

# Trouw Nutrition Canada Inc. – Multi-Year Accessibility Plan: 2026 – 2031

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## **1.0 General**

### **1.1 About Trouw Nutrition Canada**

Trouw Nutrition Canada Inc. (“Trouw Nutrition”) is a division of Trouw Nutrition, a Nutreco company owned by SHV Holdings. The company was established in 2017 following the integration of Shur-Gain, Landmark Feeds, Hi-Pro Feeds, and Nutreco’s animal nutrition businesses in Canada.

The Puslinch Office is the primary administrative hub for Ontario sales, marketing and corporate support teams. Trouw Nutrition employs approximately 350 professionals across Ontario, including nutrition advisors, nutritionists, technical specialists, customer service representatives, and operations staff.

The business activity operates out of St. Mary’s where it is engaged in the manufacture and distribution of animal nutrition products for the agricultural sector. The firm also operates a farm supply store, mill and warehouse, in Tavistock.

Trouw Nutrition Canada Inc. is a federally regulated entity under the Accessible Canada Act (ACA) and is also subject to the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) for its Ontario operations.

### **1.2 Statement of Commitment**

Trouw Nutrition Canada is committed to creating and maintaining an accessible, inclusive, and barrier-free environment for all persons, including those with disabilities.

Consistent with Nutreco’s mission of “Feeding the Future” and its commitment to building a more sustainable and inclusive food system, Trouw Nutrition will make every reasonable effort to ensure that its policies, practices, and procedures are consistent with the principles of dignity, independence, integration, and equal opportunity.

We are committed to:

- Allowing everyone to participate fully and equally;
- Allowing everyone to have the same opportunity;
- Ensuring policies, programs, services, and structures take into account the disabilities of persons, and the different ways that persons interact with their environments;
- Consulting with persons with disabilities and considering their input when developing and designing policies, programs, services, and structures;
- Providing reasonable accommodations; and
- Considering individual needs.

### **1.3 Purpose of This Plan**

This Multi-Year Accessibility Plan outlines Trouw Nutrition's strategy to identify, remove, and prevent barriers to accessibility across all areas of its operations. It covers the period from 2026 to 2031 and will be reviewed and updated:

- At least once every three years to meet ACA requirements;
- At least once every five years to meet AODA requirements.

### **1.4 Feedback Contact**

To provide feedback on this Accessibility Plan or any barriers you may encounter, please contact:

Position: Human Resources Shared Services, Director, Canada

Mail: 7506 McLean Rd, Guelph, ON N0B 2J0

Email: [ask.hr@nutreco.com](mailto:ask.hr@nutreco.com)

## **2.0 Consultations**

Under the ACA, Trouw Nutrition is required to consult persons with disabilities in the preparation of its accessibility plans.

### **2.1 Consultation Process for 2026**

Internal consultations will be conducted through an anonymous online questionnaire accessible via:

- Email link for professional employees; and
- QR code for production employees.

The questionnaire will be developed in consultation with HRBP and will ask employees for recommendations on improving accessibility in all seven priority areas.

The questionnaire will include:

- An overview of the ACA and AODA;
- Key definitions (disability, barrier, accessibility);
- Examples of barriers in each priority area.

Survey responses will be anonymous, though employees may choose to provide contact information if they wish to be involved in future consultations.

## **2.2 Ongoing Consultations**

To measure our progress, Trouw Nutrition will:

- Conduct follow-up surveys at regular intervals throughout the 2026–2031 period;
- Engage employees with disabilities through focus groups or one-on-one interviews;
- Consult with disability-focused organizations when developing or updating accessibility initiatives.

## **3.0 Accessibility Plan Action Items**

The following sections outline Trouw Nutrition’s actions to identify, remove, and prevent barriers in the seven priority areas under the ACA.

### **3.1 Employment**

Barrier: Updated information regarding our workforce is required

Objectives Actions Owners Timeline

- Increase the percentage of employees who have completed the Employment Equity self-identification process to 100% of new hires
- Audit self-identification form collection process
- Confirm self-identification process for production employees
- Create and deploy training on the process of submitting forms for newly hired production employees Talent Acquisition 2026

- Increase the percentage of employees who have completed the Employment Equity self-identification process to 90% of current employees
- Partner with HR technology team to create a link in the employee portal for employees to self-identify at any time
- Communicate updates and encourage employees to self-identify through training and email campaigns
- Send annual reminders Employee Relations 2026–2027

