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# Multi-Year Accessibility Plan for the Integrated Accessibility Standards Regulation (IASR)

## Cargill Limited

With 150 years of experience Cargill provides food, agriculture, financial and industrial products and services to the world. We have 150,000 employees in 70 countries who are committed to feeding the world in a responsible way, reducing environmental impact and improving the communities where we live and work. Learn more at [www.cargill.com](http://www.cargill.com).

Cargill Limited is a subsidiary of Minneapolis-based Cargill, Incorporated, an international provider of food, agriculture and risk management products and services. We are headquartered in Winnipeg, Manitoba and employ over 8,000 people across Canada as one of Canada's largest merchandisers and processors. Our interests include the processing of meat, eggs, malt and oilseed, and the manufacturing of livestock feed. In addition, we are involved in crop input product retailing, as well as grain handling, milling, salt distribution and merchandising.

### INTENT

This 2012 to 2017 accessibility plan outlines the policies and actions that Cargill Limited will put in place to improve opportunities for people with disabilities in accordance with the requirements communicated under the [Integrated Accessibility Standards, Ontario Regulation 191/11](#).

### STATEMENT OF COMMITMENT

*When people with different backgrounds come together to meet challenges and solve problems, business is more creative, innovative, and, ultimately, more successful. Leveraging inclusion and diversity in Cargill leads to more ideas, more connections and more value for our customers. This is what makes a great company. Dave MacLennan, President and CEO*

Cargill Limited 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 by:

- Ensuring that everyone is treated fairly and consistently;
- Allowing individuals with disabilities to do things in their own ways, at their own pace as long as this does not present a safety risk;
- Using alternative methods when possible to ensure that individuals with disabilities have access to the same services and programs offered by the company, in the same place and in a similar manner;
- Consideration of individual needs; and

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- Communicating in a manner that takes into account the individual's disability.

Cargill Limited believes in equal opportunity and is committed to building and sustaining a supportive culture that attracts, values and retains employees living with disabilities (self and/or family), enabling those employees to thrive and provide a unique contribution to Cargill's business success. As an organization, we respect and uphold the requirements set forth under the Accessibility for Ontarians with Disabilities Act (2005) and its associated Regulations and strive to meet the needs of individuals with disabilities in a timely and effective manner.

### CARGILL LIMITED MULTI-YEAR ACCESSIBILITY PLAN

PART I - GENERAL REQUIREMENTS				
Initiative	ISAR Requirement	Action	Status	Compliance Date
<b>1.1 Establishment of Accessibility Policies</b>	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 the Regulation.	Policy completed and distributed internally to all Ontario employees.  Policy posted to internal HR SharePoint	Completed	January 1, 2014
<b>1.2 Accessibility Plans</b>	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.	Development of AODA Compliance Register to provide insight into the formation of Cargill Ltd's Accessibility Plan  Team lead responsible for creation of Accessibility Plan attended AODA Training workshop.  Cargill Canada Inclusion and Diversity Network Business Resource Group identified as subject matter experts to inform on accessibility.  AODA committee to meet ongoing until compliance deadlines have all been met	Completed	January 1, 2014
<b>1.3 Self-Serve Kiosks</b>	Large organizations and small organizations shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring selfservice kiosks.	Not applicable at this time	N/A	January 1, 2014

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<b>1.4 Training</b>	<p>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,</p> <p>a) All employees, and volunteers;</p> <p>b) All persons who participate in developing the organization's policies; and</p> <p>c) All other persons who provide goods, services or facilities on behalf of the organization</p>	<p>Training developed on AODA legislation, ISAR and Human Rights Code rolled out to all Cargill people in Ontario and new hires via site on-boarding programs.</p> <p>All employees must acknowledge receipt of training and training records available for audit. Tracking completion of training will be via the AODA Compliance Register and site training tools.</p> <p>Training will be mandatory and training will be available via site training program (ex. Alchemy) or online via NourishingU.</p> <p>Assess training needs (e.g., separate training for managers and employee levels)</p>	<p>Completed</p>	<p>January 1, 2016</p>
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### PART II - INFORMATION & COMMUNICATIONS STANDARDS

Initiative	ISAR Requirement	Action	Status	Compliance Date
<b>2.1 Feedback</b>	<p>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.</p>	<p>Determine what current feedback mechanisms are within Cargill and review feedback processes to ensure accessible formats and current accessibility features are available.</p> <p>Ensure awareness of ISAR requirements with Corporate Affairs, Human Resources, Customer Service and appropriate admin staff on proper communication support for those with disabilities</p>	<p>Completed</p>	<p>January 1, 2016</p>

