

Accessibility for Ontarians with Disabilities

Statement of Commitment

The goal of the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”) is to create a more accessible Ontario by identifying, and to the extent possible, preventing and eliminating barriers experienced by persons with Disabilities. There are five standards set out under the AODA, all of which will be implemented by the year 2025. These standards include: customer service, transportation, information and communications, built environment and employment.

The first standard being implemented is the Customer Service Standard (“CSS”). The purpose of the CSS is to ensure that goods and services are provided in a manner that respects the dignity and independence of persons with Disabilities and that persons with Disabilities are given an equal opportunity to obtain, use and benefit from the goods and services. The second standard, the Integrated Accessibility Standard (“IAS”), deals specifically with removing barriers to accessibility related to transportation, information and communications, the built environment and employment.

Novartis Pharmaceuticals Canada Inc. (the “Company”) is committed to meeting the objectives and requirements of the AODA, CSS and IAS, including the accessibility needs of persons with Disabilities with respect to the Company’s programs, services and facilities, in a timely manner.

DEFINITIONS

Accessible Format(s): means formats that are an alternative to standard print and are accessible to persons with Disabilities. Accessible Formats may include, but are not limited to, large print, recorded audio and electronic formats, and other formats usable by persons with Disabilities.

Assistive Device(s): means any device used to assist a person in performing a particular task(s) or to aid that person in activities of daily living. This can include a wheelchair, screen reader, listening device or cane.

Communication Support(s): means supports that persons with Disabilities may need to access information. Communication Supports may include, but are not limited to, captioning, alternative and augmentative supports, plain language, sign language and other supports that facilitate effective communications.

Disability or Disabilities: means:

- a. 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 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;
- b. A condition of mental impairment or developmental disability;

- c. A learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- d. A mental disorder; or
- e. An injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

Employee(s): means any employee or volunteer of the Company.

Guide Dog(s): means a highly-trained working dog that has been trained at one of the facilities listed in *Ontario Regulation 58* under the *Blind Persons' Rights Act, 1990* to provide mobility, safety and increased independence for people who are blind.

Service Animal(s): an animal is a Service Animal for a person with a Disability if:

- It is readily apparent that the animal is used by the person for reasons relating to his or her Disability; or
- The person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the Disability.

Support Person(s): means an individual hired or chosen by a person with a Disability to provide services or assistance with communication, mobility, personal care, medical needs or with access to goods or services. Medical needs may include, but are not limited to, monitoring an individual's health or providing medical support by being available in the event of a seizure.

A. CUSTOMER SERVICE STANDARD

PURPOSE

The Company is committed to providing an equal opportunity to all of our customers. The objective of this policy is to ensure we meet the requirements of the CSS and promote its underlying core principles.

SCOPE

All Employees, contractors and agents who work on behalf of the Company and deal with members of the public or other third parties are expected to conduct themselves in accordance with this policy.

CORE PRINCIPLES

The Company will make every effort to ensure that this policy and related practices and procedures are consistent with the following four core principles:

Dignity: Persons with Disabilities must be treated as valued customers as deserving of service as any other customer.

Equality of Opportunity: Persons with Disabilities should be given an equal opportunity to obtain, use and benefit from the Company's goods and services.

Integration: Wherever possible, persons with Disabilities should benefit from the Company's goods and services in the same place and in the same or in a similar manner as any other customer. In circumstances where integration does not serve the needs of persons with Disabilities, goods and services will, to the extent possible, be provided in another way that takes into account the person's individual needs.

Independence: Goods and services must be provided in a way that respects the independence of persons with Disabilities. To this end, the Company will always be willing to assist persons with Disabilities but will not do so without express permission.

PROVIDING GOODS AND SERVICES TO PERSONS WITH DISABILITIES

Communication

The Company strives to communicate with persons with Disabilities in a manner that takes into account the person's Disability. Communication strategies are set out in the Company's accessibility training program.