**Barrier: More diverse talent recruiting resources are required**

#### **Objectives**

- Identify and leverage 2 new resources focused on diverse talent
- Research available recruiting resources and select the best fit for Trouw Nutrition Talent Acquisition 2026

**Barrier:** Increased awareness of Trouw Nutrition accommodation policies and practices is necessary

#### **Objectives**

- Provide employees with a clear and consistent approach to accommodations in the workplace
- Review and improve processes and resources for employees seeking accommodations
- Update the Accommodation Policy
- Develop and implement training regarding the updated accommodation policy, including roles and responsibilities Employee Relations 2026–2027

**Barrier:** Increased awareness and knowledge regarding disabilities is necessary

#### **Objectives**

- Create awareness, de-stigmatization and understanding of mental, physical, visible, and non-visible disabilities for all employees
- Create awareness campaign on internal training and resources, including Disability Allyship training
- Leverage Nutreco's global diversity and inclusion resources Employee Relations 2026–2028

**Barrier:** Accessibility needs not consistently considered in performance management, career development, and redeployment

## **Objectives**

- Ensure accessibility needs and Individual Accommodation Plans are considered in performance management, career development, and redeployment
- Review existing performance management processes to ensure accessibility is built into the process
- Provide performance plans in accessible formats
- Consider accessibility needs when providing coaching, feedback, and reassignments Employee Relations / Managers 2027–2028

## **3.2 Built Environment**

**Barrier:** Building access, navigation, and workstations

- Ensure accessibility in newly constructed buildings and facilities
- Follow ACA Standards for Accessible Design and applicable national building codes
- When applicable, consult with persons with disabilities to identify and incorporate accessibility features in the design of new buildings and facilities Engineering / Facilities Ongoing
- Ensure accessibility in existing facilities (offices, production facilities, warehouses, parking and green spaces, etc.)
- Assess existing facilities to identify accessibility gaps
- Identify architectural barriers in existing buildings that could be easily removed without much difficulty or expense
- Develop a plan to address accessibility issues that cannot be addressed through building retrofits or alterations
- When facilities' alterations, renovations, expansions, and other changes are planned, the ACA and relevant building codes will act as the guiding design input Engineering / Facilities 2026–2030

## **3.3 Information and Communication Technologies (ICT)**

**Barrier:** Digital tools, platforms, and software

## **Objectives**

- Create awareness of existing accessibility tools and technologies available at Trouw Nutrition
- Provide education through channels such as email, recorded training, or lunch & learns explaining accessibility features of technology available to employees. This may include topics such as the use of closed captioning in virtual meeting platforms; making collaboration tools available on mobile devices; terms and definitions, etc. IT 2026–2027
- Ensure accessibility tools are available at all locations
- Introduce the role of a Plant Champion across sites in Canada. These IT resources will routinely visit sites and will have a good knowledge of the technology needs and can recommend changes to improve network access IT 2026–2028

**Barrier:** External websites and intranet

## **Objectives**

- Ensure customer-facing websites as well as the Trouw Nutrition intranet meet the WCAG 2.1 Level AA Standard
- Review all internal and external web pages related to Trouw Nutrition Canada to ensure accessibility standards are met and update if required
- Ensure compliance with federal digital accessibility regulations IT / Digital Communications 2026–2027

### **3.4 Communication (Other Than ICT)**

**Barrier:** Consistent process to ensure alternate formats of communication

## **Objectives**

- Develop process to ensure alternate formats of communication may be provided upon request
- Identify and procure service providers to create alternate formats when needed

- Provide these alternate formats as soon as possible and within the time frames listed in the Accessible Canada Regulations: – Print – Large print – Braille – Audio format
- An electronic format that's compatible with adaptive technology meant to help people with disabilities Global Communications 2026

**Barrier:** Plain and concise language used in communication material

### **Objectives**

- Ensure readability when creating communication documents and emails
- Use plain and concise language on signs, posters, and emails to ensure readability
- Add more visuals, such as pictures, emojis, and icons, to portray messaging
- Create a library of Trouw Nutrition and Nutreco acronyms Global Communications 2026–2027

**Barrier:** Availability of accessible tools

### **Objectives**

- Ensure employees are provided the tools necessary to participate fully in both in-person and virtual meetings
- Identify sign language interpreter resources
- Promote use of closed captioning, including translations, for virtual meetings Global Communications 2026

## **3.5 Procurement of Goods, Services and Facilities**

**Barrier:** Accessibility to be considered in Procurement policies and procedures

### **Objectives**

- Ensure accessibility requirements are incorporated into procurement policies and procedures

