



**2024 – 2027**

**Accessibility Plan**

# Accessibility Plan

## 1.0 GENERAL

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### 1.1 About Avena Foods Limited (Avena)

Avena is a specialty miller that provides food, beverages, pet food and nutraceutical manufacturers with sustainably grown and milled purity protocol oat and functional gluten-free pulse ingredients.

Avena's dedication as a food ingredient company extends beyond mere supply. We prioritize the health and safety of consumers, ensuring that every ingredient we produce adheres to the highest standards of quality with full traceability right back to the farm. Our comprehensive approach as an ingredient manufacturer involves meticulous processes and stringent quality checks, guaranteeing the best for our customers and the planet.

Avena was established in 2008 by a group of pedigreed seed growers in Saskatchewan, Canada. These farmers understood the dietary challenges faced by individuals with celiac disease, non-celiac gluten sensitivity and wheat allergies. They established Avena Purity Protocol, the gold standard for producing pure, gluten-free oats: *Start Safe, Stay Safe*.

In January 2018, Avena merged with Best Cooking Pulses Inc. (BCP), a family-owned Canadian agri-foods milling company that had been active in the international pulse trade since 1936.

Avena has built its business based on four core values and encourages employee commitment through these values.

- Do the right thing when no one is looking.
- Dive in, speak up and leave a mark.
- Welcome challenges with a smile.
- Collaborate to do great things with customers, farmers, and colleagues.

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### 1.2 Requirements

As a federally regulated company, Avena is governed by the Accessible Canada Act (ACA). The ACA is a federal law enacted by the Canadian government in 2019 to promote and ensure equal access and inclusion for persons with disabilities. The ACA applies to all federally regulated entities, including companies, organizations, and government agencies.

Per the Act, all federally regulated entities must:

- Prepare and publish an initial Accessibility Plan
- Establish accessibility feedback process.
- Report annually on the progress towards the plan and address any feedback received.

Our Accessibility Plan must be reviewed in its entirety and published every three years.

Overall, the Accessible Canada Act represents a significant step towards creating a more inclusive and accessible society for all Canadians, including those with disabilities. By complying with these requirements, Avena can help ensure that we are providing equal access and opportunities to all.

### 1.3 Statement of Commitment

Avena Foods believes in empowering our employees, promoting teamwork, and providing outstanding service to our customers and farmers. We build these relationships with integrity and trust.

Promoting accessibility and creating a barrier free environment is our responsibility to our employees, stakeholders, and customers. Avena is committed to becoming more accessible and removing accessibility barriers from our workplace. We value diversity and inclusion and are committed to meeting the Government of Canada's goal of being barrier free by 2040.



## Accessibility Plan

### 1.4 Contact Information and Feedback Process

Avena is committed to providing opportunities for feedback from employees, customers, and members of the public. We are committed to reviewing this feedback and taking steps to address barriers that are identified. For more information, to provide feedback or to request alternative formats of this Plan, please contact Avena through one of the following methods:

- **Mail:**  
Avena Foods Limited  
Attn: Human Resources  
316 1<sup>st</sup> Avenue E  
Regina, SK S4N 5H2
- **Phone:** 306-757-3663
- **Email:** [HR@avenafoods.com](mailto:HR@avenafoods.com)

Avena employees are also able to provide feedback utilizing the Avena employee app.

Your feedback will be considered as part of Avena's commitment to continuous improvement of accessibility. Some feedback may be addressed right away, and some may be included in the development of future plans. All feedback that is received and its consideration will be included in our progress reports.

### 1.5 Alternative Formats

Avena's Accessibility Plan can be made available in the following formats:

- Print
- Large Print
- Electronic

If alternative versions of this Plan are required, please make the request via email to [HR@avenafoods.com](mailto:HR@avenafoods.com) , or by phone at 306-757-3663.

## Accessibility Plan

### 1.6 Definitions

The following definitions apply throughout this plan:

**Disability:** Any impairment, including a physical, mental, intellectual, cognitive, learning, communication, or sensory impairment – or a functional limitation – whether permanent, temporary, or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person’s full and equal participation in society.

**Barrier:** Anything – including 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.

**Accessibility:** Combination of aspects that influence a person’s ability to function within an environment and to access it with ease.

### 2.0 PRIORITY AREAS

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Avena continues to take steps towards accessibility across the organization. This includes the following:

- Safety and Workplace Injury
  - This program encourages all staff to report near misses as well as physical injuries. Staff are encouraged to recover at work when possible as accommodation may be offered for any restrictions or limitations the injured employee may have.
  - All managers are educated in and understand Avena’s duty to accommodate to ensure all employees can continue to contribute to the organization if possible.
  - Avena also provides benefits and support to employees who need financial assistance if an injury impacts their ability to fully participate.
- Diversity, Equity, and Inclusion
  - Diversity is valued at Avena. We understand that diversity creates a stronger, more successful organization.
  - We plan to build on our current diversity strategy and identify opportunities to increase our diversity through our recruitment process.

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We understand that barriers still exist and Avena is committed to our Plan and the goals included to reduce these barriers.

### 2.1 Employment

Avena believes in treating employees with respect and dignity. We aim to foster an environment where people from all backgrounds feel that they can contribute and thrive in the workplace without barriers. We strive to continue to provide employees with a safe and welcoming workplace.

