

<i>Category:</i> Human Resources	<i>Title:</i> Accessibility Policy	<i>Date of Issue:</i> 01/01/2014	<i>Scope:</i> All Company
<i>Owner:</i> Corporate HR		<i>Date of Last Revision:</i> 01/01/2022	<i>Region:</i> Ontario

POLICY STATEMENT

High Liner Foods Inc. (“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. High Liner believes in integration, and will take action, to the extent possible, by preventing and removing barriers to accessibility in a timely manner.

High Liner Foods 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 or communication supports;
- seeks to provide integrated services;
- provides an opportunity equitable to others to obtain, use and benefit from our products, services and employment;
- takes into account a person’s disability; and,
- where an accessible solution(s) is not generally available, where possible, an 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 High Liner Food employees, independent contractors, agent, volunteer or otherwise; and all 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.

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Communication supports – Supports that persons with disabilities may need in 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

High Liner Foods is committed to providing a high standard of goods, services, programs and facilities, where 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:

a) Training

High Liner Foods provides accessibility training to our employees and all other persons who provide goods, services or facilities on behalf of High Liner Foods. 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 various types of both visible and non-visible disabilities;
 - what to do if a person with a disability is having difficulty accessing High Liner Foods’ premises and/or High Liner Foods’ products or services; and
- confirmation of any material changes to other relevant policies.

b) Support persons and service animals

High Liner Foods welcomes persons with disabilities to bring their service or guide animals on our premises. In line with existing privacy requirements, while conducting High Liner Foods business, an appropriately authorized support person will also be welcome to accompany a person with a disability.

c) Communication

Accessible Format and Communication Support

High Liner Foods will endeavor to communicate with High Liner Foods 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 make arrangements to provide accessible format or communication supports for them. Accessible formats and communication support shall be provided in a timely manner taking into account the person’s accessibility needs.

Accessible Websites and Web Content

High Liner Foods internet websites and web content shall conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level A and AA in accordance with the AODA Regulation.

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Notice of Service Disruption

High Liner Foods 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 facilities, programs or services that are unavailable, the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if any, that are available.

Any notices will be communicated via internal communications like email or the Company intranet, or on our website at www.highlinerfoods.com, as is appropriate in the circumstances.

Assistive Devices

Persons with disabilities are permitted to use their own assistive devices when on High Liner Foods’ premises for the purposes of obtaining, using or benefiting from High Liner Foods’ services, programs and facilities. If there is a physical, technological or other type of barrier that prevents the use of an assistive device on High Liner Foods’ premises, High Liner Foods will make its best efforts to remove that barrier. If High Liner Foods is not able to remove the barrier, High Liner Foods will ask the person with the disability how they can be accommodated, and what alternative measures would enable equal access to High Liner Foods’ services, programs and facilities. High Liner Foods will make its best effort to provide the person with alternative means of assistance.

d) Employment

Recruitment

High Liner Foods welcomes applicants with disabilities in its recruitment process and provides information about the availability of accommodations upon request. Job applicants who are 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. High Liner Foods will consult with any applicant who requests an accommodation in a manner that considers the applicant’s needs. Successful applicants shall be notified about High Liner Foods’s policy for accommodating employees with disabilities as part of their offer of employment.

Employee Supports

High Liner Foods informs employees of the accessibility and accommodation policies available to support employees with disabilities. High Liner Foods 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 High Liner Foods 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 is such that an emergency response plan is necessary, the employee will follow the process outlined in the High Liner Foods’ Emergency Action Plan for People Requiring Assistance. Once High Liner Foods is made aware of the need for accommodation, an emergency response plan will be developed in consultation with the employee. In addition, this information shall

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be provided, with the employee’s consent, to the person designated to provide assistance. The information shall undergo review when:

- the employee moves to a different location;
- the employee’s overall accommodation need or Accommodation Plan is reviewed; or
- High Liner Foods 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 accommodations, may request an Accommodation Plan be developed to facilitate the employee’s return to work.

Performance Management, Career Development and Redeployment

High Liner Foods will consider the accessibility needs of its employees with disabilities as well as any individual Accommodation Plan when providing career development, conducting performance management and considering redeployment.

Design of Public Spaces

High Liner Foods will comply with the AODA Design of Public Spaces Standard and Ontario Building Code amendments, including consultation requirements, when undertaking new construction and redevelopment of public spaces.

e) Feedback

At High Liner Foods, 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:

- **In writing:**
High Liner Foods Incorporated
100 Battery Point, P.O. Box 910
Lunenburg, Nova Scotia
B0J 2C0 Canada
- **By email:**
Related to HLF Corporate: humanresources@highlinerfoods.com
Related to HLF Retail Products/Services: feedback@highliner.com

EMPLOYEE PRIVACY

High Liner Foods respects employee privacy and dignity. It is our intention to take all reasonable and required steps to protect your personal information. We will only collect and retain personal information from employees that is required for the effective operation of the Company or as required by law. We will keep that information confidential and release it only to those who have a legitimate need to know.

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RELATED POLICIES AND PROCEDURES

Other High Liner 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.