

Saputo Ontario - Accessibility for Ontarians with Disabilities Act Standard



STATEMENT OF COMMITMENT

In 2005, the government of Ontario passed the *Accessibility for Ontarians with Disabilities Act, 2005* (the “AODA”). It is the goal of the Ontario government to make Ontario accessible by 2025.

Saputo Dairy Products Canada G.P. (“Saputo”) is committed to treating all people in a way that allows them to maintain their dignity and independence. Saputo believes in integration and equal opportunity. Saputo is committed to meeting the needs of people with disabilities in a timely manner and will do so by attempting to prevent and remove barriers to accessibility by meeting the requirements of the AODA and the Integrated Accessibility Standards regulation (“IASR”) under the AODA.

Under the AODA and the IASR, the following accessibility standards set certain requirements that are applicable to Saputo, Ontario:

- Customer Service;
- Information and Communications;
- Employment; and
- Design of Public Spaces (Accessibility for the Built Environments)

DEFINITION OF DISABILITY

The AODA defines “disability” as:

- “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*.”

GENERAL REQUIREMENTS

Accessibility Standard

This standard has been drafted in accordance with the IASR and addresses how Saputo achieves accessibility through meeting the integrated accessibility standards applicable to Saputo, Ontario, as set out above. This Standard applies to all individuals entitled to the protections set out in the AODA and the IASR, including customers and employees of Saputo.

Saputo, Ontario is governed by this Standard and related policies and documentation, including the AODA and Ontario’s Human Rights Code, in meeting the accessibility needs of persons with disabilities.

Multi-Year Accessibility Plan

The IASR requires that Saputo, Ontario establishes, implements, maintains and documents a multi-year accessibility plan that outlines the organization’s strategy to prevent and remove barriers for persons with disabilities and to meet its requirements under the IASR. The multi-year accessibility plan of Saputo, Ontario focuses on

Saputo, Ontario's initiatives in respect of the AODA's accessibility standards in making Ontario an accessible province for all Ontarians.

In accordance with the requirements set out in the IASR, Saputo will:

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

Kiosks

Saputo, Ontario will consider the needs of people with disabilities when designing, procuring or acquiring self-service kiosks for use in the workplace.

Training

Saputo, Ontario will ensure that training is provided on the requirements of the accessibility standards referred to in the IASR and will continue to provide training on Ontario's Human Rights Code as it pertains to persons with disabilities, to:

- all its employees, and volunteers;
 - all persons who participate in developing Saputo's policies; and
 - all other persons who provide goods, services or facilities on behalf of the company.
- The training will be appropriate to the duties of the employees.
- New employees will be provided with training as soon as practicable. If any changes are made to the policies of Saputo, Ontario or the requirements, then further training will be provided.
 - Documentation of employee training including names of participants and dates of training shall be maintained by the Human Resources Department.

Refer to Appendix -1: AODA Commitment Statement

CUSTOMER SERVICE STANDARDS

All of Saputo's Ontario facilities are committed to meeting their current and ongoing obligations under Ontario's *Human Rights Code* respecting non-discrimination.

Saputo understands that obligations under the AODA and its accessibility standards do not substitute or limit its obligations under Ontario's *Human Rights Code* or obligations to people with disabilities under any other law.

Saputo is committed to complying with both Ontario's *Human Rights Code* and the AODA.

Saputo is committed to excellence in serving all customers including people with disabilities. Our accessible customer service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

Assistive Devices

People with disabilities may use their personal assistive devices when accessing our facility. In cases where the assistive device presents a significant and unavoidable food safety, health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with a disability can access our facility.

It should be noted that it is the responsibility of the person with a disability to ensure that his or her assistive device is operated in a safe and controlled manner at all times.

Saputo will train its employees on the use of various assistive devices available at all Ontario locations, if applicable.

Communication

When communicating with a person with a disability, Saputo will do so in a manner that takes into account the person's disability. Saputo commits to provide training on customer service to all employees. This training will include how to interact and communicate with persons with various types of disabilities.

Service Animals

We welcome people with disabilities and their service animals. Service animals are only allowed on the parts of our premises that are open to the public.

When we cannot easily identify that an animal is a service animal, our employees may ask a person to provide documentation from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.

A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

Saputo will train its employees on how to interact with persons with disabilities who are accompanied by a support person.

