

	<b>Accessibility Policy &amp; Statement</b>	Approval Date: 2023/09/01 Policy Status: Approved Document Owner: HS&W Owning Department: HS&W Version: 1 Revision Date: 2024/02/23
Applicable Group: <input checked="" type="checkbox"/> All Canadian Operations (except Giant Tiger stores)		

### **A. Introduction:**

The North West Company (NWC) is dedicated to fostering an inclusive and accessible environment for our employees, customers, and the communities we serve. We strive to comply with all applicable federal, provincial, and territorial accessibility laws, regulations, and standards to ensure equal access and opportunities for all individuals, including those with disabilities.

### **B. Purpose:**

The purpose of this policy is to outline NWC's commitment to accessibility, the standards we adhere to, and the actions we are taking to ensure that our facilities, services, and products are accessible to all individuals, regardless of their abilities. This policy aims to establish a culture of accessibility within our company and promote an understanding of the diverse needs of individuals with disabilities.

### **C. Statement of Commitment:**

NWC is committed to providing a respectful, welcoming, accessible, and inclusive environment for all persons with disabilities in a way that is respectful of the dignity and independence of people with disabilities and in a manner which takes into account the person's disability and embodies the principles of integration and equal opportunity.

NWC is committed to becoming a barrier free environment and meeting the requirements of all existing legislation and its own policies and goals related to identifying, removing and preventing barriers to people with disabilities that might interfere with their ability to interact with The North West Company.

NWC ensures that all persons within its community are aware of their rights and responsibilities to foster an accessible and inclusive environment with and for persons with disabilities.

### **D. Policy:**

NWC is committed to meeting the accessibility needs of all individuals, including those with disabilities. We will adhere to the accessibility standards outlined in the Accessible Canada Act, as well as all other applicable federal, provincial, and territorial accessibility laws, regulations, and standards. We will regularly review and update our policies to ensure ongoing compliance and effectiveness. To support this commitment, we will communicate these standards to our employees and provide them with training on accessibility and the needs of individuals with disabilities.

### **E. Accessible Built Environment:**

We will make reasonable efforts to ensure that all new facilities and renovations to existing facilities are designed to be accessible to individuals with disabilities. This includes ensuring

accessible entrances, aisles, checkouts, washrooms, parking lots, and clear and easily readable store signage.

#### **F. Accessible Employment:**

We are committed to promoting inclusion and diversity in our workforce. We will make reasonable efforts to accommodate the accessibility needs of our employees and provide training on accessibility and the needs of individuals with disabilities to all employees. This includes reasonable accommodations throughout the recruitment, selection, and hiring processes, accessible job postings and employment-related communications, and ensuring that workplace policies and procedures are accessible to all employees.

#### **G. Recruitment and Selection**

We will notify all applicants about the availability of accommodation measures and practice. If a selected applicant requests an accommodation, we will consult with the applicant to arrange suitable accommodations that consider the applicants disabilities in a timely manner. As part of our onboarding, we will notify successful applicants of our policies for accommodating people with disabilities. This includes consulting with employees to determine reasonable accommodations that would remove barriers relating to material or activities used in the selection process.

#### **H. Accessible Products & Services:**

We will make reasonable efforts to ensure that our products and services are designed and manufactured to be accessible to individuals with disabilities. We will provide necessary modifications to ensure accessibility upon request. Additionally, we will offer accessible online shopping options and delivery services to enable individuals with disabilities to access our products and services.

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

- ensuring that all customers receive the same value and quality;
- allowing 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 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 customer's disability.

#### **I. Accessible Websites & Digital Content:**

We are committed to make all reasonable efforts to adhere to the Web Content Accessibility Guidelines (WCAG) to ensure accessibility of our websites and digital content. We will proactively train our web design and digital content team to stay at the forefront of accessibility progress and monitor advancements in accessibility to continually improve our online accessibility efforts.

#### **J. Communication**

We aim to meet the communication needs of our employees by providing workplace information and communications in ways that are easy to access for everyone.

If requested by an employee with a temporary or permanent disability, we will consult with the employee to identify the accessible formats, or communication supports needed when providing information to the employee. Identified accessible formats or communication supports are continually used when providing information to the employee

#### **K. Individualized Accommodation Plans:**

We will provide reasonable accommodations assessed on an individual basis by developing individualized plans for employee with disabilities who request them. Employees may request accommodations verbally, or in writing for an individualized accommodation plan.