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<p><b>2.1 Feedback (continued)</b></p>		<p>Ensure staff and management are aware of the need to accommodate upon request.</p> <p>Review/Update current process for requesting accessible formats</p> <p>Develop understanding of current accessible formats and technology aids available at Cargill to adequately respond to requests for accessible formats that take into consideration the requestor's disability needs.</p>		
<p><b>2.2 Accessible Formats &amp; Communication Supports</b></p>	<p>2.2.1 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,</p> <p>(a) in a timely manner that takes into account the person's accessibility needs due to disability; and</p> <p>(b) at a cost that is no more than the regular cost charged to other persons.</p>	<p>Communicate to all staff that upon request we must provide accessible formats and communication supports to people with disabilities in a timely manner and equal cost</p> <p>Create process for requesting accessible formats and alternative methods of feedback</p> <p>If staff require assistance, they are to contact Employee Relations</p>	<p>Completed</p>	<p>January 1, 2016</p>
	<p>2.2.2 The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.</p>	<p>Within created process for requesting accessible formats and communication supports ensure there is a response mechanism for approvals and denials.</p> <p>Communicate to staff and management requirement</p>	<p>Completed</p>	<p>January 1, 2016</p>

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	2.2.3 Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Advise that, in accordance with AODA, accessible formats may be made available on request via website and postings at site.	Completed	January 1, 2016
<b>2.3 Accessible Websites &amp; Web Content</b>	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.	<p>Conducted an assessment of Cargill.ca website to ensure compliance and adequate accessibility features are available</p> <p>Build business case for website accessibility compliance regarding redesign and development of Cargill.ca following WCAG 2.0 Level AA requirements.</p> <p>Ensure website Content Owners (IT and Corporate Affairs) are aware of ISAR requirements for web content.</p> <p>Partner with Cargill's Ability Network, the disability focused business resource group on initiative to help Cargill comply with the guidelines on website accessibility, both in the US and Canada.</p>	<p>Completed</p> <p>Ongoing</p>	<p><b>January 1, 2014</b> New internet websites and web content on those sites must conform with WCAG 2.0 Level A</p> <p><b>January 1, 2021</b> All internet websites and web content must conform with WCAG 2.0 Level AA, other than, • success criteria 1.2.4 Captions (Live) • success criteria 1.2.5 Audio Descriptions (Pre-recorded).</p>
<b>2.4 Emergency Procedures, Plans or Public Safety Info</b>	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.	Reviewed and completed	Completed	January 1, 2012

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Part III – Employment Standards				
<b>3.1 Recruitment, General</b>	Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	Review all mechanisms for posting at location  Liaise with Talent Acquisition and University Recruiting to review AODA requirements for postings.  Create and add language on postings.	Completed	January 1, 2016
<b>3.2 Recruitment, Assessment or Selection Process</b>	3.2.1 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.	Create language to be included on interview notifications that accommodation is available in accordance with AODA.  Recruiters taking part in <i>Know the Essential Duties of Your Jobs: Comply with AODA</i> on August 23, 2016 to educate Talent Acquisition on inclusive selection strategies.  Implement process for accommodation requests during the recruitment phase which will include an assessment of barriers to the recruitment process.	Completed	January 1, 2016
	3.2.2 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.	Implement process for accommodation requests during the recruitment phase which will include an assessment of barriers to the recruitment process.  Ensure awareness across Human Resources and Hiring Managers of AODA requirement on an as needed basis.	Completed	January 1, 2016

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<b>3.3 Notice to Successful Applicants</b>	<p>Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.</p>	<p>Incorporate in offer letter e-mail a section regarding Cargill Limited's accessibility policies and where to access additional information.</p>	<p>Completed</p>	<p>January 1, 2016</p>
<b>3.4 Informing Employees of Supports</b>	<p>3.4.1 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.</p>	<p>Develop training plan and schedule to educate and advise Cargill employees based in Ontario on accessibility policies, plan, and processes.</p>	<p>Completed</p>	<p>January 1, 2016</p>
	<p>3.4.2 Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.</p>	<p>Accessibility policies and processes to be incorporated in onboarding process for Ontario and included within the onboarding package.</p>	<p>Completed</p>	<p>January 1, 2016</p>
	<p>3.4.3 Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.</p>	<p>Communicate any policy changes by email to location AODA contacts and HR.  Post any changes to the internal Canada HR Site.</p>	<p>Completed</p>	<p>January 1, 2016</p>
<b>3.5 Accessible Formats and Communication Supports for Employees</b>	<p>3.5.1 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, (a) information that is needed in order to perform the employee's job; and (b) Information that is generally available to employees in the workplace.</p>	<p>Educate employees and Managers with direct reports on the availability of accessible format and communication supports; in accordance with AODA supports for  Educate employees and Managers on process for requesting accessible formats and communication supports  Ensure documents are available that inform employees on how to perform their job</p>	<p>Completed</p>	<p>January 1, 2016</p>

