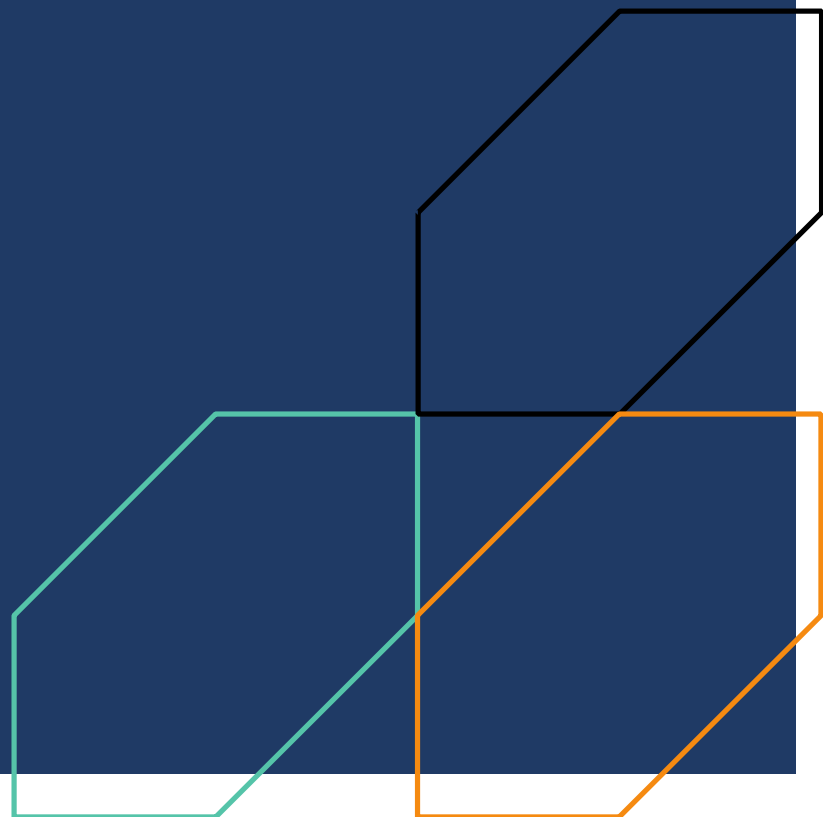




ACCESSIBILITY (AODA) POLICY & MULTI-YEAR ACCESSIBILITY PLAN

Medline Canada, Corporation





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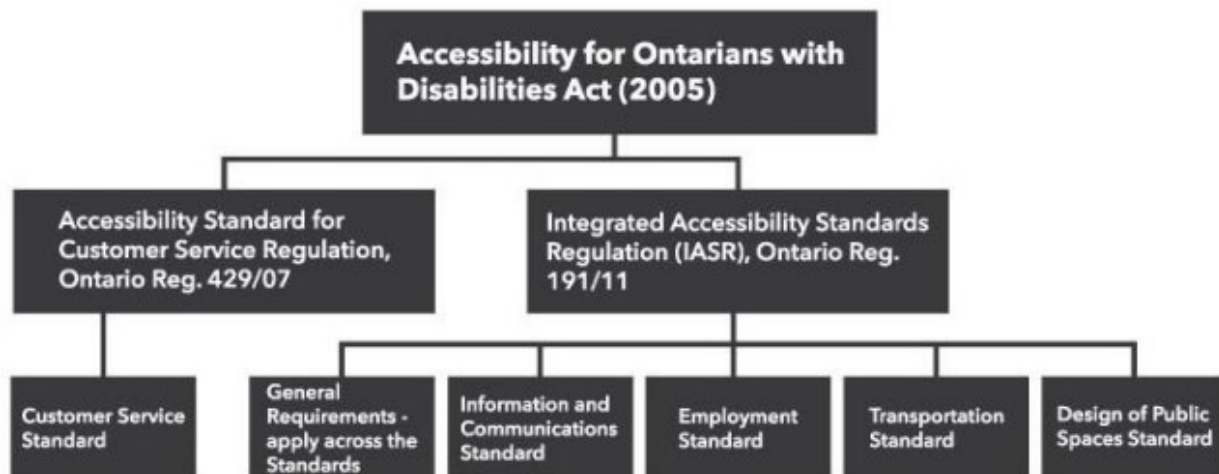
Accessibility Policy And Multi-Year Accessibility Plan

Medline Canada, Corporation — Policies, Practices and Procedures

Medline Canada, Corporation (“Medline Canada”) provides exceptional service and quality medical products to the Canadian health care industry. Medline Canada is more than just a distribution company: we deliver innovative solutions for today’s leading health care providers. Medline Canada is committed to comply with the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)* to ensure that all customers have equal access to all of our services. Medline Canada’s goal is to remove any barriers that could prevent any customer from receiving our services.

