



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.¹

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 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, 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, November 2017

Multi-Year Accessibility Plan (Appendix 1)

Requirement	Planned Activity	Timeline
Train staff on the Accessibility Standards for Customer Service and on the Integrated Standards Regulations and on our obligations under the Human Rights Code	All new employees will be required to undertake AODA Customer Services Accessibility Standard and Integrated Standards (Human Rights) training modules (http://www.ohrc.on.ca/en/learning/working-together-code-and-aoda) as part of their 10 day onboarding plan in EXCELERATOR.	• Ongoing
Ensure the AODA policy continues to be posted on the iPAL policy page and the Purdue Pharma webpage so that it is available to the public.	Periodically verify that the AODA policy is posted as required by this policy.	• Ongoing
Train specific employees on the Communications and Employment Accessibility Standards that apply to their job	<ul style="list-style-type: none"> • Ensure that all new designated employees in Communications, IT, HR and Marketing are trained in the Information and Communications Standard - http://www.accessforward.ca/ • Ensure that all new Human Resources employees, hiring managers/ interviewers and Health & Safety are trained in the AODA Employment Standard - http://www.accessforward.ca/ 	• Ongoing
Notify employees and the public that we will accommodate as part of the hiring process	<ul style="list-style-type: none"> • Disclaimer included on internal and external job postings • Offer letters to continue to include information about our intent to provide accommodation to persons with disabilities. 	• Ongoing
Provide workplace information (job descriptions, performance management tools, etc.) in an accessible format if asked	Requirement is included in the AODA Policy	• As requested.
Provide individualized accommodation and emergency response plans for employees with disabilities	Requirement is included in the AODA Policy and HS-08 Accommodation and Early and Safe Return to Work Policy	• As requested.
File Accessibility Reports in accordance with required timelines	File AODA reports.	• To be filed as required

ⁱ 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”).