There may be rare circumstances where, for reasons of food safety, health and safety, allowing a person with a disability to enter a premise accompanied by a service animal needs to be considered.

Support Persons

Saputo welcomes customers who are accompanied by a support person, when the support person has been hired or chosen by the person with a disability to accompany them in order to assist in accessing goods or services and/or for providing support with mobility, personal assistance and/or communication. Individuals who are accompanied by a support person are encouraged to inform relevant Saputo persons of their participation. Support persons shall be permitted entry to all Saputo facilities that are open to the public. Saputo will train its employees on how to interact with persons with disabilities who are accompanied by a support person.

There may be rare circumstances where, for reasons of food safety, health and safety, allowing a person with a disability to enter a premise accompanied by their support person needs to be considered. If deemed necessary, a risk assessment will be conducted by an Ontario Management Representative. The risk assessment will include identifying the risks inherent with the support person being in the area of concern and identify alternate measures available to enable the person with a disability to access the service.

Notice of Temporary Disruption of Service

Saputo will take reasonable steps to provide the public with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. The required information necessary for any communication of a temporary disruption may include:

- The time, date and location of the disruption;
- Information about the reason for the disruption;
- Anticipated duration of the disruption; and
- Descriptions of alternative facilities or services, if any.

This notice will be placed at all public entrances to our premises.

As Saputo facilities in Ontario have limited access to the public, due to CFIA Regulations, Food Safety and Health & Safety Regulations/Compliance, services/facilities may not be available for public use. This may include, but is not limited to the following (dependent upon each location),

- Washrooms

- Boardrooms
- Wheelchair accessible ramp
- Wheelchair accessible doors

Refer to Appendix 2 – Template of Notice of Disruption in Service & Appendix 3 – Notice of Disruption of Service Procedure.

Training

Saputo shall provide all Ontario employees with a review of the purpose of the AODA and the requirement of the Customer Service Standards.

More in-depth training will be provided to those employees who:

- Are involved in the development and approval of customer service policies, practices and procedures.
- Deal with the public or other third parties on Saputo's behalf.

Training will include:

- A review of how to interact and communicate with persons with various types of disabilities;
- How to interact with persons with disabilities who use an assistive device or require the assistance of a service animal or a support person;
- How to use Saputo's available equipment or devices that may assist with the provision of services to persons with disabilities;
- What to do if a person with a disability is having difficulty in accessing Saputo's goods and/or services; and
- Saputo's policies, procedures and practices related to the provision of services to persons with disabilities.

New employees will be provided such training as part of their orientation, and a refresher training will be provided to employees, should there be a change to this standard or Saputo's relevant policies and on an on-going basis.

Documentation of employee training, including names of participants and dates of training, shall be maintained by the Human Resources Department.

Feedback Process

Feedback about the delivery of services to persons with disabilities is welcomed, as it may identify areas that require change and assist in continuous service improvement. Such feedback may be by telephone, in person, in writing or by email. Saputo will make best efforts to provide a response in the same format in which the feedback was received. Where possible, feedback will be addressed immediately. Some feedback may, however, require more effort to address and may need to be reviewed before an action is taken. Feedback is to be directed to the Human Manager at each location. Please refer to Appendix 1 - Saputo Ontario AODA Commitment Statement

Notice of Availability of Documents

Saputo will notify the public that documents related to accessible customer service are available upon request by posting a notice in the reception/entrance area of each facility.

Saputo will provide this document in an accessible format or with communication support, on request. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and, at no additional cost. Refer to Appendix 5 - Saputo Ontario, AODA (Customer Service Standards)

Modifications to This Standard or Other Policies

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

Any policies of Saputo that do not respect and promote the principles of dignity, independence, integration and equal opportunity for people with disabilities will be modified or removed.

INFORMATION AND COMMUNICATIONS STANDARDS

Accessible Formats and Communication Supports

Saputo is committed to meeting the communication needs of people with disabilities. The Company will consult with people with disabilities who request information in an accessible format to determine their information and communication needs. Saputo will provide the accessible format in a timely manner and, at no additional cost.

Feedback Process

Saputo has a process in place for receiving and responding to feedback from all sources and will ensure that those processes are provided in accessible formats and with communication supports upon request.

Emergency Information

Saputo is committed to providing the public with any publicly available emergency information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

Accessible Websites and Web Content

To the extent required, Saputo will ensure its internet websites and content on those sites conform with the WCAG 2.0, Level AA requirements.

