

Accessibility Policy

Trouw Nutrition Canada Inc.

Updated: July 2026

1. Commitment Statement

Trouw Nutrition Canada Inc. is committed to fostering an accessible, inclusive, and barrier-free environment for all persons, including those with disabilities. We believe that every individual deserves to be treated with dignity, independence, integration, and equal opportunity.

We comply with all applicable accessibility legislation, including:

- The Accessible Canada Act (ACA) and the Accessible Canada Regulations (federal);
- The Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and the Integrated Accessibility Standards Regulation (Ontario);
- The Canadian Human Rights Act and the Ontario Human Rights Code as they pertain to disability.

We will proactively identify, remove, and prevent barriers in all areas of our operations.

2. Purpose

This policy:

- Affirms our commitment to accessibility and inclusion;
- Provides a clear and consistent process for requesting and receiving accommodations;
- Defines the roles and responsibilities of employees, managers, and the organization;
- Ensures that all policies, practices, and services are designed with accessibility in mind;
- Fulfills our legal obligations under both the ACA and AODA.

3. Scope

This policy applies to:

- All employees (full-time, part-time, temporary, students, and contractors);
- Job applicants during recruitment, assessment, and selection;
- Customers, clients, and visitors;
- Third-party suppliers, vendors, and service providers while acting on our behalf.

Jurisdictional Scope:

- AODA requirements apply to all operations, employees, and services provided within the province

of Ontario.

- ACA requirements apply to all federally regulated business units and activities across Canada.

For employees and activities that fall under both jurisdictions (e.g., Ontario-based federally regulated staff), the more stringent or more specific requirement will apply.

4. Definitions

Disability – Under both the ACA and AODA, "disability" means any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment – or a functional limitation – whether permanent, temporary or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person's full and equal participation in society.

Barrier – Anything – including physical, architectural, technological, attitudinal, information-based, communication-based, or resulting from a policy or practice – that hinders the full and equal participation of persons with an impairment.

Accommodation – Any adjustment, modification, or support provided to eliminate a barrier so that a person with a disability can fully participate in the workplace or access goods, services, and facilities.

Undue Hardship – The point at which providing an accommodation would create unreasonable difficulty for the organization, considering cost, health and safety, and external funding. Undue hardship is assessed on a case-by-case basis, as permitted under both ACA and AODA.

Individualized Accessibility Plan (IAP) – A documented, individualized plan developed in consultation with an employee with a disability. The plan includes functional limitations (not diagnosis), workplace barriers, accommodations, emergency response information, accessible formats required, and review schedule.

5. Accommodation Request Process

This process applies to all employees, applicants, and customers across both jurisdictions.

Step 1 – Request

Any individual may request an accommodation verbally or in writing. Early requests are encouraged to allow timely responses.

Step 2 – Initial Discussion

The manager or HR representative will meet with the individual to discuss their needs, limitations, and preferred solutions. The individual may bring a support person or union representative.

Step 3 – Information Gathering

With the individual's consent, relevant information (such as medical documentation or functional assessments) may be requested. All information will be handled confidentially and stored in accordance with privacy laws (PIPEDA, PHIPA).

Step 4 – Individual Accommodation Plan (IAP)

For employee accommodations, a written IAP will be developed, including:

- Specific accommodation measures;
- Accessible formats or communication supports to be provided;
- Workplace emergency response information (if needed);
- Timeline for implementation and future review dates.

Step 5 – Implementation and Follow-up

Accommodations will be implemented promptly. Regular follow-ups will assess effectiveness, and adjustments will be made as needed.

6. Feedback and Complaint Procedure

If an employee, customer, or visitor is not satisfied with an accommodation request or accessibility concern, they may:

1. Informal resolution: Discuss the matter with their manager, HR, or customer service team.
2. Formal complaint: Submit a written complaint to HR Shared Services, who will investigate and respond within a reasonable timeframe.
3. External recourse:
 - Under AODA: File a complaint with the AODA Compliance Unit in Ontario.
 - Under ACA: File a complaint with the Accessibility Commissioner via the federal complaint process.
 - Use the organization's HRSS line.

No retaliation will be taken against anyone who raises a concern in good faith.

7. Feedback Contact

For questions about this policy, to request an accessible format, or to provide feedback:

- Position: HR Shared Services
- Mail: Trouw Nutrition Canada Inc., 7504 McLean Road, Puslinch, ON N0B 2J0
- Phone: 1 888 759 -8330
- Email: ask.hr@nutreco.com

8. Privacy and Confidentiality

We are committed to protecting the privacy of all individuals requesting accommodation. Personal

information will:

- Be collected, used, and disclosed only with the individual's consent;
- Be shared only on a "need-to-know" basis;
- Be stored securely in accordance with applicable privacy laws (PIPEDA, PHIPA, etc.);
- Not be used for any purpose unrelated to the accommodation.

9. Training

All employees, managers, and persons involved in policy development will receive training on:

- The requirements of the ACA and AODA;
- Trouw Nutrition's Accessibility Policy and accommodation procedures;
- How to interact and communicate with persons with various types of disabilities;
- How to use accessibility tools and technologies available in the workplace.

Training will be provided:

- During onboarding for new employees;
- Whenever policy changes occur;
- At least once every year as a refresher.

Training records will be maintained.

10. Monitoring and Review

This policy will be:

- Reviewed and updated at least once every three years to meet ACA requirements;
- Reviewed and updated at least once every five years to meet AODA requirements;
- Monitored for effectiveness through employee surveys, feedback mechanisms, and accommodation request data;
- Made available in alternate formats upon request.

11. Availability of Documents

Copies of this policy, our Multi-Year Accessibility Plan, and any related policies are available upon request. If a person with a disability requests a copy in an accessible format, we will provide it in a format that takes their disability into account, as agreed upon by both parties.