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	3.5.2 The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	Develop a process for consulting with employees to determine accessible format needs (educate managers to have conversations and escalate to Human Resources/Employee Relations)	Completed	January 1, 2016
<b>3.6 Workplace Emergency Response Information</b>	3.6.1 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.	Established process to provide people in Ontario who request, or for whom Cargill Ltd is aware of the need for accommodation due to the employee's disability, to receive individualized workplace emergency response information	Completed	January 1, 2012
	3.6.2 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.	The process for creating Individualized Workplace Emergency Response Information process includes a mechanism to acquire consent from the person to share the information with those designated to provide assistance in the event of an emergency	Completed	January 1, 2012
	3.6.3 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.	Upon request, the locations HR/AODA contact and/or occupational health unit will work with the stakeholder who requires accommodation, to provide Individual Workplace Emergency Response Information as soon as practicable	Completed	January 1, 2012



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	<p>3.6.4 Every employer shall review the individualized workplace emergency response information,</p> <p>(a) when the employee moves to a different location in the organization;</p> <p>(b) when the employee's overall accommodations needs or plans are reviewed; and</p> <p>(c) when the employer reviews its general emergency response policies.</p>	<p>The Individualized Workplace Emergency Response process includes procedures for when plans and information are to be reviewed due to a move, or change in accommodation needs</p>	<p>Completed</p>	<p>January 1, 2012</p>
<p><b>3.7 Documented Individual Accommodation Plans</b></p>	<p>3.7.1 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.</p>	<p>Review of current accommodation policy and practices</p> <p>Develop and institute a standard process for the development of individualized accommodation plans.</p>	<p>Completed</p>	<p>January 1, 2016</p>
	<p>3.7.2 The process for the development of documented individual accommodation plans</p>	<p>Review of current accommodation policy and practices.</p>	<p>Completed</p>	<p>January 1, 2016</p>

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	<p>shall include the following elements:</p> <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 accommodation can be achieved and, if so, how accommodation can be achieved.</li> <li>4. The manner in which the employee can request the participation of a representative 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</li> <li>5. The steps taken to protect the privacy of the employee's personal information.</li> <li>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</li> <li>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</li> <li>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</li> </ol>	<p>Updates to the policy will include the elements as listed in 3.7.2.</p>		
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<b>3.8 Return to Work Process</b>	3.8.1 Every employer, other than an employer that is a small organization, (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 (b) shall document the process.	Working with Health Services update and have in place a return to work process for stakeholders based on compliance needs  Liaise with OSI to conduct a review of the current return to work process	Completed	January 1, 2016
	3.8.2 The return to work process shall, (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 (b) use documented individual accommodation plans, as part of the process.	Ensure that the return to work process outlines the steps the employer will take to facilitate the return to work of stakeholders which includes a documented accommodation plan.	Completed	January 1, 2016
	3.8.3 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.	While creating the return to work process Cargill will take into account all statutes as it pertains to accommodation and return to work.	Completed	January 1, 2016
<b>3.9 Performance Management</b>	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.	Create material and training for managers that take part in the performance management process which provides awareness on potential accessibility needs of stakeholders and reasonable accommodation for those needs.	Completed	January 1, 2016

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<b>3.10 Career Development &amp; Advancement</b>	<p>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.</p>	<p>Ensure career development and advancement processes take into account individual accommodation needs and plans in accordance with AODA</p> <p>Provide training to people managers to ensure knowledge of career development and advancement requirements</p>	<p>Completed</p>	<p>January 1, 2016</p>
<b>3.11 Redeployment</b>	<p>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.</p>	<p>Review and update of current transfer and redeployment practices and processes to ensure accommodation plans are referenced</p> <p>Provide training to people managers to ensure knowledge of redeployment requirements</p>	<p>Completed</p>	<p>January 1, 2016</p>

### REVIEW AND UPDATE

In accordance with the AODA and with Cargill Limited's belief in equal opportunity and commitment to building and sustaining a supportive culture that attracts, values and retains employees living with disabilities, enabling those employees to thrive and provide a unique contribution to Cargill's business success, the Multi-Year Accessibility plan is posted on Cargill Limited's website and will be reviewed and updated at least every 5 years.

To learn more about Cargill Limited and the AODA, please visit [www.cargill.ca](http://www.cargill.ca).

### FEEDBACK

If you have any questions, or have feedback related to the Cargill Limited Multi-Year Accessibility Plan, please e-mail [m\\_johnston@cargill.com](mailto:m_johnston@cargill.com).