EMPLOYMENT STANDARDS

Recruitment

When posting employment opportunities for positions located in Ontario, Saputo will include the statement “Saputo welcomes and encourages applications from people with disabilities. Accommodations, up to the point of undue hardship, are available on request for candidates taking part in all aspects of the selection process.” The recruitment representative responsible for the opportunity will ensure that the appropriate contact information is provided.

If a selected applicant requests an accommodation, Saputo will consult with the applicant and provide, or arrange for the provision of, a suitable accommodation in a manner that takes into account the applicant’s accessibility needs due to disability.

Furthermore, when Saputo makes offers of employment, Saputo will notify the successful applicant of its policies for accommodating employees with disabilities, by including Saputo’s policies on accommodating employees with disabilities in offer of employment letters.

Informing Employees of Supports

In accordance with the IASR, Saputo 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. Refer to Appendix 4 - AODA Employee Commitment Statement.

Accessible Formats and Communication Supports for Employees

Upon the request of an employee with a disability, Saputo will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his/her job, and information that is generally available to other employees. In determining the suitability of an accessible format or communication support, Saputo will consult with the employee making the request.

Workplace Emergency Response Information

Saputo will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if Saputo is aware of the need for accommodation due to the employee's disability. Saputo will provide this information as soon as practicable after becoming aware of the need for accommodation.

Where the employee requires assistance, Saputo will, with the consent of the employee, provide the workplace emergency response information to the person designated by Saputo to provide assistance to the employee.

Saputo will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodations needs or plans are reviewed and when Saputo reviews its general emergency response policies.

Documented Individual Accommodation Plans

Saputo has implemented and will maintain a written process for the development of documented individual accommodations plans for employees with disabilities.

The process for the development of documented individual accommodation plans will include the following elements:

- The employee's participation in the development of the accommodation plan;
- Assessment on an individual basis;
- Identification of accommodation to be provided;
- Timelines for the provision of accommodation;
- Saputo may request an evaluation by outside medical or other expert, at our expense, to assist with determining accommodation and how to achieve accommodation;
- Employee may request participation of a representative from the workplace in the development of the accommodation plan;
- Steps taken to protect the privacy of the employee's personal information;
- The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done;
- If denied, the reasons for denial are to be provided to the employee;
- A format that takes into account the employee's disability needs;
- If requested, any information regarding accessible formats and communication supports provided; and
- Identification of any other accommodation that is to be provide;
- If requested, information regarding accessible formats and communications supports provided will also be included in individual accommodation plans;
- In addition, the plans will include individualized workplace emergency response information (where required) and will identify any other accommodation that is to be provided.

Refer to Appendix – 6: Individual Accommodation and Return to Work Plans

Return to Work Process

Saputo has implemented and will maintain a documented return to work process for our employees who have been absent from work due to a disability and who required disability-related accommodations in order to return to work.

The return-to-work process outlines the steps Saputo will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

Generally speaking, any employee who is off work due to a disability will be required to provide medical information from their medical practitioner before returning to work. This medical information must indicate that an employee is able to return to work without restrictions. Alternatively, a medical practitioner must identify the employee's specific restrictions and their associated duration. These restrictions must be provided to the Disability Manager, Human Resources Department and/or supervisor/manager prior to the anticipated return to work date. Following this, the relevant parties will review the request considering each Ontario locations accommodation process.

This return-to-work process will not replace or override any other return to work process created by or under any other statute (i.e., Ontario's Workplace Safety Insurance Act, 1997).

Refer to Appendix – 6: Individual Accommodation and Return to Work Plans

Performance Management, Career Development and Redeployment

Saputo will take accessibility needs (as well as individual accommodation plans) into account in the areas of performance management, career development and redeployment of an employee with a disability. If an employee requires accommodation due to a disability within these areas' they are required to identify their needs to their manager, Human Resources Department and/or supervisor/manager. The relevant parties will review the request to develop an individual accommodation plan.

DESIGN OF PUBLIC SPACES STANDARDS (ACCESSIBILITY FOR THE BUILT ENVIRONMENT)

Saputo is committed to designing public spaces that are free from barriers and accessible to all persons we serve, and in accordance with the requirements of any other applicable statutes or codes, while undertaking new construction or planned significant alterations.

