

# Accessibility Standards for Customer Service Policy (Ontario, Canada)

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## Intent

This policy is intended to meet the requirements of the *Accessibility Standards for Customer Service, Ontario Regulation 429/07* under the *Accessibility for Ontarians with Disabilities Act, 2005* (hereinafter, “*Ontario Regulation 429/07*”). This policy applies to the business activities of Patheon Inc. (hereinafter, “Patheon”), namely, the provision of pharmaceutical development, pharmaceutical manufacturing, and related services to Patheon’s third-party clients, including their employees, agents, and/or contractors (hereinafter collectively referred to, in the plural, as “customers” and, individually, as a “customer”).<sup>1</sup>

All services provided by Patheon shall follow the principles of dignity, independence, integration and equal opportunity.

## Scope

- a) This policy applies to the provision of services at premises operated by Patheon in the Province of Ontario, Canada.
- b) This policy applies to each employee, volunteer, agent and/or contractor of Patheon (hereinafter collectively referred to as an “employee”) who deals with customers on behalf of Patheon, including if the provision of any services occurs off the premises of Patheon.
- c) The section of this policy that addresses the use of guide dogs, service animals and service dogs only applies to the provision of services that takes place at premises operated by Patheon.
- d) This policy shall also apply to all persons who participate in the development of Patheon’s policies, practices and procedures governing the provision of services to customers.

## Definitions

**Assistive Device** – is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that customers bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

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<sup>1</sup> *Ontario Regulation 429/07* applies to both the provision of services and goods; however, Patheon does not sell goods to its customers.

Disability – as defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*, the term “disability” refers to:

- 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 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* of Ontario.

Guide Dog – is a highly-trained working dog that has been trained at one of the facilities listed in *Ontario Regulation 58* under the *Blind Persons’ Rights Act* of Ontario, to provide mobility, safety and increased independence for people who are blind.

Service Animal – as reflected in *Ontario Regulation 429/07*, an animal is a service animal for a person with a disability if:

- it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

Service Dog – as reflected in *Health Protection and Promotion Act, Ontario Regulation 562*, a dog other than a guide dog for the blind is a service dog if:

- it is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability;
- or the person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.

Support Person – as reflected in *Ontario Regulation 429/07*, a support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to goods and services.

## General Principles

In accordance with *Ontario Regulation 429/07*, this policy addresses the following subjects organized under the following sections:

### A. The Provision of Services to Persons with Disabilities

- B. Assistive Devices
- C. Guide Dogs, Service Animals and Service Dogs
- D. Support Persons
- E. Notice of Disruptions in Service
- F. Customer Feedback Process
- G. Training
- H. Notice of Availability and Format of Documents

A. The Provision of Services to Persons with Disabilities

Patheon will make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity, by:

- ensuring that all customers receive the same value and quality;
- allowing customers with disabilities to do things in their own ways, at their own pace, when accessing services, as long as this does not present a safety risk, is not excluded by law, or is not otherwise a concern in respect of compliance with standards of the pharmaceutical industry that are generally accepted in accordance with applicable laws, regulations, guidelines, and/or rules, such as the GMP (i.e. good manufacturing practices) rules of the World Health Organization (such safety risk, exclusion, or other concern hereinafter collectively referred to as a “safety concern”);
- using alternative methods when possible to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner;
- taking into account individual needs when providing services; and
- communicating in a manner that takes into account the customer's disability.

B. Assistive Devices

Persons with disabilities may use their own assistive devices as required when accessing services provided by Patheon.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of services. For example, open flames and oxygen tanks cannot be near one another. Therefore, the accommodation of a customer with an oxygen tank may involve ensuring the customer is in a location that would be considered safe for both the customer and business. Or, where elevators are not present and where an individual requires assistive devices for the purposes of mobility, service will be provided in a location that meets the needs of the customer.

C. Guide Dogs, Service Animals and Service Dogs

A customer with a disability who is accompanied by a guide dog, service animal or service dog will be allowed access to premises where other customers may be normally permitted access (that is, from time to time and in accordance with Patheon’s regular business practices), unless such access for a customer with a disability is a safety concern.

“No pet” policies do not apply to guide dogs, service animals and/or service dogs.

