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# Accessibility for Ontarians with Disabilities

## *Multi-Year Accessibility Plan*

### **Section A: Background and Overview**

In 2005, the Ontario government passed the Accessibility for Ontarians with Disabilities Act (the “AODA”). The Integrated Accessibility Standards Regulations established under the AODA requires companies to establish and maintain a multi-year accessibility plan to outline the company’s commitment to address accessibility matters as described in this plan. This plan represents Sanofi Pasteur Limited Company, sanofi-aventis Canada Inc. and Sanofi Consume Health Inc. which are collectively known as the Sanofi Group. The Sanofi Group is commitment to achieve an accessible and inclusive environment for persons with disabilities.

According to the Accessibility for Ontarians with Disabilities Act, 2005, “disability” means,

- any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
- a condition of mental impairment or a developmental disability,
- a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- a mental disorder, or
- an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997;

The Sanofi Group employs close to 1600 people in Ontario and is one of the largest investors in Canada’s biopharmaceutical research and development with investments of \$130 million. The Sanofi Group has approximately 75 ongoing clinical trials and therapeutic areas of study including cardiovascular disease, internal medicine, metabolism/diabetes, neurology, oncology and thrombosis. The objective of accessibility is aligned with values contained in both our global and local policies.

The Sanofi Group strives to meet the needs of its employees and customers with disabilities and is working hard to remove and prevent barriers to accessibility. Our business is committed to fulfilling our requirements under the Accessibility for Ontarians with Disabilities Act. This accessibility plan outlines the steps The Sanofi Group is taking to meet those requirements and to improve opportunities for people with disabilities.

Our plan shows how The Sanofi Group will play its role in making Ontario an accessible province for all Ontarians.

## Section-B: Strategies and Actions

### Section One: Past Steps to Remove and Prevent Barriers

In 2011 the Sanofi Group created an AODA cross-functional team of various employees within the company to address the requirements and compliance matters of the new law. We continue to have various corporate initiatives that promote awareness of issues relating to diversity in the workplace, as well as mental health week campaign information.

The following are some examples of some accessibility initiatives the Sanofi Group has implemented:

#### Customer Service

- Actions taken and described in our Accessibility Policy to ensure our organization has remained in compliance with the Customer Service Standard, including: .
  - (i) a customized customer feedback form was created .
  - (ii) mandatory training of customer service representatives to address any concerns from members of the public

#### Information and Communications

- Upon request the Sanofi Group will provide and or arrange for accessible formats and communication supports for persons with disabilities.

#### Employment

- Posting of co-op programs in university and colleges (boards directed to interests of specific groups)
- Accommodation offered to job applicants for interviews
- Accommodations offered for all events
- Creation of Accessibility Policy
- Individual Emergency Response Plan including:
  - all existing and new employees who require individual emergency response plan are provided with a customized plan, which the company updates if the individual changes workplace location
  - all managers are made aware of the customized plan in place for the employee
- Disability Management and Return to Work / Modified Return to Work Policies / Programs

## Multi-Year Accessibility Plan – Integrated Accessibility Standards (“IAS”)

		Status		
Customer Service Standard	Action Plan	In Progress	Ongoing	Complete
<b>General: Establishing Accessibility Policies</b>				
Develop, implement and maintain polices governing how the Sanofi Group achieves or will achieve accessibility through meeting the requirements of the IAS.	An Accessibility Policy meeting the IAS requirements has been developed and implemented.			Complete
Statement of organizational commitment to meeting the accessibility needs of persons with disabilities in a timely manner.	The Accessibility policy has a statement of organizational commitment.			Complete
Prepare one or more written documents describing the policies and make the policies publicly available and provide them in an accessible format upon request.	Policy is available upon request and will be accessible upon request.	In Progress		
<b>General: Accessibility Plans</b>				
Establish, implement, maintain and document a multi-year accessibility plan, which outlines the Sanofi Group strategy to prevent and remove barriers and meet requirements of IAS.				
Post the accessibility plan on the website, if any, and provide the plan in an accessible format upon request.				
Review and update the accessibility plan at least once every five years.	An Accessibility Plan has been established, implemented, maintained and documented meeting the requirements of the IAS			Complete

