



## **INTEGRATED ACCESSIBILITY STANDARDS STATEMENT OF COMMITMENT, POLICY & PLAN**

**UPDATED:** DECEMBER 2017

This policy and plan formalizes Edgewell's commitment to accessibility, and outlines those steps that Edgewell will take to remove barriers and improve opportunities for people with disabilities through compliance with the *Integrated Accessibility Standards* Regulation (the "IASR").

### **STATEMENT OF COMMITMENT**

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Edgewell is committed to treating all people in a way that allows them to maintain their dignity and independence. This vision is built upon a foundational belief in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner. We are dedicated to breaking down barriers to accessibility, preventing new barriers from arising and to meeting the accessibility requirements prescribed by the *Accessibility for Ontarians with Disabilities Act, 2005*.

### **ACCESSIBILITY POLICY & ACTION PLAN**

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In pursuit of Edgewell's commitment to ensuring accessibility, we have implemented this multi-year accessibility plan, which outlines our strategy to prevent and remove barriers and meet the requirements under the ISAR.

We have posted this policy and accessibility plan on our website, and are able to provide the plan in an accessible format upon request.

#### **I. Training**

Edgewell provides training on the requirements of the IASR, the Accessible Customer Services and on the Ontario *Human Rights Code* as it relates to people with disabilities.

Edgewell ensures that prompt and on-going training is provided to all employees, volunteers, persons who participate in developing Edgewell's policies, and all persons who provide goods, services or facilities on Edgewell's behalf.

The following actions have been taken to achieve our goals:

1. Identify training materials that address the requirements of Ontario's accessibility laws and the disability-related obligations under human rights laws;
2. Tailor the training to the specific duties of an individual or group of individuals that require training;

3. Delivering the training using a method that is appropriate for the audience and needs of Edgewell;
4. Keeping a record detailing which individuals have been trained and on what date;
5. Ensure that all the above-listed individuals are trained as soon as practicable and that training in respect of any changes to the policy takes place on an on-going basis
6. Policies will be reviewed and those that do not respect and promote the dignity and independence of people with disabilities will be modified.

Responsibility for Training: Director, Human Resources.

## **II. Information & Communication**

Edgewell is committed to creating, providing and receiving information and communications in ways that are accessible for people with disabilities.

### **Website**

Edgewell is working towards ensuring that all new websites and content on those sites conforms with WCAG 2.0, Level A.

### **Feedback**

Edgewell is committed to ensuring that its processes regarding receiving and responding to feedback from customers, clients and/or employees are accessible to individuals with disabilities upon request. Those who wish to provide feedback are encouraged to do so in person, by telephone, in writing or by delivering an electronic text by email or on diskette. Edgewell ensures that any established processes for employees to provide comments will be made accessible to individuals with disabilities by providing or arranging for accessible formats or communication supports, upon request and in a timely manner. When an individual requests an accessible format or communication support, Edgewell will consult with the person to determine their accessibility needs and decide on the most appropriate accessible format or communication supports given the needs of the individual and the capability of Edgewell.

Responsibility for Information & Communication: Director, Human Resources.

### **Availability of Information**

In further pursuit of our commitment to meeting the communication needs of people with disabilities, Edgewell ensures that, upon request, we will provide or arrange for the provision of publicly available information that is in respect of our goods, services, emergency response information or facilities in an accessible format and at a cost that is not more than that charged to others.

It is Edgewell's policy to take the following actions to achieve these goals:

1. Consult with the person making the request in a timely manner to determine the most appropriate accessible format or communication support, given the needs of the person, whether the content is convertible and Edgewell's capability;
2. Provide the accessible format or communication support in a timely manner and at no additional cost; and
3. Notify the public about the availability of accessible formats and communication supports.

Responsible for Information & Communication: Director, Human Resources.

## **IV. Employment**

Edgewell is committed to providing for fairness and accessibility across all stages of the employment life cycle, allowing employees to reach their full potential.

In pursuit of Edgewell's commitment to providing fairness and accessibility across all stages of employment, Edgewell has and continues to:

1. Provide individualized workplace emergency response information to our employees with disabilities, if the disability is such that the individualized information is necessary and Edgewell is aware of the need for accommodation. The information will be provided as soon as practicable after Edgewell becomes aware of the need for accommodation.
2. Review the individualized information when:
  - a. The employee changes location;
  - b. The employee's overall accommodation needs and/or plan are reviewed; or
  - c. The company's general emergency policies are reviewed.
3. With the employee's consent, provide the individualized information to designated persons if the employee requires assistance in emergency situations, and in a way that respects the privacy of the employee.

