



Manitoba Accessible Employment Policy

May 2022

STATEMENT OF COMMITMENT

Bunge Canada (“**Bunge**” or the “**Company**”) is committed to complying with the Accessibility Standard for Employment under *The Accessibility for Manitobans Act*. Our policies, practices and measures reflect principles of dignity, independence, integration and equal opportunity for people with disabilities.

We aim to remove barriers in our workplace. If a barrier cannot be removed, we seek to provide reasonable accommodations to affected employees.

The following policy statements, organizational practices and measures are intended to meet the requirements of Manitoba’s *Accessibility Standard for Employment*.

This policy applies to all applicants and employees.

PRE-EMPLOYMENT ACCESSIBILITY REQUIREMENTS

1. Remove barriers to recruitment and selection

Policy Statement:

During recruitment, the Company informs potential applicants that reasonable accommodations are available during the selection process, and we respond to requests for accommodations.

Practices and Measures:

- The Company includes a statement on all job postings that reasonable accommodations are available to applicants with disabilities, and we seek their advice on how best to accommodate their needs
- When making interview arrangements in writing or verbally, the Company informs applicants that reasonable accommodations are available during the assessment and selection processes.
- When an applicant has made a request for an accommodation during the selection process, the Company:
 - Consults with the applicant to determine the appropriate accommodation; and
 - Puts the appropriate accommodation in place during the assessment or selection process.

2. Mention workplace accommodation when offering employment

Policy Statement:

When hiring, Bunge informs selected applicants of its measures, policies and practices for accommodating employees with disabilities.

Practices and Measures:

- Bunge includes information about workplace accommodations in our letter of offer to new employees.
- Bunge includes information about workplace accommodations in our new employee orientation materials.

EMPLOYMENT ACCESSIBILITY REQUIREMENTS

3. Inform employees about accommodation policies and practices

Policy Statement:

Bunge keeps employees informed about our accommodation measures, policies and practices for employees with disabilities. The Company also provide updates to employees when this information changes.

Practice and Measures:

- Bunge provides employees with information about our policies for employees with disabilities by:
 - Posting information on an internal site memo, or through staff emails;
 - Posting information in the staff room or in high traffic areas; and
 - Communicating information in discussions with management and during staff meetings.

4. Communicate in a way that meets employees' needs

Policy Statement:

Bunge aims to meet the communication needs of our employees by providing workplace information and communications in ways that are easy to access for everyone. If requested by an employee with a disability, Bunge will:

- Consult with the employee to identify the accessible formats, or communication supports needed by that employee; and
- Ensure that identified accessible formats or communication supports are continually used when providing information to that employee.

Practice and Measures:

- To meet an employee's communication needs, Bunge will ask the employee what accessible format or communication support is most appropriate for them.
- Bunge will provide information to employees in multiple ways to meet everyone's needs, including posting information in the staff room and circulating information electronically by email in accessible formats.

5. Provide individualized accommodation plans

Policy Statement:

Bunge's policy is to provide reasonable accommodations by developing and documenting individualized accommodation plans ("IAPs") for employees with disabilities who request them.

Practice and Measures:

An IAP will include:

- accessible formats and communication supports, if requested;
- workplace emergency response information, if required;
- details of how and when any other accommodations will be provided; and
- when the plan will be reviewed

Bunge employees will participate and cooperate in the accommodation process by:

- providing related information and taking part in assessments, if requested by Bunge;
- complying with the requirements of the IAP; and
- offering ongoing feedback related to modifications, including whether the accommodation is no longer required.

Human Resources will also review an employee's individualized accommodation plan, and update if required, when:

- the employee's workspace is modified or relocated;
- the employee's responsibilities have changed;
- other workplace changes have occurred that affect the accommodation; or
- the employee has made a request to review and update the accommodation plan.