**General: Training**

<p>Provide training on the requirements of the accessibility standards referred to in the IAS and the Human Rights Code as it pertains to persons with disabilities to:</p> <ul style="list-style-type: none"> <li>- All employees and volunteers</li> <li>- All persons who participate in developing the organization's policies</li> <li>- All other persons who provide goods, services or facilities on behalf of the organization</li> </ul>	<p>Training meeting the IAS requirement has been implemented and deployed to all persons who require training.</p> <p>Measures are in place to document and track training.</p>			<p>Complete</p>
<p>The training required in subsection 1 is appropriate to the duties of employees, volunteers and other persons</p>	<p>Training is scheduled within two weeks of new hires starting the organization.</p>			<p>Complete</p>
<p>Training is done as soon as practicable</p>	<p>Training will be provided to all employees when changes to policies occur.</p>	<p>In Progress</p>		
<p>Training is provided on changes to policies and on an ongoing basis</p>				
<p>Training records are maintained for all training, including the date of training and the number of individuals in attendance.</p>				

**General: Compliance Reporting**

<p>Ensure the Sanofi Group files online compliance reports with the Schedule established under IAS.</p>	<p>The Sanofi Group has been compliant with online compliance reports in accordance with IAS</p>			<p>Complete</p>
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<b>Information and Communications Standards: Feedback</b>				
<p>Ensure the Sanofi Group processes for receiving and responding to feedback are accessible to person with disabilities by providing or arranging for accessible formats and communication supports upon request.</p> <p>Notify the public about the availability of accessible formats and communication supports.</p>	<p>Upon request the Sanofi Group will provide and or arrange for accessible formats and communication supports for persons with disabilities.</p>			<p>Complete</p>
<b>Information and Communications Standards: Accessible Formats and Communication Supports</b>				
<p>Upon request provide or arrange for accessible formats and communication supports for persons with disabilities.</p> <ul style="list-style-type: none"> <li>-Provide in a timely manner that takes into account the person's accessibility needs due to disability; and</li> <li>- Provide at a cost that is no more than the regular cost charged to other persons.</li> </ul> <p>Consult with the person making the request to determine the suitability of an accessible format or communication support.</p> <p>Notify the public about the availability of accessible formats and communication supports</p>	<p>Upon request the Sanofi Group will provide and or arrange for accessible formats and communication supports for persons with disabilities.</p>			<p>Complete</p>
<b>Information and Communications Standards: Emergency Procedure, Plan or Public Safety Information</b>				
<p>Upon request provide in an accessible format or with appropriate communication supports, the Sanofi Group emergency procedures, plans or public safety information that it makes available to the public.</p>	<p>Emergency response plans are individualized and will be supplied in an accessible format as appropriate.</p>			<p>Complete</p>

**Information and Communications Standards: Accessible Websites and Web Content**

<p>a) Ensure the websites and web content conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0.</p>	<p>Websites and web content conforms to the world wide web consortium web content accessibility guidelines.</p>			<p>Complete</p>
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**Employment Standards: Recruitment, General**

<p>a) Notify employees and the public about the availability of accommodations for applicants with disabilities in the Sanofi Group recruitment process.</p>	<ul style="list-style-type: none"> <li>• Review the methods for posting Sanofi positions (website, campus posting)</li> <li>• Incorporate language in postings and Sanofi career websites (internal and external) to make applicants aware that accommodation is available in compliance with AODA.</li> </ul>			<p>Complete</p>
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**Employment Standards: Recruitment, Assessment or Selection Process**

<p>a) During recruitment process, notify job applicants, when they are individually selected to participate in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.</p> <p>b) If the selected applicant requests accommodation, 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.</p>	<ul style="list-style-type: none"> <li>• Include language in all notifications to applicants for interview (email, phone) that in accordance with AODA, accommodation is available upon request.</li> <li>• Provide diversity –related guidance to Recruiters on how to engage in conversations when handling accommodation requests, in accordance with AODA.</li> <li>• Educate Recruiters on inclusive selection strategies and on how to implement and request support for accommodation related requests, in accordance with AODA.</li> <li>• Review recruitment process (arrival, rooms) to ensure barriers may be removed or accessible features provided, upon request in accordance with AODA.</li> </ul>			<p>Complete</p>
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**Employment Standards: Notice to Successful Applicants**

<p>a) When making offers of employment, notify the successful applicant of the Sanofi Group Policies for accommodating employees with disabilities.</p>	<ul style="list-style-type: none"> <li>• Include language when offering employment to applicants that in accordance with AODA, accommodation is available upon request.</li> <li>• Include in offer letter a section regarding accessibility policies and where to access additional information on the internal (and external) internet.</li> </ul>			<p align="center">Complete</p>
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**Employment Standards: Informing Employees of Supports**

