#### Paracel Laboratories Ltd. - Multi-Year Accessibility Plan

#### Introduction

This document outlines the plan that Paracel will follow to ensure the company meets its obligations under The Accessibility for Ontarians with Disabilities Act.

#### **Statement of Commitment to Accessibility**

Paracel is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence.

We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and by meeting our accessibility requirements under Ontario's accessibility laws.

#### References

Accessibility for Ontarians with Disabilities Act, 2005. (AODA)

ONTARIO REGULATION 191/11, Integrated Accessibility Standards. Last amendment 165/16.

### **Accessibility Plan Details**

Multi-year plan – prevent and remove barriers to address the current and future requirements of the AODA, and to fulfill Paracel's commitment as outlined in the Paracel Accessibility Policy.

# **GENERAL REQUIREMENTS**

Application	Requirement	Action	Status
Establishment of accessibility policies	Develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements referred to in this Regulation. O. Reg. 191/11, s. 3 (1).	Policies developed.	Review and update in 2022
	Prepare one or more documents describing the policies it developed under subsection (1) and make the documents publicly available and, on request, provide them in an accessible format. O. Reg. 165/16, s. 3 (1).	Procedural Document available that describes the policies/procedures	Review and update in 2022
Accessibility plans	Establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under this Regulation	Plan developed to meet requirements in O.reg 191/11	Review and update in 2022
	Post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request	Current plan posted September 2021	Review and update in 2022
	Review and update the accessibility plan at least once every five years. O. Reg. 191/11, s. 4 (1).	Review process in place	Review and update in 2022
Training	Ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to,	Training included in initial training plan for each new employee	Review and update in 2022

o all persons who are an employee of, or a volunteer with, the organization; o all persons who participate in developing the organization's policies; and o all other persons who provide goods, services or facilities on behalf of the organization. O. Reg. 191/11, s. 7 (1); O. Reg. 165/16, s. 5 (1).		
Keep a record of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided. O. Reg. 191/11, s. 7 (5).	Training indicated on employee orientation checklist	Review and update in 2022

# **INFORMATION & COMMUNICATION STANDARDS**

Application	Requirement	Action	Status
Feedback	Every obligated	Included in the Feedback	Review and update
	organization that has	policies of the Paracel	in 2022
	processes for receiving	Accessibility procedures.	
	and responding to		
	feedback shall ensure that		
	the processes are		
	accessible to persons with		
	disabilities by providing or		
	arranging for the provision		
	of accessible formats and		
	communications supports,		
	upon request. O. Reg.		
	191/11, s. 11 (1).		
	Notify the public about	Notification done when	Review and update
	the availability of	requests are made.	in 2022
	accessible formats and		
	communications supports		
	with respect to the		
	feedback process. O. Reg.		
	165/16, s. 7.		
Accessible formats	Provide or arrange for the	Included in the Feedback	Review and update
and communication	provision of accessible	policies of the Paracel	in 2022
supports	formats and	Accessibility procedures.	
	communication supports		
	for persons with		
	disabilities, (a) in a timely		
	manner that takes into		
	account the person's		
	accessibility needs due to		
	disability; and (b) at a cost		
	that is no more than the		
	regular cost charged to		
	other persons. O. Reg.		
	191/11, s. 12 (1).		
	Consult with the person	Included in the Feedback	Review and update
	making the request in	policies of the Paracel	in 2022
	determining the suitability	Accessibility procedures.	
	of an accessible format or		
	communication support.		
	O. Reg. 191/11, s. 12 (2).	Notification dans	Davious and data
	Notify the public about	Notification done when	Review and update
	the availability of	requests are made.	in 2022
	accessible formats and		
	communication supports.		
	O. Reg. 191/11, s. 12 (3).		

_		Review and update
	requests are made.	in 2022
information and makes		
the information available		
to the public, the		
obligated organization		
shall provide the		
information in an		
accessible format or with		
appropriate		
communication supports,		
as soon as practicable,		
upon request. O. Reg.		
191/11, s. 13 (1).		
- make their	Update will be done when	Revision/upgrade
internet websites and web	the website is	date not
content conform with the	upgraded/revised.	determined.
World Wide Web		
Consortium Web Content		
Accessibility Guidelines		
(WCAG) 2.0, initially at		
Level A and increasing to		
ŭ		
in accordance with the		
schedule set out in this		
section. O. Reg. 191/11. s.		
	to the public, the obligated organization shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request. O. Reg. 191/11, s. 13 (1).  - make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA, and shall do so in accordance with the	organization prepares emergency procedures, plans or public safety information and makes the information available to the public, the obligated organization shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request. O. Reg. 191/11, s. 13 (1).  - make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out in this section. O. Reg. 191/11, s.

