

Scope: Teva Canada Employees (All Canada)  
Location: Canada  
Effective: May 1, 2021  
Owner: Human Resources

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## AODA Workplace Accommodation Policy & Procedure

### Policy Statement

Teva Canada is committed to treating all people with respect, and in a manner that allows them to maintain their dignity and independence. Teva Canada believes in inclusiveness and equal opportunity, and is committed to meeting the needs of people with Disabilities in a supportive and timely manner. Teva Canada will prevent and remove barriers to Accessibility and meet Accessibility requirements under the *Accessibility for Ontarians with Disabilities Act*, and equivalent legislation on other jurisdictions, where applicable.

This policy applies to all phases of the employment cycle which includes but not limited to; recruitment and selection, orientation, working conditions, promotion, training, performance management, career development and workforce restructuring.

### Purpose

Teva Canada is committed to creating and maintaining a barrier-free work environment to ensure the full participation of all persons. To this end, Teva Canada will, where it is possible and does not cause undue hardship, provide reasonable Workplace Accommodation to Employees who may be unable to perform aspects or specific duties of their job. This policy provides a procedure and guidance for the provision of Workplace Accommodation for all current and prospective Employees in accordance to the Ontario Human Rights Code.

### Scope

This policy applies to any Teva Canada employee with a disability that may require accommodation and to prospective employees who may require accommodation during the recruitment process at Teva Canada.

In accordance with Teva Canada's obligations under the Accessibility for Ontarians with Disabilities Act, the Integrated Accessibility Standards, and the Ontario Human Rights Code, Teva Canada will work proactively to provide reasonable accommodations free of barriers that may prevent a person with a disability from fully participating in all aspects of the workplace.

This policy is distinct from Teva Canada's EHS Operating Procedure 300.11.1 Incident Responses Reporting Procedure. For information regarding workplace occupational illness and/or injury, please refer to the EHS Operating Procedure 300.11.1.

For all non-occupational illness and/or injury that require a workplace accommodation, modified duties or modified hours of work please contact your direct manager and Health Services.

### Definitions

**Accessibility** – Refers to the removal of barriers, visible and invisible, that may prevent a person with a Disability from participating fully in the community, including Teva Canada's workplace.

**Disability** – Under the Ontario *Human Rights Code*, Disability is defined as:

- 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*

**Undue Hardship** - Workplace Accommodation will generally be provided up to the point of undue hardship. Undue hardship is determined on a case-by-case basis. Factors that constitute or may contribute to undue hardship include: insupportable costs, substantial disruptions of operations, and health and safety considerations. If any of these factors create a burden which cannot be reasonably borne by Teva Canada, the obligation to provide Workplace Accommodate is suspended.

**Workplace Accommodation** – Means a reasonable adaptation or adjustment to a workplace condition or environment reasonably required in the circumstances to facilitate, up to the point of undue hardship or a bona fide occupational requirement, (a) an accessibility standard that removes barriers for persons with disabilities, or (b) equal workplace treatment, without discrimination because of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, gender identity, gender expression, age, marital status, family status or disability.

### **Examples of Workplace Accommodation**

Types of Workplace Accommodations may include, but are not limited to:

- Providing information about the position in multiple formats (i.e. for candidates who are blind or visually impaired)
- Ensuring that applicants who are deaf or hearing impaired can make inquiries via a TTY number or fax
- Allowing extra time, where appropriate, for tests or exams
- Ensuring that the interview site is fully accessible
- Attendant services
- Adaptive technology
- Changes to work sites
- Flexible work arrangements, including, but not limited to, telework, task modification, allowing time for religious observance or other alternative work arrangements
- Converting printed matter to alternative media and reader services for employees who are blind or visually impaired
- Providing work space and furnishing appropriate to the nature of the disability;
- Providing interpreters for deaf and hearing-impaired employees
- Adapting training programs to the needs of employees with disabilities, including those with learning disabilities
- Cultural accommodation

Alternate formats can include:

- Braille documents
- Large print documents
- Electronic versions of documents

### **Responsibilities**

Overall responsibility for implementing this policy rests with Teva Canada. Teva Canada will advise employees about their right to accommodation and assist the Employee in identifying the most suitable accommodation.

There is, however, a shared responsibility for ensuring that accommodation needs are identified. The Employee has a responsibility for requesting accommodation including providing appropriate information or input, where possible, to help identify appropriate Workplace Accommodation.

### **Procedure Steps**

#### **Recognize the Need for Accommodation**

The onus for initiating the Workplace Accommodation request rests with the Employee who requires the

Workplace Accommodation.