#### Food Service Areas:

A customer with a disability that is accompanied by a guide dog or service dog will be allowed access to food service areas, unless otherwise excluded by law.

Other types of service animals are not permitted into food service areas due to the *Health Protection and Promotion Act, Ontario Regulation 562, Section 60*.

#### Alternative Methods:

If a guide dog, service animal or service dog is a safety concern (including those cases where excluded by law; see some applicable laws below), Patheon will offer alternative methods to enable the person with a disability to access services, when possible (for example, securing the animal in a safe location and offering the guidance of an employee).

#### Applicable Laws:

The *Health Protection and Promotion Act, Ontario Regulation 562, Section 60*, normally does not allow animals in places where food is manufactured, prepared, processed, handled, served, displayed, stored, sold or offered for sale. It does allow guide dogs and service dogs to go into places where food is served, sold or offered for sale. However, other types of service animals are not included in this exception.

*Dog Owners' Liability Act, Ontario* (the “DOLA”): If there is a conflict between, on the one hand, a provision of the DOLA or of a regulation under the DOLA or any other law relating to banned breeds (such as pit bulls), and, on the other hand, a provision of a by-law passed by a municipality relating to these breeds, the provision that is more restrictive in relation to controls or bans on these breeds prevails.

#### Recognizing a Guide Dog, Service Dog and/or Service Animal:

If it is not readily apparent that the animal is being used by the customer for reasons relating to his or her disability, Patheon may request verification from the customer.

Verification may include:

- a letter from a physician or nurse confirming that the person requires the animal for reasons related to the disability;
- a valid identification card signed by the Attorney General of Canada; or,
- a certificate of training from a recognized guide dog or service animal training school.

#### Care and Control of the Animal:

The customer that is accompanied by a guide dog, service dog and/or service animal is responsible for maintaining care and control of the animal at all times.

### Allergies:

If a health concern presents itself (for example, in the form of a severe allergy to the animal), Patheon will make all reasonable efforts to meet the needs of all individuals involved.

### D. Support Persons

If a customer with a disability is accompanied by a support person, Patheon will ensure that both persons are allowed to enter the premises together and that the customer is not prevented from having access to the support person.

There may be times where seating and availability prevent the customer and support person from sitting beside each other. In these situations, Patheon will make every reasonable attempt to resolve the issue.

In situations where, in the presence of the support person, confidential information of the customer might be discussed, consent will be obtained by Patheon from the customer, and, in the case of confidential information of Patheon, confidentiality undertakings will be obtained by Patheon from the support person, prior to any conversation where confidential information might be discussed.

### E. Notice of Disruptions in Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Patheon. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use Patheon's services, reasonable efforts will be made to provide advance notice. In some circumstances, such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

### Information in Notifications:

In the event that a notification needs to be posted, the following information will be included, unless it is not readily available or known:

- services that are disrupted or unavailable
- reason for the disruption
- anticipated duration.

### Notifications Options:

When disruptions occur, Patheon will provide notice by:

- posting notices in conspicuous places, including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption and/or on the Patheon website;
- contacting customers with appointments; or

- by any other method that may be reasonable under the circumstances.

F. Customer Feedback Process

Patheon shall provide customers with the opportunity to provide feedback on dealings between Patheon and customers with disabilities. Information about the feedback process will be readily available to all customers and notice of the process will be made available on the Patheon website. Feedback forms will be available upon request. Alternate methods of providing feedback are also available, such as verbally (in person or by telephone) or in any written form (howsoever delivered). See below.

Submitting Feedback:

Customers can submit feedback to:

- For feedback relating to Patheon's services in Toronto (Mississauga) or Burlington:

Patheon Inc.  
Human Resources Department  
2100 Syntex Court, Mississauga, Ontario, L5N 7K9 Canada  
Tel.: (905) 821-4001 (please ask for "HR Department")  
Fax: (905) 816-3958  
hr.canadian.email@patheon.com (please specify "Toronto" or "Burlington" in the "Subject" line)

- For feedback relating to Patheon's services in Whitby:

Patheon Inc.  
Human Resources Department  
111 Consumers Drive, Whitby, Ontario, L1N 5Z5 Canada  
Tel.: (905) 668-3368 (please ask for "HR Department")  
Fax: (905) 668-2747  
hr.canadian.email@patheon.com (please specify "Whitby" in the "Subject" line)

Customers who wish to provide feedback while onsite may do so verbally or by completing a customer feedback form while still on the premises. When a customer indicates to an employee the desire to provide feedback while onsite, the employee shall contact the Human Resources Department.

