



Accessibility for Ontarians with Disabilities Act (AODA):
Rexall Pharmacy Groups Ltd. Multi-Year Accessibility
Plan

December 2013

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INTRODUCTION AND STATEMENT OF COMMITMENT

In 2005, the government of Ontario passed the Accessibility for Ontarians with Disabilities Act (“AODA”). It is the goal of the Ontario government to make the province accessible by 2025. The Integrated Accessibility Standards Regulations (“IASR”) under the AODA requires that effective January 1, 2014, Rexall Pharmacy Group Ltd. (“RPGL”) establish, implement, maintain and document a multi-year accessibility plan which outlines RPGL’s strategy to prevent and remove barriers for persons with disabilities and to meet its requirements under the IASR.

Under AODA, the following accessibility standards set certain requirements that are applicable to RPGL:

- Customer Service;
- Accessible Emergency Information;
- Training;
- Information and Communications;
- Employment; and
- Proposed Accessibility Standards for the Design of Public Spaces

The multi-year plan outlines RPGL’s strategy to prevent and remove barriers to accessibility and addresses the current and future requirements of AODA. In addition, this plan allows RPGL to fulfill its commitments as outlined in the RPGL- Accessibility Standards for Customer Service Policy.

In accordance with the requirements set out in the IASR, RPGL will:

- Establish, review and update this plan in consultation with persons with disabilities;
- Post the plan on its website (Rexall.ca);
- Report, as required, on its website (Rexall.ca) on the progress of the implementation of this plan;
- Provide this plan in an accessible format, upon request; and
- Review and update the plan at least once every five years.

ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE

Commitment:

Since 2013, RPGL has been in compliance with the Accessible Customer Service Regulation under the AODA, and will continue to comply with the regulation until all required obligations have been fulfilled. RPGL is committed to excellence in serving all customers, including persons with disabilities, and it will carry out its functions in a manner which delivers an accessible customer service experience. RPGL is committed to treating all people in a way that allows them to maintain their dignity and independence. We are committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under AODA.

Action Taken:

The following measures have been implemented by RPGL:

- Ensured that all employees who, on behalf of RPGL, deal with the public, and all those involved in the development and approval of customer service policies, practices and procedures, are trained to communicate and provide the best possible customer service to all customers, including persons with disabilities.
- Ensured that staff are trained and familiar with various assistive devices that may be used by customers with disabilities who are accessing RPGL for goods or services.
- Ensured completion of accessibility training is tracked and recorded.
- Ensured that customers accompanied by a guide dog or support person are accommodated.
- Welcome feedback from persons with disabilities through multiple communication channels.

INTEGRATED ACCESSIBILITY STANDARDS REGULATIONS (IASR)

ACCESSIBLE EMERGENCY INFORMATION

Commitment:

RPGL is committed to providing its customers with publicly available emergency information in an accessible way upon request. We will also provide employees with disabilities individualized emergency response information when necessary.

Action Taken:

The following measures have been implemented by RPGL:

- Individualized workplace emergency response information procedures have been developed for employees with disclosed disabilities, as required.
- Workplace Emergency Response Information forms have been prepared for employees who have disclosed a disability and/or who are being accommodated according to their disability.
- Where required, RPGL provides assistance to specific disabled employees, with the employee's prior consent, to help them evacuate the workplace in case of an emergency. These plans for providing assistance have been set out in individualized emergency plans for said employees.
- On an ongoing and regular basis, and as per the applicable terms of the IASR, RPGL will review and assess general workplace emergency response procedures and individualized emergency plans to ensure accessibility issues are addressed.

IASR TRAINING

Commitment:

RPGL is committed to providing appropriate training to its employees on the requirements of the IASR and on the Ontario Human Rights Code as it relates to persons with disabilities. Training will be provided in a way that best suits the duties of employees.

Planned Action:

In accordance with IASR, RPGL will take the following steps to ensure that employees are provided with the training needed to meet Ontario's accessibility laws by **January 1, 2015**:

- Through our Learning department, ensure that our current online training modules are inclusive of components of the Human Rights Code as they relate to people with disabilities.
- Implement a training plan that involves all RPGL employees in the province of Ontario completing the online module by January 1, 2015.
- Provide training to existing employees on an ongoing basis to reflect any changes in accessibility laws that pertain to providing goods or services to the public.
- Mandate online training on accessibility laws for new hires beginning January 1, 2015.
- Keep records of training provided, including dates as well as number of employees trained.

IASR INFORMATION AND COMMUNICATION STANDARDS

Commitment:

RPGL is committed to meeting the communication needs of people with disabilities. RPGL will incorporate new accessibility requirements under the Information and Communication Standard to ensure that its information and communication systems and platforms are accessible and are provided in accessible formats that meet the needs of persons with disabilities. RPGL will consult with people with disabilities to determine their information and communication needs

Planned Action:

I. Feedback:

RPGL will take the following steps to ensure existing feedback processes are accessible to people with disabilities upon request by January 1, 2015.

