



BENTO SUSHI ACCESSIBILITY POLICY

Purpose

The following policy has been established by Bento Sushi to govern the provision of services with Regulation 191/11, "Integrated Accessibility Standards" ("Regulation") under the Accessibility for Ontarians with Disabilities Act, 2005.

These standards are developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment.

Bento Sushi is governed by this policy as well as the Accessibility Standards for Customer Service Policy and the Accessibility for Ontarians with Disabilities Act, 2005 in meeting the accessibility needs of persons with disabilities.

COMMITMENT

Bento Sushi is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of persons with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act.

This policy will be implemented in accordance with the time frames established by the Regulation.

ACCESSIBILITY PLAN

Bento Sushi will develop, maintain, and document an Accessibility Plan outlining the Bento Sushi's Plan to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities.

The Accessibility Plan will be reviewed and updated at least once every five years and will be posted on the Bento Sushi's website. Upon request, Bento Sushi will provide a copy of the Accessibility Plan in an accessible format.

TRAINING

Bento Sushi will ensure that training is provided on the requirements of the accessibility standards referred to in the Regulation and continue to provide training on the Human Rights Code as it pertains to persons with disabilities, to:

- all its teammates and volunteers.
- all persons who participate in developing Bento Sushi's policies; and,
- all other persons who provide goods, services, or facilities on behalf of the Bento Sushi

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The training will be appropriate to the duties of the teammates, volunteers, and other persons. Teammates will be trained when changes are made to the accessibility policy. New teammates will be trained within the first two weeks of their starting date. Bento Sushi will keep a record of the training it provides.

INFORMATION AND COMMUNICATIONS STANDARDS

FEEDBACK

Bento Sushi will continue to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communications supports, upon request.

ACCESSIBLE FORMATS AND COMMUNICATIONS SUPPORT

Upon request, Bento Sushi will provide, or will arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that considers the person's accessibility needs due to disability.

Bento Sushi will consult with the person making the request in determining the suitability of an accessible format or communication support.

Bento Sushi will also notify the public about the availability of accessible formats and communication supports.

ACCESSIBLE WEBSITES AND WEB CONTENT

Bento Sushi will ensure that our Internet websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA in accordance with the time frames established by the Regulation except where this is impracticable.

USE OF ASSISTIVE DEVICES

An assistive device is one or more devices used by a person with a disability to help him/her independently complete everyday tasks. Accessibility devices include mobility aids (e.g., wheelchairs and walkers), portable communication devices, head-wands, hearing aids and much more. Bento Sushi welcomes the use of assistive devices by our Guests to access our goods and/or services. We will ensure our Associates are trained on how to interact with individuals using various assistive devices and how Associates can provide alternative service methods.

USE OF SERVICE ANIMALS AND SUPPORT PERSONS

SERVICE ANIMALS

An animal is a service animal for a person with a disability if,

- A. (a) it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- B. (b) the person provides a letter from a Regulated Health Professional (including but not limited to physiologist, psychotherapist, chiropractor, nurse, physician, mental health therapist, etc.) confirming that the person requires the animal for reasons relating to the disability.

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- C. Guests with disabilities who are accompanied by a service animal are welcome at all Bento Sushi properties when accessing our goods and/or services unless the animal is otherwise excluded by law from the premises. If the animal is legally excluded from the premises, Bento Sushi will provide alternative measures to enable the person to obtain, use or benefit from its services. Bento Sushi will ensure that all Associates are properly trained on how to interact with Guests with disabilities and who are accompanied by a service animal.

SUPPORT PERSONS

If a customer with a disability is accompanied by a support person, Bento Sushi will ensure that both persons are allowed to enter the premises together and that the customer is not prevented from having access to the support person.

In situations where confidential information might be discussed, consent will be obtained from the customer, prior to any conversation where confidential information might be discussed.

NOTICE OF DISRUPTIONS IN SERVICE

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Bento Sushi. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use Bento Sushi's goods or services, reasonable efforts will be made to provide advance notice. In some circumstances, such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

When disruptions occur, Bento Sushi will provide notice by:

- posting notices in conspicuous places including at the service counters and/or at the main entrance of our premises.
- by any other method that may be reasonable under the circumstances.
- Bento Sushi will provide Guests with notice of a planned or unexpected disruption in services usually used by Guests with disabilities. This notice will include the reason for the disruption, its anticipated duration, as well as describe alternative facilities or services that may be available. This notice will normally be posted on a website and may also be posted on the premises, where appropriate in the circumstances.