Actions to be Taken:

A customer who provides formal feedback will receive acknowledgement of the feedback, and will be informed of any resulting action or decision based on the concern(s) or complaint(s) submitted. As an exception, a customer who expressly indicates a desire to not be contacted in connection with the feedback will not be contacted.

The feedback will be reviewed by the Human Resources Department and shared with other internal stakeholders, as appropriate, to ensure full analysis and to consider any further steps to

be taken. Patheon will also take the feedback into consideration as part of its ongoing policy and process review.

#### G. Training

Training will be provided to:

- a) all employees, volunteers, agents and/or contractors who deal with customers on behalf of Patheon; and,
- b) those who are involved in the development and approval of customer service policies, practices and procedures.

#### Training Provisions:

As reflected in *Ontario Regulation 429/07*, regardless of the format, training will cover the following:

- A review of the purpose of the *Accessibility for Ontarians with Disabilities Act, 2005*.
- A review of the requirements of *Ontario Regulation 429/07*.
- Instructions on how to interact and communicate with people with various types of disabilities.
- Instructions on how to interact with people with disabilities who:
  - use assistive devices;
  - require the assistance of a guide dog, service dog or other service animal; or
  - require the use of a support person.
- Instructions on how to use equipment or devices that may be available at our premises or that we may provide in order to help people with disabilities.
- Instructions on what to do if a person with a disability is having difficulty accessing our services.
- Patheon's policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

#### Training Schedule:

Patheon will provide training as soon as practicable. As regards new employees, volunteers, agents and/or contractors who deal with customers on behalf of Patheon, training will be provided during orientation or otherwise upon commencement of engagement. Revised training will be provided in the event of changes to legislation, procedures and/or practices.

#### Record of Training:

Patheon will keep a record of training that includes the dates training was provided and the number and names of persons who attended the training.

## H. Notice of Availability and Format of Documents

Patheon shall notify customers that the documents related to *Ontario Regulation 429/07* are available upon request and in a format that takes into account the customer's disability. This notification will be posted (i) in a conspicuous place on each of the premises operated by Patheon (in Ontario), (ii) on the Patheon website, and/or (iii) by any other reasonable method.

## Administration

If you have any questions or concerns about this policy or its related procedures please contact:

- For questions or concerns relating to Patheon's services in Toronto (Mississauga) and/or Burlington:

Patheon Inc.  
Human Resources Department  
2100 Syntex Court, Mississauga, Ontario, L5N 7K9 Canada  
Tel.: (905) 821-4001 (please ask for "HR Department")  
Fax: (905) 816-3958  
hr.canadian.email@patheon.com (please specify "Toronto" or "Burlington" in the "Subject" line)

- For questions or concerns relating to Patheon's services in Whitby:

Patheon Inc.  
Human Resources Department  
111 Consumers Drive, Whitby, Ontario, L1N 5Z5 Canada  
Tel.: (905) 668-3368 (please ask for "HR Department")  
Fax: (905) 668-2747  
hr.canadian.email@patheon.com (please specify "Whitby" in the "Subject" line)

This policy and its related procedures will be reviewed as required in the event of legislative changes.

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## Referenced Documents:

- *Accessibility for Ontarians with Disabilities Act, 2005*
- *Accessibility Standards for Customer Service, Ontario Regulation 429/07*
- *Blind Person's Rights Act, 1990*
- *Dog Owners' Liability Act, Ontario*
- *Health Protection and Promotion Act, Ontario Regulation 562*
- *Ontario Human Rights Code, 1990*



## Acknowledgement & Agreement

I acknowledge that I have read and understand the Accessibility Standards for Customer Service Policy (Ontario, Canada) of Patheon. Further, I agree to adhere to this policy and, if any employees, volunteers, agents and/or contractors are working under my direction, I will seek to ensure that they also adhere to this policy. I understand that if I violate this policy, I may face disciplinary action, up to and including termination of employment.

Name (print): \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Witness  
Name (print): \_\_\_\_\_

Witness  
Signature: \_\_\_\_\_