Process for Developing an Individualized Accommodation Plan:

A. Request for an IAP

Bunge supports employees by providing reasonable accommodations in the workplace. Employees may make a verbal or written request to their Human Resources Representative for an IAP.

B. Assessment of employee and accommodation required

Bunge will assess the employee and possible accommodations on an individual basis. The Company may request that the employee provide documentation from a health practitioner who supports the need for the accommodation.

In some circumstances, the Company may request, and cover costs for, an evaluation by an independent regulated health professional or other practitioner.

C. Assistance for the employee in developing the IAP

An employee may request assistance with developing the IAP, including assistance from a union representative if applicable, or another person who is knowledgeable about workplace accommodations for employees with disabilities.

D. Accessible formats

Bunge will meet the communication needs of our employees by providing them with a copy of their IAP, or an explanation for denying the request to introduce a plan, in a format and with any communication support to meets the needs of the employee.

E. Reasons for denying a request

We may deny an employee's request for an IAP in the following circumstances:

- The employee is able to carry out most of the job without an accommodation;
- The independent health professional does not support the employee's self-assessed requirement for accommodation; or
- Our research and evidence shows that the accommodation request would cause undue hardship on the Company (e.g., by creating safety risks to other employees or a significant measurable financial burden).

F. Maintaining Privacy

We maintain employee privacy regarding accommodation plans and personal health information by following the practices outlined below.

6. Manage Performance

Policy Statements:

Bunge ensures our performance management process takes into account:

- that an employee may be temporarily or permanently disabled by one or more barriers in the workplace;
- an employee's IAP;
- that the accommodations provided for an employee may not fully address a workplace barrier.

Practice and Measures:

- Bunge will conduct regular performance management meeting reviews mid-year and end of year to discuss progress, new goals and any challenges. Existing or newly required workplace accommodations may be discussed, including IAPs and any assistance required during emergencies.
- Bunge will speak with employees when they do not follow Company policy or meet expectations, and offer a spoken and written warning of consequences, including disciplinary action.

- Bunge will discuss existing workplace accommodations and propose modifications or new workplace accommodations if we believe this could help improve the performance of an employee with a disability.
- Prior to imposing disciplinary measures, Bunge will consider whether there is a connection between concerns about job performance and workplace barriers.

7. Provide career development, training, internal advancement and reassignment

Policy Statements:

When providing career development, training or opportunities for internal advancement or reassignment, Bunge ensures the process for recruiting and selecting candidates takes into account:

- that an employee may be temporarily or permanently disabled by one or more barriers in the workplace;
- an employee's IAP; and
- that the workplace accommodation provided for an employee with a disability may not fully address the workplace barrier.

Our practices and measures aim to ensure that workplace accommodations do not negatively affect access to career development.

Practice and Measures:

- Bunge recruits and selects candidates based on objective criteria, such as current training, job experience, skills and experience.
- If a candidate has an IAP, we ensure it is adequate to address any barriers in the new opportunity.
- Bunge provides accessible training for all employees and if a barrier is identified, attempt to reduce or remove that barrier.

8. Put return to work processes in place

Policy Statements:

Bunge's return to work policy reflects our commitment to providing a safe and healthy work environment for employees who are, or have been, absent from work due to a disability or health condition, and require reasonable accommodations to return to work.

Bunge will include a description of the process we will follow in determining the accommodations necessary to facilitate the return to work of employees who have been absent due to a disability or health condition.

Bunge's return to work policy ensures reasonable accommodations for employees who are at work or absent due to a disability or health condition. Bunge will make efforts to modify

employees' duties and work schedule based on their functional abilities. Our aim is to increase duties safely to help employees reach their full potential.

Practice and Measures:

- Bunge will keep in touch with absent employees and the Workers Compensation Board of Manitoba (“**WCB**”) (where involved) throughout the employees' recovery to help them maintain a connection with their workplace.
- Where available, Bunge offers meaningful and productive modified or alternate duties that are safe and within the employee's functional abilities.
- Bunge will be flexible and tailor the return to work plan to the employee's needs, provided that doing so does not cause undue hardship.
- Bunge ensures that supervisors and co-workers support employees who have been absent due to a disability, and participate in the return to work process.
- Bunge follows WCB's return to work process.

