

**Rothmans, Benson & Hedges Inc. MULTI-YEAR ACCESSIBILITY PLAN
ONTARIO, CANADA**

Introduction and Statement of Commitment

In 2005, the government of Ontario passed the Accessibility for Ontarians with Disabilities Act (the “**AODA**”). The AODA requires that, effective January 1, 2014, Rothmans, Benson & Hedges Inc. (“**RBH**”) establish, implement, maintain and document a multi-year accessibility plan which outlines the organization’s strategy to prevent and remove barriers for persons with disabilities and to meet its requirements under the AODA.

Although RBH has already established and implemented a number of policies in compliance with AODA, this multi-year accessibility plan sets RBH’s comprehensive strategy to prevent and remove barriers for persons with disabilities and to address the current and future requirements of the AODA by fulfilling our commitment as outlined in RBH's Ontario, Canada Accessibility Policies.

General Requirements

Requirement	Description	Action	Responsibility & Status	Compliance Date
Establishment of Accessibility Policies	Develop, implement and maintain policies governing how RBH will achieve accessibility through meeting its requirements under the accessibility standards.	Draft policy Obtain management approvals Post policy online (publicly available) and intranet Make policy available in an accessible format upon request	Done Done Done Ongoing	January 1, 2014
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	Identify barriers Prepare and develop multi-year accessibility plan Update multi-year accessibility plan	Done Done Done	January 1, 2014

	<p>requirements under this Regulation</p> <p>Post the accessibility plan on their website and provide the plan in an accessible format upon request.</p> <p>Review and update the accessibility plan at least once every five years.</p>	<p>Obtain management approvals</p> <p>Post plan publicly online and on intranet</p> <p>Review plan every year on January 1st to ensure it remains up to date</p>	<p>Done</p> <p>Done</p> <p>Ongoing</p>	
Training	<p>Ensure that training is provided on the requirements of the accessibility standards and on the Human Rights Code as it pertains to persons with disabilities, to all employees, persons who participate in developing the organization's policies, and all other persons who provide goods, services or facilities on behalf of the organization.</p>	<p>Prepare training modules</p> <p>Provide training to all employees, etc.</p> <p>Maintain records of training including dates training is provided and number of individuals training is provided to</p> <p>Continue to provide training on any changes to the policies on an ongoing basis</p>	<p>Done</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>	January 1, 2015
Self-Service Kiosks	<p>Have regard to accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.</p>	<p>Ensure compliance with the AODA requirements, where applicable</p>	<p>Where applicable, the Company strives to include accessibility features where it can, in the self-service kiosks available on its premises.</p>	January 1, 2014

Accessibility Report	File the accessibility report.	File the accessibility report every three years.	Done	December 2023

Information and Communications

Requirement	Description	Action	Responsibility & Status	Compliance Date
Feedback	Ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request.	<p>Conduct review of all feedback processes</p> <p>Determine what accessible formats and communication supports will be provided for each feedback process</p> <p>Notify public of availability of accessible formats and communications supports</p> <p>Ensure all requests for accessible formats and communication supports are directed to People and Culture</p>	<p>Done</p> <p>Done</p> <p>Done</p> <p>Ongoing</p>	January 1, 2015
Accessible Formats & Communication Supports	Provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner when requested, taking into account the person's accessibility needs	<p>Determine what accessible formats and communication supports will be provided upon request</p> <p>Determine timeline/draft guideline to employees for providing formats and supports</p>	<p>Ongoing</p> <p>Ongoing</p>	January 1, 2016

	<p>due to disability at a cost that is no more than the regular cost charged to other persons.</p> <p>Consult with the person making the request in determining the suitability of an accessible format or communication support.</p> <p>Notify the public about the availability of accessible formats and communication supports.</p>	<p>in a timely manner when requested</p> <p>Ensure all requests from the public for such formats and supports are directed to People & Culture</p>	Ongoing	
Accessible Websites and Web Content	<p>Make internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines ("WCAG") 2.0.</p>	<p>RBH Canada is committed to making its information technology widely available and accessible, regardless of the physical ability of the user.</p> <p>RBH websites meet the Worldwide Web Consortium's Web Content Accessibility Guidelines as outlined in the AODA legislation.</p> <p>As technology changes, RBH will continue to monitor external and internal web pages, along with internal tools and applications, to ensure compliance with AODA.</p>	Completed	<p>January 1, 2014</p> <p>Any new internet websites and web content on websites conformed with WCAG 2.0 Level A.</p> <p>January 1, 2021</p> <p>All internet websites and web content on those sites conform with WCAG 2.0 Level AA.</p> <p>November 15, 2023</p>

				Confirmation that all new websites are conformed with WCAG 2.0 Level AA.
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Customer Service

Requirement	Description	Action	Responsibility & Status	Compliance Date
Establishment of Customer Service Policy	Develop, implement and maintain policies governing the provision of goods, services of facilities, as the case maybe, to persons with disabilities. Post the customer service policy on the website and provide the plan in an accessible format, upon request.	Draft policy Notify public of availability of customer service policy Post customer service policy publicly online and on intranet	Done Done Done	January 1, 2015
Training	Ensure that training is provided to staff on the provision of goods, services of facilities, as the case maybe, to persons with disabilities.	Prepare training modules Provide training to all employees, etc. Maintain records of training including dates training is provided and number of individuals training is provided to	Done Done Ongoing	January 1, 2015

