

Policy Owner: Valerie Rother	Dept: Human Resources	Title: VP, Human Resources
Issued: October 2024	Issue #: 1	Approved By: Mike Meshkati

1.0 Purpose

The purpose of this Accessibility & Accommodation Policy is to outline the company's commitment to providing a barrier-free and inclusive work environment for all employees, customers, and stakeholders. The company is dedicated to ensuring that individuals with disabilities have access to equal opportunities, accommodations, and support. This policy ensures that the company fosters an inclusive environment for employees and customers while promoting equal access for all individuals with disabilities.

This policy ensures accessibility and accommodations for employees and customers in compliance with AODA and the Ontario Human Rights Code. It also reinforces SinaLite's **food safety culture** by enabling employees to fully participate in food safety-critical roles and uphold GMP and compliance requirements.

1.0.1 Scope

This policy applies to all employees, contractors, interns, volunteers, and customers of the company. It covers accommodations related to disabilities and the provision of services to customers with disabilities.

1.0.2 Compliance Responsibilities

This policy along with all related directives, policies, procedures, guidelines and other associated documents issued in its support, serve as the standard to be applied by management. Every SinaLite employee will ensure they are aware of and understand this policy, follow it, and report any unapproved exceptions, violations, questions and/or suggested improvements to the Policy Owner. Any violation may result in disciplinary action up to and including termination with cause of the SinaLite employee's employment agreement.

This policy is in full compliance with the Accessibility for Ontarians with Disabilities Act (AODA), the Ontario Human Rights Code, and any other applicable provincial or federal laws. The company will regularly review its policies and practices to ensure ongoing compliance and make updates as needed.

1.1 Commitment to Accessibility

SinaLite is committed to identifying, preventing, and removing barriers to accessibility in the workplace and in the delivery of services to customers. The company will take proactive steps to ensure accessibility in the following areas:

- Physical Accessibility: Ensuring reasonable best efforts are made with respect to facilities, entrances, exits, washrooms, and other spaces for accessibility to individuals with mobility impairments.
- Communication: Providing accessible formats and communication supports for individuals with disabilities upon request.
- Technology: Ensuring that online services, websites, and digital platforms meet accessibility standards.

1.2 Employee Accommodation

The company will provide accommodation to employees with disabilities to ensure they can fully participate in the workplace. This includes:

- Individualized Accommodation Plans: Employees who require accommodations are encouraged to request them by notifying their supervisor or the Human Resources department. The company will work with the

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employee to develop a personalized accommodation plan, which may include modified duties, flexible work hours, assistive devices, or workplace modifications.

- **Return to Work Plans:** The company will develop return-to-work plans for employees who are returning to work after a disability-related absence, ensuring appropriate accommodations are provided to facilitate their return.
- **Confidentiality:** The company will maintain the confidentiality of all personal and medical information provided during the accommodation process, and information will only be shared with individuals directly involved in implementing the accommodation plan.

Accommodation plans must ensure that food safety-critical responsibilities (e.g., CCP monitoring, sanitation verification, product release) are continuously covered, with trained alternates assigned as needed.

To request an accommodation complete the Workplace Accommodation Request Form found in the Forms section of BambooHR.

1.3 Customer Accessibility

The company is committed to providing accessible customer service including:

- **Accessible Communication:** Customers with disabilities will be provided with alternative communication methods, such as large print, audio formats, or assistive devices, upon request. Staff will be trained on how to interact with customers with disabilities and accommodate their specific needs.
- **Service Animals and Support Persons:** The company welcomes customers with disabilities who are accompanied by service animals or support persons. Service animals will be permitted in all areas open to the public, unless otherwise prohibited by law, and support persons will not be denied access to company facilities or services.
- **Physical Accessibility for Customers:** The company will make reasonable best efforts to ensure that all customer-facing locations, entrances, restrooms, and service areas are accessible to individuals with mobility, visual, or other disabilities. This includes making any necessary modifications to ensure barrier-free access to products and services.
- **Feedback Process:** Customers are encouraged to provide feedback on the accessibility of the company's services. Feedback can be submitted through a variety of formats, including email, phone, or in-person, and the company will respond to accessibility-related feedback in a timely and respectful manner.