QUESTIONS ABOUT THIS STANDARD

This Standard has been developed to break down barriers and increase accessibility for persons with disabilities. If anyone has a question about the Standard, or if the purpose of a Standard is not understood, an explanation will be provided by the Ontario Human Resources Team, which is comprised of:

- Georgetown – Human Resources Manager
- Orangeville – Human Resources Manager, Human Resources Advisor
- St. Marys – Human Resources Manager, Human Resources Advisor
- Tavistock – Human Resources Manager, Human Resources Advisor
- Vaughan - Human Resources Manager
- Ontario - Human Resources Director

Note: specified contact details to be included in Appendices and updated as required.

NOTICE TO BE POSTED IN RECEPTION AREAS & PROVIDED TO NEW HIRES



Saputo recognizes that the Government of Ontario supports the full inclusion of persons with disabilities as set out in Ontario's Human Rights Code (the "Code"), and the Accessibility for Ontarians with Disabilities Act, 2005 (the "AODA").

Saputo is committed to treating all people in a way that allows them to maintain their dignity and independence. Saputo believes in integration and equal opportunity. The Company is committed to meeting the needs of people with disabilities in a timely manner and will do so by attempting to prevent and remove barriers to accessibility to endeavor to meet the requirements as defined by the AODA.

Should you require an accommodation, it is your responsibility to inform the Receptionist, who in turn will notify the appropriate Human Resources Representative. Documents related to accessible customer service, are available upon request from the Human Resources Department. Saputo will provide these documents in an accessible format or with communication support, on request. Saputo will consult with the person making the request to determine the suitability of the format or communication support. Saputo will provide the accessible format in a timely manner and, at no additional cost.

Feedback about the delivery of services to persons with disabilities is welcomed, as it may identify areas that require change and assist in continuous service improvement. Such feedback may be by telephone, in person, in writing or by email. Saputo will make best efforts to provide a response in the same format in which the feedback was received. Where possible, feedback will be addressed immediately. Some feedback may, however, require more effort to address and may need to be reviewed before an action is taken.

Ontario Human Resources Contact Information:

Vaughan	Georgetown
Phone: 905-264-4610 Email: carla.stutz@saputo.com	Phone: 905-702-7229 Email: linda.randell@saputo.com
Orangeville	Tavistock/St. Marys
Phone: 905-264-4610 Email: carla.stutz@saputo.com	Phone: 519-655-2337 Email: ammie.poag@saputo.com

NOTICE WILL BE PLACED AT ALL PUBLIC ENTRANCES TO OUR PREMISES



Dear Customers/Employees,

Please note that our XXXXXXXXXX located XXXXXXXXXX is/are out of service. This disruption in service will anticipated from XXXXXX to XXXXXX for XXXXXXXX (Reason to be provided by Maintenance).

To access other XXXXXXXXXX in the facility, please contact the receptionist, and he/she will provide you with an alternative XXXXXXXXXX which can be used during the disruption of service.

We regret any inconvenience this may cause.

If you have questions or concerns, please see the receptionist directly, or reach out to the Human Resources Department via the contact information listed below.

Thank you.

Management

Human Resources Contact Information:

Vaughan	Georgetown
Phone: 905-264-4610 Email: carla.stutz@saputo.com	Phone: 905-702-7229 Email: linda.randell@saputo.com
Orangeville	Tavistock/St.Marys
Phone: 905-264-4610 Email: carla.stutz@saputo.com	Phone: 519-655-2337 Email: ammie.poag@saputo.com

NOTICE WILL BE PLACED AT ALL PUBLIC ENTRANCES TO OUR PREMISES



Saputo recognizes that the Government of Ontario supports the full inclusion of persons with disabilities as set out in Ontario's *Human Rights Code* (the "Code"), and the *Accessibility for Ontarians with Disabilities Act, 2005* (the "AODA"). When a disruption occurs, the following people will be responsible to ensure compliance with the Act:

- Upon the Maintenance Team being informed of an issue, when a disruption occurs:
 - Maintenance Manager and/or a Member of the Maintenance team will complete the Notice of Disruption with the required information and inform the Receptionist and all members of the management team with an estimated time when the problem should be resolved;
 - Notice of Disruption will be posted in a conspicuous place where it is visible to the people affected by the disruption;
 - Maintenance Manager and/or a Member of Maintenance team, if needed, will work with site Management Team Members to find a solution for the problem in a timely manner;
 - Reasonable accommodation up to the point of undue hardship will be provided to any customer, or employee to deal with the disruption (accommodation to be discussed between the parties);
 - Maintenance Manager and/or a Member of the Maintenance team will inform when disruption is resolved and will remove the notice of disruption.

