

**ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005 (“AODA”)**

**GLAXOSMITHKLINE INTEGRATED ACCESSIBILITY STANDARDS – Multi Year Plan for GSK**

| <b>Part I – GENERAL REQUIREMENTS</b> |  |  |   |                             |
|--------------------------------------|--|--|---|-----------------------------|
| <b>#</b>                             | <b>Initiative</b>                                | <b>Description</b>   | <b>Action</b>   | <b>AODA Compliance Date</b> |
| 1.                                   | <b>Accessibility Plans</b> - (Section 4 of IASR) | <p>1a. GSK shall, 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;</p> <p>1b. GSK shall post the accessibility plan on its website, and will provide the plan in an accessible format upon request; and</p> <p>1c. GSK shall review and update the accessibility plan at least every 2 years (or more frequently on years with deliverable)</p> | <p>a) Created the written multi year Plan and posted it on GSK’s website.</p> <p>b) Copies to be provided, upon request (in an accessible format), in addition to the AODA disclaimer.</p> <p>c) Monitoring of a multi- year Plan on a regular schedule</p> <p>d) Review and approve Plan on a regular schedule throughout the year</p> | January 1, 2014             |

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| 2. | <b>Establishment of Accessibility Policies</b> - (Section 3 of IASR) | <p>2a. GSK shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this Regulation.</p> <p>2b. GSK shall include a statement of organizational commitment to meet the accessibility needs of persons with disabilities in a timely manner in their policies.</p> <p>2c. GSK will post / make available these policies upon request.</p> | <p>a) Created written policies:</p> <ul style="list-style-type: none"> <li>• Accessible Customer Service for Persons with Disabilities</li> <li>• Integrated Accessibility Policy</li> </ul> <p>b) Policies maintained on a regular basis</p> <p>c) Copies of policies to be made available (in an accessible format) to members of the public, upon request</p> <p>d) Should updates be made to the policies, changes will be communicated to employees</p> | January 1, 2014      |
| 3. | <b>Self-service kiosks</b> (Section 6 of IASR)                       | 3. GSK shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.  | N/A  | January 1, 2014      |

| #  | Initiative                           | Description   | Action  | AODA Compliance Date |
|----|--------------------------------------|---|---|----------------------|
| 4. | <b>Training</b> -(Section 7 of IASR) | <p>4a. GSK will 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:</p> <ul style="list-style-type: none"> <li>• all employees, and volunteers should they be applicable in Ontario;</li> <li>• all persons who participate in developing the organization's policies; and</li> <li>• all other persons who provide goods, services or facilities on behalf of the organization specific to Ontario</li> </ul> <p>4b.Ensure all new Training requirements are completed</p> | <p>a) Determined method of Training for this phase (ie. E-Learning Modules)</p> <p>b) Secured the training documentation</p> <p>c) Determined timing and launch of modules</p> <p>d) Determined who needs to be trained</p> <p>e) Worked with My Learning to update Training modules and employees training plans</p> <p>f) Monitor ongoing compliance</p> <p>Rolled in the Manager AODA review training into the Training expectations of 2014</p> | January 1, 2015      |

**PART II – Information and Communications Standards**

| #  | Initiative   | Description  | Action   | AODA Compliance Date |
|----|--|--|--|----------------------|
| 1. | <b>Feedback –</b><br>(Section 11 of IASR)  | 1. GSK shall ensure that all areas that receive and respond to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request.  | a) Reviewed all feedback mechanisms across the organization<br>b) Determined if alternative formats need to be considered<br>c) Ensured that all staff and Managers are aware of need to accommodate requests (included in the training due by Dec 31, 2014)<br>d) Ensured that policies include notification for public that there is the availability of accessible formats and communication support upon request   | January 1, 2015      |
| 2. | <b>Accessible Formats &amp; Communication Supports –</b><br>(Section 12 of IASR): Includes <ul style="list-style-type: none"> <li>• Consultation</li> <li>• Promotion of Accessible Formats &amp; Communication Support</li> </ul> | 2a. GSK shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, <ul style="list-style-type: none"> <li>• in a timely manner that takes into account the person’s accessibility needs due to disability; and</li> <li>• at a cost that is no more than the regular cost charged to other persons.</li> </ul> 2b. GSK will consult with the person making the request in determining the suitability of an accessible format or communication support.<br><br>2c. GSK shall notify the public about the availability of accessible formats and communication supports. | a) Ensure accessible formats and communication support can be provided in a timely manner upon request<br>b) Ensure Feedback forms, employee communication, Manager and Human Resources are clear that these accessible formats and communication support shall be provided at a cost that is no more than the regular cost charged to other persons.<br>c) Ensure training is complete for all first contact personnel<br>d) Ensure there is a link to documentation available on the Web page and on the Human Resources Landing page via the Questions Page<br>e) Work with Communications regarding the links and postings | January 1, 2016      |