1.4 Training

The company will provide training to all employees, volunteers, and contractors on:

- Accessibility standards under the AODA
- Ontario Human Rights Code as it relates to accessibility and accommodation
- How to interact with individuals with disabilities
- How to provide accessible customer service

Training will be conducted during onboarding and refreshed periodically to ensure that all employees understand their responsibilities regarding accessibility and accommodation.

1.5 Feedback and Complaints

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The company values feedback on how we provide accessible services and accommodations to employees and customers. Any employee, customer, or member of the public who has concerns or suggestions regarding accessibility or accommodation may submit feedback to:

- Human Resources Department (for employee-related accommodations)
- Customer Service Department (for customer-related accommodations)

The company will investigate and address all complaints related to accessibility in a timely manner and take appropriate corrective action where needed.

1.6 Record Control

Related HR records are maintained in BambooHR or the current HR system of record. In addition to this forms are also maintained in the employees physical file. Any HR Records will be maintained indefinitely during the employees employment and owned by HR.

1.7 References

This content of this document is related to the following regulatory / compliance documents and frameworks:

Reference Doc / Framework
Accessibility for Ontarians with Disabilities Act (AODA)
Ontario Human Rights Code
Accessibility in Ontario

1.8 Definitions

SinaLite	Sina Printing Inc. (dba “SinaLite”)
Policy Owner	The individual listed in the header above who is responsible to review, update, gain approval for and implement this standard on an ongoing basis.
Accessibility	The design of products, devices, services, or environments to be usable by people with disabilities.
Accommodation	Adjustments or modifications made to policies, practices, procedures, or the work environment to ensure that individuals with disabilities can fully participate in the workplace or access services.
Disability	Any degree of physical, mental, developmental, or cognitive impairment that affects an individual's ability to perform everyday tasks or access services.
Duty to Accommodate	An employer’s legal obligation under the Ontario Human Rights Code to take reasonable steps to eliminate barriers and provide accommodations for employees with disabilities, to the point of undue hardship.

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Undue Hardship A legal limit to the duty to accommodate, occurring when providing accommodations would cause significant difficulty or expense to the organization. Factors considered include financial cost, health and safety, and organizational impact.

IAP Individual Accommodation Plan, documented plan developed collaboratively between an employer and an employee with a disability, outlining specific accommodations to support the employee's work performance and accessibility needs.

Barrier Any physical, technological, or systemic obstacle that prevents or limits individuals with disabilities from accessing opportunities, services, or spaces. Barriers can be attitudinal, organizational, architectural, or informational.

Reasonable Accommodation Adjustments or changes made to meet the needs of an individual with a disability that do not cause undue hardship to the organization.

Assistive Devices Tools, technologies, or equipment used to enhance the functionality or independence of individuals with disabilities, such as screen readers, mobility aids, or hearing devices.

Functional Limitation A restriction in performing tasks or activities due to a disability, which may require accommodations to support the individual in the workplace.

Invisible Disability A disability that is not immediately apparent, such as a mental health condition, chronic illness, or learning disability, which may still require accommodations.

Support Person An individual who accompanies a person with a disability to provide assistance, such as helping with communication, mobility, or personal care.

Service Animal An animal trained to provide assistance to a person with a disability, permitted in the workplace or public spaces as per the AODA and Ontario Human Rights Code.

1.9 Version / Revision History

When you update this document and the table below, please update the header with the new "Last Updated" date.

Version	Update Date	Purpose	By
1.0	October 11 2024	Creation	Valerie Rother
2.0	November 20 2024	Edits to content before going live with updated policies	Valerie Rother
3.0	June 23 2025	Addition of Version / Revision History	Kamil Ladowski
4.0	October 16 2025	Adding paragraph to purpose to tie to SQF and food safety culture. Adding comment to employee accommodations to ensure food safety responsibilities are continued and the practice is not compromised. Addition of Records Control section.	Kamil Ladowski