- Review existing procurement policies and procedures for accessibility requirements and update if necessary
- Review internal procurement processes to identify barriers with suppliers of services and goods
- When procuring new technologies, equipment, or facilities, include accessibility as a key evaluation criterion Procurement 2026–2027

### **3.6 Design and Delivery of Programs and Services**

**Barrier:** Standard approach to ensure accessibility in programs, processes, and services

#### **Objectives**

- Ensure all programs, processes and services have taken accessibility into account
- Provide training on the ACA and AODA for those whose role is to develop programs, processes, and procedures
- Build accessibility reviews into the design phase of all new programs and services Employee Relations / Program Owners 2026–2028

**Barrier:** Clarity on the accessible tools or services available

#### **Objectives**

- Determine tools and services available to support the accessibility of our workplace
- Research existing accessibility tools and services for employees
- Create an awareness campaign highlighting existing tools and services
- Research new tools to support persons with disabilities and others who experience barriers in the workplace Employee Relations 2026–2027

### - **3.7 Transportation**

Under the ACA, even organizations that do not operate a transportation system must still consider transportation barriers in their accessibility plans.

#### **Objectives**

- Identify and address transportation-related barriers for employees and customers
- Review travel policies and procedures for accessibility
- Assess the accessibility of vehicles made available for employee use
- Gather information about transportation barriers encountered by employees and persons with disabilities
- Identify relevant partners needed to address these barriers Employee Relations / Facilities 2027–2028

### **4.0 Feedback Mechanisms**

Trouw Nutrition employees, customers, and other stakeholders can use the following channels to report concerns, ask questions, or provide feedback regarding accessibility:

#### **Human Resources**

Employees can contact their local HR representative, the dedicated HRSS email ([ask.hr@nutreco.com](mailto:ask.hr@nutreco.com)), or the toll-free HR line. All workforce concerns are routed to HR Managers trained on Trouw Nutrition's policies and investigation procedures. Trouw Nutrition strictly prohibits retaliation against anyone who, in good faith, raises a concern or participates in an investigation.

#### **Ethics & Compliance Line**

Employees, customers, and third parties can submit reports through [ask.hr@nutreco.com](mailto:ask.hr@nutreco.com). Individuals may remain anonymous and still receive a response.

Contact Us (Website- Under construction)

The Trouw Nutrition website ([www.trouwnutrition.accessibility.ca](http://www.trouwnutrition.accessibility.ca)) includes an online form for submitting questions, concerns, and feedback. Requests for accessible formats can also be submitted through this form.

## Responding to Feedback

- All feedback will be acknowledged and responded to in a timely manner.
- Feedback will be used to improve accessibility and update this Plan.
- If requested, responses will be provided in an accessible format.

## 5.0 Training

Trouw Nutrition will ensure that all employees, managers, and persons involved in policy development receive training on:

- The requirements of the ACA and AODA;
- The Canadian Human Rights Act and Ontario Human Rights Code as they pertain to disability;
- 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 three years as a refresher.

Training records will be maintained.

## 6.0 Monitoring and Reporting

### 6.1 Plan Review and Update

This Multi-Year Accessibility Plan 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;
- Made available in alternate formats upon request.

## 6.2 Progress Reporting

Trouw Nutrition will:

- Publish progress reports on the implementation of this Plan as required under the ACA;
- Submit annual accessibility compliance reports as required under the AODA;
- Notify the Accessibility Commissioner within 48 hours of publishing any accessibility plan or progress report.

## 7.0 Definitions

**Accessibility** – Refers to the needs of persons with disabilities being intentionally and thoughtfully considered when products, services, and facilities are built or modified so they can be used and enjoyed by persons of all abilities.

**Disability** – The Accessible Canada Act defines a disability as “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** – The Accessible Canada Act defines a barrier as “anything—including anything physical, architectural, technological or attitudinal, anything that is based on information or communications or anything that is the result of a policy or a practice—that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation.”

**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.

## **8.0 Availability of Documents**

Copies of this Plan and Trouw Nutrition's accessibility policies are available upon request. If a person with a disability requests a copy in an accessible format, Trouw Nutrition will provide it in a format that takes their disability into account, as agreed upon by both parties.

This Multi-Year Accessibility Plan covers the period of 2026 to 2031 and will be reviewed and updated every three years in accordance with the Accessible Canada Act and every five years in accordance with the Accessibility for Ontarians with Disabilities Act, 2005.