

# GLOBALIZATION PARTNERS (CANADA), ULC MULTI-YEAR ACCESSIBILITY PLAN

### **Introduction: Background & Purpose**

In 2005, the government of Ontario, Canada passed the *Accessibility for Ontarians with Disabilities Act* (the "*AODA*"). The *AODA* requires Globalization Partners (Canada), ULC (the "Company") to 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 of the Integrated Accessibility Standards Regulation (the "IAS"), established under the *AODO* to ensure accessibility for persons with disabilities in the areas of (1) Information and Communication, (2) Employment, (3) Transportation, (4) Design of Public Spaces, and (5) Customer Service.

This multi-year accessibility plan (the "Accessibility Plan") outlines the Company's strategy to prevent and remove barriers for persons with disabilities and to address the current and future requirements of the IAS in order that the Company fulfills its commitment as outlined in the Company's Integrated Accessibility Standards Policy.

#### **Statement of Commitment**

The Company is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and by meeting our accessibility requirements under Ontario's accessibility laws.

### **Compliance with Existing Law**

Nothing in the Company's Accessibility Plan is intended to replace or negate existing laws regarding accessibility for persons with disabilities including but not limited to the Human Rights Code and the Workplace Safety and Insurance Act ("Accessibility Legislation").



### **Review of Accessibility Plan**

The Accessibility Plan must be reviewed and updated at least once every 5 years but may be reviewed more frequently depending on need. This most recent review of the Accessibility Plan was completed in June 2021. The next formal review is scheduled for June 2026 unless an earlier review is required due to changes in the legislation or the Company's policies.

### **Transparency**

As of June 30, 2021, the Accessibility Plan will be posted on the Company's website. The Accessibility Plan will be provided to any member of the public in a hard, electronic or other accessible format (including but not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities) upon request to the Company.

### **Application**

This Accessibility Plan applies to the Company's operations in Ontario, Canada, including the Company's employees in Ontario.

### **Definitions**

- 1. The term "disability" means the following:
  - 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, 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,
  - b. a condition of mental impairment or a developmental disability,
  - c. a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
  - d. a mental disorder, or



- 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 or relevant provincial laws.
- 2. The term "Communication Supports" includes but is not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communication.
- 3. The term "Accessible Formats" includes, but is not limited to, large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.
- 4. The phrase "Unconvertible Information or Communication" means information or communication that it is not technically feasible to convert, or if it is technically feasible to convert, the technology required to do so is not readily available.

### **Documentation of Need for Accommodation or Accessibility Request**

The Company reserves the right to request reasonable medical documentation to support a need for accommodation or an accessibility request pursuant to this Accessibility Plan or the Company's policies.



### **General Accessibility Standards**

Requirement	Responsible Individual/Department	Action	Status
Integrated Accessibility Standards Policy ("Policy")  Develop, implement and maintain polices governing how the Company achieves or will achieve accessibility through meeting the requirements of the IAS.  Statement of organizational commitment to meeting the accessibility needs of persons with disabilities in a timely manner.  Prepare one or more written documents describing the policies and make the policies publicly available and provide them in an accessible format upon request.	Global Operations, People Resources & Legal	The Company's Global Operations, People Resources, and Legal departments have created and implemented a written policy and a statement of commitment.	Complete
Multi-Year Accessibility Plan  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.  Post the accessibility plan on the Company's website and provide the plan in an accessible format upon request.	Legal will have initial responsibility for developing the accessibility plan, with input from Global Operations and People Resources. Global Operations and People Resources will have primary responsibility for administering the accessibility plan but	Review the requirements of the IAS and determine how the Company will meet all of the requirements and work towards preventing and removing barriers to accessibility.  Post the accessibility plan on the Company's website at <a href="https://www.globalization-partners.com">www.globalization-partners.com</a> .	Complete