Assistive Devices

Persons with Disabilities are permitted to use their own Assistive Devices when on the Company's premises for the purposes of obtaining, using or benefiting from the Company's goods and services.

If there is a physical, technological or other type of barrier that prevents the use of an Assistive Device on the Company's premises, we will make its best efforts to remove that barrier. If we are not able to remove the barrier, we will ask the individual with the Disability how he/she can be accommodated, what alternative measures would enable equal access to the Company's goods and services and the Company will make its best effort to provide the individual with alternative means of assistance.

Accessibility to Company Premises

The Company has equipped its facilities with the following services in order to provide persons with Disabilities with an equal opportunity to obtain, use and benefit from the Company's goods and services:

- **Rampways (with handrails)**
- **Elevators**
- **Handicapped parking spots**

Guide Dogs and Service Animals

Persons with Disabilities that are accompanied by a Guide Dog or Service Animal will be allowed to access the Company's premises that are open to the public and keep the animal with him or her unless otherwise excluded by law. If a Guide Dog or Service Animal must be excluded from the premises, the Company will provide the individual with the reasons for the exclusion and explore alternative ways to meet the individual's needs.

If it is not readily apparent that the animal is a Service Animal, the Company may request a letter from a physician or nurse confirming that the person requires the animal for reasons relating to his/her Disability.

Support Persons

Persons with Disabilities may enter premises owned and/or operated by the Company with a Support Person and have unobstructed access to the Support Person while on the premises.

The Company may require persons with Disabilities to be accompanied by a Support Person where it is necessary to protect the health or safety of the person with a Disability or the health and safety of others on the premises.

Notice of Temporary Disruptions

The Company will notify customers if there is a planned or unexpected disruption of facilities or services typically used by persons with Disabilities in order to access the Company's goods and services. The notice will be posted at the entrance of the affected premises and on our website.

The notice will include the following information:

- The facility or service that is unavailable;
- The anticipated duration of the disruption;
- The reason for the disruption; and
- Alternative facilities or services, if available.

CSS TRAINING AND RECORDS

The Company will provide training as required under the AODA to all persons to whom this policy applies as well as to the individuals charged with developing this policy and related procedures and practices.

Content of Training

Training will include:

- A review of the purpose of the AODA and requirements of the CSS;
- A review of this policy;

- How to interact and communicate with persons with various types of both visible and non-visible Disabilities;
- How to interact with persons with Disabilities who use an Assistive Device or require the assistance of a Guide Dog, Service Animal or Support Person.
- How to use equipment and/or devices made available on the Company's premises to assist persons with Disabilities with obtaining, using or benefiting from the Company's goods and services.
- What to do if a person with a Disability is having difficulty accessing the Company's premises and/or goods and services.

The training will be provided to all Employees to whom this policy applies as soon as practicable after he or she is assigned the applicable duties. Training will be provided on an ongoing basis in accordance with changes to this policy and its related practices and procedures.

Documenting Training

Records of the training provided, including the training protocol, the dates on which the training is provided and the number of individuals who attended the training will be maintained in accordance the requirements of the AODA.

FEEDBACK

The Company welcomes and appreciates feedback regarding this policy and its implementation. Feedback can be provided in the following ways:

- In person at reception
- By telephone at **514-631-6775**
- In writing: **General Counsel**
385 boul. Bouchard
Dorval, Quebec
H9S 1A9
- Through our website: **www.novartis.ca**

The Company will respond to feedback within **five (5)** business days of receipt of the feedback.

DOCUMENTATION TO BE MADE AVAILABLE

This policy is made available to any member of the public upon request. This policy will also be posted on our Intranet and in a conspicuous place in the workplace.

FORMAT OF DOCUMENTS

The Company will provide documents, or the information contained in documents, required to be provided under the CSS, to persons with Disabilities in a format that takes into account the person's Disability.

