

Accessibility Plan

Novocol Pharmaceutical of Canada Inc. Multi-year Accessibility Plan

2024-2029

Statement of Commitment

Novocol Pharmaceutical of Canada Inc. (“Novocol Pharma”) is committed to preventing, identifying and removing barriers to accessibility in a timely and accessible manner that respects the dignity and independence of persons with disabilities. We are committed to offering an inclusive and accessible work environment and services to all people. This Multi-Year Accessibility Plan outlines our approach to meeting the current accessibility requirements under the Accessibility for Ontarians with Disabilities Act, 2005 (“AODA”).

In accordance with the legal and regulatory requirements set out in the AODA’s Integrated Accessibility Standards Regulations, Accessible Customer Service Standard Regulation under the AMA Novocol Pharma will:

- Establish, implement, and maintain policies governing how the organization will achieve accessibility.
- Prepare and develop the Multi-Year Accessibility Plan.
- Make the corporate policy(ies) and Multi-Year Accessibility Plan available to our employees and the public, upon request.
- Provide the polices and Multi-Year Accessibility Plan in an accessible format, upon request.
- Review and update the Multi-Year Accessibility Plan at least once every five years.

Under the AODA, the following accessibility standards are applicable to Novocol Pharma. These accessibility standards will help our organization identify and remove barriers to improve accessibility for people with disabilities:

- Information and Communications
- Customer Service
- Employment
- Design of Public Spaces

Information and Communication

Commitment

Novocol Pharma is committed to meeting the needs of people with disabilities and communicating in ways that consider their disabilities. The company has and will continue to incorporate new accessibility requirements under the standard by doing the following:

- Consult with employees to provide or arrange for the provision of accessible formats and communication supports that is suitable and meets the needs of people with disabilities in a timely manner.
- Provide accessible information that is needed in order to perform the employee's job.
- Make arrangements in a timely manner and at a cost that is no more than the regular cost charged to other persons.

Accessible Websites and Web Content

Novocol Pharma will continue to incorporate compliance with relevant accessibility legislation as it pertains to our website and updates made to the website to comply with WCAG 2.0 Level AA.

Customer Service

Commitment

Novocol Pharma is committed to providing its goods and services in a way that respects the dignity and independence of people with disabilities. We strive to deliver an accessible customer service experience by ensuring that people with disabilities can access and equally benefit from the same services and facilities as all other customers by:

- Permitting the use of assistive devices, in compliance with our GMP and Health and Safety teams' requirements, by people with disabilities so that they can gain, utilize, and benefit from the organization's goods and services.
- Ensuring that in situations where an individual with a disability is accompanied by a support person or service animal, both are accommodated and provided equal access in areas opened to the public and other third parties in accordance with our GMP and Health and Safety standards.
- Provide accessibility features/options so that they are available for use as requested.
- Providing a prompt notification to the public of any temporary service disruption to facilities or services used by persons with disabilities. This clearly posted notice will include information regarding the reason and duration of disruption and a description of alternative facilities or services, if available.

Training

- Ensuring every employee within the organization is provided with training based on the requirements of the relevant accessibility laws and standards, including those who participate in the development of the organization's policies, and all other people who provide goods, services, and facilities on behalf of the company.
- Training is provided as soon practicable within the onboarding process and on a continuous basis in respect to any changes made to the Novocol Pharma Accessibility policies
- Completion of training is tracked and recorded. These records consist of the dates and number of individuals to whom the training was provided

Employment

Commitment

Novocol Pharma is committed to inclusive and accessible employment practices throughout all stages of the employment cycle. The organization will take the necessary steps to meet the employment regulations under relevant accessibility legislation relating to recruitment and selection, return to work, individual accommodation, workplace emergency response information, and performance management and talent development.

Recruitment & Selection

- During the recruitment process, Novocol Pharma will continue to notify the public including job applicants who are selected to participate in an assessment, that accommodations are available upon request for those with disabilities.
- When a selected applicant requests accommodation, Novocol Pharma consults with the applicant to provide or arrange suitable accommodation in a manner that considers the applicant's accessibility needs due to disability.
- When making offers of employment, Novocol Pharma will notify the successful applicant about its policies for accommodating employees with disabilities.
- Employees will be provided with updated information whenever there is a change to existing policies.
- Employees will be advised that their dignity and privacy will be respected, and that information related to their accommodation needs will not be discussed without their consent.

Return to Work Process

Novocol Pharma will continue to develop and document a return-to-work process that outlines the steps that the company will take to facilitate the return to work of employees who have been absent due to a disability and require disability-related accommodations

in order to return-to-work. The return-to-work process incorporates the following elements:

- Identifying the essential job tasks or functions.
- Determining a reasonable method to provide accommodation that enables the employee with disability to perform the essential duties of the job.
- Maintaining the return-to-work policy in writing and tracking the progress of employees who are currently being accommodated as a result of disability.
- Developing and providing training to the managers and other professionals responsible for executing the return-to-work process.

The goal is to provide the employee with a timely return to work that is safe, productive, meaningful, and consistent with the worker's functional abilities. This return-to-work process does not replace or override any other return-to-work process under any other statute.

Individual Accommodation Plans

Novocol Pharma will continue to develop and document individual accommodation plans. The individual accommodation plan will be provided to the point of undue hardship and will incorporate the following elements:

- The employee's participation in the development of the individual accommodation plan.
- The manner in which the employee will be assessed on an individual basis.
- The manner in which Novocol Pharma can request evaluations by an outside medical professional or other expert at our own expense to assist with determining if and how a suitable accommodation can be achieved.
- The frequency by which the plan will be reviewed and updated.
- The plan will outline the steps to follow when providing reasons to the employee, if the individual accommodation policy is denied.
- The plan will outline the steps to protect the privacy of the employee's personal information.
- The plan will be provided in an accessible format that considers the employee's accessibility needs.

Workplace Emergency Response Information

Novocol Pharma believes that emergency preparation is an important component to the health, safety, and security of all people. We recognize the need for accommodation in an emergency for those individuals who are unable to follow the standard emergency plan in their work location. We will continue to develop individualized workplace emergency response plans for employees upon awareness of their needs for accommodation in an emergency. In addition:

- Novocol Pharma will provide all existing public emergency procedures, plans and public safety information, upon request, in a timely manner and in an accessible format.
- The individualized workplace emergency response plan will include the necessary steps individuals with disabilities will take during an emergency.
- Upon consent, we will provide designated assistance to employees with a disability when required.
- The plan will be communicated to the employee's manager and safety personnel on an 'as needed' basis.
- The plan will be maintained and updated with any changes to employee's accessibility needs and location.
- The information will be stored in an area that can be accessed by all Human Resource professionals.

Performance Management and Talent Development

Novocol Pharma encourages and supports the growth and development of all employees in their career. We will consider the accessibility needs of employees with disabilities and reference the individual accommodation plans when:

- Using the organization's performance management process in respect of employees with disabilities.
- Providing career development and advancement opportunities to employees with disabilities.

Design of Public Spaces

Commitment

Novocol Pharma is committed to incorporate accessibility into the design of public spaces when building or making significant renovations to existing public spaces. This will be done in accordance with the criteria established in existing accessibility standards including but not limited to the following:

- Outdoor public eating areas.
- Outdoor paths of travel such as sidewalks, ramps, stairs, curb ramps, and rest areas.
- Accessible off-street parking.

For More Information

If you require more information on this accessibility plan, need to request this plan in an accessible format, or wish to provide feedback, please contact us at:

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