

BroadGrain Accessibility Plan

This plan covers the period from years 2022-2025.

GENERAL

Statement of Commitment

BroadGrain Commodities Inc. is committed to its current and ongoing obligations under the Ontario Human Rights Code, Canada Human Rights Act, Accessibility for Ontarians with Disabilities Act, Accessible Canada Act, and other similar legislation in the applicable jurisdiction of its workplaces.

We value being an inclusive, accessible, and diverse employer. We are committed to creating and maintaining a barrier-free workplace that allows both full and equitable participation in the workplace for persons with disabilities.

For further information on our policies, and specifically those of “Training for Staff”, “Service Animals”, and “Support Persons”, please review the BroadGrain Accessibility Policy.

Feedback Process

At BroadGrain, we consider feedback extremely valuable to our operations. The Human Resources Director will ensure that all feedback is organized, analyzed, shared with the relevant teams or peoples in the organization for their consideration, preserved, and ultimately, used to prevent and remove barriers in a timely manner.

There are four main ways that individuals can provide feedback on accessibility to BroadGrain:

- *Anonymous Feedback*
 - This can either be done through our Accessibility Form on our website or by sending a non-returnable letter to the address below.
- *Mail*
 - Human Resources Director
18 King Street East, Suite 900
Toronto, Ontario
M5C 1C4
- *Email*
 - hrgroup@broadgrain.com
- *Phone/Fax*
 - Phone: +1 877.804.0070 / +1 416.504.0070
 - Fax: +1 416.504.0080

You may request information on the accessibility plan and feedback process in Braille, audio, print, large print, and any other electronic format that is used in assistive devices for persons with disabilities.

POLICIES, PROGRAMS, PRACTICES AND SERVICES IN RELATION TO THE IDENTIFICATION, REMOVAL AND PREVENTION OF NEW BARRIERS IN THE FOLLOWING AREAS

Employment

BroadGrain is committed to diversity and inclusion in our hiring practices and talent strategy.

Identification and Removal of barriers

We recognize that barriers exist for employees and applicants with disabilities. We have worked to remove these barriers by conducting training on accessibility and disability in the workplace for all of those in management and providing guidance to support employee accessibility requests.

Prevention of new barriers

BroadGrain will regularly review the evaluation and interview process for possible barriers in recruitment and the ongoing employment of workers.

The Built Environment

“The built environment” refers to the physical work environment, including the equipment and tools available in it.

Identification and Removal of barriers

Where BroadGrain has control over such, BroadGrain has worked with contractors for its facilities and buildings to incorporate best practices for accessibility in our buildings.

Prevention of new barriers

BroadGrain will regularly review its spaces to ensure there are no barriers under its control that would prohibit persons with disabilities from equitable performance in its built environment.

Maintenance of Accessible Elements

In owning properties that the public has access to, BroadGrain is committed to ensuring that these areas remain accessible to persons with disabilities.

Identification and Removal of barriers

BroadGrain recognizes that public spaces require regular maintenance and when properties were constructed they were reviewed in order remain accessible to persons with disabilities.

Prevention of new barriers

BroadGrain will continue to ensure that the procedural protocols for preventative and emergency maintenance of accessible elements are in line with industry standards. A review of the areas which BroadGrain has constructed and controlled will be conducted on an annual basis. We will also ensure that temporary disruptions in the working order of accessible elements do not hinder the overall accessibility of public spaces under BroadGrain's control. The procedure for the places that BroadGrain has constructed and controlled is to provide notice to those who may be affected and a time period for which these disruptions will occur.

Information and Communication Technologies (ICT)

BroadGrain uses a variety of digital technologies and tools, including our public website, and video and audio communications platforms.

Identification and Removal of barriers

BroadGrain reviewed its online web content to ensure it follows to industry standard accessibility guidelines. This includes ensuring our website and web contents all conform with WCAG 2.0 Level AA requirements.

Prevention of new barriers

We will continue to conform to new web standards as they become available. If requested, BroadGrain will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities. BroadGrain will also consult with the person making the request to determine the suitability of an accessible format or communication support.

Communication (non-web documents and other non-ICT communications)

Enabling all persons to be able to access communications material is important for BroadGrain. Not all disabilities are present in the same way, therefore having a broad range of communication options is essential.

Identification and Removal of barriers

When communicating with a person with a disability, BroadGrain has done so in a manner that takes into account the person's disability.

Prevention of new barriers

Review and update our communications to ensure they are in easy-to-read language and are accessible and consistent with the use of alternative text.

Procurement of Goods, Services and Facilities

From time to time, BroadGrain buys technology and equipment that support our services and operations.

Identification and Removal of barriers

BroadGrain recognizes that certain equipment purchased for use by employees may be more accessible than others. Where necessary, BroadGrain has removed these barriers so that all employees can use its equipment.

Prevention of new barriers

BroadGrain will continue to review accessibility options when purchasing equipment from vendors in order to comply with accessible formats for persons with disabilities.

Design and delivery of programs and services

Identification and Removal of barriers

BroadGrain does not provide services or programs to others apart from any needs for its employees, therefore this priority area is not relevant to our business.

Prevention of new barriers

In the event that BroadGrain does begin providing relevant programs or services that may have an impact on accessibility, BroadGrain will continue to review this in accordance with its Accessibility Policy.

Transportation

Identification and Removal of barriers

BroadGrain currently does not have any transportation services, therefore this priority area is not relevant to our business.

Prevention of new barriers

In the event that BroadGrain does begin providing something in relation to transportation, BroadGrain will continue to review this in accordance with its Accessibility Policy.

CONSULTATIONS

Working with persons with disabilities is a key part in the development and updating of BroadGrain's Accessibility Plan. Consultation leads to a more inclusive design process that provides constant input and feedback from the community.

In the development of BroadGrain's Accessibility Plan, we consulted with persons with disabilities through administering an anonymous survey for employees and persons with disabilities.

The survey asked whether employees experienced any barriers while working at or interacting with BroadGrain. We also asked employees who answered the survey to provide details about the positive and negative experiences they have, including barriers to accessibility that they encountered.

To receive feedback from BroadGrain's clients who have disabilities, we also have a feedback process on our website's accessibility page. We also provided the contact

information for persons with disabilities to provide feedback in alternative ways, including email, fax, and telephone.

Any barriers that were identified during these consultations were considered in the creation of this Accessibility Plan.