

## Subject: Accessibility

Corporate Policy No. **C03.042**

Date Issued: **January 1, 2014**

### Application:

This Policy governs all colleagues of Loblaw Companies Limited and its Canadian subsidiaries ("Loblaw" or the "Company"), excluding PC Financial and Services, Choice Properties REIT and T&T Supermarkets Inc.

## 1.0 Purpose

This Policy affirms Loblaw's commitment to meeting the accessibility needs of persons with disabilities in a timely manner and in a way that respects their dignity, independence, and rights of equal opportunity and access.

## 2.0 Definitions

- a) "*Accessible formats*" – means formats that are an alternative to standard print and are accessible to persons with disabilities. Accessible formats may include, but are not limited to, large print, braille, recorded audio and electronic formats.
- b) "*Accommodation*" – means an arrangement made with, or assistance provided to, persons with disabilities, to ensure their equal access to Loblaw's goods, services, employment and programs. Accommodation will vary depending on the person's unique needs.
- c) "*Barrier*" – means anything that prevents a person with a disability from accessing Loblaw's goods, services, employment or programs, including physical, attitudinal and technological barriers, and inadequate information or communication.
- d) "*Communication*" - means the interaction between two or more persons where information is provided, sent or received.
- e) "*Communication supports*" – means supports that facilitate effective communication, and may include plain language formats, sign language and captioning.
- f) "*Disability*" – means any degree of physical, mental, emotional, developmental or learning impairment, and includes temporary and permanent disabilities, visible and invisible disabilities (e.g. visual, hearing or mental impairment, or learning or developmental disabilities).
- g) "*Information*" – means data, facts and knowledge that exists in any format, including text, audio, digital or images.
- h) "*Mobility Aid*" - means a device used to facilitate the transport, in a seated posture, of a person with a disability.
- i) "*Mobility Assistive Device*" – means a cane, walker or similar aid.

## 3.0 Loblaw's Commitment to Accessibility

Loblaw is committed to identifying, removing and preventing barriers to accessibility for persons with disabilities. We comply with applicable legal and regulatory requirements, including those set out in human rights and accessibility-related legislation. We will ensure that:

- goods, services, employment and programs are provided in a manner that respects the dignity and independence of persons with disabilities;
- information and communication is provided in accessible formats where requested; and
- accessibility is integrated into our regular workplace processes, thereby providing equal access and opportunity across all stages of the employment lifecycle for colleagues with disabilities.

Further to these commitments, Loblaw’s Multi-year Accessibility Plan (the “Plan”; **Appendix “A”**) outlines the Company’s phased-in strategy for identifying, removing and preventing barriers to accessibility.

- The Plan is posted on our website ([www.loblaw.ca](http://www.loblaw.ca)) and will be provided in alternate formats upon request.
- The Plan will be reviewed and updated at least once every five years.

## 4.0 Accessible Information and Communication

### 4.1 Accessible Websites and Web Content

Loblaw’s websites and web content will conform to level A of the Worldwide Web Consortium’s Web Content Accessibility Guidelines. Compliance with level AA will be in place by 2021.

4.2 By January 1, 2016 in Ontario, and as soon as practicable nationally, accessibility will be integrated into Loblaw’s communication methods as follows:

#### a) Feedback

Loblaw will ensure its process for receiving and addressing feedback is accessible by providing or arranging for the provision of accessible formats and communication supports, upon request.

#### b) Accessible Formats and Communication Supports

Loblaw recognizes that persons with disabilities may use alternative methods to access information or services and will upon request provide, or arrange for the provision of, information and communication in an alternative format. The Company will consult with the person making the request in determining the suitability of an accessible format or communication support.

## 5.0 Employment

### 5.1 Emergency Response Plans

Loblaw provides workplace emergency response information to its colleagues. An *alternative emergency preparedness plan* will be completed, and updated as required, for each colleague with a disability for whom the Company is aware an individualized plan is necessary.