Review and update the accessibility plan at least once every five years.	will consult with other departments as required.	Review and update the accessibility plan as often as necessary but at least every 5 years.	
Provide training to all existing employees, volunteers and all persons who participate in the development of AODA Policies.  Training must include:  i. The requirements of the IAS ii. The Human Rights Code as it pertains to persons with disabilities; iii. How to interact and communicate with persons with disabilities; iv. The AODA Policies as required by the IAS.  Keep a record of the training provided, including the dates on which the training is provided and the number of individuals to whom it is provided.  Ensure that contractors providing goods, services and/or facilities on its behalf have received the training required under the IAS.	Global Operations and People Resources	Determine which training mandated under the IAS is necessary and appropriate for each employee based on their particular duties.  Source online training providers that offer the ability to customize training programs to suit the Company's operations.  Additional in-person training will be provided to particular employees as necessary (e.g., additional training for IT personnel on requirements for accessible website).  The content of the training will be appropriate to the individual's work duties.  The Company will ensure training is provided to all persons to whom the Policy applies as soon as practicable after the person is hired or otherwise retained and if the Policy changes.	Complete
		Global Operations and People Resources will maintain records of training.	



### **Information and Communication Standard**

Requirement	Responsible	Action	Status
	Individual/Department		
Emergency Plans, Procedures or Public Safety Information  Provide any emergency plans, procedures or public safety information that it makes available to the public in an Accessible Format or with appropriate Communication Supports, as soon as practicable, upon request.	Global Operations and People Resources	Requests for Accessible Formats and Communication Supports will be directed to Global Operations or People Resources.  Global Operations and People Resources personnel will familiarize themselves with different types of Accessible Formats and Communication Supports as well as how to provide same.	Complete
Feedback  Ensure that processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of Accessible Formats and Communications Supports, upon request.  Notify the public that Accessible Formats and Communications Supports are available in respect of its feedback procedures.	Global Operations, People Resources, and Marketing Departments	Human Resources is responsible for providing Accessible Formats and Communication Supports if requested by an individual with a disability in the course of utilizing the Company's feedback process. The Company will provide or receive responses to feedback from employees, clients and the public in an Accessible Format or with Communication Supports upon request Notification of the availability of Accessible Formats and Communication Supports will be posted on the Company's website at <a href="https://www.globalization-partners.com">www.globalization-partners.com</a> .	Complete



## **Accessible Formats and Communication Supports**

Upon request, provide or arrange for the provision of Accessible Formats and Communication Supports in order to make its communications or information about the goods, services and/or facilities it offers accessible to persons with disabilities.

Provide Accessible Formats and Communication Supports in a timely manner at a cost that is no more than the regular cost charged to other persons and in a manner that takes account of the person's accessibility needs due to disability.

Consult with the person making the request when determining the suitability of an Accessible Format or Communication Support and notify the public of the availability of same. Global Operations, People Resources and Marketing Departments Requests from the public for Accessible Formats and Communication Supports are likely to be directed to Global Operations or People Resources in the first instance, or if coming through the Company's website, the Marketing Department.

Notification about the availability of documents required to be provided under the IAS is posted on the Company's website at <a href="https://www.globalization-partners.com">www.globalization-partners.com</a> as well as the right to request such documentation in an Accessible Format or with a Communication Support.

Global Operations, People Resources, and Marketing will be trained on the obligation to provide Accessible Formats and Communication Supports and how to consult with a person making the request that would meet that person's individual needs, as well as directing inquiries to People Resources or Legal where required.

The Company may not have Accessible Formats immediately available upon request. If a person makes a request for accessible documentation in these circumstances, the Company will contact and obtain the services of a company that

Complete



		Supports will be provided in a timely manner and at a cost that is no more than the regular cost charged to other persons.  Exempt Information  The Information and Communication Standard does not apply to (i) Unconvertible information or communications; and (ii) information that Globalization Partners does not control directly or indirectly through a contractual relationship.  If Globalization Partners determines that information or a communication is Unconvertible information or	
		communications, it will explain why this is the case and provide the person making the request with a summary of the said information or communication.	
Accessible Websites and Web Content  Ensure that, where practicable, a New Internet Website and web content on such site(s) conforms with WCAG 2.0 Level A.  Dr. January 1, 2021 angure that where	Marketing Department	The Company will ensure IT personnel and others responsible for management of the Company's website are aware of the requirements to create an accessible website and the timelines for so doing.	Complete
By <b>January 1, 2021</b> ensure that, where practicable, any website or content on that			



site(s) published after January 1, 2012 conforms	The Company operates a website to serve
with WCAG 2.0 Level AA to the extent	its clients and members of the public.
required by the IAS.	The Company will ensure its website
	meets the applicable accessibility
	standards by January 1, 2021.