## **Recruitment and Assessment**

Edgewell has implemented the following into its workplace policies to achieve its accessibility goals during the recruitment and assessment processes, and when employees are hired:

1. Notify recruiters, our staff and the public, as applicable that we will accommodate people with disabilities during the recruitment process;
2. 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 utilized;
3. Consult with job applicants who request accommodation to support them through the recruitment, selection and/or assessment process and take into account their needs, so that the accommodations provided are effective; and
4. Notify the successful applicant of Edgewell's policies for supporting our employees with disabilities.

## **Information Regarding Policies**

Edgewell informs its employees of the policies used to support 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, by:

1. On request, consulting with our employees with disabilities to determine those accessible formats or communication supports that may be of assistance in accessing workplace information, and how such individualized accommodation may be provided.
2. Providing the information as soon as practicable after commencement of employment, and updates whenever there is a change to the policies.

Where an employee requests it, Edgewell will consult with the employee in order to provide or arrange to provide accessible formats and communication supports for:

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

### **Individualized Accommodation Plans**

Edgewell has implemented a process for the creation of documented individual accommodation plans for those employees with disabilities. This process includes:

1. Considering how employees with disabilities will participate in the development of their accommodation plan and what the plans may include;
2. Determining the means by which an employee is assessed on an individual basis;
3. Determining the manner by which Edgewell can request an evaluation by an outside expert, at the company's expense, to determine if and how accommodation can be achieved;
4. Establishing the manner in which the employee can request the participation of a workplace representative in the development of the accommodation plan.
5. Establishing where the plans will be stored and what steps will be taken to protect the privacy of employee information;
6. Determining when and how the individual accommodation plans will be reviewed and updated;
7. Determining the manner in which reasons will be given when an accommodation plan is denied; and
8. Determining the means of providing the accommodation plan in a format that takes into account the employee's accessibility needs.

Individualized accommodation plans will include any:

1. Information regarding accessible formats and communication supports provided;
2. Individualized workplace emergency response information; and
3. Other accommodation that is to be provided.

### **Return to Work, Performance Management, Advancement and Redeployment**

Edgewell has developed and put in place a documented return to work process for those employees that have been absent from work due to a disability and require disability-related accommodation in order to return to work. This process has been modified to take into account individual documented accommodation plans.

Edgewell takes into account the accessibility needs of employees with disabilities (as well as their individual accommodation plans) when implementing its performance management process by:

1. Reviewing individual accommodation plans to understand employee needs and determine whether they should be adjusted to improve job performance;
2. Providing performance-management related documents in accessible formats; and
3. Providing informal and formal coaching and feedback in a manner that takes an employee's disability into account.

Edgewell takes into account the accessibility needs of its employees with disabilities (as well as their individual accommodation plans) when providing career development, advancement, or redeployment. This may occur through the consideration of what accommodations employees with disabilities may need to succeed elsewhere within our organization, to take on new responsibilities in a current role, or when redeployment has become necessary.

Responsibility for Employment Standards Requirements: Director, Human Resources.

### **GOALS TO MEET BY JANUARY 1, 2021:**

#### **I. Information & Communication**

In further pursuit of our commitment to meeting the communication needs of people with disabilities, Edgewell will ensure that all required websites and content conform with WCAG 2.0, Level AA.

Responsibility for Information & Communication: Director, Human Resources.  
Owner of I.T. platforms: I.T. Department, Shelton, CT.

### **OTHER ACCESSIBILITY MATTERS**

#### **I. Design of Public Spaces**

At the present time, Edgewell does not plan on developing or redeveloping any of its public spaces, as defined in the Design of Public Spaces Standard. However, should it choose to do so, this policy and plan will be revised to include the requirements thereunder and how we will achieve compliance.

#### **II. Kiosks**

At this time, Edgewell does not use kiosks. However, should the use of kiosks become a part of Edgewell's business in the future, we will ensure that our employees consider the needs of disabilities when designing, procuring or acquiring self-service kiosks.

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### **GOING FORWARD**

Edgewell will endeavour to identify and remove accessibility barriers going forward. This accessibility plan will be reviewed and updated at least every five (5) years to ensure compliance with legislated deadlines, address existing accessibility barriers and plan for the removal and prevention of any future barriers.

### **ACHIEVEMENTS & PROGRESS**

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Edgewell has taken a variety of strides to incorporate accessibility into aspects of its business and operations. We have achieved our goals on various fronts, as set out in more detail below.

