

	<b>ADMINISTRATIVE MANUAL</b>	<b>ACCESSIBILITY POLICY</b>	
EFFECTIVE DATE: 01/2024 REVIEW DATE: REVISED DATE: REPLACES:	POLICY NUMBER: 100.5.6	<b>SECTION: HR Policies</b>	
REFERENCES:			Page 1 of 5

**1. BACKGROUND:**

The Accessibility for Ontarians with Disabilities Act (AODA) became law on June 13, 2005. The AODA aims to identify, remove, and prevent barriers for people with disabilities. Effective July 1, 2016, the Customer Service Standards have been consolidated with the Integrated Accessibility Standards into one regulation, O. Reg. 191/11: Integrated Accessibility Standards under the AODA, 2005, S.O. 2005, c. 11, which includes the following five accessibility standards:

- I. Information and Communication Standards
- II. Employment Standards
- III. Transportation Standards
- IV. Design of Public Spaces Standards
- V. Customer Service Standards

**2. PURPOSE:**

The Company (please see definition in section 4) is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence.

We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and by meeting our accessibility requirements under Ontario’s accessibility laws.

The Company is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination.

The Company understands that obligations under the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) and its accessibility standards do not substitute or limit its obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law.

### 3. SCOPE:

This Policy applies to all employees of "The Company" and all its locations in Canada (please refer to the definition of the company below). This policy applies to all employees who are assigned to perform work for the Company in Canada whether employed by the Company on a regular full-time/part-time, contract or casual basis. This policy also applies to independent contractors.

### 4. DEFINITIONS:

*Company:* Rx Connect Specialty Pharmacy, Rx Connect Pharmacy Solutions, Bio Santé, Paris (Patient, Reimbursement Solutions) and SL Specialty Logistics (collectively, the "Company")

*Disability:* According to the Ontario Human Rights Code, disability is defined as:

- 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 physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog, wheelchair, or other remedial appliance or device;
- b. a condition of mental impairment or a 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.

A disability may be the result of environmental barriers, such as attitudinal barriers, inaccessible information, an inaccessible built environment, or other barriers that affect a person's full participation in the educational context.

### 5. Policy

#### 5.1 Training

We are committed to training all staff and volunteers in accessible customer service, other Ontario's accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities.

In addition, we will train:

- a) all persons who participate in developing The Company's policies; and
- b) all other persons who provide goods, services, or facilities on behalf of the organization

Training of our employees and volunteers on accessibility relates to their specific roles.

Training includes:

- Purpose of the *Accessibility for Ontarians with Disabilities Act, 2005*

- How to interact and communicate with people with various types of disabilities
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- How to use the equipment or devices available on-site or otherwise that may help with providing goods, services, or facilities to people with disabilities.
- What to do if a person with a disability is having difficulty in accessing our organization's goods, services, or facilities.

We train every person as soon as practicable after being hired and provide training in respect of any changes to the policies.

We maintain records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided.

### *5.2 Information and Communications*

We have a process for receiving and responding to feedback and the process is accessible to persons with disabilities upon request.

We communicate with people with disabilities in ways that consider their disability. When asked, we will provide information about our organization and its services, including public safety information, in accessible formats or with communication supports:

- a) in a timely manner, considering the person's accessibility needs due to disability; and
- b) at a cost that is no more than the regular cost charged to other persons.

We will consult with the person making the request in determining the suitability of an accessible format or Communication support. If the organization determines that information or communications are unconvertible, the organization shall provide the requestor with:

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

### *5.3 Employment*

We notify employees, job applicants and the public that accommodations can be made during recruitment and hiring. We notify job applicants when they are individually selected to participate in an assessment or selection process that accommodations are available upon request. We consult with the applicants and provide or arrange for suitable accommodation.

We notify successful applicants of policies for accommodating employees with disabilities when making offers of employment.

We notify staff that supports are available for those with disabilities as soon as practicable after they begin their employment. We provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that consider an employee's accessibility needs due to a disability.

We will consult with employees when arranging for the provision of suitable accommodation in a manner that considers the accessibility needs due to disability. We will consult with the person making the request in determining the suitability of an accessible format or communication supports specifically for:

- a) information that is needed to perform the employee's job; and
- b) information that is generally available to employees in the workplace

Where needed, we will also provide customized emergency information to help an employee with a disability during an emergency. With the employee's consent, we will provide workplace emergency information to a designated person who is aiding that employee during an emergency.

We will provide the information as soon as practicable after we become aware of the need for accommodation due to the employee's disability.

We will review the individualized workplace emergency response information:

- a) when the employee moves to a different location in the organization.
- b) when the employee's overall accommodations needs or plans are reviewed; and
- c) when the employer reviews its general emergency response policies.

We have a written process to develop individual accommodation plans for employees.

We have a process for employees who have been absent from work due to a disability and require disability-related accommodations to return to work.

Our performance management, career development and redeployment processes consider the accessibility needs of all employees.

#### *5.4 Notice of Temporary Disruption*

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, this organization will notify customers promptly. This clearly posted notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available.

#### 5.5 Feedback Process

The Company welcomes feedback on how we provide accessible customer service. Customer feedback will help us to identify barriers and respond to concerns.

Feedback may be provided in the following ways:

**Email:** [hr@rxconnect.ca](mailto:hr@rxconnect.ca)  
**Telephone:** (437) 995-3800  
**Fax:** (289) 801-7194

All feedback, including complaints will be handled by being directed to the HR manager. Customers can expect to hear back in 7 business days.

The Company ensures our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request.

#### 5.6 Self-service Kiosks

We will incorporate accessibility features/consider accessibility for people with disabilities when designing, procuring, or acquiring self-service kiosks.

#### 5.7 Notice of Availability of Documents

This policy and all other documents are considered critical to the delivery of goods, services or facilities will be made available upon request. Documents will be made available in an alternative format upon request.

This policy will be posted on the Rx Connect Specialty Pharmacy website and will be made available to all members of the Rx Connect community.

Any policies of this organization that do not respect and promote the principles of dignity, independence, integration, and equal opportunity for people with disabilities will be modified or removed.

This document is publicly available. Accessible formats are available upon request.