



2025 Accessibility Plan Progress Report



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1.0 GENERAL

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.

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.



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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.

1.4 Contact Information and Feedback Process

Avena is committed to providing opportunities for feedback from employees, customers, vendors, 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 the accessibility plan and progress report please contact Avena through one of the following methods:

- **Mail:**
Avena Foods Limited
Attn: Human Resources
316 1st Avenue E
Regina, SK S4N 5H2
- **Phone:** 306-757-3663
- **Email:** HR@avenafoods.com

Avena employees can also provide feedback in person or through the Avena Employee App.

All 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.



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1.5 Alternative Formats

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

- Print
- Large Print
- Electronic

If alternative versions of the accessibility plan and progress report are required, please request via email to HR@avenafoods.com, or by phone at 306-757-3663.

1.6 Definitions

The following definitions apply throughout this report:

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

Avena continues to take steps towards accessibility across the organization. In addition to the goals outlined in the 2024–2027 Accessibility Plan, the following ongoing initiatives support our broader commitment: 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.



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- Diversity, Equity, and Inclusion (DEI)
 - 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.

We acknowledge that barriers may still exist, and Avena remains committed to the goals outlined in our Accessibility Plan. This report outlines the progress we've made toward achieving the objectives in our 2024–2027 Accessibility Plan.

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.

In the first reporting period (2024), Avena successfully completed all employment accessibility goals, including publishing a workplace accommodation policy, providing management training, implementing a confidential recruitment accommodation process, establishing a feedback mechanism, and updating job postings to reflect our accessibility commitment. During the second reporting period (2025), these initiatives have been actively maintained and reinforced.

The following table summarizes the continued maintenance and monitoring of Avena's employment accessibility goals.

Goal	Progress Update	Status
Publish a workplace accommodation policy that includes clear instruction on how to request workplace accommodation.	The policy continues to be maintained and reviewed to ensure clarity and effectiveness.	Completed in 2024; maintained in 2025
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	The management team continues to apply best practices in receiving and managing accommodation requests, providing support as needed.	Completed in 2024; maintained in 2025
Incorporate a confidential process for candidates to request accommodation during the recruitment process.	The process continues to be applied for all candidates, ensuring requests are handled appropriately.	Completed in 2024; maintained in 2025



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Establish a tool for employees to provide feedback on concerns or identified opportunities to remove barriers from the workplace.	The designated email address for accessibility feedback remains in use and is actively monitored for concerns or suggestions	Completed in 2024; maintained in 2025
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.	Job postings continue to reflect accessibility practices; applicants are informed of accommodation availability.	Completed in 2024; maintained in 2025

Avena continues to monitor the effectiveness of its accommodation and recruitment practices to ensure ongoing accessibility and inclusion.

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 table outlines the progress made toward reducing barriers in the built environment:

Goal	Progress Update	Status
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.	No facility alterations, renovations, or expansions have been undertaken during this reporting period.	Pending Future Projects
When applicable, consult with persons with disabilities to identify and incorporate in the design of new buildings and facilities.	No new building or facility designs have been initiated during this reporting period.	Pending Future Projects
Review of emergency evacuation processes and procedures to ensure an accessible emergency response plan	Avena reviewed the emergency response plans for the Regina and Rowatt oat facilities and incorporated accessibility considerations.	In Progress



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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 table outlines the progress made toward reducing barriers in ICT:

Goal	Progress Update	Status
Seek feedback from our diverse workforce of women, visible minorities, indigenous peoples, and people with disabilities regarding adaptive accessibility information technology needs.	During the second reporting period, we maintained our process for gathering employee feedback on accessibility needs related to digital systems and tools. Employees are reminded that support is available, and assistance continued to be provided as needed. No further actions are planned at this time.	Completed
Complete an assessment to make sure there is barrier-free access to our information and communication technology.	No actions directly taken in this area during this reporting period.	To Be Initiated

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 table outlines the actions taken to ensure that everyone can access and understand information communicated at Avena:

Goal	Progress Update	Status
Assess the need for adaptive and accessible communication tools.	The communication guide introduced by Avena continues to support the use of clear and accessible language in communications with internal and external stakeholders. Training continues to be provided to staff who communicate with external audiences to ensure messages are delivered clearly and consistently. Company announcements and policies continue to be shared through multiple formats, including email and printed materials, to support inclusive	Completed



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	<p>communication. Employees are provided with a designated contact person and inbox for questions or additional support.</p> <p>We will continue to review and strengthen communication practices to ensure they remain accessible, effective, and inclusive. No further actions are planned at this time.</p>	
Request feedback from employees to determine if updates or changes are required to current practices	During the second reporting period, Avena continued to gather feedback from employees as part of ongoing communication practices. Employees are regularly encouraged to share suggestions or raise questions when receiving company updates, ensuring communication remains clear, accessible, and effective.	In Progress

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 table outlines the actions taken to ensure accessibility is a priority in procurement:

Goal	Progress Update	Status
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	<p>The procurement process has been reviewed and amended to include accessibility considerations in the contracting practices. The Producer Code of Conduct is now included in the grower’s contracts.</p> <p>All new suppliers are asked to review and sign the supplier code of conduct.</p> <p>..</p>	Completed



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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 table outlines the actions taken to help Avena provide more accessible programs and services:

Goal	Progress Update	Status
Implementation of process for customers to raise accessibility concerns to Avena.	No actions directly taken in this area during this reporting period.	To Be Initiated

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.

3.0 CONSULTATIONS

In alignment with Avena's commitment to ensuring an accessible workplace for all, we developed our 2024-2027 Accessibility Plan in consultation with both employees and external organizations that support individuals with disabilities.

Actions Taken in First Reporting Period (2024):

- Consultation with External Organizations**

We reached out to external organizations that support people with disabilities to provide suggestions and recommendations for increasing accessibility at Avena. Organizations consulted include:

- Ready Willing and Able
- People First of Canada
- Indigenous Disability Canada
- Inclusion Canada
- Ability Online
- Manitoba League of Persons with Disabilities

- Employee Consultations**

We consulted with employees who self-identified as women and visible minorities. During these consultations, we presented the 2024-2027 Accessibility Plan and invited feedback on

actions Avena could take to identify or prevent barriers. Employees were encouraged to provide suggestions on how we could make Avena more accessible.



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Actions Taken in Second Reporting Period (2025)

- **Consultation with Ability Online**

We gathered feedback to enhance accessibility practices across the organization. Key recommendations included:

- Expanding accessibility considerations beyond physical barriers to include social, cognitive, emotional, spiritual, and sensory aspects.
- Considering social and sensory needs, such as fragrance-free environments and noise-sensitive workspaces.
- Demonstrating leadership commitment to accessibility initiatives.
- Encouraging open discussion about accessibility needs.
- Using plain language and offering flexible work arrangements.
- Supporting mental health and equitable accommodation practices.
- Promoting an inclusive workplace culture.

- **Consultation with Inclusion Canada**

We received resources to support inclusive employment practices, including:

- The Inclusive Workplace resource hub.
- The Ready, Willing & Able initiative.
- The Accessibility Exchange consultation platform.

- **Consultation with Ready, Willing & Able (RWA)**

We received guidance on inclusive hiring practices, including recruitment support, workplace accommodations, and inclusive onboarding practices.

In the upcoming years, we will continue to ask for feedback and consult with both internal and external stakeholders to further strengthen our accessibility strategies.

4.0 FEEDBACK

Avena has included different methods for individuals to provide feedback on its Accessibility Plan. As of the date of this report, we have not yet received any feedback about accessibility through our feedback mechanism. More information about how to submit feedback is shared in section 1.5 of this report.

5.0 CONCLUSION

Avena is committed to creating an inclusive and accessible environment for our employees, customers, farmers, and stakeholders. The 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.