The following goals have been established focused on accessibility and employment:

- Publish a workplace accommodation policy that includes clear instruction on how to request workplace accommodation.
- Education of management team to ensure they have a general understating of disability and diversity. This includes understanding the purpose of accommodation and how to appropriately receive and handle requests for accommodation.
- Incorporate a confidential process for candidates to request accommodation during the recruitment process.
- Establish a tool for employees to provide feedback on concerns or identified opportunities to remove barriers from the workplace.
- Each new posting will outline Avena's commitment to providing accessible hiring practices. Our Human Resources Department will also notify applicants selected for an interview that accommodation can be provided, should an applicant require it.

### 2.2 The Built Environment

Avena has three locations on the Canadian Prairies - Regina, SK, Rowatt, SK and Portage la Prairie, MB. Our processing facilities are built largely from steel which is open to weather elements. This greatly impacts physical accessibility. However, Avena is committed to making our facilities more accessible.

The following goals have been created to reduce barriers in the built environment:

- When facilities' alterations, renovations, expansions, and other changes are planned, the Accessibility Canada Act under the relevant building codes will act as the guiding design input.

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- When applicable, consult with persons with disabilities to identify and incorporate in the design of new buildings and facilities.
- Review of emergency evacuation processes and procedures to ensure an accessible emergency response plan.

### 2.3 Information and Communication Technology (ICT)

As society relies more and more on sharing and communicating information digitally, we will work to make sure accessibility is considered. We want to make sure that our information and communications technology products, services and digital content can be accessed and used by all.

The following goals have been created to reduce barriers in ICT:

- Seek feedback from our diverse workforce of women, visible minorities, indigenous peoples, and people with disabilities regarding adaptive accessibility information technology needs.
- Complete an assessment to make sure there is barrier-free access to our information and communication technology.

### 2.4 Communication, other than ICT

Avena believes in creating communication that is effective and can be easily understood by employees, customers, farmers, and other stakeholders.

The following goals will ensure that everyone can access and understand information communicated at Avena:

- Assess the need for adaptive and accessible communication tools.
- Request feedback from employees to determine if updates or changes are required to current practices.

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### 2.5 Procuring Goods, Services, and Facilities

At Avena we understand that creating an accessible Canada is everyone's responsibility and our procurement process is an opportunity to extend this responsibility to our vendors. We aim to incorporate accessibility into our procurement processes.

The following goals have been created to ensure accessibility is a priority in procurement:

- Amend our existing procurement process to include accessibility for diverse disabilities as a factor in the decision process when selecting vendors, conferences, and employee accommodation.

### 2.6 Designing and Delivering Programs and Services

Avena is dedicated to working with customers, stakeholders, and the community to continue to provide programs and services without barriers.

The following goal will help Avena provide more accessible programs and services:

- Implementation of process for customers to raise accessibility concerns to Avena.

### 2.7 Transportation

The ACA also recognizes transportation as one of the priority areas of accessibility. However, Avena is not involved in the transportation of the public or our employees. We, therefore, do not currently have any commitment or actions regarding Transportation.



## Accessibility Plan

### 3.0 CONSULTATIONS

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In preparation of Avena's Accessibility Plan we conducted a survey with employees. This included all employees as well as those who had previously disclosed a physical or cognitive disability. We also contacted the Saskatchewan Abilities Council, Inclusion Saskatchewan and Abilities Manitoba to obtain feedback that they have received from their clientele. This internal and external feedback shaped the plan that was developed.

Avena will continue to strengthen our organization culture by:

- Continuing to encourage feedback and input by people with disabilities as well as understanding and educating all employees on the barriers and challenges these individuals face.
- Use best practices, research and guidelines as outlined by the Government of Canada Accessibility resources.
- Promote an environment of equity, diversity, and inclusion.

Avena also commits to additional consultation of mechanisms for feedback:

- We commit to identifying women, visible minorities, indigenous peoples, and people with disabilities that can provide advice and feedback on accessibility.
- We will conduct an annual accessibility audit to ensure Avena meets accessibility standards, addresses and issues identified as well as identified opportunities for improvements.
- We will engage our leaders to ensure there is understanding and championing of accessibility at Avena.

### 4.0 CONCLUSION

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Avena is committed to creating an inclusive and accessible environment for our employees, customers, farmers, and stakeholders. This Plan and continued progress will ensure that we continue to serve our industry and communities effectively. By implementing these commitments, Avena will ensure that all individuals, regardless of their background or abilities are able to contribute and thrive within our organization.

## Accessibility Plan

### 5.0 RESOURCES

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For more information and guidance on the Accessible Canada Act and creating an Accessibility Plan:

- Employment and Social Development Canada: Summary of the Accessible Canada Act.  
[Summary of the Accessible Canada Act - Canada.ca](#)
- Employment and Social Development Canada: Summary of the Accessible Canada Regulations  
[Summary of the Accessible Canada Regulations - Canada.ca](#)
- Employment and Social Development Canada: Sample Accessibility Plan Template  
[Guidance on the Accessible Canada Regulations: Sample Accessibility Plan Template - Canada.ca](#)
- Employment and Social Development Canada: Guidance on Accessibility Plans  
[Guidance on accessibility plans - Canada.ca](#)