## **EMPLOYMENT STANDARDS**

Application	Requirement	Action	Status
Recruitment, general	Notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes. O. Reg. 191/11, s. 22.	This is done at the time of contact with individuals.	Review and update in 2022
Recruitment, assessment or selection process	During a recruitment process, an employer shall 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.  O. Reg. 191/11, s. 23 (1).	This is done at the time of contact with individuals.	Review and update in 2022
	If a selected applicant requests an accommodation, the employer shall 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 disability. O. Reg. 191/11, s. 23 (2).	This is followed if a request is made.	Review and update in 2022
Notice to successful applicants	Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities. O. Reg. 191/11, s. 24.	Part of hiring process.	Review and update in 2022
Informing employees of supports	Every employer shall inform its employees of its policies used to support	Part of hiring process.	Review and update in 2022

	communication support. O. Reg. 191/11, s. 26 (2).		
Workplace emergency response information	Every employer shall 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. O. Reg. 191/11, s. 27 (1).	Individualized emergency response plans are made available to affected employees when required.	Review and update in 2022
Documented individual accommodation plans	Employers shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities. O. Reg. 191/11, s. 28 (1).	Requirement included in H&S policies.	Review and update in 2022
	The process for the development of documented individual accommodation plans shall include the following elements:  1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.  2. The means by which the employee is assessed on an individual basis.  3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if	These requirements are taken into consideration.	Review and update in 2022

	accommodation can be		
	achieved and, if so, how		
	accommodation can be		
	achieved.		
	4. The manner in which		
	the employee can request		
	the participation of a		
	representative from their		
	bargaining agent, where		
	the employee is		
	represented by a		
	bargaining agent, or other		
	representative from the		
	· · · · · · · · · · · · · · · · · · ·		
	workplace, where the		
	employee is not		
	represented by a		
	bargaining agent, in the		
	development of the		
	accommodation plan.		
	5. The steps taken to		
	protect the privacy of the		
	employee's personal		
	information.		
	6. The frequency with		
	which the individual		
	accommodation plan will		
	be reviewed and updated		
	and the manner in which		
	it will be done.		
	7. If an individual		
	accommodation plan is		
	denied, the manner in		
	which the reasons for the		
	denial will be provided to		
	the employee.		
	8. The means of providing		
	the individual		
	accommodation plan in a		
	format that takes into		
	account the employee's		
	accessibility needs due to		
	disability. O. Reg. 191/11,		
	s. 28 (2).		
Return to work	Develop and have in place	Procedural document in	Review and update
process	a return to work process	place to cover return to	in 2022
	for its employees who	work.	
	have been absent from		
	work due to a disability		

	and require disability-related accommodations in order to return to work; and shall document the process. O. Reg. 191/11, s. 29 (1).		
Performance management	An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities. O. Reg. 191/11, s. 30 (1).	Accessibility needs are accounted for during performance management process.	Review and update in 2022
Career development and advancement	An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities. O. Reg. 191/11, s. 31	Career development and advancement accounts for accessibility needs of employees.	Review and update in 2022
Redeployment	An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities. O. Reg. 191/11, s. 32 (1).	Accessibility needs are accounted for when redeploying employees within the company.	Review and update in 2022

# **CUSTOMER SERVICE STANDARDS**

Application	Requirement	Action	Status
Establishment of	Develop, implement and	Policies and procedures	Review and update
policies	maintain policies	developed as required by	in 2022
	governing its provision of	the Accessibility Standard	
	goods, services or	and this regulation.	
	facilities, as the case may		
	be, to persons with		
	disabilities. O. Reg.		
	165/16, s. 16.		
	The policies must deal	Included in the policies.	Review and update
	with the use of assistive		in 2022
	devices by persons with		
	disabilities to obtain, use		
	or benefit from the goods,		
	services or facilities or		
	with the availability of		
	other measures, if any,		
	which enable them to do		
	so. O. Reg. 165/16, s. 16.		
	Prepare one or more	Documents prepared as	Review and update
	documents describing the	required.	in 2022
	policies established under		
	this section and, on		
	request, shall give a copy		
	of any such document to		
	any person. Notify		
	persons to whom it		
	provides goods, services		
	or facilities that the		
	documents required are		
	available on request. The		
	notice may be given by		
	posting the information at		
	a conspicuous place on		
	premises owned or		
	operated by the provider,		
	by posting it on the		
	provider's website, if any,		
	or by such other method		
	as is reasonable in the		
	circumstances. O. Reg.		
Use of comics	165/16, s. 16.	Dogument program	Davious and wadet
Use of service	Prepare one or more	Document prepared.	Review and update
animals and support	documents describing its		in 2022
persons	policies with respect to		
	the matters governed by		

