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Rothmans Benson & Hedges Inc. (the "Company") is committed to providing an accessible and inclusive environment in which all individuals have equal access to its services as required by the Accessibility Standards for Customer Service, O. Regulation 429/07 ("ASCS") made under the *Accessibility for Ontarians with Disabilities Act, 2005* ("AODA").

To that end, the Company will take steps to ensure that anyone with a disability who visits the Company's premises or who accesses the Company's services will be able to do so in a manner that respects their dignity and independence. The Company will make every reasonable effort to ensure that its policies, practices, and procedures respecting accessibility will be consistent with the principles of independence, dignity, integration and equality of opportunity, as outlined in the ASCS.

Availability of Documents

Copies of the Company's policies developed and implemented to meet the requirements of ASCS are available upon request. If required to provide a copy of our policies to a person with a disability, the Company will provide the person with the policies or the information contained in the policies in a format that takes the persons disability into account and as agreed upon by the Company and the person with the disability.

Questions

Persons seeking access to the Company's services who have questions about accessible services may contact a management member from the Company's office in Ontario for information and advice.

You may also refer to our Feedback Process for additional information.

Assistive Devices

Rothmans, Benson & Hedges Inc. (the “Company”) is committed to ensuring that members of the public and third parties who access the Company’s services and anyone with a disability who visits the Company’s premises are able to use their personal assistive devices within the limits of any applicable privacy, health and safety, or other relevant laws.

Use of Assistive Devices

Persons with assistive devices are entitled to use personal assistive devices while accessing any of the Company’s services or premises.

Such persons are entitled to confidentiality and the protection of their privacy and are not required to disclose to employees of the Company, information about their disability and/or the need for a personal assistive device unless such information is required by the Company or other appropriate persons for the purposes of creating and implementing an individualized accommodation plan, to assist the person with a disability.

Commonly Used Assistive Devices

Persons may use a variety of personal assistive devices depending on their disability to access the Company’s services, including the following:

Persons who have vision loss:

- a. Screen readers - a software application that attempts to identify and interpret what is being displayed on the screen (or, more accurately, sent to standard output, whether a video monitor is present or not). This interpretation is then re-presented to the user with text-to-speech, sound icons, or a Braille output device;
- b. Digital audio player – enables a person to listen to books, directions;
- c. Magnifier – makes print and images larger and easier to read;
- d. Portable global positioning systems (GPS) – helps orient a person to get to specific destinations; and
- e. White cane – helps a person find their way around obstacles.

Persons who are deaf or otherwise hard of hearing:

- a. FM transmitter system or other amplification devices – boosts sound closest to the listener while reducing background noise;
- b. Hearing aid – makes sound louder and clearer; and
- c. Teletypewriter (TTY) – helps a person who is unable to speak or hear to communicate by phone. The person types their messages on the TTY keyboard and messages are sent using telephone lines to someone who has a TTY, or to an operator (e.g. Bell Relay Service) who passes the message to someone who does not have a TTY.

Persons who have physical disabilities:

- a. Mobility device (e.g., a wheelchair, scooter, walker, cane, crutches) – helps a person who has difficulty walking; and
- b. Personal oxygen tank – helps with breathing.

Persons who have learning disabilities:

- a. Electronic notebook or laptop computer – used to take notes and to communicate;
- b. Personal data managers – stores, organizes and retrieves personal information; and
- c. Mini pocket recorders – records information for future playback.

Persons who have developmental disabilities:

- a. Communication boards (e.g., a Bliss board) – used to pass on a message by pointing to symbols, words or pictures; and
- b. Speech generating devices – used to pass on a message using a device that “speaks” when a symbol, word or picture is pressed.

Assistive Devices and Alternate Measures Provided by the Company

The Company provides several assistive devices and alternate measures on-site to enable persons with disabilities to benefit from the same level of service, in the same place, and in a similar way as other persons while accessing the Company’s services.

The following assistive measures are available on the Company’s premises:

1. Automatic door openers at base of office buildings/premises;
2. Elevators;
3. Staff Assistance; and
4. Video conferencing (i.e. microphones) in training and conference rooms.

Support Persons

Rothmans, Benson & Hedges Inc. (the "Company") is committed to ensuring that members of the public and third parties who access the Company's services and anyone with a disability who visits the Company's premises will be able to be accompanied by their support persons.

Policy on Support Persons

The Company will allow members of the public and/or third parties to receive assistance from their own support persons while accessing the Company's services at its premises that are open to the public or third parties.

A support person may be a paid personal support worker or a volunteer, friend or family member. This person does not necessarily need to have special training or qualifications.

