

Beau's AODA – Integrated Accessibility Standards Regulation (IASR) Policy

Effective Date: December 2017

Statement of Commitment & Intent

Beau's All Natural Brewing Company is committed to providing a barrier-free environment for our clients/customers, employees, job applicants, suppliers, and any visitors who may enter our premises, access our information, or use our services. We respect and uphold the requirements set forth under the Accessibility for Ontarians with Disabilities Act (2005), and its associated standards and regulations.

Beau's All Natural Brewing Company understands that we have a responsibility for ensuring a safe, dignified, and welcoming environment for everyone, which upholds the principles of dignity, independence, integration and equal opportunity. We are committed to ensuring our organization's compliance by incorporating accessibility legislation into our policies, procedures, equipment requirements, training, and best practices. We will review these policies and practices as needed. In addition, we will strive to meet the needs of individuals with disabilities in a timely and effective manner.

This policy is intended to meet the requirements of the <u>Integrated Accessibility Standards</u>, <u>Ontario Regulation 191/11</u> for the standards related to Information and Communications, Customer Service, Employment & Design of Public Spaces, set forth under the <u>Accessibility for Ontarians with Disabilities Act</u>, <u>2005</u>. This policy applies to the provision of information and communications services and materials for people with disabilities.

For more information or to obtain a copy in an accessible format, please contact a member of our Human Resources team.

1. Definitions

<u>Accessible Formats</u>– May include but are not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.

<u>Accommodation</u> - Individualized assistance, support or other help to assist a person in their employment, or use of our services, without causing undue hardship to Beau's.

<u>Assistive Device</u> – Is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that customers bring with them, such as a wheelchair, walker or a personal oxygen tank, which might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

<u>Communication Supports</u> – Include but are not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communication.



<u>Conversion-Ready</u>— An electronic or digital format that facilitates conversion into an acceptable format.

<u>Disability</u> – The term disability as defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*, refers to:

- 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;
- A condition of mental impairment or a developmental disability;
- A learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- A mental disorder; or
- An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

<u>Kiosk</u> – An interactive electronic terminal, including a point-of-sale device, for public use that allows users to access one (1) or more services or products.

<u>Guide Dog</u> – Is a highlytrained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons' Rights Act*, to provide mobility, safety and increased independence for people who are blind.

Service Animal – an animal is a service animal for a person with a disability if:

- 1. the animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the vest or harness worn by the animal; or
- the person provides documentation from one of the following regulated health professionals confirming that the person requires the animal for reasons relating to the disability:
 - A member of the College of Audiologists and Speech-Language Pathologists of Ontario;
 - A member of the College of Chiropractors of Ontario;
 - A member of the College of Nurses of Ontario;
 - o A member of the College of Occupational Therapists of Ontario;
 - A member of the College of Optometrists of Ontario;
 - A member of the College of Physicians and Surgeons of Ontario;
 - o A member of the College of Physiotherapists of Ontario;
 - o A member of the College of Psychologists of Ontario; or
 - A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.



<u>Service Dog</u> – As reflected in *Health Protection and Promotion Act, Ontario Regulation* 562 a dog other than a guide dog for the blind is a service dog if:

- It is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability; or
- The person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.

<u>Support Person</u> – a support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to goods and services.

<u>Performance Management</u> – Activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success.

<u>Redeployment</u> – 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.

2. General Provisions

Establishment of Multi-Year Accessibility Plan

Beau's All Natural Brewing Company will establish, implement, maintain and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR. The Accessibility plan will be:

- posted on our website;
- reviewed and updated once every five (5) years; and
- made available in an accessible format, upon request.

Procuring or Acquiring Goods and Services, or Facilities

Beau's All Natural Brewing Company will incorporate accessibility design, criteria and features when procuring or acquiring goods, services, facilities or self-service kiosks, except where it is impractical to do so.

<u>Training</u>

Beau's All Natural Brewing Company will provide training for its employees and volunteers regarding the IASR and the <u>Ontario Human Rights Code</u> as they pertain to individuals with disabilities. Training will also be provided to individuals who are responsible for developing Beau's All Natural Brewing Company's policies, and all other persons who provide goods, services or facilities on behalf of Beau's All Natural Brewing Company.

