employees with disabilities, including notification of the ability to provide accommodations on internal job postings;

4. DESIGN OF PUBLIC SPACES STANDARDS (ACCESSIBILITY FOR THE BUILT ENVIRONMENTS)

Commitment:

DLF is committed to designing public spaces that are free from barriers and accessible to all persons we serve while undertaking new construction or planned significant alterations.

Action Taken:

In accordance with the IASR, DLF implemented the following:

- DLF shall comply with the AODA Design of Public Spaces Standards (Accessibility Standards for the Built Environment) when undertaking new construction or planned significant alterations of public spaces.

5. TRANSPORTATION

DLF Canada Inc. will advocate AODA transportation requirements where it makes sense to do so. Consideration will be given to the needs of disabled employee/s with regards to booking travel whenever possible.

Manitoba - The Accessibility for Manitobans Act (AMA)

Goals

The Accessibility for Manitobans Act, or AMA was enacted in 2013. The AMA has two main goals.

1. Goal 1: Identify, prevent and remove barriers to participation.
2. Goal 2: Make significant progress towards achieving accessibility in Manitoba by 2023.

Manitoba's efforts will focus on collaboration, education and the training of organizations to fulfill the requirements set out in the law. Like other laws, the AMA also sets out enforcement measures, including orders to comply and monetary penalties for non-compliant organizations.

The Five Accessibility Standards

Accessibility Standards, or regulations, are the building blocks of the Accessibility for Manitobans Act. Standards outline who has to do what and by when, to enhance accessibility.

The Manitoba Government appointed an Accessibility Advisory Council to assist in developing five standards under the AMA, affecting accessibility in customer service, employment, information and communications, the design of public spaces and transportation.

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The Standards

- Standard 1: Customer Service (enacted November 2015)
- Standard 2: Employment (enacted May 2019)
- Standard 3: Information and Communications
- Standard 4: Design of Public Spaces
- Standard 5: Transportation

DLF will follow the above Ontario AODA outline that will encompass all that Manitoba AMA requires.

Training Resources for AMA Customer Service and Employment available at:

[The Accessibility for Manitobans Act | Province of Manitoba \(accessibilitymb.ca\)](http://accessibilitymb.ca)