The *Accessibility for Ontarians with Disabilities Act, 2005 (“the AODA”)* is a Provincial Act with the purpose of developing, implementing and mandating accessibility standards in order to achieve accessibility for persons with disabilities, with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises. The AODA contains accessibility standards in a variety of areas, including:

- Customer Service
- Information and Communications
- Employment
- Design of Public Spaces
- Transportation



Statement of Commitment:

The Company is committed to ensuring accessibility for all. Due to our participation in the healthcare market, we understand the diverse needs of others, and we believe that those with disabilities should not be limited or restricted from accessing our services or gaining employment with us. The Company believes in equal consideration



and opportunity for all, and we are interested in treating all people in a way that allows them to maintain their dignity and independence.

It is our hope that the accessibility policies and procedures set forth in this document will help remove barriers, as per the requirements set forth by the Accessibility for Ontarians with Disabilities Act, 2005 (AODA).

Accountabilities and Responsibilities:

The Medline Canada Executive Committee is accountable to and responsible for:

- Corporate liability for compliance with legislative requirements, including fiscal responsibility, human costs and human rights issues.
- Support and promote the policy in their area of direct report and throughout the organization.
- Drive the culture to a high level of understanding regarding disability and accommodation.

The Medline Canada Directors and Managers are accountable to and responsible for:

- Fostering open and constructive communication.
- Demonstrating sensitivity to and respect confidentiality of information.
- Raising awareness to facilitate understanding of the policy.
- Participating and co-operating to facilitate workplace accommodation.

The Medline Canada Employees are accountable to and responsible for:

- Participating and cooperating with all parties to facilitate workplace accommodation.

The Medline Canada Human Resources is accountable to and responsible for:

- The governance of the policy.
- Participating and cooperating with all parties.
- Acting as a resource for all parties and participants.
- Supporting and educating managers and employees in their obligations.

General Definitions

Accessible Formats: include, but are not limited to, accessible electronic formats, Braille, text transcripts, large print, recorded audio, and other formats accessible to persons with disabilities.

Assistive Device: 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 members and guests 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.

Barrier: as defined by the Ontarians with Disabilities Act, 2001, anything that prevents a person with a disability from fully participating in all aspects of society because of his/her disability. This includes:

- a physical barrier,
- an architectural barrier,
- an informational or communications barrier,



- an attitudinal barrier,
- a policy, practice and procedure barrier

The Company Premises: refers to the physical area where the general public is allowed access. These areas are the home healthcare showroom and the Medline Canada head office buildings (excluding warehouse areas).

Communication Supports: include, but are not limited to, sign language, plain language and other communication supports that facilitate effective communications.

Disability: a key feature of the AODA is its definition of "disability". Under the AODA, the definition of "disability" is the same as the definition in the Ontario Human Rights Code [2]:

Any degree of physical disability, infirmity, malformation or disfigurement, including, but not limited to:

- Diabetes mellitus;
- Epilepsy;
- A brain injury;
- Any degree of paralysis;
- Amputation;
- Lack of physical coordination;
- Blindness or visual impediment;
- Deafness or hearing impediment;
- Muteness or speech impediment; or
- Physical reliance of 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.

An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety & Insurance Act, 1997.

The definition includes disabilities of different severities, visible as well as non-visible disabilities, and disabilities with effects of which may come and go. This is a broad definition, and one that must be considered closely when educating our employees in the appropriate response to our customers.

Integrated Accessibility Standards Regulation Policy

Purpose and Background



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The Integrated Accessibility Standards Regulation (Regulation 191/11) (the “IASR”) under the AODA provides standards for private sector organizations to increase accessibility for persons with disabilities specifically in the areas of:

- Information and Communications
- Employment

Accessibility Plan

In order to achieve our goals, Medline Canada has developed a multi-year Accessibility Plan which documents Medline Canada’s strategy and commitment to meet the applicable standards of the IASR.