WORKPLACE EMERGENCY RESPONSE INFORMATION

In addition to providing customers with Disabilities with full accessibility to goods and services at all times in a way that respects their dignity and independence, the Company is committed to providing Employees with Disabilities with the same opportunities as other Employees. With this in mind, the Company will provide individualized workplace emergency response information to all Employees with a visible or non-visible Disability, if the individual so requires. This information can also be provided to the Employee who is designated to assist the Employee with Disabilities.

B. INTEGRATED ACCESSIBILITY STANDARDS

ACCESSIBLE INFORMATION AND COMMUNICATIONS STANDARDS

The Company will create, provide and receive information and communications in a way that is accessible for persons with Disabilities.

Feedback

The Company will 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 Communication Supports upon request.

Accessible Formats

Upon request, we will provide or arrange for the provision of Accessible Formats and Communication Supports for persons with Disabilities in a timely manner that takes in account the person's accessibility needs. The Company will work collaboratively with the person making the request to determine the suitability of an Accessible Format or Communication Support. We will also notify the public about the availability of Accessible Formats and Communication Supports.

Accessible Website

The Company will ensure that its internet websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines ("WCAG"). At present, the Company's website and web content conforms with WCAG 2.0, Level A.

The Company will take action to ensure that its internet websites and web content conform with WCAG 2.0 Level AA, (except where this is impracticable), as outlined by the IAS. The requirements of WCAG 2.0 Level AA will be met by the Company by the compliance date of January 1, 2021.

EMPLOYMENT STANDARDS

The Company will identify, prevent and remove barriers at all stages of the employment life cycle for persons with Disabilities.

Recruitment, Assessment and Selection Processes

The Company will notify job applicants about the availability of accommodation for persons with Disabilities in its recruitment process. We will also notify job applicants when they are selected to participate in an assessment or selection process that accommodations are available upon request. If a selected applicant requests an accommodation, we will consult with the applicant and provide or arrange for the provision of suitable accommodation in a manner that takes into account the applicant's accessibility needs.

Notice to Successful Applicants

When making offers of employment, the Company will notify the successful applicant of its policies for accommodating Employees with Disabilities.

Informing Employees of Supports

The Company will continue to inform Employees of its policies and any updates to those policies used to support Employees with Disabilities, including policies on the provision of job accommodation that take into account an Employee's accessibility needs. This information will be provided to new Employees as soon as practicable after commencing employment.

Accessible Formats and Communication Supports for Employees

Upon the request of an Employee with a Disability, the Company will consult with the Employee to provide or arrange for the provision of Accessible Formats and Communication Supports needed to perform the Employee's job, as well as information generally available to other Employees. When determining the suitability of an Accessible Format or Communication Support, we will consult with the Employee making the request. However, the Company reserves the flexibility to decide on the most appropriate Accessible Formats or Communication Supports for Employees (based on the needs of the specific Employee and the capacity of the Company to provide the support).

Workplace Emergency Response Information

The Company will provide individualized workplace emergency response information to Employees with Disabilities if we are made aware of the need for accommodation. The Company will provide this information as soon as practicable after becoming aware of the need for accommodation.

In circumstances where the Employee requires assistance, we will, with the consent of the Employee, provide the workplace emergency response information to those designated by the Company to provide assistance to the Employee (e.g., immediate supervisor, fire warden, etc).

Individualized workplace emergency response information will be reviewed when an Employee moves to a different location within the office, when the individual overall accommodation needs or plans are modified when, from time-to-time, the Company reviews its general emergency response plans.

Return to Work Process

The Company will develop, document and have in place a return to work process for Employees who have been absent from work due to a Disability, and who require Disability related accommodations in order to return to work. Such processes will be documented and will outline the steps the Company will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

Performance Management, Career Development and Advancement and Redeployment

We will take into account the accessibility needs and individual accommodation plans of Employees with Disabilities in performance management processes, when providing career development and advancement opportunities, and when considering redeployment.