



## **ACCESSIBILITY POLICY**

### **Statement of Commitment**

Purdue is committed to providing its goods and services, and to providing employment opportunities, in an equitable manner, respecting the dignity and independence of persons with disabilities, and promoting integration and equal opportunity without discrimination. Purdue will use reasonable efforts to adhere to this commitment, providing accommodation where required and in a timely manner, but the intent is not to cause undue hardship to the organization.<sup>1</sup>

### **Application**

This Policy applies to all individuals who do business with Purdue, whether as employees, contractors, consultants, customers or otherwise, and to any individual or organization that provides goods, services or facilities to the public or other third parties on behalf of Purdue regardless of the province in which they may reside.

### **Principles**

All services, programs, goods and facilities will be available to any individual (employee, customer, third party provider, etc.) with a disability in a manner that:

- is free from discrimination;
- provides accessible formats and communication supports;
- seeks to provide integrated services;
- provides an opportunity equitable to others to provide or obtain, use and benefit from the goods or services and/or employment opportunities, and;
- takes into consideration a person's disability.

### **Definition of Disability**

"Disability" is defined under the AODA and this Policy as:

- any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device, a condition of mental impairment or a developmental disability;
- a learning disability or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- a mental disorder; or;



- an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

It is important to note that a disability may or not be visible.

### **POLICY COMPONENTS**

Purdue is committed to excellence in serving all customers, including people with disabilities. In the context of the following, a customer may also include an employee or third party provider so long as such accommodation does not cause undue hardship to Purdue Pharma.

This commitment is demonstrated in the following areas:

#### ***Assisted Devices***

Purdue will support people who need to use their own personal assistive devices to access our goods and use our services. A personal assistive device is a tool, technology or other mechanism that enables a person with a disability to do everyday tasks and activities, such as moving, communicating or lifting and includes, but is not limited to, wheelchairs and teletypewriters (TTY) which allow callers to send typed messages across phone lines, hearing aids, computer software, etc.

#### ***Use of Service Animals***

Individuals with disabilities shall be permitted to use service animals in the provision or receipt of goods and services or employment opportunities. If a service animal is excluded by law from the premises (for example GMP restricted areas), Purdue shall ensure that other measures are available to enable the individual with a disability to obtain, use or benefit from the available goods and services or to avail themselves of employment opportunities.

#### ***Use of Support Persons***

If an individual with a disability is accompanied by a support person, Purdue will ensure that both persons are permitted to enter the premises together and that the individual with a disability is not prevented from having access to the support person while in the obtainment, use or benefit of available goods and services or in the attainment of employment opportunities.

#### ***Notice of Temporary Disruptions***

If, in order to obtain, use or benefit from Purdue's goods or services, persons with disabilities are required to utilize Purdue's facility and if there is a temporary disruption in those facilities or services in whole or in part, Purdue will give notice of the disruption to the public, outlining the reason of the disruption and anticipated duration. Notice may be posted at a conspicuous location on the premises, on Purdue's external and internal websites, and through any other reasonable methods.



***Accessible Formats and Communication Supports***

Purdue shall, upon request, and in consultation with the person making the request, provide or make arrangements to provide accessible formats and communication supports for persons with disabilities in a timely manner, taking into account the individual's accessibility requirements.

"Accessible formats" may include, but are not limited to, large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.

This applies to general communications and information, as well as emergency procedure plans. It also applies to workplace information (job descriptions, performance management tools, etc.). This does not apply to products and product labels, unconvertible information or communications, and information that Purdue does not control directly or indirectly through a contractual relationship. If Purdue determines that information or communications are unconvertible, Purdue shall provide the person requesting the information or communication with:

- an explanation as to why the information or communications are unconvertible; and
- a summary of the unconvertible information or communications.

Purdue will take steps to make all new websites and content on those sites comply with World Wide Web Consortium - Web Content Accessibility Guidelines (WCAG) 2.0, Level A and Level AA. In addition, all existing websites will be updated to meet accessibility requirements according to requirements.

***Recruitment and Selection Processes***

Purdue will take all appropriate steps to ensure that all applicants have an awareness of the organization's commitment to accommodation and applicants may request accommodation support during the recruitment process. Job postings and offer letters will reflect Purdue's commitment to accommodate individuals with disabilities.

***Employee Accommodation Supports (Individualized Accommodation Plans)***

Employee accommodation will mirror any accommodations outlined under the customer service standards and the accessible formats and communication supports standards outlined above. Any employee with a disability may request an Individualized Accommodation Plan (IAP) by contacting Human Resources. An IAP will include the following:

- the specific accommodations to be provided by Purdue;
- if requested, any information regarding accessible formats and communication supports provided; and
- if required, the individualized workplace emergency response information (see below).