1. The Company will remain up to date on its continuing obligations under AODA. These obligations include, but are not limited to, the action items listed in the multi-year plan below:



Date Initiated	Accessibility Policy Details
January 1 st , 2013	<p>As well, THE COMPANY shall provide customers, clients or employees with emergency information (i.e. fire exit procedure) in a format that takes into account the person's disability. Requests for this information should be made in advance of need, as the timeframe attached to the formatting process may vary depending on the media, complexity and number of documents to be converted.</p> <ul style="list-style-type: none">- Revised in 2017
January 1 st , 2014	<p>THE COMPANY will make this accessibility multi-year plan and these policies available to the public. THE COMPANY will re-evaluate this plan and make necessary adjustments every five years.</p> <ul style="list-style-type: none">- Revised in 2017 <p>THE COMPANY will ensure that employees and customers are able to send feedback regarding our accessibility policies in a format most acceptable to them. Contact information will be made available for multiple platforms, and responses will be given in a timely manner to all questions and concerns received.</p>
January 1 st , 2015	<p>THE COMPANY will provide training to employees, volunteers and other staff members on Ontario's accessibility laws and the Human Rights Code. All current and new employees will take this training, which will be combined with the "On-Boarding" process; employees will be asked to complete as soon as they commence working here.</p> <p>We will communicate all of these efforts to employees and prospective employees on our website, on in-office bulletin boards and for new employees, in their contracts. We will also make any and all information available in any format an employee or prospective employee requests due to their disability.</p> <ul style="list-style-type: none">- Updated in 2017



January 1 st , 2016	<p>THE COMPANY will be reaffirming our commitment to fair and accessible employment practices. Any job openings posted on our website or job board will state our commitment to equal employment opportunities, and confirm that we are willing to accommodate those who may need to be accommodated.</p> <p>Our Human Resources department will actively work with management to ensure that return-to-work accommodations are made for any employee who is absent from work due to disability.</p>
January 2017	<p>As well, THE COMPANY will be ensuring that any new website/online presence will conform with <i>WCAG 2.0, Level A</i>, which is an internationally accepted standard for web accessibility developed by the World Wide Web Consortium (W3C), an international team of experts.</p> <p>THE COMPANY will provide new training to employees, volunteers and other staff members on Ontario's accessibility laws and the Human Rights Code. All current and new employees will take this training, which will be combined with the "On-Boarding" process; employees will be asked to complete as soon as they commence working here.</p>
January 2018	<p>We will continue to re-assess accessibility at our offices and retail store by sending out an employee survey on an annual basis. We will use the opinions our employees express in anonymous surveys to help find weaknesses in our current accessibility plans, and work to improve them.</p> <p>Medline Canada & Medical Mart will ensure to implement procedures for preventative and emergency maintenance of the accessible elements and how to deal with disruptions when accessible elements are not in working order.</p> <p>THE COMPANY will re-asses and evaluate our progress with this plan, and make changes or adjustments as necessary.</p> <p>This process will occur again in five years, and every five years after that, indefinitely.</p>
January 1 st , 2021	<p>THE COMPANY will make further updates on our website / online presence to conform to WCAG 2.0, Level AA.</p>



Accessibility Standards for Customer Service Policy

The objective of this policy is to identify what the equal treatment provisions are of the Ontario Human Rights Code through the AODA and the Service Regulation. This is a requirement with respect to service delivery to persons with disabilities and addresses the following:

- The Provision of Goods and Services to Persons with Disabilities;
- Accessible Customer Service Principles;
- The Use of Assistive Devices;
- The Use of Guide Dogs and Service Animals;
- The Use of Support Persons;
- Notice of Service Disruptions;
- Training;
- Customer Feedback, and
- Notice of Availability and Format of Required Documents.

Providing Goods and Services to People with Disabilities

Medline Canada provides exceptional service and quality medical products to the Canadian health care industry. Medline Canada is more than just a distribution company: we deliver innovative solutions for today's leading health care providers. Medline Canada is committed to comply with the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)* to ensure that all customers have equal access to all of our services. Medline Canada's goal is to remove any barriers that could prevent any customer from receiving our services.