### **Employment Standard**

Requirement	Responsible	Action	Status
	Individual/Department		
Recruitment  Notify the public and employees about the availability of accommodation for applicants with disabilities in its recruitment processes.	Legal will have initial responsibility for developing the notice of availability of accommodation for applicants with disabilities, with input from People Resources. People Resources will have primary responsibility for distributing the notice but will consult with other departments as required.	People Resources will develop a notice, in consultation with the Legal Department, for public and external applicants about the availability of accommodation during the recruitment process. This notice will be posted on the Company's website.  Where the Company posts open positions on job search websites, the Company will include a notification of the availability of accommodation during the recruitment process.  The Company will instruct any external recruiters it engages to include the notice as well in their advertisements/job postings.	Complete



#### Recruitment, assessment or selection process

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.

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.

Legal will have initial responsibility for developing the notice of availability of accommodation for applicants with disabilities, with input from People Resources. People Resources will have primary responsibility for distributing the notice and consulting with applicants, but will consult with other departments as required.

People Resources will develop a notice about the availability of accommodation during the assessment and selection process.

The Company sends emails to applicants when they are selected to come in for an interview. This email will include the notice about the availability of accommodation during the assessment and selection process.

People Resources will consult with any applicant requesting accommodation in respect of an assessment or selection process to determine an appropriate accommodation.

Where the Company determines an applicant, due to a disability, requires accommodation during the assessment or selection process, the Company will provide accommodation unless it imposes an undue hardship on the Company.

Where the Company uses recruitment agencies to recruit for certain position, the Company will notify the recruitment agency of its obligation to notify applicants about the availability of accommodation during the recruitment, assessment and selection process in the

Complete



		Company's service contract with the recruitment agency.	
Notice to successful applicants  Notify successful applicants of the Company's policies for accommodating employees with disabilities.	People Resources and Legal	The Company will develop a clause to be added to offer letters and/or contracts of employment that will serve to notify successful applicants about the Company's policies on accommodating employees with disabilities.	Complete
Informing employees of supports  Inform employees of policies used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.  Provided to new employees as soon as practicable after commencing employment.  Provide employees with updated information whenever there is a material change to its policies on the provision of job accommodations for employees with disabilities.	People Resources and Global Operations	The Company's training program will notify all existing employees of the Company's policies to support employees with disabilities and the availability of accommodation during employment as well as its policies for the development of documented individual accommodation plans and return to work plans.  As above, new employees will be notified of these policies in their offer letters and/or contracts of employment.  If material changes are made to the Company's policies, People Resources and Global Operations will determine the best way to communicate such changes to employees at that time.	Complete



Accessible Formats and Communication Supports for employees  Upon the request of an employee with a disability, provide or arrange for the provision of Accessible Formats and Communication Supports in order to ensure that (i) information required by the employee to perform his/her job; and (ii) information generally available to employees in the workplace, is accessible to the employee with a disability.  Consult with the employee making the request to determine the suitability of any Accessible Format or Communication Support. However, where the needs of an employee with a disability may be accommodated in various different ways, the Company reserves the right to determine the type of Accessible Format or	People Resources and Global Operations	The appropriate individuals within People Resources and Global Operations will be trained on the requirement to provide Accessible Formats and Communication Supports to employees upon request as well as the need to consult with the employee to determine how their individual needs may be met.  Managers will be instructed to contact Human Resources where assistance in providing Accessible Formats and Communication Supports is required.  Where the provision of information in an Accessible Format is required, the Company may utilize the services of an Accessible-IT or another service provider as may be appropriate in the	Complete
Communication Support that will be provided in the circumstances.		circumstances.	
Workplace emergency response information  Provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if the Company is aware of the need for accommodation due to the employee's disability.  Provide this information as soon as practicable after becoming aware of the need for	People Resources and Global Operations	The Company's workplace emergency response procedures are included in its Human Resources Policies which is provided to employees upon commencement of employment.  Information regarding the availability of individual emergency response information is provided to employees as soon as practicable upon commencement of employment.	Complete