Training will be provided as soon as is reasonably practicable, and will be provided on an ongoing basis to new employees and as changes to Beau's All Natural Brewing Company's accessibility policies occur.



Beau's All Natural Brewing Company will maintain records on the training provided, when it was provided and the number of employees who were trained.

3. Customer Service Standard

Beau's is committed to excellence in servicing all customers and visitors, including those with disabilities by:

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- Allowing visitors and customers with disabilities to do things in their own ways, 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 visitors and customers with disabilities have access to the same services, in the same place and in a similar manner;
- Taking into account individual needs when providing goods and services; and
- Communicating in a manner that takes into account the visitor's or customer's disability.

The Use of Assistive Devices

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by Beau's All Natural Brewing Company.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services.

Guide Dogs, Service Animals and Service Dogs

We welcome visitors or customers with disabilities who are accompanied by a guide dog, service animal or service dog to those areas of our premises that are open to the public unless otherwise excluded by law. Any "no pet" policies do not apply to guide dogs, service animals and/or service dogs.

Food Service Areas

A customer with a disability that is accompanied by guide dog or service dog will be allowed access to food service areas that are open to the public unless otherwise excluded by law.

Other types of service animals are not permitted into food service areas due to the *Health Protection and PromotionAct, Ontario Regulation 562 Section 60.*

Exclusion Guidelines

If a guide dog, service animal or service dog is excluded by law (see applicable laws below) Beau's All Natural Brewing Company will offer alternative methods to enable the person with a disability to access goods and services, when possible (for example, securing the animal in a safe location and offering the guidance of an employee).



Applicable Laws

Food Safety and Quality Act 2001, Ontario Regulation 31/05: Animals not intended for slaughter or to be euthanized are not allowed in any area or room of a meat plant. It also makes an exception for service dogs to allow them in those areas of a meat plant where food is served, sold or offered for sale to customers and in those areas that do not contain animals or animal parts and are not used for the receiving, processing, packaging, labelling, shipping, handling or storing of animals or parts of animals.

The Health Protection and Promotion Act, Ontario Regulation 562 Section 60, normally does not allow animals in places where food is manufactured, prepared, processed, handled, served, displayed, stored, sold or offered for sale. It does allow guide dogs and service dogs to go into places where food is served, sold or offered for sale. However, other types of service animals are not included in this exception.

Dog Owners' Liability Act, Ontario: If there is a conflict between a provision of this Act or of a regulation under this or any other Act relating to banned breeds (such as pitbulls) and a provision of a by-law passed by a municipality relating to these breeds, the provision that is more restrictive in relation to controls or bans on these breeds prevails.

Recognizing a Guide Dog, Service Dog and/or Service Animal:

If it is not readily apparent that the animal is being used by the customer for reasons relating to his or her disability, Beau's All Natural Brewing Company may request verification from the customer.

Care and Control of the Animal:

The customer who is accompanied by a guide dog, service dog and/or service animal is responsible for maintaining care and control of the animal at all time.

Allergies

If a health and safety concern presents itself for example in the form of a severe allergy to the animal, Beau's All Natural Brewing Company will make all reasonable efforts to meet the needs of all individuals.

The Use of Support Persons

If a customer with a disability is accompanied by a support person, Beau's All Natural Brewing Company will ensure that both persons are allowed to enter the premises together and that the customer is not prevented from having access to the support person.

There may be times where seating and availability prevent the customer and support person from sitting beside each other. In these situations, Beau's All Natural Brewing Company will make every reasonable attempt to resolve the issue.

In situations where confidential information might be discussed, consent will be obtained from the customer, prior to any conversation where confidential information might be discussed.



Admission Fees

Where Beau's All Natural Brewing Company requires a support person to accompany a person with a disability, and where the person with a disability has agreed to the accompaniment, Beau's All Natural Brewing Company will not charge the support persons any entrance fees or fares.

Notice of Disruptions in Service

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, Beau's will notify customers and visitors promptly. Reasonable efforts will be made to provide advance notice, however in the event of an unexpected disruption, advance notice may not be possible.

Notifications will include:

- Services or facilities that are disrupted or unavailable;
- Reason for the disruption;
- Anticipated duration; and
- A description of alternative services or options, if available.