The Company recognizes that support persons may assist persons with disabilities in many different ways, such as:

- a. A person who is hearing or vision impaired may use a support person to guide, to provide transportation or to provide adaptive communication such as tactile or adapted American Sign language, large print notes, print on palm or two-handed manual signing;
- b. A person with a disability may use a support person to assist with complex communication or note-taking;
- c. A person with a developmental disability may use a support person to help with travel, daily activities, prompting medication, complex tasks, or to keep them safe from dangerous situations;
- d. A person with a physical disability may use a support person to provide services related to travelling, personal care, or monitoring medical conditions;
- e. A person with a seizure disorder may use a support person to assist in the event of a seizure;
- f. A person with a speech impairment who uses an augmentative or alternative communication system may use a support person to relay or interpret a person's communications; and
- g. A person with vision loss may use a support person to read information or guide.

Fees for Support Persons

The Company recognizes that persons with disabilities who use a support person are often unable to attend places or participate in activities without that support person.

Requirements with respect to fees for support persons, if any, will be noted on event invitations and/or registration forms.

Service Animals

Rothmans Benson & Hedges Inc. (the "Company") is committed to ensuring that members of the public and third parties who access the Company's services and anyone with a disability who visits the Company's premises will be able to use their service animals within the limits of any applicable health and safety or other relevant laws.

Policy on Service Animals

The Company will allow service animals onto its premises and allow a person with a disability to be accompanied by his/her service animal.

The Company recognizes that service animals may assist persons with disabilities in many different ways, including:

- a. Persons with vision loss may use guide dogs, or seeing eye dogs to alert them of changes in elevation such as curbs and stairs and other obstacles;
- b. Persons who are hearing impaired may use a hearing aid, hearing, sound alert or hearing alert dog, or other animal to alert them to sounds, often by a nudge or pawing and lead the person to the source of the sound;
- c. Persons with mental health disabilities may use a psychiatric service dog to retrieve and prompt the person to take medicine, retrieve or activate medical alert or leads the person out of crowds;
- d. Persons with physical disabilities may use a service or mobility dog or animal or a special skills dog or animal to pull wheelchairs, carry objects, pull items, turn handles or push buttons such as door openers; and
- e. Persons who have epilepsy or other seizure disorders may use a seizure alert, seizure assist or seizure response dog or animal to alert them to an oncoming seizure, steer owner from danger during a seizure, or activate medical alert.

Prerequisites for Service Animals

No animal will be permitted on the Company's premises as a service animal unless:

1. it is readily apparent that the animal is being used because of a person's disability; or
2. the person with a disability a medical practitioner confirms that the animal is required for reasons relating to the person's disability.

It will "readily apparent" that an animal is a service animal when:

1. The animal is wearing a harness or saddle bags;
2. The animal is wearing a sign that identifies it as a service animal;
3. The person using the service animal has a certificate or identification card from a service animal training school or an identification card from the Attorney General of Ontario; or
4. It is apparent that the person is using the animal to assist him or her in doing things, such as opening doors or retrieving items.

Where an animal is not a trained guide dog and it is not readily apparent that the animal is a service animal, the Company may ask the person using the service animal for a letter from a doctor or nurse that states the animal's assistance is needed because of a disability. The letter does not need to identify the nature of the disability, the reason the animal is needed, or how the animal may provide assistance. The letter need only state that the animal is required because of a disability.

Standards Applicable to Service Animals at the Company's Premises

All service animals are expected to meet the following standards:

1. the health and care of the animal is the sole responsibility of the person using the service animal;
2. the animal must be within the person's control at all times, either by means of a leash, containment (e.g. crate) or voice command;
3. the animal must behave in a non-aggressive manner at all times (e.g. no jumping, growling, snarling, biting or snapping); and
4. the animal must not be disruptive in the workplace (e.g. barking, or destructive of state or personal property).

Failure to meet any of the above standards may result in the disallowance of the service animal on the Company's premises.

Removal of Service Animal from Premises

In the event that a service animal's behavior poses a direct threat to the health or safety of others and the owner does not take action to correct its behavior, the Company has the right to exclude the animal from its premises. The Company will not exclude a particular service animal based on past experience with other animals or based on fear that is not related to a service animal's actual behavior. Each situation will be considered individually.

In the event the Company excludes a service animal, the Company will take steps to ensure that other measures are available to enable the person with a disability to obtain, use or benefit from its services.

Notice of Temporary Disruptions

If there is a temporary disruption of facilities or services that persons with disabilities use to access the Company's services, the Company will give notice of the disruption to the public. Notice will include information about the reason for the disruption, its anticipated duration and a description of alternative facilities or services.

Notice will be given by posting the information in a conspicuous place on the Company's premises or by posting it on the Company's website.

Feedback Process

Rothmans, Benson & Hedges Inc. (the "Company") recognizes that constructive feedback provides a valuable opportunity to learn and improve. To that end, every person has the right to make a complaint or offer a suggestion or compliment on the way in which the Company provides its services to persons with disabilities.

Process to Initiate Feedback and/or Complaints

The Company is committed to making every effort to provide services to members of the public and third parties that are free of accessibility barriers.

Members of the public and third parties who wish to provide feedback on the way the Company provides its services to persons with disabilities may do so by contacting:

Human Resources

Telephone: 416-442-3571

E-mail: RBHPensionandBenefits.PMI@pmi.com

Process to Respond to Feedback and/or Complaints

Response to feedback and complaints respecting the way in which the Company provides its services to persons with disabilities will be addressed by the Company.