| #  | Initiative  | Description  | Action   | AODA Compliance Date |
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| 3. | <b>Accessible Websites &amp; Web Content</b> – (Section 14 of IASR) | <p>2a. GSK shall 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.</p> <p>2b. January 1, 2014 New internet websites (including websites undergoing a significant refresh) and web content on those sites must conform with WCAG 2.0 level A</p> | Applicable GSK internet websites conform with the Level A requirements of the World Wide Web Consortium Web Content Accessibility Guidelines 2.0 | January 1, 2014      |
|    |   | <p>2c. January 1, 2021: All internet websites and web content must conform with WCAG 2.0 Level AA, other than</p> <ul style="list-style-type: none"> <li>• success criteria 1.2.4 Captions (Live)</li> <li>success criteria 1.2.5 Audio Descriptions</li> </ul>  |  | January 1, 2021      |

**PART III – Employment Standards**

| #  | Initiative   | Description  | Action  | AODA Compliance Date |
|----|--|--|---|----------------------|
| 1. | <b>Recruitment General</b> - (Section 22 of IASR)                          | 1. GSK shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.  | <ul style="list-style-type: none"> <li>a) GSK will amend its policies to communicate to employees and the public that it accommodates applicants with disabilities in its recruitment process. It will also ensure that all job postings reflect this information.</li> <li>b) Ensure changes are communicated to Employees</li> <li>c) Ensure all posting are inclusive of a statement informing candidates of this accomodation</li> <li>d) Ensure Recruiters, Managers and Human Resources are trained as necessary on this accomodation</li> <li>e) Create a guideline for Human Resources that outlines, options available and potential timeframes</li> </ul> | January 1, 2016      |
| 2. | <b>Recruitment, Assessment or Selection Process</b> - (Section 23 of IASR) | 2a. During a recruitment process, GSK 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. | <ul style="list-style-type: none"> <li>a) Include on any written notification to individuals selected</li> <li>b) Ensure all verbal communication to selected candidates includes this verbiage</li> <li>c) Ensure Process documents are updated to reflect this option</li> <li>d) Ensure training is done for all Recruiters and Human Resources</li> </ul>   | January 1, 2016      |
|    |  | 2b. If a selected applicant requests an accommodation, GSK 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.      | Prepare documentation guidelines on what options are available and potential timeframes   | January 1, 2016      |

| #  | Initiative   | Description  | Action  | AODA Compliance Date |
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| 3. | <b>Notice to Successful Applicants</b><br>(Section 24 of IASR)   | 3. GSK shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.   | <ul style="list-style-type: none"> <li>a) Meet with Recruitment Managers with respect to notifying successful applicants</li> <li>b) Add accessibility language to all offer letters, calls, scripts</li> </ul> | January 1, 2016      |
| 4. | <b>Informing Employees of Supports</b> -<br>(Section 25 of IASR) | 4a. GSK shall 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. | <ul style="list-style-type: none"> <li>a) Include all policy and documentation as part of the Onboarding process</li> <li>b) Ensure information on AODA is available on our intranet</li> </ul>                 | January 1, 2016      |
|    |  | 4b. GSK shall provide the information required under this section to new employees as soon as practicable after they begin their employment.   | Include all policy and documentation as part of the Onboarding process  | January 1, 2016      |
|    |  | 4c. GSK shall 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.                                  | Ensure changes are communicated to employees in a timely manner, via communications such as Leaders Direct and Updated Policies on the Human Resources Landing page   | January 1, 2016      |

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| 5. | <b>Accessible Formats &amp; Communication Supports for Employees -</b><br>(Section 26 of IASR) | <p>5a. In addition to its obligations under section 12, where an employee with a disability so requests it, GSK shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:</p> <ul style="list-style-type: none"> <li>• Information that is needed in order to perform the employee's job; and</li> <li>• Information that is generally available to employees in the workplace.</li> </ul> | <p>a) When asked, Human Resources will meet with any employee who identifies a need for information to perform their job and/or information that is generally available to other employees in the workplace in a format that takes their disability into account. Within [insert days-TBD] after meeting, GSK will provide the employee with the information required in a format that recognizes the employee's disability. If GSK cannot meet the [insert days-TBD] timeframe, Human Resources will speak with the affected employee and discuss how the employee's needs will be met pending the delivery of the information</p> <p>b) Each department, in addition to Human Resources will individually comply with the action described above</p> | January 1, 2016      |
|    |  | <p>5b. GSK shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>   | <p>During discussions and approval of a request, determine:</p> <p>a) Who will consult with the employee, and</p> <p>b) The training requirement for those who will be deemed as the Emergency Responder</p>   | January 1, 2016      |