EMPLOYMENT STANDARDS

RECRUITMENT, ASSESSMENT AND SELECTION PROCESS

Bento Sushi will notify its teammates and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

Bento Sushi will notify job applicants, when they are individually selected to participate further in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.

If a selected applicant requests an accommodation, Bento Sushi will consult with the applicant and provide, or arrange for the provision of, a suitable accommodation in a manner that considers the applicant's accessibility needs due to disability.

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NOTICE TO SUCCESSFUL APPLICANTS

When making offers of employment, Bento Sushi will notify the successful applicant of its policies for accommodating teammates with disabilities.

INFORMING TEAMMATES OF SUPPORTS

Bento Sushi will continue to inform its teammates of its policies (and any updates to those policies) used to support teammates with disabilities, including policies on the provision of job accommodations that consider a teammate's accessibility needs due to disability. This information will be provided to new teammates as soon as practicable after commencing employment.

ACCESSIBLE FORMATS AND COMMUNICATION SUPPORTS FOR TEAMMATES

Upon the request of a teammate with a disability, Bento Sushi will consult with the teammate to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his/her job, and information that is generally available to other teammates.

In determining the suitability of an accessible format or communication support, Bento Sushi will consult with the teammate making the request.

WORKPLACE EMERGENCY RESPONSE INFORMATION

Bento Sushi will provide individualized workplace emergency response information to teammates who have a disability, if the disability is such that the individualized information is necessary, and if Bento Sushi is aware of the need for accommodation due to the teammate's disability. Bento Sushi will provide this information as soon as practicable after becoming aware of the need for accommodation.

Where the teammate requires assistance, Bento Sushi will, with the consent of the teammate, provide the workplace emergency response information to the person designated by Bento Sushi to aid the teammate.

Bento Sushi will review the individualized workplace emergency response information when the teammate moves to a different location in the organization, when the teammate's overall accommodations needs, or plans are reviewed.

DOCUMENTED INDIVIDUAL ACCOMMODATION PLANS

Bento Sushi will maintain a written process for the development of documented individual accommodation plans for teammates with disabilities.

If requested, information regarding accessible formats and communications supports provided will also be included in individual accommodation plans.

In addition, the plans will include individualized workplace emergency response information (where required) and will identify any other accommodation that is to be provided.

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RETURN TO WORK PROCESS

Bento Sushi maintains a documented return to work process for its teammates who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

The return-to-work process outlines the steps Bento Sushi will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

This return-to-work process will not replace or override any other return to work process created by or under any other statute (i.e., the Workplace Safety Insurance Act, 1997).

PERFORMANCE MANAGEMENT, CAREER DEVELOPMENT AND ADVANCEMENT & REDEPLOYMENT

Bento Sushi will take into account the accessibility needs of teammates with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to teammates, or when redeploying teammates.

QUESTIONS ABOUT THIS POLICY

This policy has been developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment. If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation will be provided by:

Vice President, People Operations
Bento Sushi, 25 Centurian Drive, Suite 208, Markham, Ontario L3R 5N8
Tel: 905-513-0028
Fax: 905-513-9855
Email: feedback@bentosushi.com
Website: www.bentosushi.com

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BENTO SUSHI
Multi-Year Accessibility Plan

**To obtain this document in an alternate format, please contact People Operations Department
at 905-513-0028, extension 110 or at feedback@bentosushi.com**

Compliance Date	Section	Initiative	Description	Action	Status
January 1, 2012	PART III – EMPLOYMENT STANDARD				
	27	Workplace Emergency Response Information	<p>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.</p> <p>(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.</p> <p>(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.</p> <p>(4) Every employer shall review the individualized workplace emergency response information,</p> <ul style="list-style-type: none"> (a) when the employee moves to a different location in the organization; (b) when the employee’s overall accommodations needs or plans are reviewed; and (c) when the employer reviews its general emergency response policies. 	<ul style="list-style-type: none"> • Communicated emergency procedures to all employees. • Employee Emergency Information Form distributed to all employees and available on the intranet for employees who have a disability to complete and submit to their supervisor. 	Completed

January 1, 2014	Section	Initiative	Description	Action	Status	
	PART I – GENERAL REQUIREMENTS					
	3	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.	<ul style="list-style-type: none"> • Policy prepared and approved. • Developed strategy to communicate policies to teammates. 	Completed	
4	Accessibility Plans	4.(1) Large organizations shall, <ol style="list-style-type: none"> 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; post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and review and update the accessibility plan at least once every five years. 	<ul style="list-style-type: none"> • Developed a multi-year accessibility plan in consultation with Bento Sushi's Accessibility Committee to address the requirements to be met between 2013 and 2015. • HR to review in conjunction with Bento Sushi's Accessibility Committee and Senior Management in January every year. 	Completed		
January 1, 2015	Section	Initiative	Description	Action	Status	
	PART I – GENERAL REQUIREMENTS					
	7	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	<ul style="list-style-type: none"> • Determine method of training and number of training levels. • Require separate one for supervisors/managers and 	Completed	