In accordance with the Accessibility for Ontarians with Disabilities Act (AODA), Medline Canada is committed in providing a work environment that is accessible and inclusive to all persons who work and visit our office and warehouse.

Definitions:

Disability (as defined by the Ontario Human Rights Code): 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,

1. A condition of mental impairment or a developmental disability,
2. A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
3. 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.



Barrier: A barrier is anything that keeps individuals with a disability from fully participating in all aspects of society because of their disability. These barriers can be attitudinal, architectural/structural, technological, or systemic.

Medline Canada premises: This refers to the physical area where the general public is allowed access. These areas are the Medline Canada head office building (excluding warehouse area).

Accessible Customer Service Principles

Medline Canada will strive to ensure that its policies, practices and procedures are consistent with the following core principles as outlined in the AODA.

Dignity: Goods and services are provided in a manner that is respectful to persons with a disability and does not diminish the person's importance.

Independence: Accommodating a person's disability means respecting their right to do for themselves and to choose the way they wish to receive goods and services.

Integration: Persons with disabilities can access all goods and services. This may require alternative formats and flexible approaches. It means inclusiveness and full participation. This is a fundamental human right.

Equal Opportunity: Service is provided to persons with disabilities in a way that their opportunity to access goods and services is equal to that given to others.

Assistive Technology

Personal assistive technologies are permitted and unrestricted in all areas of the premises to which Medline Canada staff and the public have access. Please note that the provision, use and safety of various assistive technologies is the responsibility of the person with the disability.

Communication

When communicating with a person with a disability, Medline Canada staff will do so in an assistive and respectful manner that takes into account the person's disability.

Medline Canada staff will be patient, understanding and avoid stereotyping and making assumptions. They will accommodate persons with disabilities based on their specified needs, and:

1. Look at and interact directly with the customer, not the interpreter or support person.
2. Use correct and appropriate terminology.
3. Avoid touching service animals, assistive devices or the person with the disability without asking permission.

Medline Canada commits to provide training regarding how to interact and communicate with persons with various types of disabilities.

Service Animals and Support Persons

Service Animals, for the purpose of this policy, a 'service animal' is defined as either:

1. A "guide dog," as defined in section 1 of the Blind Persons' Rights Act; or
2. A "service animal" for a person with a disability:



- i. If it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- ii. 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 animals accompanying persons with a disability are welcome within the premises if not otherwise excluded by law. If a service animal is excluded by law, Medline Canada will ensure that alternate means are available within reasonable time and location to provide persons with a disability access to the building.

There may be rare circumstances where, for reasons of health and safety of another person, allowing a person with a disability to enter a premises accompanied by a service animal needs to be considered. Examples of such situations include but are not limited to: where a person is allergic to animals and adversely affected if they are in close proximity to a service animal. In such circumstances, Medline Canada will examine alternate measures available to enable the person with a disability access.

If it is not readily apparent that an animal is a service animal, Medline Canada may ask the person with the service animal to provide verification of the animal's duty. Please note that the use and safety of the service animal is the responsibility of the person with a disability. They must comply with all applicable legislation which includes, but is not limited to, the Provincial Dog Owner's Liability Act and City by-laws.

Support Persons

For the purpose of this policy, a 'support person' is defined as someone in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care or medical needs or with access services.

Medline Canada welcomes support persons accompanying persons with a disability in order to assist in accessing goods or services or for the purposes of providing support with mobility, personal assistance or communication. Individuals who are accompanied by a support person are encouraged to inform Human Resources of their companion.

Notice of Planned or Unplanned Disruption in Services

For the purposes of this policy, a 'facility or service disruption' is defined as planned and unplanned unavailability of facilities or services operated by or on behalf of Medline Canada, including, but not limited to, closed washroom facilities, automatic doors that are inoperable due to maintenance and websites that are temporarily unavailable.

In the event of a service disruption to Medline Canada staff or members of the public, it is the responsibility of individual service areas (Facilities, Human Resources, IT Services, etc.) to take reasonable steps to report such disruption in a timely fashion through appropriate information channels. Such channels include, but are not limited to, Work Force Now, temporary signage on or immediately adjacent to the affected area, and/or communication via email to affected individuals, departments or groups.

