

Clover Leaf Seafoods Corp.

AODA Accessibility Policy- Ontario

2024-2029

POLICY STATEMENT

Clover Leaf Seafoods Corp Canada ("The Company") is committed to providing an accessible environment where all individuals have equal access to the Company's goods, services, and employment that meets the individual needs of persons with disabilities in a way that maintains their dignity and independence. Clover Leaf Seafoods Corp Canada believes in integration and will act, to the extent possible, by preventing and removing barriers to accessibility promptly.

Clover Leaf Seafoods Corp Canada shall develop, implement, and maintain policies and procedures governing the provisions of goods, services, and facilities to people with disabilities in a manner that:

- Maintains their dignity, independence, and privacy;
- Upon request provides accessible formats prs communication supports;
- Seeks to provide integrated services;
- Provides an opportunity equitable to others to obtain, use ad benefit from our products, services, and employment;
- Considers a person's disability; and,
- Where an accessible solution(s) is not available, where possible, alternative reasonable accommodation will be offered.

PURPOSE

This Accessibility Policy establishes a framework for compliance with all applicable legislation, including the *Accessibility for Ontarians Disability Act* (the "AODA"), *Integrated Accessibility Standards Regulation* of the AODA (the 'Regulation") and the *Ontario Human Rights Code* (the "Code").

SCOPE

This policy applies to all Clover Leaf Seafoods Corp Canada employees, independent contractors, agent, volunteer or otherwise; and a; other persons who provide goods or services to members of the public and third parties (collectively "Customers") in Ontario.



DEFINITIONS

The following words and phrases have the corresponding meanings in this policy:

Accessible formats- Any form of printed or other communication or transactional media which are alternatives to standard print and are accessible to persons with disabilities, including but not limited to: large print, recorded audio and electronic, Braille and other formats.

Accommodation- Adapting or adjusting employment, services, or facilities for persons with disabilities when a more inclusive design is not feasible or available.

Assistive devices- Any device used to assist a person in performing a particular task(s) or to aid that person in activities of daily living, including, but not limited to a wheelchair, screen reader, listening device or cane.

Communication supports- Supports that persons with disabilities may need to order to access information, including, but not limited to captioning, alternative and augmented communication supports, plain language, sign language and other supports that facilitate effective communication.

Integration- Integration means that policies, programs, and services including practices and procedures are designed to be accessible to everyone, including persons with disabilities.

POLICY

Clover Leaf Seafoods Corp Canada is committed to providing a high standard of goods, services, programs, and facilities, and we will use reasonable efforts to ensure our practices are consistent with this policy.

Following are the practices in which we currently engage to meet these standards:

I. Training

Clover Leaf Seafoods Corp Canada provides accessibility training to our employees and all other persons who provide goods, services, or facilities on behalf of Clover Leaf Seafoods Corp Canada. Training includes:

• A review of the purpose of the AODA, the requirements of the relevant Regulations/Code and an overview of this policy;



Instructions on:

- How to interact and communicate with persons with diverse types of both visible and non-visible disabilities;
- What to do if a person with a disability is having difficulty accessing Clover Leaf Seafoods Corp Canada's premises and/or Clover Leaf Seafoods Corp Canada's products or services; and
- Confirmation of any material changes to other relevant policies.

II. Support persons and service animals

Clover Leaf Seafoods Corp Canada welcomes persons with disabilities to bring their service or guide animals on our premises. In line with existing privacy requirements, while conducting Clover Leaf Seafoods Corp Canada nosiness, an appropriately authorized support person will also be welcome to accompany a person with a disability.

III. Communication

Accessible Format and Communication Support

Clover Leaf Seafoods Corp Canada will endeavour to communicate with Clover Leaf Seafoods Corp Canada stakeholders and employees with disabilities in ways that consider their disability. We will, upon request, and in consultation with the person making the request, provide or plan to provide accessible format or communication support for them. Accessible formats and communication support shall be provided promptly, considering the person's accessibility needs.

Accessible Websites and Web Content

Clover Leaf Seafoods Corp Canada internet websites and web content shall conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.1, at Level AA in accordance with the AODA Regulation.

Notice of Services Disruption

Clover Leaf Seafoods Corp Canada will notify our employees and stakeholders promptly in the event of a planned or unexpected disruption to services, programs, or facilities. The notice will include information about the unavailable facilities, programs or services, the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if any, available.