<b>General Deliverables</b>	<b>Completed?</b>	<b>Legislated Date for Large Employers</b>
<b>Policies &amp; Procedures</b>		
Implement Customer Service Policy	Yes	January 1, 2012

Make Customer Service Policy available to the Public	Yes	January 1, 2012
Make Customer Service Policy available in alternative formats upon request	Yes	January 1, 2012
Implement Accessibility Policy that includes a Statement of Organizational Commitment	Yes	January 1, 2014
Post Accessibility Policy on the Company's website	Yes	January 1, 2014
Make Accessibility Policy available in alternative formats upon request	Yes	January 1, 2014
<b>Accessibility Plan - Multi Year</b>		
Develop Accessibility Plan	Yes	January 1, 2014
Make available to the public	Yes	January 1, 2014
Make available in alternative formats upon request	Yes	January 1, 2014
Review every 5 years	Yes (ongoing)	Ongoing
<b>Training</b>		
Train all applicable employees and contractors in accordance with the Customer Service requirements	Yes	January 1, 2012
Train all Ontario employees & volunteers, policy developers, those providing goods or services on behalf of the Company regarding IAS and <i>Human Rights Code</i> .	Yes	January 1, 2015
<b>Information &amp; Communications</b>	<b>Completed?</b>	<b>Legislated Date for Large Employers</b>
<b>Emergency Information</b>		
Emergency Procedure Plans or Public Safety Information are inventoried and accessible upon request	Yes	January 1, 2012
<b>Feedback</b>		
Feedback process is in place for receiving and responding to feedback - system is in place and available in accessible formats and with communication supports upon request	Yes	January 1, 2015
<b>Accessible formats and communication supports</b>		
Provide or arrange for accessible formats and communication supports upon request (timely manner, at a cost that is no more than the regular cost charged to other persons)	Yes	January 1, 2016
<b>Website Accessibility</b>		
New Internet Website WCAG 2.0 Level AA (other than closed caption Live pre-recorded audio) (where new post-2014)	Ongoing	January 1, 2014
All internet websites and web content WCAG 2.0 Level AA		January 1, 2021

Review all content on website up to 2012 to ensure everything is accessible		January 1, 2021
<b>Employment</b>	<b>Completed?</b>	<b>Legislated Date for Large Employers</b>
Develop Personalised Workplace Emergency Response for staff, on consent and as necessary	Yes	January 1, 2012
Notify employees and public regarding availability of accommodation	Yes	January 1, 2016
Notify applicant of availability of accommodation upon request for assessments or selection process	Yes	January 1, 2016
Inform employees of policies regarding job accommodations	Yes	January 1, 2016
Providing accessible formats and communication supports available to perform job	Yes	January 1, 2016
Have a documented (IAP) process in place	Yes	January 1, 2016
Have a Return to Work process in place	Yes	January 1, 2016
Ensure performance management processes take into account accessibility needs	Yes	January 1, 2016
Ensure career development and advancement information takes into account accessibility needs	Yes	January 1, 2016
Ensure redeployment process takes into account accessibility needs	Yes	January 1, 2016
<b>Public Spaces</b>	<b>Completed?</b>	<b>Legislated Date for Large Employers</b>
<b>Design of Public Spaces</b>		
Incorporate accessibility regulations in accordance with any contracts relating to our premises as required by the Design of Public Spaces Standard for new developments, redevelopments, or when making major changes to existing space or service related elements	N/A	January 1, 2017
Maintain and repair public spaces within our premises	N/A	January 1, 2017
Develop procedures for preventative and emergency maintenance of accessible elements in public spaces	N/A	January 1, 2017
Develop procedures for dealing with temporary disruptions when accessible elements under public spaces not working	N/A	January 1, 2017
Incorporate accessibility regulations in designing newly constructed service counters and fixed queuing guides	N/A	January 1, 2017

## CONTACT INFORMATION

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For more information on this accessibility policy and plan and/or to provide feedback and/or make complaints, please do so:

- In person;
- By telephone;
- In writing; or
- By delivering an electronic text by email or on a diskette.

By contacting:

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Edgewell Personal Care Canada  
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In order to ensure that our feedback process is accessible, Edgewell will provide or arrange for accessible formats or communication supports, upon request and in a timely manner. When an individual requests an accessible format or communication support, Edgewell will consult with the person to determine their accessibility needs and decide on the most appropriate accessible format or communication supports given the needs of the individual and the capability of Edgewell.

Accessible formats of this document are available free upon request by using the same contact information.