If the Medline Canada website should expect a planned temporary service disruption, advance notice where possible, keeping with the conditions of the service disruption section of this policy, shall be provided on the website.

In accordance with the AODA, notice must be conspicuous and indicate any alternatives that exist to allow access to persons with disabilities during the disruption. The required information necessary for any communication of a temporary disruption may include:

- The time, date and location of the disruption;
- Information about the reason for the disruption;
- Anticipated duration of the disruption;



- Descriptions of other services, if any; and
- Contact information for the responsible service area.

Training

Medline Canada shall require that the following will receive training about the provision of its goods or services to people with disabilities:

1. Every person who deals with members of the public or other third parties on behalf of Medline Canada
2. Every person who participates in developing Medline Canada policies, practices and procedures governing the provision of services to members of the public or other third parties.

Medline Canada shall provide training to its employees and will log and maintain records which will record the details of the training provided, as well as the name of the person, location, and date the training was completed. Individuals in the following positions will be trained: Customer Service, Sales Representatives and new hires.

Medline Canada will provide training to each person as soon as practicable after he or she is assigned the applicable duties. Training will also be provided on an ongoing basis in connection with changes to applicable legislation, and/or Medline Canada policies, procedures and practices governing the provision of services to person with disabilities.

Medline Canada employees training will include a review of the purposes of the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*, S.O. 2005, c11 and the Accessible Standards for Customer Service Ontario Regulation 429/07, the requirements of this policy, and any other Medline Canada policies, practices and procedures regarding the provision of services to persons with disabilities and instruction about the following matters:

1. How to interact and communicate with people with various types of disability;
2. How to interact with people with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person;
3. How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods or services to a person with a disability; and
4. What to do if a person with a particular type of disability is having difficulty accessing the provider's services.

Feedback

Feedback about the delivery of services to persons with disabilities is welcomed, as it may identify areas that require change and assist in continuous service improvement. Such feedback may be forwarded by telephone, in person, in writing, by email, on diskette or otherwise. Medline Canada will make best efforts to provide a response in the same format in which the feedback was received.

Where possible, feedback will be addressed immediately. Some feedback may, however, require more effort to address and may need to be reviewed before an action is taken. Medline Canada will respond in a timely manner to all formal feedback.

Feedback may be provided directly via email to HRCanada@medline.com.

If the feedback is received by Medline Canada personnel other than the Human Resources department the Medline Canada personnel will forward the submission to their supervisor who will in turn forward it to the Human Resources department. At that point, Medline Canada will assess current policies, practices, and procedures to determine if any changes are required.



Human Resources will follow up with the person, who submitted the feedback if more clarification is needed or if the person has requested that a follow up take place. Human Resources will keep records of all steps, including any discussions with the person submitting the feedback and any actions taken.

Notice of Availability and Format of Documents

Medline Canada shall notify the public that the documents related to the Accessibility Standard for Customer Service are available upon request and in a format that takes into account the person's disability. Notification will be given by posting the information in a conspicuous place owned and operated by Medline Canada, and/or any other reasonable method.

All documents required by the Accessibility Standards for Customer Service, including The Medline Canada Accessibility Standard Policy, notices of temporary disruptions, training records, and written feedback process are available upon request, subject to the Freedom of Information and Protection of Privacy Act ("FIPPA"). When providing these documents to a person with a disability, Medline Canada will endeavor to provide the document, or the information contained in the document, in a format that takes the person's disability into account.

Employment Standards Policy

This policy is intended to meet the requirements of the Integrated Accessibility Standards, Ontario Regulation for the Employment Standard set forth under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA). This policy applies to the provision of accessible employment services for people with disabilities.

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

General Recruitment

The Company will notify its employees and the public about the availability of accommodation for applicants with disabilities in its hiring processes. The notification can either be made in each job posting or through a general post on Work Force Now (WFN).

Recruitment, Assessment or Selection Process

(1) Recruitment

During a recruitment process, The Company will advise both internal and external job applicants, when they are individually selected to participate in an assessment or selection process, that accommodation will be provided upon request in all parts of the hiring process.

(2) Selection

If a selected applicant requests an accommodation, The Company will consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that considers the applicant's disability-related accessibility needs.

