

ACCESSIBILITY FOR PERSONS WITH DISABILITIES: INTEGRATED ACCESSIBILITY STANDARDS POLICY

PURPOSE:

McCormick Canada is committed to providing persons with disabilities the same opportunity to access our resources and services, in a manner consistent with the principles of dignity, independence, integration, and equal opportunity. Furthermore, McCormick Canada shall use every effort to ensure that we meet the needs of persons with disabilities, in a timely manner, through the implementation of this policy in accordance with the spirit and intent of all applicable legislation including the AODA, the Ontario Human Rights Code, and the Occupational Health and Safety Act.

Please note:

Under the Accessibility for Ontarians with Disabilities Act, 2005 all public and private sector organizations must meet the requirements of accessibility standards established by the regulation.

Where this policy varies from the Integrated Accessibility Standards under the Accessibility for Ontarians with Disabilities Act (AODA), the AODA Standard shall apply.

This policy may require revision as other standards are introduced under the AODA.

This policy establishes the Integrated Accessibility Standards in the areas of Employment, Information and Communication, and Transportation in accordance with Ontario Regulation 191/11.

REFERENCES:

HR 4-9 Accommodation Policy
HR 4-8B Return to Work Plan

DEFINITIONS:

For the purpose of this policy, the following terms are defined as:

Accessible Formats:

Refers to materials that have been converted to accessible formats which include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

Accommodation:

The special arrangement made or assistance provided so that persons with disabilities can participate in the experiences available to persons without disabilities. Accommodation shall vary depending on the person's specific accessibility needs.

Communications:

The interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received.

Communication Supports:

Methods and aids that facilitate effective communications with persons with disabilities that include, but is not limited to, captioning, alternative and augmentative communication supports, plain language, and sign language.

Disability (as defined under the AODA and the Human Rights Code):

- 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 a 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.

Information:

Means data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.

Redeployment:

Means the reassignment of workers to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated.

Supervisor:

A person who has charge of a workplace or authority over a worker. Generally this would include those with a position title such as Director, Manager or Supervisor, as well as any other management type position, or those in a temporary supervisory position.

Unconvertible:

If it is not technically feasible to convert the information or communications; The technology to convert the information or communication is not readily available.

Worker:

Refers to any person regarding whom McCormick Canada pays wages or a salary, has control over their assigned work and has a right to control the details of their work. It also extends to the senior management level. Worker includes all McCormick employees.

COMMITMENTS:**Multi-Year Accessibility Plan:**

McCormick Canada shall create a multi-year Accessibility Plan outlining a phased-in approach to prevent and remove barriers and address the current and future requirements of the AODA. The plan shall be reviewed and updated at least every five years or as required.

Training:

McCormick Canada shall ensure that training is provided to all employees (“workers”) on the requirements of the accessibility standards referred to in the regulations and on the Human Rights Code as it pertains to persons with disabilities. Training shall be scheduled and implemented as required. Training records will be kept for each individual trained.

This training shall be provided during the on boarding process, when the individual commences performing duties for McCormick Canada. Additional training shall be provided within a reasonable amount of time, any revisions made to this policy and/or related procedures and practices.

Information and Communications Standards:

McCormick Canada shall create, provide and receive information and communication in methods that are accessible to persons with disabilities.

If it is determined that it is not technically feasible to convert the information or communication, or the technology to convert the information or communication is not readily available the person requesting the information shall be provided with an explanation as to why the information or communication is not convertible; a summary of the unconvertible information or communication.

Emergency Information:

McCormick Canada shall prepare emergency procedures, plans or public safety information and make the information available in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

Feedback Process:

McCormick Canada shall establish a process for receiving and responding to feedback from individuals about the manner in which it conducts business with persons with disabilities. Information about this process shall be made readily available in an accessible format or with appropriate communication supports. The feedback process shall permit persons to provide their feedback in person, by telephone, in writing, or by delivering an electronic text by email.

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McCormick Canada will respond to all feedback received in a timely manner, and make any necessary changes to policies or procedures to ensure those with disabilities are treated with dignity, and respect.

Accessible Formats and Communication Supports:

McCormick Canada shall provide or arrange for accessible formats and communication supports for persons with disabilities.

