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Title Accessibility for Ontarians with Disabilities Policy & Accessibility Plan		Approved By Managing Director	Supersedes Accessibility for Ontarians with Disabilities Policy

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STATEMENT OF COMMITMENT

EMD Serono is committed to meeting the diverse needs of people with disabilities in a timely manner that is consistent with the principles of independence, dignity, integration and equality of opportunity, and will do so by striving to identify, prevent and remove barriers to accessibility wherever possible as well as by meeting the accessibility requirements under the AODA.

1. PURPOSE

The purpose of this document is to affirm the commitment of EMD Serono to meet the diverse needs of people with disabilities and to set forth our policy and multi-year accessibility plan for compliance with the requirements of the Integrated Accessibility Standards Regulation (the "IASR") under the Accessibility for Ontarians with Disabilities Act, 2005 (the "AODA"). EMD Serono has also implemented a separate policy dealing with the Customer Service Standards under Part IV.2 of the IAS.

2. DEFINITIONS

"**Accessible formats**" includes, but is not limited to, large print, recorded audio and electronic formats, *Braille* and other formats usable by persons with disabilities.

"**Barriers**" means any obstacle that impedes or prevents a person with a disability from fully participating in all aspects of society and includes, but is not limited to, attitudinal barriers, information or communications barriers, technological barriers, organizational barriers, and architectural and/or physical barriers.

"**Communication supports**" includes, but is not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

"**Disability**" means the corresponding definitions in section 2 of the *Accessibility for Ontarians with Disabilities Act, 2005* and section 10(1) of the Ontario *Human Rights Code*, which are summarized as:

- (a) any degree of physical disability, infirmity, malformation or disfigurement that results in 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,
- (d) a mental disorder, or
- (e) a temporary or permanent injury.

3. SCOPE

This policy applies to all Ontario-based staff of EMD Serono and its affiliates and subsidiaries. The policy – with the exception of the "Employment Requirements" set out under section 5, part (iii) –

also applies to all Ontario-based volunteers of EMD Serono as well as all non-Ontario-based staff and volunteers of EMD Serono's affiliates and subsidiaries that deal with members of the public or other third parties in Ontario on behalf of EMD Serono.

4. MULTI-YEAR ACCESSIBILITY PLAN

EMD Serono is committed to complying with the accessibility requirements under the IAS and to reviewing and updating our accessibility plan as set out in this policy at least once every 5 years. The Multi-Year Accessibility Plan is attached to this policy under Appendix 1.

5. TRAINING

EMD Serono will ensure that all employees and volunteers in Ontario, and any other persons who provide goods, services or facilities to the public or other third parties in Ontario on behalf of EMD Serono or who participate in developing EMD Serono's policies on the provision of goods, services or facilities to the public or other third parties in Ontario, will receive training on the requirements of the IASR and on the Ontario *Human Rights Code* as it pertains to persons with disabilities.

6. INTERACTING WITH PHYSICAL PREMISES

[Self Service Kiosks](#)

EMD Serono has one self-service kiosk in the main lobby, called Emma, whose sole functionality is to provide visitors with reception services. EMD Serono will ensure that those with disabilities may adequately access such services using Emma.

7. INFORMATION AND COMMUNICATIONS REQUIREMENTS

[Websites](#)

EMD Serono will ensure that all public-facing websites, apps and web content within its control conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level AA requirements, or any updates there to, except where doing so is not practicable. EMD Serono provides accessibility toggles for its website, emdserono.ca.

[Feedback](#)

Wherever EMD Serono has existing processes for receiving and responding to feedback, we will provide or arrange for the provision of accessible formats and communication supports upon request in order to ensure that all such processes are accessible to people with disabilities.

EMD Inc. will accept feedback from individuals in the following ways:

- By telephone 1-888-737-6668
- In writing at:
 - EMD Inc.
 - Attn: Legal Department
 - 2695 North Sheridan Way
 - Suite 200
 - Mississauga, ON
 - L5K 2N6
- Online at www.emdserono.ca

Accessible Formats and Communication Supports

Upon request, EMD Serono will take all reasonable steps to provide or arrange for the provision of accessible formats and communication supports in a timely manner so that people with disabilities can access our publicly available information, such as patient education materials.