			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.	one for all teammates.	
	PART II – Information and Communications Standards				
	11	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.	<ul style="list-style-type: none"> • Conduct a review of all feedback processes across the organization (internally and externally). Consult with all functional areas to make sure all feedback processes are captured. • Determine what accessible formats and communication supports we will provide upon request. • Develop communication strategy to ensure all teammates and customers are aware of feedback process. 	Completed
January 1, 2016	Section	Initiative	Description	Action	Status
	PART II – Information and Communications Standards				
	12	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	<ul style="list-style-type: none"> • Determine what accessible formats and communication supports we will provide to persons with disabilities upon request. 	Completed

			account the person's accessibility needs due to disability; and b) at a cost that is no more than the regular cost charged to other persons.	<ul style="list-style-type: none"> Communicate to staff and management that no <u>additional</u> charge is required. 	
12			12.(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	<ul style="list-style-type: none"> Communicate to staff and management of requirement. Develop protocol for situations where a suitable agreement cannot be made. 	Completed
12			12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	<ul style="list-style-type: none"> Post on website. Include notice on certain print materials. 	Completed
PART III – Employment Standard					
22	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.	<ul style="list-style-type: none"> Include a statement on the external website and intranet regarding Bento Sushi's commitment to providing equal opportunities for persons with disabilities in all employment activities including access to job and accommodation during employment. 	Completed
23	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	<ul style="list-style-type: none"> Determine how to notify applicants. May wish to designate a contact person to handle queries regarding accessibility. 	Completed

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			<p>processes to be used.</p> <p>(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.</p>	<ul style="list-style-type: none"> • Identify barriers: location of interview room, format of tests, room set-up for in-person interviews, interviewing timelines, supports, paperwork. • Develop interview guidelines 	
24	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.	<ul style="list-style-type: none"> • To consider putting a statement in our offer letter. • Some will make phone calls. Write appropriate script (Notification to Successful Applicants) 	Completed	
25	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.	<ul style="list-style-type: none"> • Bento Sushi will circulate policy. • Ongoing education and guidance provided to all employees to maintain awareness of policies, legislation, as well as supports and facilities available. • Updated information will be communicated as necessary to employees. 	Completed	
25		25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	<ul style="list-style-type: none"> • Bento Sushi will provide new employees with accommodation information. 	Completed	
25		25.(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	See 25 (1)	Completed	

			accessibility needs due to disability.		
26	Accessible Formats & Communication Supports for Employees	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,	<ul style="list-style-type: none"> (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. 	<ul style="list-style-type: none"> • Functional audit of information specific to departments. • Audit of regular communications. 	Completed
26		26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	List what the employee will require – ie. Policy, communication supports that are available (large print, accessible PDFs, plain language versions, closed captioning).		Completed
28	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.	28 (2) The process for the development of documented individual accommodation plans shall include the following elements:	<ul style="list-style-type: none"> • Bento Sushi will review its existing accommodation progress. • Identify elements of AODA requirements that need to be incorporated into existing accommodation process. • Develop a written process for IAP. • Prepare a communication strategy to communicate obligation to all employees. 	Completed
		1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.			

			<ol style="list-style-type: none"> 2. The means by which the employee is assessed on an individual basis. 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. 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. 5. The steps taken to protect the privacy of the employee's personal. 6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done. 7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee. 8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability. 		
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	29	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>	<ul style="list-style-type: none"> • Develop process for teammates returning to work after a disability-related leave of absence. 	Completed
	29		<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> <p>(b) use individual documented accommodation plans, as described in section 28, as part of the process.</p> <p>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.</p>	<ul style="list-style-type: none"> • Incorporate IAP into RTW process. • Communicate to all employees. 	Completed
	30	Performance Management	<p>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.</p>	<ul style="list-style-type: none"> • Review our current process and take into account the accessibility needs of individuals with disabilities, as well as accommodation needs with regard to performance management. 	Completed

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	31	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.	<ul style="list-style-type: none"> Review our current process and revise as necessary to incorporate AODA requirements. 	Completed
	32	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.	<ul style="list-style-type: none"> Review our current process and revise as necessary to incorporate AODA requirements. 	Completed