

## OUR COMMITMENT TO ACCESSIBILITY & ACCOMMODATION

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Virox is committed to creating and maintaining an accessible environment for all employees, customers, and visitors, and will provide accommodation where required to remove barriers to accessibility with regards to our products and employment opportunities, in accordance with the Ontario Human Rights Code, Accessibility for Ontarians with Disabilities Act, 2005 (the "Act"), the Customer Service Standard and the Integrated Accessibility Standards Regulation, 191/11.

To achieve this goal, Virox will carry out its functions and responsibilities in accordance with the applicable legislation and will make every effort possible to ensure all accessibility programs, including the Multi-Year Accessibility Plan and Accessibility Policy, will be kept up-to-date and will reflect the most recent changes in legislation and our practices to support Accessibility for all. No changes shall be made to this policy before considering the impact on persons with disabilities.

## MULTI-YEAR ACCESSIBILITY PLAN

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The Multi-Year Accessibility Plan outlines Virox's commitment to accessibility and actions it will take to:

- 1) Prevent and remove barriers to accessibility
- 2) Fulfill the requirements under the Integrated Accessibility Standards Regulation (IASR) and the Accessibility for Ontarians with Disabilities Act.

The Multi-Year Accessibility Plan is available to employees and the public on the company website [www.virox.com](http://www.virox.com), and will be provided in an accessible format, upon request. The Multi-Year Accessibility Plan shall be reviewed and updated every 5 years to reflect any legislative changes or internal practices to support Accessibility for all.

## TRAINING

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All Virox employees, volunteers and others who conduct business on behalf of Virox are required to complete training on The Human Rights Code, Accessibility for Ontarians with Disabilities Act, IASR and Customer Service training.

This training will be provided to new employees during the employee's probationary period. Employees will receive training on any changes to the Accommodation and Accessibility Policy and Procedure, as soon as is practicable. Detailed records of training completed shall also be maintained.

Training will cover areas related to:

- 1) The purpose and requirements of the AODA,
- 2) How to communicate and interact with people with disabilities,
- 3) How to interact with service animals or support persons,
- 4) How to identify assistive devices,
- 5) How to properly respond to people using assistive devices,
- 6) What to do if a person has difficulty accessing Virox services, facilities, policies, procedures and

practices pertaining to providing accessible customer service to people with disabilities.

## ACCESSIBLE CUSTOMER SERVICE & THE CUSTOMER SERVICE STANDARD

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Virox is committed to providing all customers and visitors access to its facilities and delivering accessible Customer service in a manner that respects their dignity and independence.

Customers and Visitors of Virox who require accommodation when accessing Virox's services or facilities will be provided with the appropriate accommodations in accordance with the AODA Customer Service Standard Regulation (429/07).

### USE OF ASSISTIVE DEVICES, SERVICE ANIMALS, AND SUPPORT PERSONS

Virox is committed to serving persons with disabilities who use assistive devices, require a service animal, or support person to be able to obtain, use or benefit from Virox's goods and services.

Service animals are welcome on all parts of Virox premises that are open to the public and other third parties. There are no fees to have a support person attend the facility and individuals accompanied by support persons shall not be denied access to the support person while on Virox premises.

## INFORMATION & COMMUNICATION

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Virox is committed to communicating with people with disabilities in ways that take into account their disability. Information pertaining to Virox, its goods, services, facilities and feedback processes will be provided in accessible formats, upon request, at no additional cost.

Upon receiving a request for information in an alternate format, the company will consult with the person making the request to determine the most appropriate accessible format or communication support, given the needs of the person and Virox's capability to deliver.

In the event that Virox is unable to convert the information or communications into an accessible format, Virox will explain why it is unable to do so and will provide a summary of the content, in accordance with the IASR.

### BILLING

Virox is committed to providing accessible notices or invoices to all customers. For this reason, statements or invoices will be provided in alternative formats upon request (e.g., printed copies, large print, email).

### WEB CONTENT

All new web content on the Virox website, including web-based applications that Virox controls directly or through a contractual relationship that allows for modification of the product shall conform to the WCAG 2.0,

Level A protocols and WCAG 2.0, level AA protocols, as outlined in the IASR, except for the following:

- Success criteria 1.2.4 Captions (Live)
- Success criteria 1.2.5 Audio Descriptions (pre-recorded)
- Modifications to products that are not practicable due to the availability of commercial software, tools, or both.

## NOTICE OF TEMPORARY DISRUPTION

Virox will make reasonable efforts to provide customers with notice in the event of a disruption in the facilities or services usually used by all customers, including persons with disabilities. This notice will include information about the reason for disruption, its anticipated duration and a description of alternative facilities or services, if available.

Notices will be placed at all public entrances and service counters on Virox premises. In the event of an emergency, it may not be possible for Virox to give adequate notice.