In each case, EMD Serono will take into account the accessibility needs of the person with a disability making the request and will consult with the person to determine the suitability of an accessible format or communication support.

Accessible formats and communication support will be provided at no additional cost to the person with a disability making the request.

8. EMPLOYMENT¹

Workplace Emergency Response Information

Whenever EMD Serono is aware of the need for individualized emergency response information due to an employee's disability, we are committed to accommodating the employee by preparing and providing him or her with individualized emergency response information that is suitable in the circumstances.

If the employee with a disability who receives the individualized workplace emergency response information requires assistance and provides his or her consent, EMD Serono will provide the individualized workplace emergency response information to a person who is designated to assist the employee in case of an emergency.

Applicants and Candidates

Recruitment, Evaluation and Selection Process

EMD Serono notifies the public and our employees in Ontario that, when requested, we will provide accommodation for applicants with disabilities who participate in our recruitment processes.

More specifically, during the recruitment process, EMD Serono will notify all job applicants that are selected to participate in an assessment or selection process that we will provide reasonable accommodations, upon request, to a person with a disability in relation to the materials or processes to be used in the assessment or selection process. Where an applicant with a disability requests an accommodation, we 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 his or her disability.

As part of all offers of employment, EMD Serono will notify successful job applicants of our policies for accommodating employees with disabilities.

Employees

Informing Employees of Disability-Related Supports

We notify our employees of our existing policies in respect of employees with disabilities including policies regarding job accommodations by posting such policies on HR4You, on the EMD Serono EVA site under the 'HR' tab and by request.² We will provide updated information to our employees with respect to any changes to our existing policies regarding employees with disabilities and job accommodations for disability-related needs.

¹ **NOTE:** The following accessibility requirements apply only in respect of EMD Serono's employees in Ontario and do not apply in respect of volunteers or other non-paid individuals.

All new employees in Ontario will be notified of our existing policies in respect of employees with disabilities and job accommodations for disability-related needs as part of their onboarding.

Accessible Formats and Communication Supports for Employees

As part of the accommodation process, where an employee with a disclosed disability requests an accessible format and communication support for information that is needed by the employee in order to perform his or her job and/or information that is generally available to employees in the workplace, we will consult with that employee on what the most suitable support is and how we will provide it to them.

Individual Accommodation Plans & Return to Work Process

As part of the accommodation process, EMD Serono has in place a written process for the creation of individual accommodation plans for employees with disabilities. It is called Individual Accommodation Plan Policy and is available on HR4You. This policy applies to any Company employee with a disability who as a result requires accommodation, and to prospective employees who may require accommodation during the recruitment process at the Company. The Company will reasonably accommodate employees by removing barriers that limit, restrict or prevent individuals with disabilities from participating fully and equally in the workplace. Individual Accommodation Plans remain in place for the duration they are required, and continue through role changes, including promotions. If a role change requires changes to an employee's work environment, such as the transfer to a new office, reasonably similar accommodations must take place to accommodate the employee.

The Accommodation Policy includes a return-to-work process for 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 that EMD Serono will take to facilitate the return to work of employees who have been absent from work due to disability and will incorporate the use of individual accommodation plans as part of the process.

A note about performance management: EMD Serono's performance management processes takes into account an individual accommodation plan for an employee that has one, in assessing performance. Employees will not be penalized in their review as a result of having an individual accommodation plan.

COMPLIANCE STRATEGY

For various reasons, barriers to accessibility can often be difficult to identify. Our staff and customers, including in particular those persons with disabilities, are often in the best position to recognize the existence of any accessibility barriers and their impact on people with disabilities, and to alert EMD Serono so that we can take appropriate action to prevent or remove the barriers wherever reasonably possible.