- Ensure that all of our customers are aware the various platforms by which RPGL accepts feedback such as:
 - In person at any of our store locations
 - By mail, addressed to our Customer Service Department at Rexall Pharmacy Group Ltd. 5965 Coopers Avenue Mississauga, ON L4Z 1R9
 - Electronically via our 'contact us' link located at Rexall.ca
 - Via telephone at 1-877-378-4100
- Ensure that our feedback process is aligned with IASR obligations.
- Ensure our Store Level Staff know to advise customers with disabilities to contact our Customer Service Department with any issues either via the web or telephone.
- Ensure that our Rexall.ca website contains publicly available content that outlines our commitment to AODA and how to best submit feedback.
- Ensure that our feedback process is made available upon request in a manner that accommodates the customer's specific disability.

II. Accessible Formats and Communication Support

RPGL will take the following steps to ensure all publicly available information is made accessible upon request by January 1, 2016.

- Provide all publicly available information in various formats to meet the individual needs of customers with disabilities such as: in print, in various font sizes and via our Rexall.ca web site, through our Customer Service Department, and via our employees by way of verbal communication.
- In addition to the above, RPGL is committed to welcome the feedback of such customers with disabilities in order to understand how best to meet their specific needs.

III. Accessible Websites and Web Content

RPGL will take the following steps to make all new websites and content on those sites conform with WCAG 2.0, level A by January 1, 2014:

- Committing adequate resources to ensure that the Rexall.ca website, its content and all applications are level A compliant.
- Keep abreast of changes to industry standards when it comes to maintenance of website compliance and implement changes when feasible and necessary.

RPGL will take the following steps to make all websites and content conform with WCAG 2.0, level AA by January 1, 2021.

- In partnership with our IT department, create awareness of the obligation to comply with the standard and its impact on customer service.
- Committing adequate resources to ensure that the Rexall.ca website, its content and all applications are level AA compliant.

IASR EMPLOYMENT STANDARDS

Commitment:

RPGL is committed to fair and accessible employment practices across all facets of employment. This includes providing accessibility across all stages of the recruitment cycle, ensuring that barriers in accommodation and return to work processes are eliminated and corporate policies surrounding accommodation and return to work are followed, where applicable. RPGL is also committed to taking into consideration, the accessibility needs and any accommodation plans of its employees for the purposes of performance management, career development and advancement, and redeployment.

Planned Action:

I. Recruitment:

RPGL will take the following steps to notify the public and staff that, when requested, RPGL will accommodate people with disabilities during the recruitment and assessment process and when people are hired:

- Have available the documentation to notify candidates about our accommodation practices.
- Ensure that the recruiter or hiring manager consult with the candidate prior to a formal interview in order to determine any accommodation requirements.

II. Individualized Accommodation/Return to Work Plans

RPGL has taken the following steps to develop and implement a process for developing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability:

- Created an Attendance policy which outlines employee and company obligations as it pertains to absences (due to illness/disability or otherwise) from the workplace;
- Ensure steps are in place to protect the privacy of the employee's personal information.
- Ensure that all significant absences and requests for accommodation are referred to our third party ability management firm for adjudication and for developing, in conjunction with the employee's physician and his/her immediate supervisor, a return-to-work/accommodation plan that is suitable.
- Ensure that our staff are aware of our processes and procedures for ability management and that we offer modified duties to individuals who become ill and/or disabled, temporarily or otherwise.
- If individualized accommodation plans are established, ensure that they include individualized workplace emergency response information that is required.

III. Performance Management, Career Development and Redeployment

In accordance with the IASR, RPGL will:

- Review, assess and, as necessary, modify existing policies, procedures and practices to ensure compliance with the IASR.
- Take into account the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, when assessing performance, managing career development and advancement or when redeployment is required.
- Consider the accessibility needs to employees with disabilities when providing career development and advancement opportunities to its employees with disabilities.

PROPOSED ACCESSIBILITY STANDARDS FOR THE DESIGN OF PUBLIC SPACES

Commitment:

RPGL will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces. Public spaces include:

- Service counters
- Check-out areas
- Waiting areas and private counseling rooms
- Parking areas and exterior paths to our store and office locations.
- Shopping aisles
- Washrooms

If a store location is temporarily unable to offer any particular facilities or services used by customers with disabilities, RPGL will make every effort possible to provide public notice of any planned or unexpected interruption to these services. Notices of disruption will be posted conspicuously in the affected location(s) as soon as it is feasible to do so and will include information about the reason for the disruption, its anticipated duration and the description of alternative option, if available. In the event of a planned disruption, the affected location(s) will provide at least 48 hours notice by posting the notice described above.

Planned Action:

RPGL will take the following steps to ensure new public spaces are designed in such a way to meet the Accessibility Standards for the Design of Public Spaces by January 1, 2017:

- Create awareness of the Accessibility Standards for the Design of Public Spaces.
- Ensure that accessibility standards are incorporated into all new stores established beyond January 1, 2017.