Purdue may request an evaluation by an outside medical or other expert, at Purdue's expense, to assist Purdue in determining if the accommodation can be achieved and, if so, how the accommodation can be achieved.

All accommodation plans will protect the privacy of the individual's personal information and only document the necessary accommodation requirements and agreed outcomes.

In the event that an individual accommodation plan is denied, the reasons for the denial will be provided to the employee.

IAP's will be reviewed as follows:

- change of job within the organization;
- changing needs for accommodation because of recurring or sporadic illness;
- changes to Purdue policies and practices;
- performance reviews; and/or
- a return to work following an illness or injury.

### ***Emergency Response Information***

Purdue will prepare an emergency response plan for any employee with a disability whose IAP (see above) necessitates this or for any employee who requests one, and Purdue will work to ensure that all employees requiring such a plan as well as those emergency responders supporting the plan are fully trained in any requirements. Emergency response plans will be reviewed in any situation where the employee moves to a new location and as the organization reviews its overall emergency response programs. Employees with disabilities requiring support of this nature must communicate their needs to Human Resources and/or Health & Safety.

### ***Return to Work Process***

Purdue has a documented 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. The process outlines the steps taken to facilitate the return to work of employees whose absence was related to their disability. Documented individual accommodation and/or emergency response plans shall be part of the process. See Policy HS-08.

### ***Performance Management and Career Development***

Purdue will take into account any accessibility needs as well as individual accommodation plans when using its performance management processes and when providing career advancement and development opportunities to employees with disabilities.



***Training***

Purdue shall provide training to all individuals, including employees, agents, and consultants on its accessibility requirements as it relates to people with disabilities. Training shall be provided in a way that best suits the duties of each party involved. Training records shall be kept, including the dates when the training is provided, content of training, and the number of individuals to whom the training was provided.

Purdue shall provide additional training to specific individuals who may interact with people with disabilities in response to specific requirements outlined above.

- All Human Resources employees, hiring managers and interviewers will be trained on the requirements outlined in the Employment Standards section of the AODA Integrated Standards.
- All Emergency Evacuation team members will be trained on processes pertaining to the emergency procedure requirements for disabled individuals.

Training will be provided as part of a new employee's orientation to Purdue and in situations where a change in role requires training. Appropriate records of training will be maintained by Purdue.

***Multi Year Accessibility Plan***

Purdue will maintain a Multi-Year Accessibility Plan (Appendix I) outlining the company's strategy to prevent and remove barriers for persons with disabilities and to meet its requirements under appropriate legislation.

***Feedback on this Policy***

Purdue is committed to receiving and responding to feedback about the manner in which it implements this Policy. Comments regarding how well these expectations are being met are welcome and appreciated. Any individual to whom this Policy applies is expected to formally communicate feedback to the Human Resources Department.

**MODIFICATIONS TO THIS OR OTHER POLICIES**

Purdue is committed to developing company policies that respect and promote the dignity and independence of people with disabilities. *Therefore*, no changes will be made to this Policy or other policies before considering the impact on people with disabilities. Any policy of Purdue Pharma that does not respect and promote the dignity and independence of people with disabilities will be modified or removed. Purdue will review this Policy for compliance every five (5) years, or as changes to the underlying legislation so require.