Accordingly, EMD Serono will take the following steps to facilitate the identification, prevention and removal of accessibility barriers wherever it is reasonably possible to do so:

- In order to promote an understanding of and appreciation for the accessibility requirements under the IASR, as well as the importance of identifying, preventing and removing barriers to accessibility, EMD Serono will ensure that all staff in Ontario are provided access to this policy and are encouraged to review the policy and to raise any questions that they may have regarding the policy with Human Resources;
- EMD Serono will encourage, welcome and appreciate all feedback from staff and customers regarding any barriers to accessibility and more generally on how we can best achieve our goal of striving towards a barrier-free environment;

- EMD Serono will take a proactive approach to accessibility wherever reasonably possible by striving to have regard to and incorporating disability-related needs and accessibility issues in general in all aspects of our business and decision-making; and
- EMD Serono will strive to work cooperatively and consult with any person with a disability who brings to our attention an issue or concern regarding accessibility, and we will take all reasonable steps in the circumstances to address the disability-related needs of the individual.

APPENDIX 1 : MULTI-YEAR ACCESSIBILITY PLAN

INTERACTING WITH PHYSICAL PREMISES

Self Service Kiosks

Use of the self-service kiosk, Emma is accessible by using appropriate-size fonts and a colour-contrast interface and is reachable from a seated position at a comfortable distance from nearby furniture. Emma has a functionality that allows visitors to 'ping' administrative staff to provide further in-person support. Emma has audio capabilities however requires visitors to select an option of why they are here to alert the appropriate person.

Timeline for Compliance:

- Currently in place

INFORMATION AND COMMUNICATIONS REQUIREMENTS

Websites

We will achieve this by:

1. Inventorying all externally facing websites, web content and apps (each "online asset") within our control;
2. Assessing each online asset for compliance with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level AA;
3. Taking steps to breach each online asset into compliance:
 - a. Each department that owns (a) online asset(s) will be required to update their online assets by the next annual update scheduled for each online asset;
 - b. Each department will work with internal and external agencies to update each online asset;
 - c. Internal/external agencies must validate compliance via written attestation/statement
4. Changes to online assets must only be done in compliance with (WCAG) 2.0 Level AA;
5. Changes to WCAG standards will be monitored by the Information Technology (IT) department. Major changes to standards will be communicated to online asset owners in order to bring existing online assets to-date into compliance with the updated standard.

Timeline for Compliance:

- Ongoing

Feedback

Providing feedback to EMD Serono can be done through a variety of methods: email (best suited for those hard of hearing) or telephone to our general phone line (best for those who are visually impaired). Response to feedback is given using the same medium. To the extent an alternate medium is requested, EMD Serono will take active and immediate steps to reasonably accommodate it.

Timeline for Compliance:

- Currently in place

Accessible Formats And Communication Supports

Upon request, EMD Serono will provide external stakeholders such as patients with information regarding its products and services in accessible format. Depending on the nature of the request, some request may take longer to fulfill. EMD Serono will endeavour to fulfill each request, if possible, in a timely manner. Such accessible formats may include:

- Documentation in large-print format

- Documentation in digital format compatible with text-to-speech (TTS) reader functionality
- Live support via EMD Serono's Patient Support Programs
- Closed captioning of video content

Timeline for Compliance:

- Currently in place

EMPLOYMENT

[Recruitment, Assessment and Selection Process](#)

Applicants are notified of their ability to request an accommodation in the recruitment process within each job posting. It is made clear in writing that accommodations are available upon request.

Accommodations may include:

- More time to complete case exercises
- Conducting an interview virtually
- Ensuring that access to interview rooms at in-person interviews are fully accessible

Timeline for Compliance:

- Currently in place

[Informing Employees of Disability-Related Supports, Accessible Formats and Communication Supports and Individual Accommodation Plans & Return to Work Process](#)

Disability-related supports in the form of individual accommodation plans are made available to employees through HR4You.

Timeline for Compliance:

- Currently in place

TRAINING

Training is conducted via online learning modules and will be provided as soon as practicable after staff or volunteers commence their duties and on an ongoing basis as 'refresher' training.

EMD Serono will maintain a record of the training it provides to staff and volunteers, including the dates on which the training is provided and the number of individuals to whom it is provided.

Timeline for Compliance:

- Currently in place