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ACCESSIBILITY POLICY

1. Purpose / Applicability

Under the *Accessibility for Ontarians with Disabilities Act, 2005*, all public and private sector organizations in the Province of Ontario must meet the requirements of accessibility standards established by regulation. This policy establishes the accessibility policy, multi-year accessibility plan and related commitments, in accordance with the *Integrated Accessibility Standards* (Ontario Regulation 191/11) for the Ontario operations of Sobeys Inc. ("**Sobeys**" or the "**Company**"). The *Accessibility for Ontarians with Disabilities Act, 2005*, and its Regulations (including all other standards as may be developed) are collectively referred to hereafter as the AODA.

2. Scope

This Policy applies to all of the Company's Representatives in the Province of Ontario.

For the purposes of this Policy, "**Representative**" means employees, volunteers, others that provide goods or services on the Company's behalf and all those who are involved in the development of the Company's policies, practices and procedures.

3. Definitions

As used in this Policy, the following terms have the meanings identified below:

"**Accessible Formats**" means any form of large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

"**Communication Supports**" means captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

"**Disability**" as defined in the Ontario *Human Rights Code* means:

- (a) any degree of physical infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impairment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog, or other animal or on a wheelchair or other remedial appliance or device,

- (b) a condition of mental impairment or a developmental disability,
- (c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- (d) a mental disorder, or
- (e) an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

“Web Content Accessibility Guidelines” means the World Wide Web Consortium Recommendation, dated December 2008, entitled “Web Content Accessibility Guidelines (WCAG) 2.0”.

“Website” means a collection of related webpages, images, videos, or other digital assets that are addressed relative to a common Uniform Resources Identifier (URI) and is accessible to the public.

4. Sobeys’ General Accessibility Policy

Sobeys is committed to accessibility for persons with disabilities based upon the core principles of dignity, independence, inclusion, integration, responsiveness and equality of opportunity. We are committed to meeting the needs of persons with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting the accessibility requirements under the AODA.

4.1 Commitment to Accessible Information and Communications

(i) Accessible Formats and Communication Supports

Sobeys will endeavor to create, provide and receive information and communications in ways that are accessible to people with disabilities. Sobeys will notify the public about the availability of accessible formats and communication supports. When asked, Sobeys will provide information about the Company and its services, communications made available to the Company’s customers and the public (including this policy), and any publicly available emergency procedures, plans or public safety information in accessible formats or with communication supports.

Sobeys will provide or arrange for accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person’s accessibility needs and at a cost that is no more than the regular cost charged to other persons. Sobeys will consult with the person making the request to determine the suitability of any accessible format or communication support provided.

If the Company determines that it is not technically feasible to convert the information or communications or that the technology to convert the information or communications is not readily available, Sobeys shall, upon request, provide the person that requires the information with an explanation as to why the information or communications are unconvertible; and a summary of the unconvertible information or communications.

(ii) **Website Accessibility**

Except where not practicable, the Company ensures that its current internet website(s), web content (backdated to 2012) and web-based applications conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level AA (other than success criteria 1.2.4 and 1.2.5).

(iii) **Feedback Regarding Accessibility**

Sobeys encourages persons with disabilities to provide comments on the services they receive, including feedback regarding the accessibility of those services and Sobeys' feedback process itself.

Feedback may be delivered to Sobeys in person, by telephone, mail, email, facsimile, feedback forms or other means available to the person.

Customers may use any of the following feedback channels:

- In person at Sobeys location: Speak with Manager in Charge
- By telephone: 1-866-948-0196
- By e-mail: customer.service@sobeys.com
- By mail: in writing to:
*ATTN: Compliments Customer Care
4980 Tahoe Blvd
Mississauga, ON
L4W 0C7*
- By submitting a feedback form.

[Contact Us - Sobeys Inc.](#)

All feedback will be reviewed for possible improvement in Sobeys' services and accessibility to its services. Feedback will be directed to the most appropriate Company employee for resolution, and any complaints will be addressed as soon as possible. Persons providing feedback can expect an acknowledgment of their feedback to be issued within 2 business days. The acknowledgment will indicate when the matter will be addressed, and when the individual will be notified further with respect to the matter. Correspondence with the individual will take into account their accessibility needs and will be provided in accordance with Sobeys' commitment to accessible information and communication supports, described above.

4.2 Kiosks

Sobeys will have regard for accessibility when procuring or acquiring kiosks to better serve persons with disabilities.

4.3 Procuring Goods, Services and Facilities

Sobeys will have regard for accessibility when procuring or acquiring goods, services or facilities to better serve persons with disabilities.

4.4 Accessible Employment

The Company has implemented the following practices and procedures to promote the inclusion of applicants for employment and existing employees with disabilities in its workplace.

(i) Recruitment

Sobeys notifies employees and the public about the availability of accommodations for applicants with disabilities during the recruitment process and when job applicants are individually selected to participate in an assessment or selection process.

If a selected applicant requests an accommodation, Sobeys consults with the applicant and provides or arranges for the provision of a suitable accommodation (including with respect to any materials or processes used in the application process), taking into account the applicant's disability.

When making offers of employment, Sobeys notifies successful applicants of its policies for accommodating employees with disabilities.

(ii) Employee Notification

Sobeys informs its employees of its policies used to support its employees with disabilities: (a) to new employees as soon as practicable after they begin their employment; and (b) whenever there is a change to existing policies on the provision of job accommodations that take into account accessibility needs due to a disability.