**Attachments - **Appendix I - Multi-Year Accessibility Plan****

Issued: November 2011  
Revised: July 2016



**Multi-Year Accessibility Plan (Appendix 1)**

| Requirement   | Planned Activity  | Timeline   |
|---|---|--|
| Train staff on the Accessibility Standards for Customer Service   | <ul style="list-style-type: none"> <li>• Accessibility Standards for Customer Service training module to be launched in EXCELERATOR</li> <li>• Implement <u>mandatory</u> refresher training for all employees on Customer Service Training module in EXCELERATOR</li> <li>• Implement a process for all new employees to undertake AODA Customer Services Accessibility Standard training as part of onboarding in EXCELERATOR with tracking capability</li> </ul>                 | <ul style="list-style-type: none"> <li>• End of 2016</li> </ul>    |
| Train staff on Ontario's requirements in the Integrated Accessibility Standards Regulations and on disability obligations under the Human Rights Code (including anyone who provides outsourced services, e.g. Paragon) | <ul style="list-style-type: none"> <li>• AODA and Human Rights training module (<a href="http://www.ohrc.on.ca/en/learning/working-together-code-and-aoda">http://www.ohrc.on.ca/en/learning/working-together-code-and-aoda</a>) to be launched in EXCELERATOR</li> <li>• Implement <u>mandatory</u> training for all employees</li> <li>• Implement a process for all new employees to undertake training as part of onboarding in EXCELERATOR with tracking capability</li> </ul> | <ul style="list-style-type: none"> <li>• End of 2016</li> </ul>    |
| Implement an accessibility policy; policy is to be available to the public  | <ul style="list-style-type: none"> <li>• Finalize policy with new requirements and post on internal website for employees and on external website for the general public</li> </ul>   | <ul style="list-style-type: none"> <li>• September 2016</li> </ul> |
| Provide a process by which customers can provide feedback on the way the organization provides goods and services to its disabled customers   | <ul style="list-style-type: none"> <li>• Include a statement on the external website outlining the ways in which the public can provide feedback</li> </ul>   | <ul style="list-style-type: none"> <li>• September 2016</li> </ul> |
| Provide or make arrangements to provide accessible formats and communication supports for persons with disabilities in a timely manner, taking into account the individual's accessibility requirements.                | <ul style="list-style-type: none"> <li>• Included in updated Accessibility Policy and training materials</li> </ul>   | <ul style="list-style-type: none"> <li>• Completed</li> </ul>      |
| New public websites, significantly refreshed websites and any web content posted after January 1, 2012 must meet WCAG 2.0 Level A   | <ul style="list-style-type: none"> <li>• IT has awareness of requirements for new website development and are implementing standards as required</li> </ul>   | <ul style="list-style-type: none"> <li>• Completed</li> </ul>      |



**Multi Year Accessibility Plan (con't) (Appendix 1)**

| Requirement  | Planned Activity  | Timeline   |
|--|---|--|
| Train specific employees on the Integrated Accessibility Standards that apply to their job   | <ul style="list-style-type: none"> <li>• Provide the following training to designated employees in Communications, IT, HR and Marketing <a href="http://www.accessforward.ca/">http://www.accessforward.ca/</a> - Information and Communications Standard</li> <li>• Provide the following training to all Human Resources employees, hiring managers and interviewers and Health and Safety <a href="http://www.accessforward.ca/">http://www.accessforward.ca/</a> - Employment Standard</li> </ul> | <ul style="list-style-type: none"> <li>• End of 2016</li> </ul>                  |
| Notify employees and public that we will accommodate as part of hiring process   | <ul style="list-style-type: none"> <li>• Disclaimer included on internal and external job postings</li> <li>• Update offer letters to include information about our intent to provide accommodation to persons with disabilities</li> </ul>   | <ul style="list-style-type: none"> <li>• Completed</li> <li>• Q3 2016</li> </ul> |
| Provide workplace information (job descriptions, performance management tools, etc.) in an accessible format if asked                              | <ul style="list-style-type: none"> <li>• Included in updated Accessibility Policy</li> </ul>  | <ul style="list-style-type: none"> <li>• Completed</li> </ul>                    |
| Provide individualized accommodation plans for employees with disabilities   | <ul style="list-style-type: none"> <li>• Included in updated Accessibility Policy and HS-08 Accommodation and Early and Safe Return to Work Policy</li> </ul>   | <ul style="list-style-type: none"> <li>• Completed</li> </ul>                    |
| Provide individualized emergency response information for employees with disabilities  | <ul style="list-style-type: none"> <li>• Included in updated Accessibility Policy</li> <li>• Covered in new employee Health and Safety orientation</li> <li>• Fire evacuation plan has been updated</li> <li>• Reviewed annually with Fire Wardens</li> </ul>   | <ul style="list-style-type: none"> <li>• Completed</li> </ul>                    |
| Develop a process to support employees who have been off work for a disability and require accommodation plans with regard to their return to work | <ul style="list-style-type: none"> <li>• Included in updated Accessibility Policy</li> <li>• Accommodation Policy (HS-08) developed and updated to include these requirements</li> </ul>  | <ul style="list-style-type: none"> <li>• Completed</li> </ul>                    |
| Build accessibility requirements into Performance Management, Career Development and Advancement and Re-deployment processes                       | <ul style="list-style-type: none"> <li>• Included in updated Accessibility Policy</li> </ul>  | <ul style="list-style-type: none"> <li>• Completed</li> </ul>                    |



|  |   |   |
|--|---|---|
| File Accessibility Reports in accordance with required timelines | <ul style="list-style-type: none"><li>• As needed</li></ul> | <ul style="list-style-type: none"><li>• To be filed as required</li></ul> |
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<sup>i</sup> This Policy is intended to provide the framework for compliance by Purdue Pharma with the standards developed under the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA), the *Accessibility Standards for Customer Service, Ontario Regulation 429/07*, the *Integrated Accessibility Standards, Ontario Regulation 191/11* (the “IAS”), as well as any amendments and future regulations, as required (collectively, the “AODA”), and the Ontario *Human Rights Code* (the “Code”).