If the person initiating the feedback or complaint wishes to be contacted, the Company will respond within ten (10) business days either in writing, by e-mail or by telephone acknowledging the receipt of feedback and outlining the action(s) to be taken.

Employee Training

Rothmans, Benson & Hedges Inc. (the "Company") will develop and maintain an accessibility training program that identifies applicable legal requirements. The Company's training requirement will apply to:

- The Company's employees and other parties (e.g. contractors) who, in the provision of the Company's services, deal with members of the public and third parties on the Company's behalf; and
- Every person who participates in developing the Company's policies, practices, and procedures governing the provision of the Company's services to members of the public and third parties, if they direct, monitor or evaluate policies on how services are provided to persons with disabilities.

Summary of Contents of Training

Training will include the following:

- Review of the purposes of the *AODA*, including a description of barriers to accessible client service;
- An overview of the requirements of the *ASCS*;
- Instruction on the ways in which a person with a disability may communicate (e.g. sign language, gestures, boards with symbols on them, through interveners, by TTY);
- Instruction on how to appropriately interact and communicate with persons with various types of disabilities;
- Instruction on how to interact with persons with disabilities who use an assistive device or require the assistance of a service animal or a support person (including appropriate and inappropriate methods of interaction);
- How to identify assistive devices at the Company's premises (i.e. automatic doors) and a description of alternative methods of service provision used at the Company (i.e. providing assistance of staff person) that may help with the provision of the Company's services to persons with disabilities;
- What to do if a person with a disability is having difficulty in accessing the Company's services;
- Review of the Company's policies, practices, and procedures about the provision of its services to persons with disabilities; and
- How to deal with feedback and complaints, including internal escalation of the feedback or complaint, as appropriate.

The degree, nature and format of the training will be tailored to the actual need of the person being trained to ensure that training resources are focused where they will have the greatest impact on compliance with the *ASCS* and our ability to provide accessible service.

Terms/Definitions

Below is a list of terms, definitions and acronyms as referenced in Rothmans Benson & Hedges Inc.'s policies and procedures on the *Accessibility for Ontarians with Disabilities Act, 2005* and the Accessibility Standards for Customer Service Regulation, O. Reg. 429/07.

Term/Acronym	Definition
Alternative Ways	Ways of helping members of the public or third parties that access the Company's premises or goods and services when they are unable to use their own assistive devices.
AODA	<i>Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, Chapter 11</i>
ASCS	Accessibility Standards for Customer Service, O. Reg. 429/07
Assistive Device	An assistive device is a tool, technology or other mechanism that enables a person with a disability to do everyday tasks and activities such as moving, communicating or lifting. It helps the person to maintain their independence.
Barrier	Anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice.
Blind Person	Means a person who because of blindness is dependent on a guide dog or white cane.
Complaint	Complaints identify a problem where the person is looking for remedy. For example, "I can't access your building because there is no automatic door opener, when are you going to install one?"
Dignity (as referenced in s. 3(2) of the ASCS)	Persons with disabilities are treated as valued and as deserving of effective and full service as any other person.
Disability (as defined by Ontario's AODA, s. 2)	<p>"disability" means,</p> <p>(a) 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,</p> <p>(b) 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,</p> <p>(c) 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,</p> <p>(d) a mental disorder, or</p> <p>(e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.</p>
Equal Opportunity (as referenced in s. 3(2) of the ASCS)	Persons with disabilities must be given an opportunity equal to that given to others to obtain, use and benefit from a company's goods and services.

Feedback	Feedback refers to commentary offered where the person is not necessarily looking for action or remedy. For example, "You should consider having an automatic door opener." Feedback can be positive or negative.
Guide Dog, as per the <i>Blind Person's Rights Act, R.S.O. 1990, c.B.7</i> and Guide Dogs, R.R.O. 1990, Regulation 58	Means a dog trained as a guide for a blind person and having the qualifications prescribed by the regulations.
Independence (as referenced in s. 3(2) of the ASCS)	Means freedom from control or influence of others.
Integration (as referenced in s. 3(2) of the ASCS)	The provision of a company's goods and services to persons with disabilities must be integrated unless an alternate measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from a company's goods and services.
Members of the Public	Members of the public include those individuals that use a company's goods and services – e.g. clients
'Operate Premises'	A provider is deemed to 'operate premises' if they have control over the premises and are responsible for determining who is allowed to enter and exit the premises or areas of those premises. Providers who rent or lease their facilities have control over their premises.
Premises	Premises include the buildings, land or grounds where a company provides goods or services.
Service Animal (as referenced in ss. 4(8)(9) of the ASCS)	An animal is a service animal for a person with a disability, (a) if it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or (b) if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability. A service animal may also be referred to as a mobility animal or assistance animal.
Support Person (as referenced in s. 4(8) of the ASCS)	Means, 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 to goods or services.
Third Parties	Other business or organizations that a company makes its goods and services available to.