(iii) Accessible Formats and Communication Supports

Where an employee with a disability requests it, Sobeys will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for: (a) information that is needed in order to perform the employee's job; and (b) employment information that is generally available to employees in the workplace.

Sobeys will consult with the employee making the request in determining the suitability of an accessible format or communication support.

(iv) Individual Accommodation Plans

Sobeys has a written process for the development of a documented Individual Accommodation Plan. A copy of this process can be found in the Accessible Employment Policy, which is posted on the Company's SharePoint.

(v) Return to Work Process

Sobeys has a return-to-work process for employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work. A copy of this

process can be found in the Accessible Employment Policy, which is posted on the Ontario Retail Resource Centre SharePoint site.

(vi) **Performance Management, Career Development and Advancement and Redeployment**

Sobeys takes into account the accommodation needs of its employees, including any individual accommodation plans of employees, when: (a) using performance management; (b) providing career development and advancement opportunities; and (c) redeploying employees.

(vii) **Workplace Emergency Response Information**

Sobeys provides individualized Workplace Emergency Response Information to employees who have a disability if the disability is such that the individualized information is necessary, and Sobeys is aware of the need for accommodation due to the employee's disability. More details regarding this process can be found in the Accessible Employment Policy, which is posted on the Ontario Retail Resource Centre SharePoint site.

4.5 Training Commitment

Sobeys provides three types of training related to accessibility: accessible customer service training (as further discussed in section 5.6 below); integrated standards accessibility training; and training on the *Human Rights Code* as it relates to individuals with disabilities.

This training will be provided to all Representatives as soon as practicable. For newly hired employees, training will be provided as part of the orientation process. Training will also be provided on an ongoing basis when changes are made to these policies, practices and procedures. The training provided will be appropriate to the duties of the individual.

Sobeys will keep a record of the training provided, including the dates on which the training is provided and the number of individuals to whom it is provided.

5. Accessible Customer Service

Sobeys is committed to providing access to goods and services to its customers in a manner that is consistent with the principles of independence, dignity, integration and equality of opportunity, and that is in compliance with the AODA. To that end, the Company recognizes the importance of:

- Providing integrated access to goods and services for individuals with disabilities.
- Openly communicating and responding to the needs of customers with disabilities in order to provide them with excellent customer service; and
- Complying with the mandatory Customer Service Standard addressed under the AODA.

5.1 Accessible Customer Communications

The Company's Representatives are required to communicate with customers with disabilities in a manner that takes into account their disabilities. Representatives will consider how a customer's disability may affect the way that the customer expresses, receives or processes communications and, where possible, they will ask the customer how to best communicate with the individual.

5.2 Assistive Devices

Assistive devices that may be used by individuals with disabilities are welcome on the Company's premises that are open to the public or other third parties. Sobeys will take steps to ensure that Representatives are familiar with commonly used assistive devices.

5.3 Service Animals

Sobeys welcomes guide dogs or other animals that serve individuals with disabilities in those areas of its premises that are open to customers and will permit the customer to keep the service animal with them, except for those animals that are otherwise excluded by law from the premises. The service animal must be under the care and control of the individual at all times. In the event that a service animal is otherwise excluded by law from the premises, Sobeys will provide the customer with an alternative method of obtaining, using or benefitting from its goods or services.

5.4 Support Persons

Sobeys welcomes persons who support individuals with disabilities to accompany them onto those parts of its premises that are open to the public or other third parties. The Company will ensure that customers who so require have access to their support persons while on the premises. Such support persons need not be paid, professional support workers. They may be volunteers, family members or friends who provide support to the customer.

Sobeys may require a person with a disability to be accompanied by a support person when in our facility, but only if a support person is necessary to protect the health or safety of the person with a disability or the health or safety of others in the facility.

5.5 Temporary Unavailability of Access to Goods or Services for Customers with Disabilities

In the event that a facility, service or system offered by Sobeys to customers with disabilities becomes temporarily unavailable, in whole or in part, Sobeys will provide notice of the disruption, as is reasonable in the circumstances. The notices will be posted in a conspicuous on or near the entry doors, or in another reasonable location (such as in a local newspaper), in the circumstances and shall:

- Explain the reason for and anticipated length of the disruption; and
- Provide a description of and indicate the location of an alternative facility or service that is accessible to individuals with disabilities, if available.

5.6 Accessible Customer Service Training

All of Sobeys' Representatives will be:

- Provided with an overview of the AODA and the Customer Service Standard under the Regulation;
- Trained on how to interact, communicate and assist people with disabilities, and in particular, people with assistive devices, and those who require the assistance of a guide dog, service animal or support person;
- How to use equipment or devices available on the Company's premises or that are otherwise provided by the Company that may help with the provision of goods or services to a person with a disability;
- Made aware of the policies and procedures created by the Company in accordance with the Customer Service Standard; and
- Trained on what to do if a person with a disability is having difficulty accessing the Company's goods or services.

This training will also be provided on an ongoing basis, as soon as practicable, whenever the Company's policies change with respect to customer service accessibility for individuals with disabilities.

6. Availability of this Policy

A copy of this policy will be posted on the Company's [corporate website](#).

Upon request, Sobeys will provide or arrange for the provision of this policy, or the information contained in this policy, to the requesting individual in an accessible format or with a communication support in a timely manner that takes into account the person's accessibility needs due to disability and at no cost. In doing so, Sobeys will consult with the person making the request in determining the suitability of the format or communication support.