NOTICE TO BE POSTED ON SITE COMMUNICATION BOARDS & PROVIDED TO NEW HIRES



Saputo recognizes that the Government of Ontario supports the full inclusion of persons with disabilities as set out in Ontario's *Human Rights Code* (the "Code"), and the *Accessibility for Ontarians with Disabilities Act, 2005* (the "AODA").

Saputo is committed to treating all people in a way that allows them to maintain their dignity and independence. Saputo believes in integration and equal opportunity. The Company is committed to meeting the needs of people with disabilities in a timely manner and will do so by attempting to prevent and remove barriers to accessibility to endeavor to meet the requirements as defined by the AODA and its regulations.

Upon request from an employee who requires an accommodation due to a disability, in consultation with the employee, and where reasonably able, the Company will provide or arrange for the provision of accessible formats and communication supports for information that is needed in order to perform one's job; and information that is generally available to employees in the workplace. [S. 26 1-2 IASR].

If you, as an employee of Saputo, have a disability as defined under Ontario's *Human Rights Code* or the AODA, and require access or an accommodation to do your job, it is your responsibility to inform the Human Resources Department, and we will work with you to provide suitable accommodation up to the point of undue hardship. Saputo will also provide individualized workplace emergency response information to employees who have a disability and where necessary.

If you have questions or concerns, please contact your local Human Resources Department.

Human Resources Contact Information:

Vaughan	Georgetown
Phone: 905-264-4610 Email: carla.stutz@saputo.com	Phone: 905-702-7229 Email: linda.randell@saputo.com
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TO BE PROVIDED UPON REQUEST



SAPUTO ONTARIO CUSTOMER SERVICE STANDARDS

All of Saputo's Ontario facilities are committed to meeting their current and ongoing obligations under Ontario's Human Rights Code respecting non-discrimination.

Saputo understands that obligations under the AODA and its accessibility standards do not substitute or limit its obligations under Ontario's Human Rights Code or obligations to people with disabilities under any other law. Saputo is committed to complying with both Ontario's Human Rights Code and the AODA.

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There may be rare circumstances where, for reasons of food safety, health and safety, allowing a person with a disability to enter a premise accompanied by their support person needs to be considered. If deemed necessary, a

risk assessment will be conducted by an Ontario Management Representative. The risk assessment will include identifying the risks inherent with the support person being in the area of concern and identify alternate measures available to enable the person with a disability to access the service.

Notice of Temporary Disruption of Service

Saputo will take reasonable steps to provide the public with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. The required information necessary for any communication of a temporary disruption may include:

- The time, date and location of the disruption;
- Information about the reason for the disruption;
- Anticipated duration of the disruption; and
- Descriptions of alternative facilities or services, if any.
- This notice will be placed at all public entrances to our premises.

As Saputo facilities in Ontario have limited access to the public, due to CFIA Regulations, Food Safety and Health & Safety Regulations/Compliance, services/facilities may not be available for public use. This may include, but is not limited to the following (dependent upon each location),

- Washrooms
- Boardrooms
- Wheelchair accessible ramp
- Wheelchair accessible doors

Feedback Process

Feedback about the delivery of services to persons with disabilities is welcomed, as it may identify areas that require change and assist in continuous service improvement. Such feedback may be by telephone, in person, in writing or by email. Saputo will make best efforts to provide a response in the same format in which the feedback was received. Where possible, feedback will be addressed immediately. Some feedback may, however, require more effort to address and may need to be reviewed before an action is taken. Feedback is to be directed to the Human Manager at each location.

Notice of Availability of Documents

Saputo will notify the public that documents related to accessible customer service are available upon request by posting a notice in the reception/entrance area of each facility. Saputo will provide this document in an accessible format or with communication support, on request. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and, at no additional cost.

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 Standard before considering the impact on people with disabilities. Any policies of Saputo that do not respect and promote the principles of dignity, independence, integration and equal opportunity for people with disabilities will be modified or removed.