The existing or prospective Employee requiring Workplace Accommodation will do the following:

- Make a formal request to her/his Direct Manager, where possible, self-identifying themselves as a Person with a Disability
- Make the request to Talent Acquisition (potential employee)
- Identify the type of Workplace Accommodation required, if possible
- Participate and cooperate to facilitate the Workplace Accommodation
- Provide any necessary documentation requested by Teva Canada

An Employee requesting a Workplace Accommodation is expected to be reasonable in responding to proposals put forward by Teva Canada.

### **Processing Requests**

Upon receiving a request for Workplace Accommodation, the Direct Manager will:

- Review accommodation requests as quickly as possible
- Contact Human Resources
- Identify Workplace Accommodation options appropriate to that Employee
- Work in close cooperation with the Employee to obtain their input
- Advise Human Resources if the accommodation requires action that exceeds the Direct Manager's budget or authority to act
- Participate and cooperate to facilitate the Workplace Accommodation

Upon receiving a request for Workplace Accommodation, Human Resources will:

- Provide advice, guidelines, and resources to the employee and or Direct Manager to find the most appropriate Workplace Accommodation alternatives
- Ensure that the Employee can participate in the selection process as fully as possible
- Seek the advice of a specialist, with the employee's consent, where the request involves issues outside the expertise of Teva Canada
- Raise the issue to an appropriate level if a Workplace Accommodation request requires a commitment of resources which may be beyond the budget for Workplace Accommodation or raises the likelihood of undue hardship

The Direct Manager or Human Resources may request relevant documentation from the employee to verify the need for or help facilitate the Workplace Accommodation.

Teva Canada will:

- Ensure that all Employees have access to this policy
- Educate and communicate with all Employees about this policy
- Educate managers about their role and responsibilities in facilitating Workplace Accommodation and ensure they follow this policy
- Make available the resources necessary to implement this policy
- Participate and cooperate with all parties to facilitate the Workplace Accommodation, while respecting the dignity of the Employee requesting Workplace Accommodation
- Provide Workplace Accommodation to the point of undue hardship
- Respect Employees' right to privacy and confidentiality

All accommodations are subject to the limit of causing undue hardship.

### **Appeal**

Should a Workplace Accommodation request be denied or an alternative offered, the Employee requesting the Workplace Accommodation will be informed of the decision by his/her Direct Manager.

The Employee may submit a written request for reconsideration to their Business Partner or Human Resources.

### **Formalize an Individual Accommodation Plan**

The Employee along with their Direct Manager will work together to identify the appropriate workplace accommodation(s), with consultation with sources of expert input that could include but not limited to; Human Resources, Health Services, Family Doctor/General Practitioner, Specialists as needed. -

Once the appropriate accommodation(s) has been identified the employee along with their Direct Manager will formally document accommodation details using the Individual Accommodation Plan together with the Emergency Response Accessibility Self-Assessment Form in accordance to requirements under the *Accessibility for Ontarians with Disabilities Act*, where applicable. Both forms can be found on Teva.net.

The Self-Assessment form will be used by the identified employee and their Direct Manager with the assistance of Health Services, Security and/or Environment & Safety, with the consent of the identified employee, to develop Individualized Workplace Emergency Response Information (IWERI) that will meet the identified employee's needs in the event of an emergency situation.

### **Monitoring and Review**

The Employee and Direct Manager will monitor the Individual Accommodation Plan and Individualized Workplace Emergency Response Information to ensure it is current and effective with reviews on an annual basis or as needed.

Formal reviews may be conducted:

- During scheduled follow-up meetings with the Employee and Direct Manager
- Employee's accessibility need has changed due to their disability
- Employee's Work location or position has changed
- Emergency response policy or procedures are reviewed
- When an Employee is dissatisfied with an identified accommodation, in which a review can be undertaken with their Direct Manager and Business Partner, Human Resources.

Teva Canada will review the Workplace Accommodation policy on a regular basis and will make revisions as necessary. Employees will be invited to contribute input into the review process. Teva Canada will also accept comments on the Workplace Accommodation policy at any other time, however, unless the comment raises an urgent concern, these comments will be considered during the review process. Comments outside the review should be directed to their Business Partner, Human Resources.

### **Confidentiality**

All documents relating to specific requests for Workplace Accommodation will be kept confidential and will only be disclosed with the express consent of the Employee. No documentation with regards to Workplace Accommodation will be kept in the personnel file of the Employee, but may be included in their secure, confidential Occupational Health file.