

# INTEGRATED ACCESSIBILITY STANDARDS POLICY

## Background

This Integrated Accessibility Standards Policy (the “**Policy**”) has been established to meet the requirements of the Integrated Accessibility Standards (Regulation 191/11) (“**IASR**”) set forth under the *Accessibility for Ontarians with Disabilities Act, 2005* (“**AODA**”).

The *IASR* establishes standards to address barriers that persons with disabilities face in the areas of information and communications, employment and transportation. The requirements under the *IASR* are not a replacement or substitution for the requirements of the Ontario *Human Rights Code*.

## Purpose

The purpose of this Policy is to define the requirements and process for compliance with the *IASR*, by Shoppers Drug Mart Inc., and its affiliates Shoppers Home Health Care Inc., Shoppers Drug Mart Specialty Health Network Inc., MediSystem Technologies Inc., MediSystem Pharmacy Limited (and such other affiliated companies located in Ontario as may exist from time to time) and Murale stores (collectively referred to hereunder as the “Organization”)

## Application and Scope

This Policy applies to anyone dealing with members of the public or other third parties on behalf of the Organization, whether the person is an employee (whether full-time or part-time, temporary or permanent) and all individuals paid by or under contract with the Organization including but not limited to consultants and independent contractors, agents, volunteers or otherwise.

## Integrated Accessibility Standards Commitment

The Organization is committed to achieving an inclusive culture across the organization by preventing and removing barriers for persons with disabilities. Where it is not possible to remove barriers, the Organization will make efforts to accommodate persons with disabilities in a timely, effective and suitable manner. The Organization is guided by the core principles of the *AODA*, including dignity, independence, integration and equal opportunity.

This Policy should be read in conjunction with the Organization’s multi-year accessibility plan (the “**Accessibility Plan**”), which outlines the specific measures taken by the Organization to achieve compliance with the requirements under the *AODA* and its regulations.

## Definitions

“**Accessible Formats**” means formats that are an alternative to standard formats and are accessible to persons with disabilities. 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.

“**Barrier**” means anything that prevents a person with a disability from fully participating in one or more aspects of society, including a physical barrier, an architectural barrier, information or communications barrier, attitudinal barrier, technological barrier, policy or practice.

“**Communication Supports**” means supports that persons with disabilities may need to access information. These include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

**“Disability”** 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 physical co-ordination, 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 a developmental disability,
- (c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- (a) a mental disorder, or
- (b) an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

**“Feedback”** means any comments, compliments, suggestions or complaints provided to the Organization by its customers.

**“Internet Website”** means a collection of related web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier and is accessible to the public.

**“Kiosk”** means an interactive electronic terminal including a point of sale device, intended for public use.

## **Integrated Accessibility Standards Requirements**

The Organization will maintain a multi-year Accessibility Plan outlining its phased strategy to address the current and future requirements of the *AODA* and the *IASR*.

The Organization will review and update the Accessibility Plan at least once every five (5) years, and will post the Accessibility Plan on its website. Upon request, the Organization will provide a copy of the Accessibility Plan in an accessible format.

### **1. Self-Service Kiosks**

The Organization will have regard to accessibility features when designing, procuring or acquiring self-serve kiosks, except where not practicable to do so.

### **2. Training Employees and Volunteers**

The Organization will ensure that training is provided on the requirements of the *IASR* as set out in this Policy and will continue to provide training on the Ontario *Human Rights Code* as it pertains to persons with disabilities, to:

- all of its employees and volunteers;
- all persons who participate in developing the Organization’s policies regarding the provision of Organization services; and
- all other persons who provide goods, services or facilities on behalf of the Organization.

The training will be appropriate to the duties of the Organization’s employees, volunteers and other persons.

New employees will be trained as soon as practicable after assuming responsibilities of the job. Training records will be kept in the employee files.

Training will be updated in respect to any changes to the policies, practices or procedures relating to the *AODA*.

## **INFORMATION AND COMMUNICATIONS STANDARDS**

### **1. Customer Feedback**

The Organization will continue to 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 communications supports as soon as practicable, upon request.

### **2. Accessible Formats and Communication Supports**

Upon request, the Organization will provide, or will arrange for accessible formats and communication supports for persons with disabilities that takes into account the person's accessibility needs, unless it is not technically feasible to do so and subject to any privacy or confidentiality considerations.