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| 6. | <b>Workplace Emergency Response Information -</b><br>(Section 23 of IASR) | 6a. GSK shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability. | <ul style="list-style-type: none"> <li>a) As part of an employee's overall accommodation plan, employee is reviewed for the need of an Emergency Response plan.</li> <li>b) If applicable (Employee has a Emergency Response plan), partner with Manager and Employee Health Services, to ensure the Personalized Employee Evacuation Plan ("PEEP") is completed and shared with appropriate contacts as outlined on the PEEP form itself</li> <li>c) Ensure a copy of approved PEEP is filed in the Employees Accommodation plan file folder in Human Resources and is shared accordingly with Security, Facilities, Employee Health Services (EHS), the employee and the Manager</li> <li>d) Embed Plans and Process in MyLearning training on Fire Safety in connection with Human Resources</li> </ul> | January 1, 2012      |

| #  | Initiative   | Description  | Action  | AODA Compliance Date |
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| 6. | <b>Workplace Emergency Response Information -</b><br>(Section 23 of IASR), cont. | 6b. If an employee who receives individualized workplace emergency response information requires assistance and has agreed to consent, GSK shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.  | e) Based on the identified Emergency Responder for this individual, provide insight and plans as required<br>f) Emergency Responder and instructions are reviewed on an annual basis  | January 1, 2012      |
|    |  | 6c. GSK shall provide the information required under this section as soon as practicable after GSK becomes aware of the need for accommodation due to the employee's disability.   | g) Ensure that the appropriate Manager or delegate for anyone who requests special assistance and therefore has an emergency plan in place is notified as soon as possible once plans are in place  | January 1, 2012      |
|    |  | 6d. GSK shall review the individualized workplace emergency response information <ul style="list-style-type: none"> <li>• when the employee moves to a different location in the organization;</li> <li>• when the employee's overall accommodations needs or plans are reviewed; and</li> <li>• when the employer reviews its general emergency response policies.</li> </ul> | h) Ensure that a review of all plans are done with the Manager and employee ensuring the contact information and proposal are valid<br>i) If emergency response information is created, it will be adjusted and evaluated by Human Resources/ New Manager, the Employee and Facilities, during Onboarding into the new role | January 1, 2012      |

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| 7. | <b>Documented Individual Accommodation Plans -</b><br>(Section 28 of IASR) | <p>7. GSK shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.</p> <p>The process for the development of documented individual accommodation plans shall include the following elements:</p> <ul style="list-style-type: none"> <li>a) The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</li> <li>b) The means by which the employee is assessed on an individual basis.</li> <li>c) 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.</li> <li>d) 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.</li> <li>e) The steps taken to protect the privacy of the employee's personal.</li> </ul> | <ul style="list-style-type: none"> <li>a) Ensure Human Resources is trained and aware of the process as required by legislation</li> <li>b) Include the Manager and employee in the development of the accommodation plans, even if Human Resources was approached first</li> <li>c) Ensure restriction and exceptions are noted if necessary within the plan</li> <li>d) Ensure all accommodation plans are kept secure and private and only those included in development of the plan (Human Resources, Manager, and Employee) have access</li> <li>e) Review individual plans on a yearly basis or as needed should the employee or situation change</li> <li>f) Review all plans upon career development changes</li> </ul> | January 1, 2016      |

| #  | Initiative   | Description  | Action   | AODA Compliance Date |
|----|--|--|--|----------------------|
| 7. | <b>Documented Individual Accommodation Plans -</b><br>(Section 28 of IASR), cont | f) The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.<br><br>g) If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.<br><br>h) The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability. |  |                      |
| 8. | <b>Return to Work Process -</b> (Section 29 of IASR)                             | 8. GSK:<br><br>(a) shall 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<br><br>(b) shall <u>document</u> the process.   | a) Ensure the 3 <sup>rd</sup> party disability service provider's processes are compatible with the AODA requirements and document those processes<br><br>b) Connect with 3 <sup>rd</sup> Party disability services provider to review any changes | January 1, 2016      |

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| 9.  | <b>Return to Work Process</b> - (Section 29 of IASR) | <p>9. The return to work process shall,</p> <ul style="list-style-type: none"> <li>a) 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</li> <li>b) use individual documented accommodation plans, as described in section 7 under Employment Standards in this plan, as part of the process.</li> </ul> <p><i>Note: 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.</i></p> | Ensure that the 3 <sup>rd</sup> party disability service provider's process is compatible with the AODA requirements and that the process is being documented and outlines the details of the return to work process   | January 1, 2016      |
| 10. | <b>Performance Management</b> – (Section 30 of IASR) | 10. GSK as 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.   | <ul style="list-style-type: none"> <li>a) Document the process within the performance management process</li> <li>b) Ensure training is done for all Human Resources</li> <li>c) Ensure performance issues are managed and documented with respect to ensuring equality of people with disabilities</li> </ul> | January 1, 2016      |