We may request that the employee provide documentation from a treatment provider who supports the need for the accommodation at NWCs expense to help in determining if reasonable accommodation is required.

An employee may request assistance with developing the plan, including assistance from an Accommodation Specialist.

The individualized accommodation plan includes:

- accessible formats and communication supports, if requested
- workplace emergency response information, if required
- details of how and when any other accommodations will be provided
- when the plan will be reviewed

Our employees will participate and cooperate in the accommodation process by:

- providing related information and taking part in assessments, if requested by the employer
- complying with the individualized accommodation plan
- offering ongoing feedback related to modifications, including whether the accommodation is no longer required

We will review the individualized accommodation plan, and update if required, on an annual basis or when:

- the employee's workspace is modified or relocated
- the employee's responsibilities have changed
- other workplace changes have occurred that affect the accommodation
- the employee has made a request to review and update the accommodation plan

Requests for an individualized accommodation plan may be denied if the self-assessed requirement for a workplace accommodation is not supported by the evaluation completed by an external health professional or evidence that the accommodation request will result in undue hardship (i.e. create a major financial cost to the Company or health and safety risks). If an employee's request for an individualized accommodation plan is denied the employee will be notified in writing including the reasons why.

#### **L. Performance Management:**

Our performance management process takes into account an employee may be temporarily or permanently disabled by barriers in the workplace. Any individualized accommodation plans will be taken into account and acknowledge that an employee's plan may not fully address a workplace barrier

We discuss existing workplace accommodations and propose modifications or new workplace accommodations if we believe this could help improve the performance of an employee with a disability. Prior to imposing disciplinary measures, we consider whether there is a connection between concerns about job performance and any workplace barriers.

#### **M. Career Development Internal Advancement and Reassignment**

When providing career development, training or opportunities we ensure the process for recruiting and selecting candidates takes into account that an employee may be temporarily or permanently disabled. As well as employee's individualized accommodation plan that the workplace accommodation provided for an employee with a disability may not fully address the workplace barrier

Our practices and measures aim to ensure that workplace accommodations do not negatively affect access to career development.

#### **N. Return To Work:**

NWC has a return to work process for all employees who have been absent from work and require accommodation in order to return to work. Best efforts will be taken to modify the employee's duties and work schedules based on their functional abilities. These processes will be documented and will outline the steps that the Company will take to facilitate the return to work and include an individual accommodation plan.

#### **O. Training & Education:**

As soon as reasonably practicable we will provide training on accessibility, customer service, and the needs of individuals with disabilities to ensure our employees are equipped to provide accessible products and services and communicate effectively. We will also ensure that employees are aware of their responsibilities under applicable accessibility laws and regulations. This training includes instruction on how:

- Employment opportunities may be made accessible to persons with disabilities
- To interact and communicate with persons with disabilities
- To interact with people with disabilities who use an assistive device or require a support person or service animal

The North West Company will ensure that timely training is provided to all necessary persons, that it aligns with the requirements of the accessibility standards referred to in the IASR, and The North West Company will continue to provide training on the Human Rights Code as it pertains to persons with disabilities. This includes training for management and supervisors about accessible employment and accommodating employees with a disability through the course of recruitment and their employment with NWC. Appropriate records of training are maintained.

Training, using the most appropriate methodologies, as appropriate, is provided to the following person(s):

- all employees
- all persons who work under a contractual agreement directly with The North West Company

If any changes are made to this policy or the requirements, training will be provided to include those changes.

## **P. Communication & Feedback:**

We are committed to ensuring that our communications are accessible to individuals with disabilities. Upon request, we will provide alternative formats such as large print, audio, or electronic formats. For internal communications, we offer digital formats that are easily sizable for large print/visibility needs and virtual meetings with real-time transcription for those with hearing issues. We will establish accessible feedback procedures and respond promptly and appropriately to any feedback or complaints related to accessibility.

## **Q. Collaboration with Stakeholders:**

NWC will actively collaborate with individuals with disabilities, advocacy groups, accessibility experts, and other stakeholders to ensure our accessibility policies and practices are effective and responsive to community needs. We will engage in dialogue to identify barriers and improvement opportunities, develop strategies for enhancing accessibility, and work with suppliers and partners to promote accessible products and services.

