

Accessibility for Manitobans with Disabilities Policy

Statement of Commitment

The goal of The Accessibility for Manitobans Act, 2014 (“**AMA**”) is to create a more accessible Manitoba by identifying, and to the extent possible, preventing and eliminating barriers experienced by persons with Barriers (as defined hereafter).

Novartis Pharmaceuticals Canada Inc. (the “**Company**”) is committed to complying with the Accessibility Standard for Customer Service (the “**ASCS**”) under the AMA.

If a Barrier to accessing our goods or services cannot be removed, we seek to provide alternate ways to access the goods or services.

The following policy statements, organizational practices and measures are intended to meet the requirements of the ASCS. This policy applies to all employees of the Company (“**Employees**”).

AMA Standards:

The AMA contemplates compliance with five accessibility standards:

- 1- Customer service;
- 2- Accessible information and communications;
- 3- The built environment;
- 4- Employment;
- 5- Transportation.

The ASCS is the only accessibility standard that has been enacted.

DEFINITIONS

What is a barrier?

For a person who has a physical, mental, intellectual or sensory disability, a barrier is anything that interacts with that disability in a way that may hinder the person's full and effective participation in society on an equal basis (“**Barrier**”).

Examples of Barriers:

The following are examples of Barriers:

- (a) a physical barrier;
- (b) an architectural barrier;
- (c) an information or communications barrier;
- (d) an attitudinal barrier;

- (e) a technological barrier;
- (f) a barrier established or perpetuated by an enactment, a policy or a practice.

ACCESSIBILITY STANDARD FOR CUSTOMER SERVICE

PURPOSE

The Company is committed to providing an equal opportunity to all of our customers. The objective of this policy is to ensure we meet the requirements of the ASCS and promote its underlying core principles.

SCOPE

All Employees, contractors and agents who work on behalf of the Company and deal with members of the public or other third parties are expected to conduct themselves in accordance with this policy.

CORE PRINCIPLES

The Company will make every effort to ensure that this policy and related practices and procedures are consistent with the following four core principles and achieving accessibility is done through following these principles:

Access: persons should have barrier-free access to places, events and other functions that are generally available in the community;

Equality: persons should have barrier-free access to those things that will give them equality of opportunity and outcome;

Universal design: access should be provided in a manner that does not establish or perpetuate differences based on a person's disability;

Systemic responsibility: the responsibility to prevent and remove barriers rests with the person or organization that is responsible for establishing or perpetuating the barrier.

PROVIDING GOODS AND SERVICES TO PERSONS WITH DISABILITIES

Communication

The Company strives to communicate with persons with disabilities in a manner that takes into account the person's disability. Communication strategies are set out in the Company's accessibility training program and the Company, when appropriate, offers to communicate in different ways such as writing things down, reading things out loud and taking extra time to explain things.

Assistive Devices

Persons with disabilities are permitted to use their own assistive devices when on the Company's premises for the purposes of obtaining, using or benefiting from the Company's goods and services.

If there is a physical, technological or other type of barrier that prevents the use of an assistive device on the Company's premises, the Company will make its best efforts to remove that barrier. If the Company is not able to remove the barrier, the Company will ask the individual with the disability how he/she can be accommodated, what alternative measures would enable equal access to the Company's goods and services and the Company will make its best effort to provide the individual with alternative means of assistance.

Accessibility to Company Premises

The Company has equipped its facilities with the following services in order to provide persons with disabilities with an equal opportunity to obtain, use and benefit from the Company's goods and services:

- Rampways (with handrails);
- Elevators;
- Handicapped parking spots.

Guide Dogs and Service Animals

Persons with disabilities that are accompanied by a guide dog or service animal will be allowed to access the Company's premises that are open to the public and keep the animal with him or her unless otherwise excluded by law. If a guide dog or service animal must be excluded from the premises, the Company will provide the individual with the reasons for the exclusion and explore alternative ways to meet the individual's needs.

If it is not readily apparent that the animal is a service animal, the Company may request a letter from a physician or nurse confirming that the person requires the animal for reasons relating to his/her disability.

Support Persons

Persons with disabilities may enter premises owned and/or operated by the Company with a support person and have unobstructed access to the support person while on the premises.

The Company may require persons with disabilities to be accompanied by a support person where it is necessary to protect the health or safety of the person with a disability or the health and safety of others on the premises.

Notice of Temporary Disruptions

The Company will notify customers if there is a planned or unexpected disruption of facilities or services typically used by persons with disabilities in order to access the Company's goods and services. The notice will be posted at the entrance of the affected premises and on the Company's website.

The notice will include the following information:

- The facility or service that is unavailable;
- The anticipated duration of the disruption;
- The reason for the disruption;
- Alternative facilities or services, if available.

ASCS TRAINING AND RECORDS

The Company will provide training as required under the AMA to all persons to whom this policy applies as well as to the individuals charged with developing this policy and related procedures and practices.

Content of Training

Training will include:

- A review of the purpose of the AMA and requirements of the ASCS;
- A review of this policy;
- How to interact and communicate with persons with various types of both visible and non-visible disabilities;
- How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog, service animal or support person;
- How to use equipment and/or devices made available on the Company's premises to assist persons with disabilities with obtaining, using or benefiting from the Company's goods and services;
- What to do if a person with a disability is having difficulty accessing the Company's premises and/or goods and services.

The training will be provided to all Employees to whom this policy applies as soon as practicable after he or she is assigned the applicable duties. Training will be provided on an ongoing basis in accordance with changes to this policy and its related practices and procedures.

FEEDBACK

The Company welcomes and appreciates feedback regarding this policy and its implementation. Feedback can be provided in the following ways:

- In person at reception
- By telephone at **514-631-6775**
- In writing: **General Counsel**
385 boul. Bouchard
Dorval, Quebec
H9S 1A9
- Through our website: **www.novartis.ca**

The Company will respond to feedback within **five (5)** business days of receipt of the feedback.

DOCUMENTATION TO BE MADE AVAILABLE

This policy is made available to any member of the public upon request. This policy will also be posted on our Intranet and in a conspicuous place in the workplace.

FORMAT OF DOCUMENTS

The Company will provide documents, or the information contained in documents, required to be provided under the ASCS, to persons with disabilities in a format that takes into account the person's disability.

WORKPLACE EMERGENCY RESPONSE INFORMATION

In addition to providing customers with disabilities with full accessibility to goods and services at all times in a way that respects their dignity and independence, the Company is committed to providing Employees with disabilities with the same opportunities as other Employees. With this in mind, the Company will provide individualized workplace emergency response information to all Employees with a visible or non-visible disability, if the individual so requires. This information can also be provided to the Employee who is designated to assist the Employee with disabilities.