TO BE PROVIDED UPON REQUEST



Process for Developing Individual Accommodation Plans

Saputo (the "Company") is committed to providing an accessible and inclusive environment for all individuals as set out in Ontario's *Accessibility for Ontarians with Disabilities Act, 2005* (the "AODA") and will use the following process to identify and meet employee accommodation needs up to the point of undue hardship. Confidentiality will be maintained throughout the accommodation process. The Company will retain, in a secure location, all information and documentation provided to it as part of this process. Such information -excluding any private and confidential medical documentation and its contents-will be shared with others on a "need to know" basis only or upon the written request and approval of the employee requesting the accommodation.

1. Recognize the need for accommodation

Accommodation can be:

- Requested by the employee.
- Identified by the employee's manager or hiring manager.

2. Gather relevant information and assess individual needs

- The employee is an active participant in this step and may ask a representative from the employee's bargaining agent, where the employee is represented by a bargaining agent, or other workplace representative, where the employee is not represented by a bargaining agent, to participate in the process.
- The employee will provide information on their functional abilities and limitations excluding the nature of their disability.
- A medical or other expert external resource may be engaged (at the Company's discretion and expense) to help determine if/how the employee's needs can be accommodated
- The employee along with Human Resources Manager, Disability Manager and Supervisor and external expert as assigned by the Employer will work together to find a reasonable accommodation based on the employee's individual needs up to the point of undue hardship.
- The employee may be asked to provide, consider or discuss alternative solutions.

The final decision to determine what reasonable accommodation(s) , if any, will be provided and which does not result in undue hardship will be determined by the Company and will be based on the documentation submitted by the employee, consultation with required resources and the Company's operational needs.

3. Write an individual accommodation plan

After identifying the most appropriate accommodation(s), the details of agreed upon accommodation(s) will be documented in a written individual plan, which will include the following (as applicable):

- The established abilities and limitations provided at time of plan creation.
- The detailed accommodation(s) to be provided.
- The identification of any accessible formats or communication supports required.
- Any employee emergency information and/or emergency response plan additions if required.
- Training requirements.

- The plan duration and frequency with which it will be reviewed and updated.

Once finalized, the Human Resources Manager will give the employee, in an accessible format (if required), a copy of the individual accommodation plan for their review and signature, or written reasons for denying the accommodation request.

The employee's Supervisor and/or Manager will receive a copy of the finalized plan as well as employee's bargaining agent representative or other workplace representative(s), where the employee is not represented by a bargaining agent if required.

Depending on the circumstances, type of disability, levels of functionality and return to work plan details, the employee may:

- Return to his/her original pre- injury/condition position with some modifications to tasks, work environment and hours.
- Return to an alternate position.

4. Implement, monitor and update the plan

The employee will work with Supervisor and/or Department Manager to review, implement and monitor the plan accommodation(s) requirements. If additional clarification is required, Human Resources and/or Disability Manager may be consulted.

After implementation of an agreed upon accommodation plan, and based on outlined review frequency and/or if required as a result one of the following situations:

- The employee's work location or position changes.
- The nature of the employee's disability changes and/or abilities and limitations have changed.
- If the accommodation is no longer appropriate.
- If there are business changes where the accommodation requirements can no longer be met, or the accommodation is no longer available.

The Supervisor and/or Manager in conjunction with the employee and employee's bargaining agent representative or other workplace representative, where the employee is not represented by a bargaining agent if required along with Human Resources and Disability Manager – if required- will review the plan as per Steps 2 and 3 to determine if;

- Revisions to the current plan are required, or
- A new plan is required, or
- Accommodation is no longer required, or
- Accommodation request cannot be met.

Process for Developing Return to Work Plans

Saputo (the "Company") is committed to supporting employees who have been absent from work due to a disability and reintegrating the employee back into the workplace. The Company will use the following return to work planning process to help employees who require temporary or permanent disability-related accommodations in order to return to work. This return to work process does not replace or override any other return to work process created by or under any other statute (e.g., Ontario's *Workplace Safety and Insurance Act, 1997*).

Confidentiality will be maintained throughout the return to work process. The Company will retain, in a secure location, all information and documentation provided to it as part of this process. Such information -excluding

any private and confidential medical documentation and its contents-will be shared with others on a "need to know" basis only or upon the written request and approval of the employee requiring a return to work plan as a result of disability related leave.

1. Initiate the leave and stay in contact with the employee

If an employee requires to be on a disability leave as a result of a workplace injury, personal condition or injury, he/she will inform their supervisor and/or manager, Human Resources as well as follow local process for reporting an absence from work. The employee will maintain regular contact with the employer and the assigned contact person as determined based on type of leave, with the employee's consent, to address any problems that may arise and facilitate the return to work process.