## **Accountabilities and Responsibilities**

### **The North West Company Executive Committee is Accountable to and Responsible For:**

- The governance of the policy.
- Corporate liability for compliance with legislative requirements, including fiscal responsibility, human costs and human rights issues.
- Support and promote the policy in their area of direct report and throughout the organization.
- Drive the culture to a high level of understanding regarding disability and accommodation.

### **The North West Company Directors and Managers are Accountable to and Responsible for:**

- Fostering open and constructive communication.
- Demonstrating sensitivity to and respect confidentiality of information.
- Raising awareness to facilitate understanding of the policy.
- Participating and co-operating to facilitate workplace accommodation.

### **The North West Company Employees are Accountable to and responsible for:**

- Participating and cooperating with all parties to facilitate workplace accommodation.

### **The North West Company People Team is Accountable to and Responsible for:**

- Participating and cooperating with all parties.
- Acting as a resource for all parties and participants.
- Supporting and educating managers in their obligations.

## **R. Emergency Preparedness:**

We will establish emergency procedures that provide clear and accessible information to all individuals, including those with disabilities. Our employees will receive training on responding effectively to emergency situations. We will also coordinate with local emergency services and organizations to align our emergency plans with community-wide response efforts and address the needs of individuals with disabilities.

Once we learn an employee requires assistance during a workplace emergency, we offer the employee individual workplace emergency response information as soon as possible.

We review the workplace emergency response information provided to an employee each time:

- the employee is moved to a different workspace
- the employee's workspace is modified

- we review our general emergency response plans and make changes that would affect the employee's response to an emergency in the workplace

If an employee who receives workplace emergency response information requires the assistance of another person during an emergency, we obtain consent from the employee on who will assist, and we inform that person how to assist.

## **S. Privacy**

We will protect the privacy and confidentiality of all personal information and personal health information. This information will only be collected, used and disclosed as necessary for the purpose of the Accessibility Standard for Employment, unless agreed by the employee

We follow the requirements of provincial privacy legislation including the Freedom of Information and Protection of Privacy Act and Personal Health Information Act.

## **T. Monitoring & Review:**

NWC is committed to monitoring and reviewing our accessibility policies, procedures, and practices to ensure ongoing compliance with applicable laws and regulations. Regular assessments and evaluations will be conducted to identify areas for improvement and to measure our progress toward accessibility goals.

## **U. Compliance:**

NWC will comply with all applicable laws and regulations related to accessibility. We will stay informed of changes in legislation and standards and adapt our policies and practices accordingly.

NWC will ensure that its processes for receiving and responding to feedback are made available to persons with disabilities, whether members of the public, clients, customers or employees, in an appropriate, accessible format or communication support, upon their request, and that members of the public are notified of the availability of such an option.

By implementing this accessibility plan, NWC aims to create an environment that values and promotes accessibility, ensuring equal access and opportunities for all individuals, including those with disabilities.

## **Glossary of Terms:**

**Accessible Formats:** include, but are not limited to accessible electronic formats, Braille, text transcripts, large print, recorded audio, and other formats accessible to persons with disabilities.

**Assistive Device:** 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 members and guests bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

**Barrier:** Anything that prevents a person with a disability from fully participating in all aspects of society because of his/her disability. This includes:

- a physical barrier,

- an architectural barrier,
- an informational or communications barrier,
- an attitudinal barrier,
- a policy, practice and procedure barrier.

Communication Supports: include but are not limited to sign language, plain language and other communication supports that facilitate effective communications.

Disability: Any degree of physical disability, infirmity, malformation or disfigurement including, but not limited to:

- Diabetes mellitus;
- Epilepsy;
- A brain injury;
- Any degree of paralysis;
- Amputation;
- Lack of physical coordination;
- Blindness or visual impairment;
- Deafness or hearing impairment;
- Muteness or speech impairment; or
- Physical reliance of 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.

The definition includes disabilities of different severity, visible as well as non-visible disabilities, and disabilities the effects of which may come and go. This is a broad definition, and one that must be considered closely when educating our employees in the appropriate response to our customers.

Guide Dog: A highly trained working dog that has been trained at one of the special facilities to provide mobility, safety and increased independence for people who are blind.

Service Animal: An animal for a person with disability. In this policy, a service animal is:

- any animal used by a person with a disability for reasons relating to the disability; or
- where the person provides a letter from a physician confirming that they require the animal for reasons relating to their disability; or
- where the person provides a valid identification card signed by the Attorney General of Canada or a certificate of training from a recognized guide dog or service animal training school.

Support Person: 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.