- Upon request, and in a timely manner that takes into account the person's accessibility needs due to a disability;
- At a cost that is no more than the regular cost charged to another person; and
- In consultation with the person making the request determine the suitability of an accessible format or with appropriate communication supports.

Education, Training and Materials:

McCormick Canada shall provide access to or prepare for the provision of access to accessible materials where they exist, make information about the availability of accessible materials publicly available, and provide the information in an accessible format or with appropriate communication supports, upon request.

Website Accessibility:

McCormick Canada shall make their company Internet 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.

Employment Standards:

The Employment Standards builds upon the present requirements under the Human Rights Code in relation to whereby accommodate persons with disabilities through the job application process and the employment relationship. It applies in respect to workers and does not apply to volunteers and other non-paid individuals.

Recruitment and Selection:

McCormick Canada shall notify internal and external job applicants about the availability of accommodations upon request for applicants with disabilities. This may take the form of a notice posted to the company website or a statement on a job posting for which "accommodation for applicants with disabilities is available

upon request.” In addition, job applicants who have been selected to participate in an assessment or selection process shall be notified that accommodations are available. The related materials or processes required specific to the job applicant’s disability shall be discussed in consultation with the applicant.

Worker Notification:

McCormick Canada shall inform workers of policies and procedures including those on the provision of job accommodation that take into account a worker’s accessibility needs. This information shall be provided to new workers as soon as practical after he/she commences performing their duties with McCormick Canada. Once the applicable support is identified, McCormick Canada shall determine how best to accommodate the worker in consultation with the reporting supervisor, human resources specialist and the worker.

Accessible Formats and Communication Supports for Workers:

In addition and where a worker with a disability requests it, McCormick Canada shall consult with the worker to provide or arrange for the provision of accessible formats and communication supports for:

- Information that is needed in order to perform the job tasks;
- Information that is generally available to workers in the workplace;
- Consult with the worker making the request in determining the suitability of an accessible format or communication support.

Individual Accommodation Plan:

McCormick Canada shall develop, maintain and document an individual accommodation plan for workers with disabilities to meet requirements under the Employment Standards. Information regarding accessible formats and communication supports shall be covered in individual accommodation plans.

Return to Work Process:

McCormick Canada shall maintain a return to work process for its workers who have been absent from work due to a disability and who require disability-related accommodations in order to return to work. The work process shall take into account individualized accommodation plans suitable for the worker.

Performance Management, Career Development, Advancement, and Redeployment:

McCormick Canada shall examine the accessibility needs of workers with disabilities when handling performance management, providing career development and advancement to workers, and if redeploying workers to other locations or workgroups.

Workplace Emergency Response:

Where the worker with a disability requires assistance, McCormick Canada shall, in consultation with the worker, provide an assigned support person(s) to assist during emergency situations that require evacuation of the premises. The individualized workplace emergency plan or process shall be shared with the support person(s), only with full agreement by the worker ensuring their privacy at all times. McCormick Canada shall review the individual workplace emergency information when or if the worker moves to a different location or workgroup, or there is a change to their disability, with the reporting supervisor, human resources specialist and the worker.

In addition, a general, emergency evacuation process shall be in place for any facility that may have visitors with disabilities that require further assistance. This process shall be communicated to all workers.

TRANSPORTATION STANDARDS:

The Transportation Standards makes it easier for people to travel on specialized and public transportation and in taxicabs in Ontario, including persons with disabilities, older Canadians, and families with children in strollers.

McCormick Canada is not a provider of specialized or public transit and does not license taxicabs; therefore the Transportation Standards requirements do not apply to the company.

Responsibilities:

McCormick Canada is responsible for reviewing this policy every three (3) years and/or recommended amendments to ensure on-going compliance with regulated accessibility standards and legislated obligations.

Management personnel will ensure that they and their workers under their supervision are familiar with this policy.

Monitoring and Contraventions:

Management personnel will monitor current practices to ensure compliance. Failure to comply with this policy may result in disciplinary action, up to and including dismissal.

Please note

This policy is subject to amendment and/or revocation at the company's sole discretion, without prior notice to workers.

Modifications to this or other policies:

We are committed to developing customer service policies that respect and promote the dignity and independence of people with disabilities. Therefore, no changes will be made to this policy before considering the impact on people with disabilities.