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	this section and, on request, shall give a copy of any such document to any person. Notify persons to whom it provides goods, services or facilities that the documents are available on request. The notice may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances. O. Reg.		
Notice of temporary	165/16, s. 16.	Temporary Discustion	Review and undate
Notice of temporary disruptions	If, in order to obtain, use or benefit from a provider's goods, services or facilities, persons with disabilities usually use other particular facilities or services of the provider and if there is a temporary disruption in those other facilities or services in whole or in part, the provider shall give notice of the disruption to the public. O. Reg. 165/16, s. 16.	Temporary Disruption notification included in policies and procedures.	Review and update in 2022
Training for staff	Ensure that the following persons receive training about the provision of the provider's goods, services or facilities, as the case may be, to persons with disabilities:  o  1. Every person who is an employee of, or a volunteer with, the provider.  o  2. Every person who participates in	Staff training included during new employee orientation.	Review and update in 2022

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	developing the provider's		
	policies.		
	o 3. Every other		
	person who provides		
	goods, services or facilities		
	on behalf of the provider.		
	O. Reg. 165/16, s. 16.		
	Keep records of the	Training records kept as	Review and update
	training provided under	required.	in 2022
	this section, including the		
	dates on which the		
	training is provided and		
	the number of individuals		
	to whom it is provided. O.		
	Reg. 165/16, s. 16.		
	Prepare a document that	Included in policies and	Review and update
	describes its training	procedures document.	in 2022
	policy, summarizes the		
	content of the training		
	and specifies when the		
	training is to be provided;		
	and on request, give a		
	copy of the document to		
	any person. O. Reg.		
	165/16, s. 16.		
	Notify persons to whom it	Notification is given when	Review and update
	provides goods, services	required.	in 2022
	or facilities that the		
	document is available on		
	request. The notice may		
	be given by posting the		
	information at a		
	conspicuous place on		
	premises owned or		
	operated by the provider,		
	by posting it on the		
	provider's website, if any,		
	or by such other method		
	as is reasonable in the		
	circumstances. O. Reg.		
	165/16, s. 16.		
Feedback process	Every provider shall	Feedback process	Review and update
required	establish a process for	included in applicable	in 2022
'	receiving and responding	policies and procedures	
	to feedback about the	document.	
	manner in which it	-	
	provides goods, services		
	or facilities to persons		
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with disabilities; and		
feedback about whether		
the feedback process		
established complies with		
subsection (3). O. Reg.		
165/16, s. 16		
The feedback process	Included in feedback	Review and update
must specify the actions	process.	in 2022
that the provider will take		
if a complaint is received		
about the manner in		
which it provides goods,		
services or facilities to		
persons with disabilities.		
O. Reg. 165/16, s. 16		
Every provider shall	Feedback process is	Review and update
ensure that the feedback	accessible in formats	in 2022
process is accessible to	requested.	
persons with disabilities		
by providing, or arranging		
for the provision of,		
accessible formats and		
communication supports,		
on request. O. Reg.		
165/16, s. 16.		
Every provider shall make	Feedback process	Review and update
information about the	available to public when	in 2022
feedback process readily	requested.	
available to the public. O.		
Reg. 165/16, s. 16.		
Every provider shall	Document is available	Review and update
prepare a document	upon request.	in 2022
describing the feedback	,	
process and, on request,		
shall give a copy of the		
document to any person.		
Every provider shall notify		
persons to whom it		
provides goods, services		
or facilities that the		
document required is		
available on request. The		
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notice may be given by		
notice may be given by posting the information at		
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posting the information at a conspicuous place on		
posting the information at a conspicuous place on		

provider's webs or by such othe as is reasonable	nethod	
circumstances. 165/16, s. 16.		

### Conclusion

Paracel Laboratories Ltd. believes in accessibility for all, regardless of disability. This organization follows all the requirements of The Accessibility Act and its associated regulations. The multi-year plan detailed above demonstrates Paracel's commitment to the intent of these Ontario requirements.

# Paracel Contact Info and Reference links

See Contacts list on the Paracel Laboratories website at <a href="www.paracellabs.com">www.paracellabs.com</a>

Last reviewed and updated: September 02, 2021.

Approved by: Blair Colquhoun

Position: President