## EMERGENCY RESPONSE PROCEDURES COMMUNICATED TO THE PUBLIC

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

## DESIGN OF PUBLIC SPACES

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Virox will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces, including:

- Sidewalks, ramps, stairs, curb ramps, etc.
- Accessible parking
- And service counters and waiting areas

## ACCESSIBLE EMPLOYMENT PRACTICES & THE EMPLOYMENT STANDARD

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### RECRUITMENT & SELECTION

Virox will notify prospective candidates about the availability of accommodation for persons with disabilities at all stages in its recruitment process.

Candidates requiring accommodation are encouraged to make their needs known to the recruiter and/or accessibility coordinator, so that the appropriate accommodations may be provided in consultation with the applicant at every stage of the recruitment process, upon request.

Candidates that have been offered a position with Virox will be notified of Virox's policies and procedures for accommodating employees with disabilities at time of hire.

## INDIVIDUAL ACCOMMODATION PLANS & REQUESTING ACCOMMODATIONS ON THE BASIS OF HUMAN RIGHTS

Virox will maintain a written process for the development of documented individual accommodation plans for employees with disabilities and/or those that require accommodation related to other Human Rights Code Related Grounds. If requested, information regarding accessible formats, communication supports, and individualized workplace emergency response information (where required), and/or other accommodations provided will be included in the individual accommodation plan.

**It is to be understood that the onus for initiating accommodation requests is with the employee who requires the accommodation.**

Individuals who require accommodation for a disability or other ground protected by the Ontario Human Rights Code must complete and submit a Request for Accommodation form to the Human Resources Department. The Request for Accommodation form may be obtained from the Human Resources department. To ensure the appropriate accommodations are provided, medical information or other supporting documentation regarding the individual's accommodation requirements, efforts to self-accommodate (where appropriate), and the length of time the accommodation is needed for, may be required and will be kept confidential.

It is the employee's responsibility to cooperate with the Company during the accommodation process and to ensure that the company has the appropriate information to accommodate their needs. Employees requesting accommodation are also expected to be reasonable in responding to the proposals put forward by the Company and to provide updates on any changes in their situation or accommodation requirements as needed and/or requested.

If an employee is absent from work due to disability for an extended period and requires accommodation to return to work, Virox will develop an individual accommodation plan for that individual, in consultation with disability benefits providers and the individual's doctor, where suitable and necessary.

All individual accommodation plans will be reviewed on an annual basis at the latest. Depending on the individual's circumstances and the required accommodations, more frequent reviews may be required. The Company reserves the right to seek advice of a specialist (with the employee's consent), where the request for accommodation involves issues outside the expertise of the Company.

## DENIED REQUESTS AND APPEAL PROCESS

The Company will make every reasonable effort possible to accommodate disability and other Human Rights Code-related requests for accommodations up to the point of undue hardship.

Requests for accommodation may be denied if the employee requesting accommodation refuses or fails to provide the necessary information required to develop the accommodation plan.

Should an accommodation request be denied or an alternative offered by the Company be refused, the employee requesting the accommodation will be informed of the reasons for the decision and their right to request a review of the decision. The employee may submit a written request for reconsideration to the Human

Resources department.

## PERFORMANCE MANAGEMENT

Individual accommodation plans and/or the accessibility needs of an employee will be reviewed and considered prior to and when managing employee performance to ensure all relevant accommodations are implemented in the session and considered in the assessment and discussion.

## PROFESSIONAL, CAREER DEVELOPMENT, ADVANCEMENT, & REDEPLOYMENT

Individual accommodation plans or accessibility needs shall be reviewed and considered to ensure that individuals with disabilities have access to training, professional and career development and advancement within the company that meets their unique needs and requirements.

In the event that Virox chooses to use redeployment as an alternative to layoffs when a particular job or department has been eliminated, Virox will take into account the accessibility needs and skills of its employees with disabilities to determine if alternative work within the organization is available and can be offered.

## RETURN TO WORK PROCESS

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Virox is committed to supporting our employees in their early and safe return to work following work-related and non-work-related medical and/or disability related leaves of absence.

In recognition that productive work can be an important aspect of the recovery process, Virox will endeavor to return employees to suitable and productive work as early as possible following an injury or illness, provided that this can be done safely and without compromising the health of the employee and/or the safety of others.

A graduated return to work may be attempted if approved by the employee's physician, even if the types of duties or the number of hours the employee can work is initially very limited, as this may have a positive impact on the employee's recovery. If the employee's physician approves a graduated return to work, it is expected that the employee will cooperate with the plan.

## EMPLOYEE RESPONSIBILITIES

To ensure a successful early and safe return to work, employees are responsible for:

- Reporting any injury immediately to their immediate manager, HR, joint health and safety committee member, and leadership team representative.
- Maintaining contact with the organization while away from work, regardless of the length of the absence.
- Providing regular updates to the Human Resources Department on any changes in health condition and medical status, in terms of expected return to work date and/or how long the doctor believes any medical restrictions may last. Information pertaining to diagnosis are not required; however, a doctor's note outlining expected return to work date and restrictions is required.
- Cooperating in returning to work that is within the medical restrictions (if any) as set by the physician.
- Providing information and/or updates on functional abilities and medical restrictions from the physician, when requested.