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| 11. | <b>Career Development &amp; Advancement</b> - (Section 31 of IASR) | 11. GSK as 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. | <ul style="list-style-type: none"> <li>a) Accessibility needs, will be evaluated by Human Resources Manager and Line Manager during Onboarding into the new role</li> <li>b) Accommodation plans will be transferred to the New Line Manager and adjustments will be incorporated as agreed upon by the Manager, the employee and Human Resources</li> <li>c) Human Resources will ensure career and development plans are monitored for fairness, semi annually</li> </ul>                           | January 1, 2016      |
| 12. | <b>Redeployment</b> - (Section 32 of IASR)                         | 12. GSK as 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.   | <ul style="list-style-type: none"> <li>a) Ensure redeployment process is clearly documented and understood by all of Human Resources</li> <li>b) Human Resources will assess diversity and accommodation requests during restructuring exercises ensuring fair and equitable processes and will consider accommodation requests in cases of redeployment</li> <li>c) Accessibility needs will be evaluated by Human Resources Manager and Line Manager during Onboarding into the new role</li> </ul> | January 1, 2016      |

| #   | Initiative  | Description   | Action   | AODA Compliance Date |
|-----|---|---|--|----------------------|
| 13. | <b>Accessible Formats &amp; Communication Supports for Employees</b> - (Section 26 of IASR) | <p>13. In addition to its obligations under section 12, where an employee with a disability so requests it, GSK shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:</p> <ul style="list-style-type: none"> <li>• Information that is needed in order to perform the employee's job; and</li> <li>• Information that is generally available to employees in the workplace</li> </ul> | Guidelines and instructions will be created on a department by department basis to ensure that if such a request is made, they will be able to comply with it                              | January 1, 2016      |
| 14. | <b>Emergency Procedures, Plans or Public Safety Info</b> – (Section 13 of IASR)             | <p>14a. GSK shall provide its emergency procedures, plans or public safety information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.</p>  | <p>a) Information to be provided in accessible formats as soon as practicable, upon request</p> <p>b) All alerts, signals and Announcements are in a format that supports disabilities</p> | January 1, 2012      |
|     |   | <p>14b. If an employee who receives individualized workplace emergency response information requires assistance and has agreed to consent, GSK shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.</p>   | <p>Insight and plans are provided to identified Emergency Responder as consented to by individual. Instructions are reviewed on an annual basis</p>  | January 1, 2012      |

| #   | Initiative   | Description  | Action   | AODA Compliance Date |
|-----|--|--|--|----------------------|
| 14. | <b>Emergency Procedures, Plans or Public Safety Info – (Section 13 of IASR), cont.</b> | 14c. GSK shall review the individualized workplace emergency response information <ul style="list-style-type: none"> <li>• when the employee moves to a different location in the organization;</li> <li>• when the employee’s overall accommodations needs or plans are reviewed; and</li> <li>• when the employer reviews its general emergency response policies.</li> </ul>  | c) Review of all plans are done with the Manager and employee to ensure that the contact information and proposal is valid<br>d) If emergency response information was created, it was adjusted and evaluated by Human Resources, the New Manager, the employee and Facilities, during Onboarding into the new role  | January 1, 2012      |
|     |  | 14d. GSK shall, provide notice in the event of a planned service interruption to facilities, services or systems that are relied upon by people with disabilities to access GSK’s goods or services, notice shall be provided in advance and as soon as possible.<br><br>This notice will include information about the reason for the disruption, its anticipated duration and a description of alternative facilities, services or systems that may be available.<br><br>Notice may be given by posting the information in a conspicuous place on GSK’s premises or on the GSK website or by such other method that is reasonable under the circumstances. | e) All interruptions to facilities and services are posted in advance, and especially in places that affect people with disabilities<br>f) Notifications include the reason for the interruption, and an explanation of how long it is expected to be<br>g) Notifications provide alternative access or process<br>h) Notifications are posted in appropriate places for visibility by customers and employees | January 1, 2012      |



**PART IV – Build Environment Standards**

| #  | Initiative                   | Description   | Action   | AODA Compliance Date |
|----|------------------------------|---|--|----------------------|
| 1. | <b>Building requirements</b> | 1. All New building structures must comply with AODA legislation if initiated after January 1, 2017 | If GSK undertakes the build or a major renovation of a public space, it will meet with its contractors and developers in order to ensure that the Built Environment Standard is being complied with. | January 1, 2017      |