<p>Inform employees of the Sanofi Group policies used to support employees with disabilities. Provide the above information as soon as practicable after the employee begins employment. Provide updated information to employees whenever there is a material change to existing policies on the provision of job accommodations.</p>	<p>All policies are available to employees on the company intranet site.</p>			<p align="center">Complete</p>
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**Employment Standards: Accessible Formats and Communication Supports for Employees**

<p>Upon request, consult with an employee to provide or arrange for the provision of accessible formats and communication supports for information needed to perform employees job and information generally available to employees in the workplace.</p>	<p>Upon request the Sanofi Group will provide and or arrange for accessible formats and communication supports for persons with disabilities.</p>			<p align="center">Complete</p>
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**Employment Standards: Workplace Emergency Response Information**

<p>Provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability.</p> <p>If the employee provides consent, provide the employee's individualized workplace emergency response information to another person designated by the employer to provide assistance to the employee.</p> <p>Review the individualized workplace emergency response information when:</p> <ul style="list-style-type: none"> <li>i. the employee moves to a different work location;</li> <li>ii. the employee's overall accommodation needs or plans are reviewed; and</li> <li>iii. when the employer reviews its general emergency response information.</li> </ul>	<p>Individualized workplace emergency response information is provided to all employees who have been identified with a disability.</p>			<p>Complete</p>
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**Employment Standards: Documented Individual Accommodation Plans**

<p>Develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities that includes all of the considerations set out in section 28(2) and (3) of the IAS.</p>	<p>Policies are in place to support the process and accommodation plan for all employees including those with disabilities.</p>			<p>Complete</p>
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**Employment Standards: Return to Work Process**

<p>Develop and have a documented a return to work process employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.</p> <p>Ensure the return to work process outlines the Sanofi Group will take to facilitate the employee's return to work and that it uses documented individual accommodation plans, if any.</p>	<p>The Sanofi Group has a return to work process which outlines the process and steps which would be used to accommodate a return to work for employees with a disability. In addition an individual accommodation plan would be documented.</p>			<p>Complete</p>
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**Employment Standards: Performance Management**

<p>Take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when applying performance management.</p>	<p>Current performance review processes ensure accessibility features (i.e., forms accessible, System accessible 24/7 in different languages)</p> <p>Training or communications to performance managers provides awareness on effective communication strategies (DEEP Principles, STAR Feedback) ,</p> <p>Realistic deadlines to allow for manager to review and understand employee feedback prior to meeting, and reasonable accommodation.</p>			<p>Complete</p>
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<b>Employment Standards: Career Development and Advancement</b>				
<p>a) Take into account the accessibility needs of employees with disabilities as well as any individual accommodation plans, when providing opportunities for career development and advancement to employees with disabilities.</p>	<p>Ensure current and future training and materials are developed with accessibility features in mind</p> <p>Ensure promotion criteria, practices and processes take into account individual accommodation needs and plans in accordance with AODA</p>			Complete
<b>Employment Standards: Redeployment</b>				
<p>Take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.</p>	<p>Review and update of current transfer and redeployment practices and processes to ensure accommodation plans are referenced</p> <p>Educate hiring managers to ensure redeployment efforts/activities take into account the employee's accommodation needs</p>			Complete

**Part 5: Feedback/Questions**

The Sanofi Group is committed to the AODA objective to treat all people in a manner that allows them to maintain dignity and independence. We will continue to work towards removing barriers for persons with disabilities. We support the Ontario government's objective as outlined in the AODA to make Ontario accessible by 2025.

We welcome any feedback or comments on anything contained in this plan.

**For the public:**

If you have any questions or concerns, or other feedback related to the Sanofi Group's Multi-Year Accessibility Plan, please send an email to [CAINTERNET@sanofi.com](mailto:CAINTERNET@sanofi.com) or write 2905 Place Louis-R.-Renaud, Laval, QC H7V 0A3, Canada attention Communications.

**For Sanofi employees:**

If you have any questions or concerns, or other feedback related to Sanofi's Multi-Year Accessibility Plan, please send an email to [myHR@sanofi.com](mailto:myHR@sanofi.com) or call 1- 855-myHRrep (1-855-694-7737) Monday – Friday: 8 a.m. – 6 p.m. (ET).