- Participating in the creation and execution of the Accommodation and/or Return to Work plan.
- Helping the Company to identify potential work opportunities and accommodation strategies.
- Cooperating with any workers' compensation requirements or the company's disability benefits provider; and,
- Reporting any difficulties experienced in the Return-to-Work process to the Human Resources Department;
- Providing feedback upon completing the Return-to-Work plan.

Employees should be aware that the Company may ask for documentation and information to be provided, even though medical documentation may have already been provided to a third party, ex: for workers' compensation benefits or disability benefits. The reason for this is that different organizations may need the information for different purposes, such as assessing entitlement to benefits etc. However, the Company requires specific information to determine how best to assist in returning employees to work safely. Employees that fail to cooperate and/or provide documentation requested by the Company may be subject to disciplinary action, up to and including termination of employment for cause due to failure to comply with the requirements of this policy.

## SUPERVISOR RESPONSIBILITIES

- Ensuring return to work and/or accommodation plan is being followed;
- Supporting the accommodation process;
- Working with the employee to determine accommodation solutions, where appropriate;
- Providing updates to the HR Department and Leadership Team Representative on the progress of the return-to-work plan;
- Providing feedback on the Return-to-Work Plan upon completion of the plan.

## COMPANY RESPONSIBILITIES

- Providing employees with information and forms to help apply for benefits, whether for workers' compensation (for work-related injuries and illnesses) or disability benefits (for non-workplace-related injuries and illnesses);
- Providing employees with information and forms to help apply for Leaves available, should the situation require an employee to take a Leave of Absence to address and manage their concerns;
- Informing employees of the Company's policies and procedures;
- Informing employees of their legal rights and responsibilities concerning safe work, accommodation and the Return-to-Work program;
- Maintaining contact with the employee during their absence;
- Meeting with the employee to discuss Return to Work options, including a graduated return to work or modified duties if necessary;
- Following up with the employee on a regular basis to discuss the employee's progress;
- Developing a written return to work plan in collaboration with the employee, their supervisor and treating health professional (through the provision of functional abilities information);
- Requesting medical information and documentation from the employee where necessary to develop an accommodation, modified duties or a graduated return-to-work plan;
- Identifying and offering modified duty assignments;
- Identifying and discussing possible accommodation solutions.

## EMERGENCY RESPONSE PROCEDURES

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In the event that Virox makes emergency procedures, plans and public safety information available to the public, it will be provided in an accessible format or with appropriate communication supports, upon request. Virox provides employees with disabilities individualized workplace emergency response information when the employee's disability is such that the individualized information is necessary and that Virox is aware of the need for accommodation due to the employee's disability.

If an employee who receives individualized workplace emergency response information requires assistance,

Virox shall, with the employee's consent:

- Provide the workplace emergency response information to the person designated to provide assistance.
- Provide the information required under this section as soon as practicable after becoming aware of the need for accommodation due to the individual's disability.
- Review the individualized workplace emergency response information, when the employee moves to a different location in the organization; when the employee's overall accommodations needs, or plans are reviewed; and when Virox reviews its general emergency response policies.

## REPORTING

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In accordance with the requirements of the Accessibility for Ontarians with Disabilities Act, 2005, Virox will complete and submit its compliance report to the Ontario Government every 3 years.

## FEEDBACK AND QUESTIONS CONCERNING THIS POLICY

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Virox values feedback on its accessibility and accommodation processes and the way it provides service to individuals with disabilities. For any questions concerning this policy and to assist Virox in improving its policies and procedures concerning accessibility and accommodation, questions and/or feedback may be directed to the accessibility coordinator in person, via telephone, fax, e-mail or in writing to:

**Accessibility Coordinator**

Virox Technologies Inc.  
2770 Coventry Rd.  
Oakville, ON L6H 6R1  
T. 905.813.0110 ext. 212  
E. [HumanResources@virox.com](mailto:HumanResources@virox.com)

The Accessibility Coordinator will respond within seven (7) business days either in writing, in person, by e-mail or telephone acknowledging receipt of feedback and will set out the action to be taken in response to any concerns. The Accessibility Coordinator will work with the appropriate departments and/or individuals to provide information in accessible formats, upon request.



## REVISIONS TO THIS POLICY

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Virox is committed to developing accessibility and accommodation policies for its customers, business partners, and employees in a manner that respects and promotes the dignity and independence of persons with disabilities. Therefore, no changes shall be made to this policy before considering the impact on persons with disabilities.

Any policy of Virox that does not respect and promote the dignity and independence of persons with disabilities will be modified or removed.

Revisions to this policy will be made as needed by the Human Resources Department based on feedback received on how we can create a more inclusive and accessible environment. The revised policy will be made available on our website and will be provided in alternate formats on request.