

## Virox Technologies Inc. Policy 2-2 – AODA Multi – Year Accessibility Plan

<b>Effective:</b>	January 1, 2016
<b>Revision Date:</b>	December 4, 2017
<b>To be Reviewed:</b>	Annually or When Necessary to Maintain Legislative Compliance

### Introduction

Virox is committed to meeting the objectives and requirements outlined in the *Accessibility for Ontarians with Disabilities Act, 2005* (the “AODA”) and the applicable regulations and to making our workplace meet the needs of persons with disabilities, through the implementation of the requirements of the Act and its applicable regulations.

### Statement of Commitment

For employees, the company is committed to creating and maintaining an equitable and integrated environment whereby every employee receives equal opportunity with respect to employment and receives accommodation where required, in accordance with the provisions of the *Accessibility for Ontarians with Disabilities Act, 2005* (the “AODA”) and the *Integrated Accessibility Standards Regulation (191/11)* (the “IASR”).

As outlined in the Accessible Customer Service Standards, Virox is committed to providing access to our facilities and delivering excellent customer service at all times for customers and visitors, and in a way that respects the dignity and independence of people with disabilities.

### Integrated Accessibility Standard Regulation (IASR) – Ontario Regulation 191/11

In accordance with the IASR, the Accessibility and Accommodation Policy was developed to address how Virox will achieve accessibility and meet with the requirements of the IASR. The Multi-Year Accessibility Plan was developed in accordance with the regulation and it outlines our strategy to address the current and future accessibility goals.

The Accessibility Policy and Multi-Year Accessibility Plan are available on the company website at [www.virox.com](http://www.virox.com), and can be provided in an accessible format, upon request. In accordance with the requirements of the AODA and IASR, Virox will report accessibility achievements every 3 years, starting in 2014, and will review and update the Multi-Year Accessibility Plan every 5 years, with the first update to occur by the end of 2019.

The regulations applicable to our business, in accordance with the AODA and IASR, are as follows:

- customer service standard;
- workplace emergency response information;
- information and communications;
- training; and,
- Employment practices.

### Customer Service Standard – Ontario Regulation 429/07

#### Commitment

Virox is committed to providing Customers access to our facilities and delivering excellent service at all times in a way that respects the dignity and independence of all of our clients and visitors. Since 2012, Virox has been in compliance with its obligations under the AODA Accessibility Standard for the Customer Service Standard (Ontario regulation 429/07).

#### Actions Taken

The following measures have been implemented by Virox:

- Development of the Accessibility and Accommodation Policy, which is available on the company website.
- Frontline employees who interact directly with customers and visitors are trained and familiar with various assistive devices.
- Customers and visitors who are accompanied by a registered service animal or support person will be accommodated and permitted to access areas of our premises open to the public. If customers and visitors are accompanied by a support person, the support person will be accommodated.
- Training is provided to all employees on the purpose and requirements of the AODA legislation.
- Virox has an assigned Accessibility Coordinator and developed feedback processes to respond to inquiries and

suggestions by phone, email, mail or in person.

- Virox has submitted compliance reports to the Province indicating we had addressed the requirements of the Regulation. We continue to ensure compliance with the Customer Service Standard. Training is provided to all employees during the new hire orientation process and on an ongoing basis when changes are made to relevant policies and procedures.
- Training records are maintained and include the dates of the training and the people trained.

## **Workplace Emergency Response Information**

### **Commitment**

Virox is committed to providing individualized workplace emergency response information to employees who have a disability where the nature of the disability is such that accommodation is required.

### **Actions Taken**

Where required and with the disabled individual's prior consent, the individualized workplace emergency response plans are provided to emergency response providers, designated employees responsible in emergency situations for the evacuation of the workplace and to the individuals' respective managers.

## **Information and Communication Standards**

### **Commitment**

Virox is committed to making company and product information and feedback processes accessible to people with disabilities. As required, we will consult with people with disabilities to determine their information and communication needs.

### **Actions Taken**

#### *Feedback, Accessible Formats and Communication Supports*

- Feedback processes are accessible by providing or arranging for the provision of, upon request, accessible formats and communication supports. The provision of accessible formats and communication supports to persons with disabilities will be done in a timely manner, taking into account the individual's accessibility needs, and at no extra cost above what is charged to other persons.
- Virox publishes information regarding the availability of accessible formats and communication supports on the website at [www.virox.com](http://www.virox.com).

### **Planned Action**

#### *Accessible Websites and Web Content*

- Any new Virox website will conform with Web Content Accessibility Guidelines ("WCAG") 2.0, Level A.
- Any new Virox website will conform with WCAG 2.0, Level AA protocols by January 2021.
- Ability to comply with AODA will be incorporated into the selection criteria for vendors for technology, website and software development initiatives.

## **Emergency Procedure, Plans, or Public Safety Information**

In the event that Virox makes emergency procedures, plans and public safety information available to the public, it will be provided, upon request, in an accessible format or with appropriate communication supports.

## **Training**

### **Commitment**

Virox is committed to providing training to all employees who provide services on the company's behalf with respect to the requirements of the IASR and the Ontario Human Rights Code (the "Code"), as it relates to people with disabilities.