2. Gather relevant information and assess individual needs

The employee and designated contact person based on type of disability leave will work together to share and review required information in order to determine the most appropriate return to work plan up to the point of undue hardship. Steps may include the following”

For Occupational Injuries/Conditions requiring return to work planning:

Employee Supervisor and/or Manager will:

- Provide the employee with return to work information.
- Maintain regular contact with the employee.
- Review medical (abilities/limitations/restrictions) to identify most appropriate return to work plan.
- Assist with identifying accommodation up to the point of undue hardship.
- Assist with analyzing the demands of each job task.

The Employee will:

- Follow appropriate medical treatment as required.
- Provide the employee's health care provider with the return to work information.
- Provide medical updates on functional abilities, limitations and restrictions in a timely manner and as requested from time to time.

Health care provider(s), workplace representative(s), disability and Human Resources manager and others may also participate in the process, if required

For Non-Occupational Leaves of Absence requiring return to work planning

The Employee will:

- Maintain regular contact with third party administrator (TPA).
- Follow appropriate medical treatment as required.
- Provide requested medical to TPA in order to identify and develop most appropriate return to work plan.
- Work with external TPA to help develop a return to work plan.

3. Develop a return to work plan

Once the most suitable tasks to be performed are identified based on provided functionality details (restrictions and limitations), other required information, safety considerations and any transitional measures, the details of the agreed upon return to work plan will be documented in a written individual plan, which will include the following (as applicable):

- The established abilities and limitations based on documentation provided at time of plan. creation depending on the disability leave of absence.
- The assigned duties and tasks to be performed.

- The plan start and end date if known as well as hours of work.
- The frequency with which the plan will be reviewed and updated.
- The identification of any accessible formats or communication supports required.

For work-related injuries and conditions and disabilities:

For occupational injuries and conditions requiring a return to work plan for accommodation purposes or as a result of a leave of absence, the supervisor in partnership with the TPA and Disability Management – if required - will be responsible for preparing the initial return to work plan

Supervisor/Manager will:

- Provide worker with written return to work plan in an accessible format (if required).
- Ensure work practices are safe for the returning employee.
- Provide necessary training if required.
- Supervisor will sign plan along with employee and provide a final copy to the employee and to the TPA and others as required.

For non-work-related injuries and conditions and disabilities:

For non-work-related injuries and conditions requiring a return to work plan for accommodation purposes or as a result of a leave of absence, the external third-party representative will develop and present the recommended plan.

Human Resources will:

- Receive and review proposed return to work plan from external third-party representative
- Share plan with the employee's Supervisor/Manager and gain alignment up to the point of undue hardship.
- Share final aligned/signed plan with insurance case manager

Supervisor/Manager will:

- Receives proposed plan, reviews and confirms plan requirements can be met up to the point of undue hardship or provides additional commentary and/or suggestions if unable to accommodate the proposed return to work plan
- Ensure work practices are safe for the returning employee
- Provide necessary training if required
- Once finalized, Supervisor will provide employee in an accessible format (if required), a copy of the finalized return to work plan for signing.
- Supervisor will also sign the plan and provide a final copy to the employee and to Human Resources.

Depending on the circumstances, type of disability, levels of functionality and return to work plan details, the employee may:

- Return to his/her original pre-injury/condition position with some modifications to tasks, work environment and hours
- Return to an alternate position

4. Implement, monitor and update the plan

The employee will work with Supervisor and/or Department Manager to review, implement and monitor the return to work plan and accommodation(s) requirements. If additional clarification is required, Human Resources and/or Disability Manager may be consulted.

After implementation of an agreed upon return to work accommodation plan, and based on outlined review frequency and/or if required as a result one of the following situations:

- The employee's work location or position changes
- The nature of the employee's disability changes and/or abilities and limitations have changed
- If the accommodation is no longer appropriate
- If there are business changes where the accommodation requirements can no longer be met, or the accommodation is no longer available

The Supervisor and/or Manager in conjunction with the employee, TPA and Disability Manager – if required- will review the plan as per Steps 2 and 3 to determine if:

- Revisions to the current plan are required or,
- A new plan is required or,
- Accommodation is no longer required or,
- Accommodation request cannot be met.