5.2 By January 1, 2016 in Ontario, and as soon as practicable nationally, accessibility will be integrated into Loblaw’s employment-related practices as follows:

#### a) Recruitment

- Loblaw will notify all internal and external job applicants, in job postings and when inviting an applicant to an interview or assessment, that accommodation is available upon request. When arranging accommodation, the Company will consult with the job applicant to determine their specific accessibility needs.
- When an offer of employment is made, Loblaw will notify the successful applicant of its policies for accommodating employees with disabilities.

#### b) Workplace

- Loblaw will inform its colleagues of its policies relating to accessibility for colleagues with disabilities, including during orientation and on-boarding.
- In response to a colleague request, the Company will, in consultation with the colleague, provide or arrange for the provision of accessible formats and communication support for information that is required in order for the colleague to perform his/her job, and access information that is generally available to colleagues in the workplace.
- The Company will develop written individual *accommodation plans* for colleagues with disabilities.

- c) Return to Work from Disability-Related Leave
  - Loblaw will develop and maintain a documented return to work procedure for colleagues who have been absent from work due to a disability and require accommodation in order to return to work.
  - The process will outline the steps the Company will take to work with colleagues to facilitate return to work and provide for documented individual accommodation plans.
- d) Performance Management and Career Development

Loblaw will take the accessibility needs of colleagues with disabilities and individual accommodation plans into account in all performance management and career development processes.
- e) Redeployment

Where Loblaw redeploys a colleague with a disability, the colleague's accessibility needs and individual accommodation plan will be taken into account, so that the colleague's accommodation needs are met.

## 6.0 Loblaw Premises

### 6.1 Self-Service Kiosks

Loblaw will have regard to accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks e.g. self-service check-outs.

### 6.2 By January 1, 2017 in Ontario, and as soon as practicable nationally, accessibility will be integrated into Loblaw premises as follows:

#### a) Outdoor Public Use Eating Areas

Where Loblaw constructs or redevelops outdoor public use eating areas, at least 20% of the tables (minimum one table) will have knee and toe clearance, have clear ground space around them, and be approachable by a surface that is level, firm and stable.

#### b) Exterior Paths of Travel

Any new or redeveloped sidewalks and walkways, including associated ramps, stairs, curb ramps, depressed curbs, pedestrian signals and rest areas will comply with the requirements set by provincial legislation relating to accessibility.

#### c) Parking

Any new or redeveloped off-street parking, accessible parking spaces, access aisles and signage will comply with the requirements set by provincial legislation relating to accessibility.

#### d) Service Counters, Queue Guides and Waiting Areas

- Where Loblaw constructs or redevelops service counters, at least one will accommodate mobility aids in respect of countertop height, knee clearance and clear floor space. All such service counters will be clearly identified with signage.
- Any new or redeveloped queuing guides will provide sufficient width to allow for the passage of mobility aids and mobility assistive devices, will have sufficiently clear floor area to permit mobility aids to turn where queues change direction, and be cane detectable.
- Any new or redeveloped waiting areas in which seating is fixed will include at least one seating space in which an individual using a mobility aid can wait.

## 7.0 Training

### 7.1 By January 1, 2015 in Ontario, and as soon as practicable nationally, accessibility will be integrated into Loblaw's training programs as follows:

- a) Loblaw will ensure training is provided to colleagues, volunteers and those who provide services on the Company's behalf on the standards set by provincial legislation regarding accessibility as well as any aspect of local human rights legislation relating to persons with disabilities. Training will be:
  - appropriate to the duties of the person undergoing training;
  - provided before or as soon as possible after the person commences job duties and whenever Loblaw alters its policies or practices regarding accessibility.

**8.0 Reference Documents**

Multi-Year Accessibility Plan (Appendix “A”)  
Alternative Emergency Preparedness Plan  
Individual Accommodation Plan

**9.0 Interpretation**

Responsibility for interpretation of this Policy rests jointly with the Executive Vice-President, Human Resources and Labour Relations, and the Executive Vice-President and Chief Legal Officer.