### **Planned Action**

In accordance with the IASR, by January 1, 2015, Virox will:

- Review and determine the appropriate training requirements in the Code and the IASR and establish a format for delivery of training to all employees who provide services on the company's behalf.
- Ensure that training is provided to all employees who provide services on the company's behalf or training to others as soon as practicable and on any changes to the prescribed policies on an ongoing basis.
- Maintain a detailed record of the training provided.
- Ensure training is made available in accessible formats where possible.

## Employment Practices

### Commitment

Virox is committed to providing accessible formats and communication supports with respect to employment practices.

### Actions Taken

If an employee is absent from work due to disability and requires accommodation in order to return to work, we develop an individual accommodation plan for that individual, in consultation with our benefits carrier, where necessary.

### Planned Action

**By January 1, 2016**, we will have taken the following steps in line with our commitment:

- Specify that accommodation is available for applicants with disabilities during the recruitment and selection process.
- Provide information in candidate communications regarding interviews that accommodations are available upon request in relation to the materials or processes to be used.
- Inform applicants about the company's approach to accessibility and the process to request accommodation due to a disability at the time of the job offer.
- If an employee or new hire with a disability makes a request for accommodation, we will consult with the individual and determine the provision or arrangement of suitable accommodation in a manner that takes into account the applicant's accessibility needs due to a disability.
- Inform current employees and new hires of policies supporting employees with disabilities.
- Review and update, if necessary, our established process for the development of individual accommodation plans for employees with disabilities. When requested by an employee with a disability, consult with the employee to provide or arrange for provision of suitable accessible formats and communication supports needed to perform the employee's job.
- When providing performance management information to an employee with a disability, the company will take into account the accessibility needs of the employee and as applicable, individual accommodation plans.
- When providing career development information to an employee with a disability, the company will take into account the accessibility needs of the employee, and as applicable, individual accommodation plans.

## Design of Public Spaces Standards

We will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces. Virox will meet these standards by **January 1, 2017**.

## Legal References, Associated Policies, Related Forms

- Accessibility for Ontarians with Disabilities Act, 2005
- Ontario Human Rights Code
- Integrated Accessibility Standards Regulations *191/11* (IASR)
- Virox Policy 1-1 – Code of Conduct
- Virox Policy 2-1 – Accessibility & Accommodation Policy
- Virox Multi-Year Plan Status Report
- Virox Policy 2-3 – Return to Work Policy

**Virox Multi-Year Plan Status Report – Last Updated December 4, 2017**

<i>Items to be Completed</i>	<i>Person or Department Responsible</i>	<i>Deadline</i>	<i>Status</i>
<b>Customer Service Standard (CSS)</b>			
Establish Accessibility Policy for Customers with Disabilities	Human Resources	January 1, 2012	Complete
Train employees on the purpose and requirements of the AODA, Accessible Customer Service, and Human Rights Legislation	Human Resources	January 1, 2012	Complete
<b>Integrated Accessibility Standard Regulation (IASR)</b>			
Establish and Post Virox’s statement of commitment to accessibility online and in a conspicuous place in the workplace.	Human Resources	January 1, 2014	Complete
Establish multi-year accessibility plan	Human Resources	January 1, 2014	Complete
Review and update multi-year accessibility plan	Human Resources	January 1, 2019	In progress
Self-Reporting on the Status of IASR compliance	Human Resources	December 31, 2017	In progress
Training Employees and Volunteers on the IASR	Human Resources	January 1, 2015	Complete
<b>Employment Standard Requirements</b>			
Provide Workplace Emergency Response Information for Persons with Disabilities (S. 27 – Employment Standard)	Human Resources	January 1, 2012	On-going
Create Accommodation Plans for Employees with Disabilities	Human Resources	January 1, 2016	On-going
Communicate Policies for Supporting Employees with Disabilities	Human Resources	January 1, 2016	Complete
Make recruitment and hiring processes accessible	Human Resources	January 1, 2016	Complete
Provide Accommodation for employees with disabilities during the performance management process, career development planning, and job changes/redeployment	Human Resources	January 1, 2016	On-going
Develop Employee Return to Work (RTW) policies that consider persons with disabilities	Human Resources	January 1, 2015	Complete
<b>Information &amp; Communication Standard Requirements</b>			
Ensure Workplace Emergency and Public Safety Information are available in accessible formats	Operations	January 1, 2012	On-going
Make information about Virox’s goods and services accessible to the public	Technology Platform Marketing (TPM) Department	January 1, 2016	On-going
Ensure Accessible formats and Communication supports are available	Technology Platform Marketing (TPM), Professional & Technical Services (PTS), Business Development, Human Resources	January 1, 2016	On-going
Implement an Accessible Feedback Process	Human Resources	January 1, 2015	Complete
Ensure new websites and content comply with the WCAG 2.0 level A	Technology Platform Marketing (TPM)	January 1, 2014	In Progress
Ensure all websites (new and existing) comply with WCAG 2.0, Level AA protocols	Technology Platform Marketing (TPM)	January 1, 2021	In Progress
Make training resources accessible	Human Resources & Quality Assurance	January 1, 2013	On-going
Train trainers about accessibility	Human Resources	January 1, 2013	Complete