		Continue to provide training on any changes to the policies on an ongoing basis	Ongoing	
Feedback	<p>Establish a process for receiving and responding to feedback about the manner in which it provides goods and services or facilities to persons with disabilities.</p> <p>Ensure that the feedback processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request.</p>	<p>Review all customer feedback and take appropriate action</p> <p>Conduct review of all feedback processes</p> <p>Notify public of availability of accessible formats and communications supports</p> <p>Ensure all requests for accessible formats and communication supports are directed to People & Culture</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Done</p> <p>Done</p>	January 1, 2015
Notice of Temporary Disruptions	Prepare a document setting out the steps that are taken in case of a temporary disruption	Implement service disruption protocol by posting signs to advise the public where alternate service may be obtained, while repairs to existing services are completed	Done	January 1, 2015

Employment

Requirement	Description	Action	Responsibility & Status	Compliance Date
Recruitment	Notify employees and the public about the availability of accommodation for	Develop statement and include in all job postings RBH's commitment to providing accommodation and availability of accommodation to ensure all	Done	January 1, 2016

	applicants with disabilities in its recruitment processes	applicants are notified of this availability.		
Recruitment, Assessment or Selection Process	<p>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.</p> <p>Consult with an applicant requesting accommodation to 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</p>	<p>Develop process to ensure all applicants are notified of availability of accommodations when they are individually selected to participate in the process.</p> <p>Identify potential barriers in recruitment process and develop process to address barriers.</p> <p>Develop interview guidelines addressing accessibility requirements.</p>	Done	January 1, 2016
Notice to Successful Applicants	Notify successful applicants of RBH's policies for accommodating employees with disabilities.	Include statement in all offer letters/employment agreements.	Done	January 1, 2016
Informing Employees of Supports	<p>Inform current employees of RBH's policies to support employees with disabilities.</p> <p>Provide this information to new employees as soon as practicable after they commence employment.</p> <p>Provide updated information to employees whenever</p>	<p>Circulate policy and training modules to all employees, etc. and ensure sign-off for receipt of policy and training.</p> <p>Policy and training to be reviewed with all new hires as part of onboarding process.</p> <p>RBH accessibility policy and Multi year accessibility plan is</p>	<p>Done</p> <p>Ongoing</p> <p>Done</p>	January 1, 2016

	there is a change to RBH's policies.	available to all employees on intranet		
Accessible Formats & Communication Supports for Employees	<p>Upon request, consult with employees with disabilities to provide or arrange for the provision of accessible formats and communication supports for information that is needed in order to perform the employee's job, and information that is generally available to employees in the workplace.</p> <p>Consult with employees making such requests to determine the suitability of accessible format or communication supports.</p>	<p>Audit of general communications to employees to ensure employees are aware of availability of accessible formats and communication supports.</p>	Done	January 1, 2016
Workplace Emergency Response Information	<p>Provide individualized workplace emergency response information to employees who have a disability.</p> <p>Provide workplace emergency response information to the designated person to provide assistance to the employee.</p> <p>Review individualized workplace emergency response information as appropriate.</p>	<p>Develop process for providing individualized workplace emergency response.</p> <p>Develop for associates who self-identify as having disabilities.</p>	Done	January 1, 2012

<p>Documented Individual Accommodation Plans</p>	<p>Develop and have in place a written process for the development of documented individual accommodation plans, which include:</p> <ol style="list-style-type: none"> 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 determine if and 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 	<p>Develop processes for the development and implementation of individual accommodation plans and ensure this process is documented.</p> <p>Individual accommodation plans should include, if requested, information regarding accessible formats and communication supports provided, individualized workplace emergency response information if applicable, and identify any other accommodation that is provided to the employee.</p>	<p>Done</p> <p>Ongoing</p>	<p>January 1, 2016</p>
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	<p>development of the accommodation plan.</p> <p>5. The steps taken to protect the privacy of the employee's personal information.</p> <p>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> <p>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</p>			
Return to Work Process	Develop and document a return to work process for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work.	Review current policies and processes regarding return to work to ensure compliance.	Done	January 1, 2016

	The return to work process shall outline the steps RBH will take to facilitate the return to work and use individual documented accommodation plans.			
Performance Management	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.	Review current process to determine if revisions are required.	Ongoing	January 1, 2016
Career Development & Advancement	Take into account the accessibility needs of employees with disabilities as well as any individual accommodation plans when providing career development and advancement to employees with disabilities.	Review current process to determine if revisions are required.	Ongoing	January 1, 2016
Redeployment	Take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.	Review current process to determine if revisions required.	Ongoing	January 1, 2016

DESIGN OF PUBLIC PLACES

(The following requirements only apply to public spaces that are newly constructed or redeveloped on and after January 1, 2017.)

Requirement	Description	Action	Responsibility & Status	Compliance Date
Exterior Paths of Travel	RBH will ensure that any exterior paths of travel, such as outdoor sidewalks and walkways, ramps, stairs and curb ramps, that it constructs or redevelops and intends to maintain meet the technical requirements of the Design of Public Places Standards.	No action is necessary, unless RBH builds new or makes major changes to existing exterior paths of travel. Ensure exterior ramps and stairs continue to be compliant with the regulation.	Not Applicable	January 1, 2017
Accessible Parking	RBH shall ensure that when constructing new or redeveloping off-street parking facilities that it intends to maintain, the off-street parking facilities meet the requirements of the Design of Public Places Standards. Off-street parking is a space where you can park your vehicle temporarily that is not on a public road or street.	No action is necessary, unless RBH builds new or makes major changes to existing parking spaces.	Not Applicable	January 1, 2017
Maintenance	RBH will ensure accessibility plans include: 1. Procedures for preventative and emergency maintenance of the accessible elements in public spaces.			January 1, 2017

	2. Procedures for dealing with temporary disruptions when accessible elements required are not in working order.			
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Reviewed on:

- *November 2023*