

## Multi Year Accessibility Plan

Effective November 1, 2023

### INTRODUCTION

Sobeys Inc. (the “Company”) strives to meet the needs of its employees and customers with disabilities and is working hard to remove and prevent barriers to accessibility.

Our organization is committed to fulfilling our requirements under the *Accessibility for Ontarians with Disabilities Act, 2005* and its regulations (collectively the “AODA”). This accessibility plan outlines the steps the Company is taking to meet those requirements and to improve opportunities for people with disabilities.

### PAST ACHIEVEMENTS TO REMOVE AND PREVENT BARRIERS

This document includes a summary of the accessibility initiatives the Company has completed.

### Part I – GENERAL REQUIREMENTS

Initiative	Description	Action	Compliance Date under AODA
Establishment of Accessibility Policies	3.(1) Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this Regulation.	Complete	January 1, 2014
Accessibility Plans	4.(1) Large organizations shall,  a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization’s strategy to prevent and remove barriers and meet its requirements under this Regulation;  b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and  c) review and update the accessibility plan at least once every five years.	Complete  Complete  Stakeholders will review every 5 years	January 1, 2014

Self-Serve Kiosks	6.(2) Large organizations and small organizations shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.	Identified all kiosks and will have regard for accessibility during the replacement cycle.	January 1, 2014
Training	7.(1) Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to, (a) all employees, and volunteers; (b) all persons who participate in developing the organization's policies; and (c) all other persons who provide goods, services or facilities on behalf of the organization.	Training is provided to all employees, volunteers, persons who participate in the development of the Company's policies, and other persons who provide goods and services on behalf of the Company.	January 1, 2015

**PART II – Information and Communications Standards**

Initiative	Description	Action	Compliance Date under AODA
Feedback	11.(1) Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request.	Feedback processes identified.  If requested, an accessible format will be provided.	January 1, 2015
Accessible Formats & Communication Supports	12.(1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, a) in a timely manner that takes into account the person's accessibility needs due to disability; and	Options will be provided in a timely manner at no additional cost, upon request.	January 1, 2016

	b) at a cost that is no more than the regular cost charged to other persons.		
	12.(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	Persons requesting accessible formats will be consulted.	January 1, 2016
	12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Public is informed through publication of Accessibility Policy	January 1, 2016
Emergency Procedures, Plans or Public Safety Info	13.(1) In addition to its obligations under section 12, if an obligated organization prepares emergency procedures, plans or public safety information and makes the information available to the public, the obligated organization shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.	Completed.	January 1, 2012
Accessible Websites & Web Content	14.(2) Designated public sector organizations and large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out in this section.	The Company's website meets the requirements as set out by WCAG 2.0 AA.	January 1, 2014 for new internet websites and web content  June 30, 2021 for all websites and web content

**PART III – Employment Standard**

Initiative	Description	Action	Compliance Date under AODA
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Recruitment – General	22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	All employees and job applicants are notified about the availability of accommodation for applicants with disabilities.	January 1, 2016
Recruitment, Assessment or Selection Process	23.(1) During a recruitment process, an employer shall notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used. (2) If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.	All applicants are notified that accommodations are available upon request.	January 1, 2016
Notice to Successful Applicants	24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	All successful applicants are notified that accommodations are available upon request.	January 1, 2016
Informing Employees of Supports	25.(1) Every employer shall inform its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.	Employees will be informed through policy circulation and training.	January 1, 2016
	25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	Employees will be informed as part of the orientation process.	January 1, 2016
	25.(3) Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job	Updated policies will be circulated to employees.	January 1, 2016

	accommodations that take into account an employee's accessibility needs due to disability.		
Accessible Formats & Communication Supports for Employees	<p>26.1 In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for,</p> <p>(a) information that is needed in order to perform the employee's job; and</p> <p>(b) information that is generally available to employees in the workplace.</p>	Employees will be consulted when determining suitable accessible formats for both (a) and (b)	January 1, 2016
	26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	Employees will be consulted when determining suitable accessible formats.	January 1, 2016
Workplace Emergency Response Information	27.(1) Every employer shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability.	Forms and processes are complete	January 1, 2012
	(2) If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.	Part of process with employee's consent	January 1, 2012
	(3) Employers shall provide the information		