Notifications will be placed on our website at www.Beau's.ca and near the entrances to our public areas or by any other method that may be reasonable under the circumstances.

Feedback Process

Customers and visitors who wish to provide feedback on the way Beau's provides goods and services or on our facilities for those with disabilities, may do so by email at ohyeah@Beau's.ca or by phone at (866)-585-BEER. In person feedback may be directed to the on duty Tap Room manager at our brewery facility.

Formal feedback will receive acknowledgement, along with any resulting actions based on concerns or complaints that were submitted, within 5 business days.

4. Information and Communication Standard

Beau's is committed to providing and receiving information and communication in ways that are accessible to people with disabilities.

If Beau's determines that information or communications are unconvertible, Beau's All Natural Brewing Company will ensure that the individual who made the request is provided with an explanation and a summary of the information.

Accessible Websites and Web Content

Beau's All Natural Brewing Company will ensure that our website, and where applicable web content, conforms to the Web Content Accessibility Guidelines (WCAG) as outlined in the IASR, and will refer to the legislation for specific compliance deadlines and requirements.



Feedback Process

Beau's All Natural Brewing Company will ensure that all feedback processes (both internal and external) are made accessible to clients/customers or employees, upon request.

In accordance with the customer service standards, Beau's All Natural Brewing Company will make known the availability of accessible feedback formats.

Emergency Procedures, Plans or Public Safety Information

Beau's All Natural Brewing Company will ensure that all publicly available safety and emergency information (e.g. evacuation procedures, floor plans etc.) is provided in an accessible format or with appropriate communication supports, upon request.

Accessible Formats and Communication Supports

Beau's All Natural Brewing Company will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, upon request. Accessible formats and communication supports will be provided in a timely manner and at no additional cost to the individual.

Beau's All Natural Brewing Company will take into account the person's accessibility needs when customizing individual requests and shall consult with the individual making the request to ensure suitability.

Beau's All Natural Brewing Company will make the availability of accessible formats and communication supports publicly known.

Exceptions

The Information and Communications Standard does not apply to:

- Products and product labels;
- Unconvertible information or communications; or
- Information that the organization does not control either directly or indirectly through a contractual relationship.

5. Employment Standard

Beau's is an equal opportunity employer that values diversity and inclusion in the brewery and consider all qualified applicants for employment without regard to race, color, religion, sex, national origin, age, disability, or any other legally protected factors. As an extension of this commitment, Beau's has developed the following standards to ensure that applicants, new hires and employees with disabilities are provided with the necessary and required accommodation throughout their job application and employment relationship.

Recruitment, Assessment and Selection

Beau's All Natural Brewing Company will notify employees and the public about the availability of accommodation for job applicants who have disabilities. Applicants will be



informed that these accommodations are available, upon request, for the interview process and for other candidate selection methods. Where an accommodation is requested, Beau's All Natural Brewing Company will consult with the applicant and provide or arrange for suitable accommodation.

Successful applicants will be made aware of Beau's All Natural Brewing Company's policies and supports for accommodating people with disabilities.

Accessible Formats and Communication Supports for Employees

Beau's All Natural Brewing Company will ensure that employees are aware of our policies for employees with disabilities and any changes to these policies as they occur.

If an employee with a disability requests it, Beau's All Natural Brewing Company will provide or arrange for the provision of accessible formats and communication supports for the following:

- Information needed in order to perform his/her job; and
- Information that is generally available to all employees in the workplace.

Beau's All Natural Brewing Company will consult with the employee making the request to determine the best way to provide the accessible format or communication support.

Workplace Emergency Response Plan

Where required, Beau's All Natural Brewing Company will create individual workplace emergency response plan for employees with disabilities. This information will take into account the unique challenges created by the individual's disability and the physical nature of the workplace, and will be created in consultation with the employee.

This information will be reviewed when:

- The employee moves to a different physical location in the organization;
- The employee's overall accommodation needs or plans are reviewed; and/or
- Beau's All Natural Brewing Company reviews general emergency response policies.

<u>Documented Individual Accommodation Plans (IAPs)</u>

Beau's All Natural Brewing Company will develop and document IAPs for employees with disabilities, in accordance with the following process:

Step 1: Recognize the need for accommodation

This need can be:

- Requested by the employee through his/her supervisor/manager, or Human Resources.
- Identified by the employee's supervisor/manager, HR representative or hiring manager.