9. Provide workplace emergency response information.

Policy Statements:

Bunge notifies all employees of steps to be taken during emergencies, to ensure the safety of employees who are temporarily or permanently disabled. The Company ensures workplace emergency response information is specific to each employee's needs and the physical nature of the employee's workspace.

Once Bunge learns an employee requires assistance during a workplace emergency, we offer the employee individual workplace emergency response information as soon as possible. Bunge reviews the workplace emergency response information provided to an employee each time:

- the employee is moved to a different workspace; or
- the employee's workspace is modified; and
- Bunge reviews its general emergency response plans and make changes that would affect the employee's response to an emergency in the workplace.

If an employee who receives workplace emergency response information requires the assistance of another person during an emergency, we obtain consent from the employee on who will assist, and we inform that person how to assist.

Practice and Measures:

- Bunge annually sends a memo to all employees to inquire whether they need assistance during an emergency and to remind them of the office or building's emergency plan.
- Bunge discusses general accessibility and identify barriers during Workplace Safety Committee meetings when appropriate or as the need arises.
- In a situation where an employee cannot descend the stairs to exit the building during an evacuation, with permission from the employee, Bunge will identify someone to remain with this person in the (designated safe area).

- The designated Safety Monitor, who acts as fire marshal, ensures communication with these employees during the emergency.
- The designated Safety Monitor notifies the fire department about the number and location of employees who remain in the building.

10. Maintain privacy

Policy Statements:

Bunge protects the privacy and confidentiality of employee's personal information and personal health information. We only collect, use, and disclose information as required for the purposes of the *Accessibility Standard for Employment*, unless otherwise agreed to by the employee.

We also follow the requirements of other privacy legislation, including *The Freedom of Information and Protection of Privacy Act* (Manitoba) and *The Personal Health Information Act* (Manitoba).

Practice and Measures:

- We follow proper protocol when storing confidential employee information.
- We protect our employees' personal information and personal health information at all times by taking the following steps:
 - Ensuring confidential information is securely stored, and protected by passwords (if electronically stored) or is kept in a secure location (if physically stored).
 - limiting access to human resources and managers only.

11. Provide training

Policy Statements:

Bunge provides training on how to accommodate employees with a disability to staff with the following responsibilities:

- recruiting, selecting or training employees;
- supervising, managing or coordinating the work of employees;
- promoting, redeploying or terminating employees; and
- developing and implementing employment policies and practices.

Training content includes:

- how to make employment opportunities accessible to people with disabilities;
- how to interact and communicate with applicants or employees who face barriers, use assistive devices, or are assisted by a support person or service animal;
- an overview of *The Accessibility for Manitobans Act*, *The Human Rights Code* (Manitoba), and the *Accessible Employment Standard*; and
- Bunge's accessible employment policies, practices and measures, including updates or changes.

Practices and Measures:

- Bunge trains new Human Resources employees and management as soon as reasonably possible, and no later than one month after hiring.
- Bunge provides refresher training regularly, including informing staff about updates to policies, practices and measures. Training is offered bi-annually and as needed, following updates.
- Human Resources maintain records of who has taken training and when.

12. Keep a written record of accessibility and training policies

Policy Statements:

Bunge keeps a written record of our accessibility and training policies. Our written documents include a summary of the content of our training material and a list of dates when training is offered.

Bunge informs the public that our policies are available upon request and we provide these in a format that is accessible for the user.

Practices and Measures:

- Bunge informs the public in the following ways:
 - By posting on the Company's website;
 - By posting in high traffic areas;
- Bunge provides our policies within a reasonable timeframe and in a format that meets the needs of individuals with disabilities, at no additional cost.