	required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.	Information will be provided to employees as soon as the need for accommodation has become known.	January 1, 2012
	(4) Every employer shall review the individualized workplace emergency response information, <ul style="list-style-type: none"> <li>(a) when the employee moves to a different location in the organization;</li> <li>(b) when the employee's overall accommodations needs or plans are reviewed; and</li> <li>(c) when the employer reviews its general emergency response policies.</li> </ul>	Individualized workplace response information will be reviewed when any change occurs that impacts the employee with the disability.	January 1, 2012
Documented Individual Accommodation Plans	28.(1) Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.	A documented individual accommodation plan will be designed when required. The Company has a process in place for developing the individual accommodation plan.	January 1, 2016
	28 (2) The process for the development of documented individual accommodation plans shall include the following elements: <ol style="list-style-type: none"> <li>1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</li> <li>2. The means by which the employee is assessed on an individual basis.</li> <li>3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if and how accommodation can be achieved.</li> <li>4. The manner in which the employee can request the participation of a representative</li> </ol>	The process for developing individual accommodation plans is set out in the Company's Accessible Employment Policy.	January 1, 2016

	<p>from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.</p> <p>5. The steps taken to protect the privacy of the employee's personal.</p> <p>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> <p>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</p>		
Return to Work Process	<p>29.(1) Every employer, other than an employer that is a small organization,</p> <p>(a) shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and</p> <p>(b) shall document the process.</p>	The Company's return to work process is set out in the Company's Accessible Employment Policy.	January 1, 2016
	<p>29. (2) The return to work process shall,</p> <p>(a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and</p>		January 1, 2016

	(b) use individual documented accommodation plans, as described in section 28, as part of the process.		
	29. (3) The return to work process referenced in this section does not replace or override any other return to work process created by or under any other statute.		January 1, 2016
Performance Management	30.(1) An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.	Accessibility needs will be incorporated into performance management, as required.	January 1, 2016
Career Development & Advancement	31.(1) An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.	Accessibility needs will be incorporated into career development and advancement, as required.	January 1, 2016
Redeployment	32.(1) An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.	Accessibility needs will be incorporated into redeployment, as required.	January 1, 2016

**PART IV – Design of Public Spaces**

Initiative	Description	Action	Compliance Date under AODA
Exterior Paths of Travel	80.22 Obligated organizations, other than small organizations, shall ensure that any exterior paths of travel that they construct or redevelop and intend to maintain meet the requirements set	Exterior paths of travel that we construct or redevelop and intend to maintain will meet the requirements.	January 1, 2017



	out in this Part		
Parking	80.32 Obligated organizations shall ensure that when constructing new or redeveloping off-street parking facilities that they intend to maintain, the off-street parking facilities meet the requirements set out in this Part	When required, we will ensure that when constructing new or redeveloping off-street parking facilities that the Company intends to maintain, the off-street parking facilities meet the requirements.	January 1, 2017
Service Counters	<p>80.41 (1) When constructing new service counters, which includes replacing existing service counters, the following requirements must be met:</p> <ol style="list-style-type: none"> <li>1. There must be at a minimum one service counter that accommodates a mobility aid for each type of service provided and the accessible service counter must be clearly identified with signage, where there are multiple queuing lines and service counters.</li> <li>2. Each service counter must accommodate a mobility aid, where a single queuing line serves a single or multiple counters.</li> </ol>	<p>When constructing new service counters, which includes replacing existing service counters, we will do the following:</p> <ol style="list-style-type: none"> <li>1. Ensure that at least one service counter that accommodates a mobility aid is available for each type of service provided and the accessible service counter will be clearly identified with signage, where there are multiple queuing lines and service counters.</li> <li>2. Each service counter will accommodate a mobility aid, where a single queuing line serves a single or multiple counters.</li> </ol>	January 1, 2017

**Part V – Customer Service**

Initiative	Description	Action	Compliance Date under AODA
Implement Customer Service Policy	80.46 (1) In addition to the requirements in section 3, every provider shall develop, implement and maintain policies governing its provision of goods, services or facilities, as the	The Company has implemented an Accessibility Policy that addresses the requirements under the Customer Service Standard.	January 1, 2012

	<p>case may be, to persons with disabilities.</p> <p>(2) The provider shall use reasonable efforts to ensure that the policies are consistent with the following principles:</p> <ol style="list-style-type: none"> <li>1. The goods, services or facilities must be provided in a manner that respects the dignity and independence of persons with disabilities.</li> <li>2. The provision of goods, services or facilities to persons with disabilities must be integrated with the provision of goods, services or facilities to others, unless an alternative measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the goods, services or facilities.</li> <li>3. Persons with disabilities must be given an opportunity equal to that given to others to obtain, use and benefit from the goods, services or facilities.</li> <li>4. When communicating with a person with a disability, the provider shall do so in a manner that takes into account the person's disability.</li> </ol> <p>(3) Without limiting subsections (1) and (2), the policies must deal with the use of assistive devices by persons with disabilities to obtain, use or benefit from the goods, services or facilities or with the availability of other measures, if any, which enable them to do so.</p>		
	<p>80.46 (4) Every provider, other than a small organization, shall prepare one or more documents describing the policies established under this section and, on request, shall give a copy of any such document to any person.</p>	<p>The Company has implemented an Accessibility Policy that addresses the requirements under the Customer Service Standard.</p>	<p>January 1, 2012</p>
	<p>80.46 (5) Every provider, other than a small</p>	<p>The Company's Accessibility Policy will be</p>	<p>January 1, 2012</p>