When an accessible format or communication support is requested, the Organization will consult with the requesting person to determine the suitability of an accessible format or communication support and will endeavor to provide this in a reasonable amount of time and at no additional costs than the regular cost charged to other persons.

The Organization will also notify the public about the availability of accessible formats and communication supports.

### **3. Accessible Websites and Web Content**

The Organization will ensure that its Internet websites, including web content, conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA, except where it is impracticable to do so.

## **EMPLOYMENT STANDARDS**

The employment standards build upon existing requirements under the Ontario *Human Rights Code* in relation to how to accommodate individuals with disabilities throughout the job application process and the employment relationship.

### **1. Recruitment**

The Organization will notify its employees and the public about the availability of accommodations for applicants with disabilities in its recruitment process.

### **2. Recruitment, Assessment or Selection Process**

The Organization will notify job applicants when they are individually selected to participate further in an assessment or selection process that accommodations are available upon request, in relation to the materials or processes to be used in the job assessment or selection process.

If a selected applicant requests an accommodation, the Organization will consult with the applicant and provide, or arrange for the provision of, a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

### **3. Notice to Successful Applicants**

When making offers of employment, the Organization will notify the successful applicant of its policies for accommodating employees with disabilities.

#### **4. Informing Employees of Supports**

The Organization will continue to inform its employees of its policies (and any updates) used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practicable after commencing employment.

#### **5. Accessible Formats and Communication Supports for Employees**

Upon the request of an employee with a disability, the Organization will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform the employee's job, and information that is generally available to other employees.

In determining the suitability of an accessible format or communication support, the Organization will consult with the employee making the request.

#### **6. Workplace Emergency Response Information**

The Organization will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if the Organization is made aware of the employee's need for accommodation due to the employee's disability. The Organization will provide this information as soon as practicable after becoming aware of the employee's need for accommodation.

Where the employee requires assistance, the Organization will, with the consent of the employee, provide the workplace emergency response information to the person designated by the Organization to provide assistance to the employee.

The Organization will review the individualized workplace emergency response information developed for the employee when the employee moves to a different location within the Organization, when the employee's overall accommodations needs or plans are reviewed, and when the Organization reviews its general emergency response policies.

#### **7. Documented Individual Accommodation Plans**

The Organization will maintain a written process for the development of documented individual accommodation plans for employees with disabilities.

If requested, information regarding accessible formats and communications supports provided will be included in individual accommodation plans.

In addition, the accommodation plans will include individualized workplace emergency response information (where required), and will identify any other accommodation that is to be provided.

#### **8. Return to Work Process**

The Organization maintains a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

The return to work process outlines the steps the Organization will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

This return to work process will not replace or override any other return to work process created by or under any other statute (such as the *Workplace Safety Insurance Act, 1997*).

## **9. Performance Management, Career Development and Advancement & Redeployment**

The Organization will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement opportunities to employees, or when redeploying employees.

### **Reporting**

The Organization will file an accessibility report regarding its compliance with the *IASR*, annually or at such other times as specified under the *AODA*. All filed accessibility reports will be made available to the public, upon request.

### **Questions**

If anyone has a question about this Policy, or if the purpose of the Policy is not understood, an explanation will be provided by contacting us by telephone at 1-800-SHOPPERS (1-800-746-7737), by mail at Shoppers Drug Mart, 243 Consumers Road, Toronto, Ontario, M2J 4W8 Attention: Corporate Affairs, electronically through the Accessibility link located on the home page of [www.shoppersdrugmart.ca](http://www.shoppersdrugmart.ca) or by submitting a diskette. Any personal information provided in the feedback process will be handled in accordance with the Organization's privacy policies, available online at [www.shoppersdrugmart.ca](http://www.shoppersdrugmart.ca) or in writing upon request, and our Complaint Handling Processes and Procedures. Information about the feedback process is available to the public through the Shoppers Drug Mart website at [www.shoppersdrugmart.ca](http://www.shoppersdrugmart.ca) or upon request.

### **Compliance**

Compliance with this Policy is mandatory and any violations of this Policy will be treated seriously and may result in disciplinary action, up to and including termination of employment or termination of contractual relationship and/or legal action, as applicable, depending on the severity of the incident.

### **Related Documents**

Available upon request. **Contact:** [customerservice@shoppersdrugmart.ca](mailto:customerservice@shoppersdrugmart.ca)

- Multi-Year Accessibility Plan
- Customer Service Policy
- Emergency Response Plan