

Accessibility Policy

1. Statement of Commitment

1.1 BroadGrain Commodities Inc. is committed its current and ongoing obligations under the Ontario Human Rights Code and Canada Human Rights Act, the Accessibility for Ontarians with Disabilities Act, the Accessible Canada Act and other similar legislation in the applicable jurisdictions of its workplaces. We are committed to excellence in serving all customers, including people with disabilities.

2. Scope

2.1 This accessibility policy applies to the BroadGrain workplaces and staff including employees, visitors, and third party contractors.

3. General Principles

3.1 BroadGrain will strive to ensure that its policies, practices and procedures are consistent with the following core principles.

- a) **Dignity** – Goods and services are provided in a manner that is respectful to persons with a disability and does not diminish the person’s importance.
- b) **Independence** – Accommodating a person’s disability means respecting their right to do for themselves and to choose the way they wish to receive goods and services.
- c) **Integration** – Persons with disabilities can access all goods and services. This may require alternative formats and flexible approaches. It means inclusiveness and full participation.
- d) **Equal Opportunity** – Service is provided to persons with disabilities in a way that their opportunity to access goods and services is equal to that given to others.

4. Definitions

4.1 **“accessible”** means obtainable, usable, readable, audible, visible, understandable, clear, able to be entered and exited, flexible, etc.

4.2 **“alternative formats”** refers to alternate ways to provide goods and services. This may be through forms of communication such as speech or writing, or methods such as in person or over the phone. Other examples are large print, electronic text (Word or html), braille, sign language interpretation, communication devices, media caption, etc.

4.3 **“assistive devices”** are equipment that people with disabilities utilize to assist in their daily lives at home, work, school, etc. Such devices could be a walker, scooter, cane, magnification or specialized learning software, communication board, etc.

4.4 **“assistive technology”** is equipment or software such as screen reading, audio recording and voice recognition which people with disabilities use to obtain information and communicate with others.

4.5 “**customer**” is a patron, stakeholder or anyone in receipt of goods and services.

4.6 “**employee**” means an individual who performs work or services for monetary compensation at BroadGrain or is a volunteer, and includes all full-time and part-time workers, casual, contract or temporary workers, interns, students, or independent contractors carrying out business for BroadGrain.

5. Components of the Policy, Programs, Practices and Services

5.1 Communication with Persons with Disabilities

- a) When communicating with a person with a disability, BroadGrain will do so in a manner that takes into account the person’s disability.

5.2 Assistive Technology

- a) Personal assistive technologies are permitted and unrestricted in all areas of BroadGrain to which employees and the public have access, except when subject to operator safety integrity.

5.3 Service Animals

- a) Persons with a disability who are accompanied by a service animal may access premises owned or operated by BroadGrain, if the public has access to such premises and the animal is not otherwise excluded by law. If a service animal is excluded by law, BroadGrain will ensure that alternate means are available within reasonable time and location to provide persons with a disability access to BroadGrain’s services.
- b) If it is not readily apparent that an animal is a service animal, reception may ask the person with the service animal to provide verification of the animal’s duty.

5.4 Support Persons

- a) BroadGrain welcomes employees and visitors with disabilities 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 the purposes of providing support with mobility, personal assistance and/or communication. Persons with a disability who require a support person may access premises owned and/or operated by BroadGrain with their support person, provided the interaction between the person and their support person does not compromise safety.
- b) There may be rare circumstances where, for reasons of health and safety, allowing a person with a disability to enter a premises accompanied by their support person needs to be considered further, such as potential fire code violations. If deemed necessary, a risk assessment will be conducted. This assessment, completed in consultation with the person with a disability, will identify: a) the risks inherent with the support person being in the area of concern; and b) alternate measures available to enable the person with a disability to access this service.
- c) Support persons shall be permitted entry to all BroadGrain facilities and meeting rooms that are open to the public, except when there are fees applied against participants by a third party.

5.5 Notice of Temporary Disruption

- a) In the event of a planned or unexpected disruption to BroadGrain services or facilities for people with disabilities, BroadGrain will notify the appropriate parties immediately and indicate when these services or facilities will resume.

5.6 Training

- a) BroadGrain will provide accessibility training to all employees, including those who develop these policies, and persons who act on behalf of BroadGrain.
- b) This training will, in particular, include:
 1. how to interact and communicate with persons with various types of disabilities,
 2. how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person, and
 3. what to do if a person with a disability is having difficulty in accessing BroadGrain's goods, services or facilities.

5.7 Employment

- a) During a recruitment process, BroadGrain will notify job applicants that accommodations are available upon request.
- b) When making an offer of employment, BroadGrain will notify the applicant of its policies for accommodating employees with disabilities.

5.8 Built environment

- a) BroadGrain reviews its spaces to ensure there are no barriers under its control that would prohibit persons with disabilities in its built environment.

5.9 Information and Communications

- a) BroadGrain reviews its online web content to ensure it follows to industry standard accessibility guidelines.
- b) If requested, BroadGrain will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities. This will be done in a timely manner that takes into account the person's accessibility needs due to their disability and at a cost that is no more than the regular cost charged to other persons for the same information.
 1. BroadGrain will also consult with the person making the request to determine the suitability of an accessible format or communication support.
 - i. Applicable accessible formats include Braille, audio, print, large print, and any other electronic format that is used in assistive devices for persons with disabilities.

6. Feedback Process

- 6.1 At BroadGrain, we consider feedback extremely valuable to our operations. If you wish to provide feedback on how we provide product to people with disabilities, please comment in-person at one of our locations, online using the contact form or phone/fax numbers listed on our website, or alternatively send a letter to:

Human Resources Director
18 King Street East, Suite 900
Toronto, Ontario
M5C 1C4

hrgroup@broadgrain.com

- 6.2 At BroadGrain, we take accessibility seriously. This is why we have various available accessible formats and communications supports with respect to the feedback process. These formats include Braille, audio, print, large print, and any other electronic format that is used in assistive devices for persons with disabilities.