	organization, shall notify persons to whom it provides goods, services or facilities that the documents required by subsection (4) are available on request.	provided to persons to whom the Company provides goods, services or facilities upon request.	
	80.46 (6) The notice required by subsection (5) may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances.	The Accessibility Policy will be made available upon request at the customer service desk.	January 1, 2012
Service Animals	80.47 (2) If a person with a disability is accompanied by a guide dog or other service animal, the provider shall ensure that the person is permitted to enter the premises with the animal and to keep the animal with him or her, unless the animal is otherwise excluded by law from the premises. (3) If a service animal is excluded by law from the premises, the provider shall ensure that other measures are available to enable a person with a disability to obtain, use or benefit from the provider's goods, services or facilities.	The Company welcomes service animals onto the Company's premises that are available to the public.	January 1, 2012
Support Persons	80.47(4) If a person with a disability is accompanied by a support person, the provider shall ensure that both persons are permitted to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the premises.  (5) The provider may require a person with a disability to be accompanied by a support person when on the premises, but only if, after consulting with the person with a disability and considering the available evidence, the provider determines that,	The Company welcomes support persons onto the Company's premises that are available to the public.	January 1, 2012

	<p>(a) a support person is necessary to protect the health or safety of the person with a disability or the health or safety of others on the premises; and</p> <p>(b) there is no other reasonable way to protect the health or safety of the person with a disability and the health or safety of others on the premises.</p> <p>(6) If an amount is payable for a person's admission to the premises or in connection with a person's presence on the premises, the provider shall ensure that notice is given in advance about the amount, if any, payable in respect of the support person.</p> <p>(7) If, under subsection (5), the provider requires a person with a disability to be accompanied by a support person when on the premises, the provider shall waive payment of the amount, if any, payable in respect of the support person's admission to the premises or in connection with the support person's presence on the premises.</p>		
Notice of Temporary Disruptions	<p>80.48 (1) If, in order to obtain, use or benefit from a provider's goods, services or facilities, persons with disabilities usually use other particular facilities or services of the provider and if there is a temporary disruption in those other facilities or services in whole or in part, the provider shall give notice of the disruption to the public.</p> <p>(2) Notice of the disruption must include the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available.</p>	The Company provides notice of temporary disruptions as required.	January 1, 2012
Training	80.49 (1) In addition to the requirements in section 7, every provider shall ensure that the following persons receive training about the provision of the provider's goods, services or facilities, as the case may be, to persons with	The Company ensures that training is provided as set out in the Accessibility Policy.	January 1, 2012

	<p>disabilities:</p> <ol style="list-style-type: none"> <li>1. Every person who is an employee of, or a volunteer with, the provider.</li> <li>2. Every person who participates in developing the provider's policies.</li> <li>3. Every other person who provides goods, services or facilities on behalf of the provider.</li> </ol> <p>(2) The training must include a review of the purposes of the Act and the requirements of this Part and instruction about the following matters:</p> <ol style="list-style-type: none"> <li>1. How to interact and communicate with persons with various types of disability.</li> <li>2. How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person.</li> <li>3. How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods, services or facilities to a person with a disability.</li> <li>4. What to do if a person with a particular type of disability is having difficulty accessing the provider's goods, services or facilities.</li> </ol>		
<p>Feedback Process</p>	<p>80.50 (1) Every provider shall establish a process for receiving and responding to,</p> <p>(a) feedback about the manner in which it provides goods, services or facilities to persons with disabilities; and</p> <p>(b) feedback about whether the feedback process established for purposes of clause (a) complies with subsection (3).</p> <p>(2) The feedback process must specify the actions that the provider will take if a complaint</p>	<p>The Company has a feedback process in place, which is set out in the Accessibility Policy.</p>	<p>January 1, 2012</p>

	is received about the manner in which it provides goods, services or facilities to persons with disabilities.		
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**Next review date:** November 1, 2025