Step 2: Gather relevant information and assess needs

The employee is an active participant in this step.

- Beau's does not require details on the nature of the employee's disability to provide an accommodation; it only needs to know about the employee's abilities.
- The supervisor/manager may ask for a functional capacity assessment at the expense of Beau's.
- The employee and his/her supervisor/manager evaluate potential options to find the most suitable measure.
- An external expert may be involved, at Beau's expense.
- The employee can request the participation of a colleague to act as a representative.

Step 3: Write a formal Individual Accommodation Plan (IAP)

Once the appropriate accommodation has been identified, the accommodation details are written down in a formal plan, including:

- Accessible formats and communication supports, if requested.
- Workplace emergency response information, if required.
- Any other accommodation that is to be provided.

The employee's personal information will be protected at all times. Accommodation plans will only be shared with those who require the information to execute or assist with the plan and only to the extent which is required.

If Beau's denies an accommodation, the employee will be provided with the reasons for the denial.

Step 4: Implement, monitor and review IAP

The employee and his/her manager/supervisor monitor the accommodation to ensure that it has effectively resolved the challenge.

- Formal reviews will happen in accordance with the agreed upon schedule in the IAP.
- The IAP is reviewed if the employee's work location or position changes.
- The IAP is reviewed if the nature of the employee's disability changes.

If the accommodation is no longer appropriate, the employee and supervisor/manager can work together to gather information and reassess the employee's needs in order for Beau's to find the best accommodation measure (Step 2).

Performance Management, Career Development/Advancement and Redeployment

Beau's All Natural Brewing Company will consider the accessibility needs of employees with disabilities when implementing performance management processes, when offering career development or advancement opportunities or when using redeployment procedures.



Individual accommodation plans will be consulted, as required.

Return to Work (RTW)

Beau's All Natural Brewing Company will adhere to the following process to support its employees who have been absent from work due to a disability and require accommodation to return to work:

Step 1: Initiate the RTW process

 The employee reports his/her need for a disability leave to his/her supervisor/manager or to Human Resources.

Step 2: Make and maintain contact with the employee on leave

- HR representative or Supervisor/Manager is responsible for:
 - Maintaining regular contact with the employee, with the employee's consent;
 - Providing the employee with any return to work information;
 - o Monitors employee's progress until he/she is fit for work
- The employee is responsible for:
 - Obtaining and following the appropriate medical treatment;
 - Updating the HR representative about his/her progress;
 - o Giving the healthcare provider the return to work information
- The Healthcare provider is responsible for:
 - Providing appropriate and effective treatment to the employee;
 - Providing required information on the employee's functional abilities, if requested.

Step 3: Develop a RTW plan

- The employee, the HR representative, manager/supervisor and health care provider (if needed) collaborate to develop a formal RTW plan, which is included in the employee's IAP, if applicable:
 - If the employee has no residual functional limitations, they return to their regular position with no accommodation required.
 - If the employee has temporary functional limitations, they return to a temporary modified work environment with accommodation or to an alternative transitional position.
 - If the employee has lasting functional limitations, they return to work with permanent accommodation or is permanently reassigned to another position.

Step 4: Monitor and evaluate the RTW process

- The employee, supervisor/manager and HR representative monitor and review the RTW process regularly until it has been completed
- If the employee encounters challenges, the RTW plan is modified to overcome these challenges.



6. Design of Public Spaces Standard

Beau's All Natural Brewing Company shall incorporate accessibility into public spaces that are newly constructed or redeveloped from this point forward. Beau's will ensure that existing requirements stated under the Design of Public Spaces Standards (Accessibility Standards for the Built Environment) are followed for outdoor paths of travel, accessible parking and service-related elements. Beau's shall also provide maintenance and restoration of public spaces (where applicable) by ensuring that our multi-year accessibility plan includes procedures for preventative and emergency maintenance of accessible elements in public spaces, and procedures for dealing with temporary disruptions when accessible elements required under this section are not in working order.

7. Review

This policy will be reviewed regularly to ensure that it is reflective of Beau's All Natural Brewing Company's current practices and legislative requirements. Any policy that does not respect or promote the dignity and independence of people with disabilities will be modified or removed.