Notice to Successful Applicants

When extending a job offer, The Company will notify the successful applicant of its policies for accommodating employees with disabilities, and that they should make their needs known if they need accommodation.

Informing Employees of Supports

1. The Company will inform its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.
2. The Company will provide the information required under this section to new employees as soon as practicable after they begin their employment.



3. The Company will provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.

Accessible formats and communication support for employees

In addition to its obligations, where an employee with a disability requests it, The Company will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for,

1. Information that is needed in order to perform the employee's job; and
2. Information that is generally available to employees in the workplace.

Medline Canada will consult with the employee making the request in determining the suitability of an accessible format or communication support.

Workplace Emergency Response Information

1. The Company will provide individualized workplace emergency response information to employees who have a disability, if the employer is aware of the need for accommodation due to the employee's disability.
2. If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.
3. The Company will provide the information required under this section as soon as practicable after it becomes aware of the need for accommodation due to the employee's disability.
4. The Company will review the individualized workplace emergency response information,
 - i. When the employee moves to a different location in the organization;
 - ii. When the employee's overall accommodations need, or plans are reviewed; and
 - iii. When the employer reviews its general emergency response policies.

Return to Work Process

1. The Company will develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and will document the process.
2. The return to work process will outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and use documented individual accommodation plans, as part of the process.
3. The return to work process referenced in this section does not replace or override any other return to work process created by or under any other statute.

Performance Management

1. In this section, "performance management" refers to activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.



2. The Company will 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.

Career Development and Advancement

1. In this section, “career development and advancement” includes providing additional responsibilities within an employee’s current position and the movement of an employee from one job to another in an organization that may be higher in pay, provide greater responsibility or be at a higher level in the organization or any combination of them and, for both additional responsibilities and employee movement, is usually based on merit or seniority, or a combination of them.
2. The Company will 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.

Redeployment

1. In this section, “redeployment” means the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.
2. 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.

Design of Public Spaces Standards Policy

Medline Canada strives, when applicable, to meet the technical requirements of the design of public spaces standards when building or making major modifications to public spaces which can include accessible off-street parking, ramps, sidewalks, entrances and service-related elements like service counters, waiting areas and washrooms.

Outdoor Public Use Eating Areas

Medline Canada will ensure that we adhere to the general obligations and technical requirements of the Integrated Accessibility Standards when we construct new or redevelop outdoor public use eating areas that we intend to maintain.

Exterior Paths of Travel

Medline Canada will ensure that we adhere to the general obligations and technical requirements of the Integrated Accessibility Standards when we construct new or redevelop exterior paths of travel that we intend to maintain (including ramps, stairs, curb ramps, depressed curbs, pedestrian signals and rest areas) that are intended to serve a functional purpose, subject to applicable exceptions and limitations as contemplated by the Integrated Accessibility Standards.

Accessible Parking

Medline Canada will ensure that we adhere to the general obligations and technical requirements of the Integrated Accessibility Standards when we construct new or redevelop off-street parking facilities that we intend to maintain, subject to applicable exceptions and limitations as contemplated by the Integrated Accessibility Standards.

Service Counters, Queuing Lines and Waiting Areas

Medline Canada will ensure that we adhere to the general obligations and technical requirements of the Integrated Accessibility Standards when we construct new or redevelop service counters, fixed queuing guides and waiting areas.



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Maintenance

Medline Canada will ensure that the Multi-Year Accessibility Plan includes:

1. procedures for preventative and emergency maintenance of the accessible elements in Medline Canada's public spaces that are governed by the Integrated Accessibility Standards, and
2. procedures for dealing with temporary disruptions when accessible elements in Medline Canada's public spaces that are governed by the Integrated Accessibility Standards are not in working order.

Contact Information

For more information about this policy, or questions related to accessibility at Medline Canada, please contact:

HR Department

5150 Spectrum way, Suite 300, Mississauga ON L4W 5G2

Phone: 1.800.268.2848

Email: hrcanada@medline.com

References:

[Accessibility for Ontarians with Disabilities Act, 2005](#)

[Accessibility Standards for Customer Service \(Ontario Regulation 429/07\)](#)

[Integrated Accessibility Standards \(Ontario Regulation 191/11\)](#)

[Ministry of Community and Social Services](#)