Any notices will be communicated via internal communications like email or the Company intranet, or on our website at <u>www.cloverleaf.ca</u>, as is appropriate in the circumstances.



Assistive Devices

Individuals with disabilities are allowed to use their own assistive devices while on the premises of Clover Leaf Seafoods Corp Canada to access, utilize, or benefit from the company's services, programs, and facilities. If there is a physical, technological, or any other type of barrier that hinders the use of an assistive device on Clover Leaf Seafoods Corp Canada's premises, the company will make every effort to eliminate that barrier. If Clover Leaf Seafoods Corp Canada is unable to remove the barrier, they will consult with the individual to determine how they can best accommodate their needs and what alternative solutions may provide equal access to the company's services, programs, and facilities. Clover Leaf Seafoods Corp Canada is committed to offering alternative means of assistance whenever possible.

Recruitment

Clover Leaf Seafoods Corp Canada welcomes applicants with disabilities in its recruitment process and provides information about the availability of accommodations upon request. Job applicants selected for an interview and/or assessment shall be notified that accommodations for material to be used in the recruitment process are available upon request. Clover Leaf Seafoods Corp Canada will consult with any applicant who requests an accommodation in a manner that considers that applicant's needs. Successful applicants shall be notified about Clover Leaf Seafoods Corp Canada's policy for accommodating employees with disabilities as a part of their offer of employment.

Employee Supports

Clover Leaf Seafoods Corp Canada informs employees of the accessibility and accommodation policies available to support employees with disabilities. Clover Leaf Seafoods Corp Canada provides this information to new employees as soon as practicable after they begin their employment.

Accommodation Plans

In accordance with the *Accommodation Policy*, individuals who have a need for accommodation in the Clover Leaf Seafoods Corp Canada workplace may request Reasonable Accommodation, as needed. An Accommodation Plan may include individualized workplace emergency response information.

Workplace Emergency Response Plan

If an employee's disability necessitates an emergency response plan, the employee will adhere to the procedures outlined in Clover Leaf Seafoods Corp Canada's Emergency Action Plan for Individuals Requiring Assistance. Once Clover Leaf Seafoods Corp Canada is informed of the need for accommodation, an emergency response plan will be created in consultation with the employee.



Additionally, this information will be shared, with the employee's consent, with the designated person who will assist them. The information will be reviewed under the following circumstances:

- The employee moves to a different location;
- The employee's overall accommodation need or Accommodation Plan is reviewed; or
- Clover Leaf Seafoods Corp Canada reviews its general emergency response plan.

Return to Work Process

As further detailed in the *Workplace Accommodation Policy*, employees returning to work and requiring disability-related accommodation may request an Accommodation Plan be developed to facilitate the employee's return to work.

Performance Management, Career Development and Redeployment

Clover Leaf Seafoods Corp Canada will consider the accessibility needs of its employees with disabilities as well as any individual Accommodation Plane when providing career development, conducting performance management, and considering redeployment.

Design of Public Spaces

Clover Leaf Seafoods Corp Canada will comply with the AODA Design of Public Spaces Standard and Ontario Building Code amendment, including consultation requirements, when undertaking new construction and redevelopment of public spaces.

IV. Feedback

At Clover Leaf Seafoods Corp Canada, we are continually striving to improve accessibility. Feedback, questions, or suggestions regarding accessibility is welcomed. The Company will ensure that its process for receiving and responding to feedback is accessible as required or requested.

Feedback can be provided in the following ways:

CANADIAN MAILING ADDRESS:

Clover Leaf Seafoods Corp 80 Tiverton Ct. Markham, Ontario L3R 9V2 Canada

CONSUMER TOLL-FREE NUMBER:

+1 877-893-9880

BY EMAIL:

human.resources@cloverleaf.ca



EMPLOYEE PRIVACY

Clover Leaf Seafoods Corp Canada respects employee privacy and dignity. We intend to take all reasonable and required steps to protect your personal information. We will only collect and retain personal information from employees required for the effective operation of the Company or by law. We will keep that information confidential and release it only to those who have a legitimate need to know.

RELATED POLICIES AND PROCEDURES

Other Clover Leaf Seafoods Corp Canada documents to which this policy relates include the following:

- Accommodation Policy
- Multi-year Accessibility Plan
- Emergency Action Plan- Guideline for People Requiring Assistance
- AODA Training

AMENDMENT, MODIFICATION, DISCONTINUATION

The Company reserves the right to amend, modify or discontinue this policy at any time, for any reason, in its sole discretion.