#### accommodation.

With the consent of the employee, provide the workplace emergency response information to the person designated by the Company to provide assistance to the employee if the employee needs assistance by reason of disability.

Review individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodation needs or plans are reviewed and when the company reviews its general emergency response policies.

The Company keeps a record of employees who would require assistance exiting the premises in an emergency and has developed protocols for providing same. Employees have been made aware of these protocols.

The record and the protocols are regularly updated to account for changes in individual employee's particular needs.

Appropriate team members will receive training on the requirement to provide individualized emergency response information to ensure that they notify Global Operations or People Resources if they become aware of an employee who would require such information. People Resources and appropriate Global Operations team members will also receive training on the circumstances that would trigger the need to review individualized emergency response information.

The Company will continue to update individualized workplace emergency response information as necessary.



Documented individual accommodation plans  Have in place a written process for the development of documented individual accommodation plans for employees with disabilities.  Where requested, an employee's individual accommodation plan will include any information regarding the provision of Accessible Formats and Communications Supports.  Where required, an employee's individual accommodation plan will include individualized workplace emergency response information.	People Resources, Global Operations, and Manager	The Company has developed an Individual Accommodation and Return to Work Policy, which contains a written process for the development of individual accommodation plans for employees with disabilities that takes into account all of the elements set out in the IAS. This policy is included in the Company's Human Resources Policies.  The appropriate People Resources, Global Operations, and Manager team members will receive training on the requirements for creating individual accommodation plans.  People Resources and Global Operations (with the support of the appropriate Manager) will be responsible for the creation of documented individual accommodation plans as well as the management of the accommodation process generally.	Complete
Return to Work Process  Have in place a documented return to work process for employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.  The return to work process must outline the steps the Company will take to facilitate the	People Resources, Global Operations, and Managers	The Company has developed an Individual Accommodation and Return to Work Policy, which includes a return to work process for employees absent due to disability and who require accommodation in order return to work. This policy is included in the Company's Human Resources Policies.	Complete



employee's return to work and will include documented individual accommodation plans as part of the process		The appropriate People Resources, Global Operations, and Managers team members will receive training on this process.  People Resources and Global Operations (with the support of the appropriate Manager) will be responsible for administering the return to work process	
		for individual employees and for creating an individual accommodation plan for returning employees where required.	
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.	People Resources, Global Operations, and Managers	People Resources, Global Operations, and appropriate Managers will receive training on how to take accessibility needs and individual accommodation plans into account when engaging in performance management and the Company's obligation under the <i>Human Rights Code</i> not to discriminate against an employee on the basis of disability.	Complete
Career development and 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.	People Resources, Global Operations, and Managers	People Resources, Global Operations, and appropriate Managers will receive training on how to take accessibility needs and individual accommodation plans into account when providing career development and advancement opportunities as well as the Company's obligation under the <i>Human Rights Code</i> not to discriminate against an employee on the basis of disability.	Complete



Redeployment	People Resources,	People Resources, Global Operations,	Complete
Take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.	Global Operations, and Managers	and appropriate Managers will receive training on how to take accessibility needs and individual accommodation plans into account when redeploying employees, and the Company's obligation under the <i>Human Rights Code</i> not to discriminate against an employee on the basis of disability.	

### **Customer Service Standard**

Requirement	Responsible Individual/Department	Action	Status
Customer Service Policy  Develop, implement and maintain polices governing how the Company provides goods, services or facilities to persons with disabilities in compliance with the requirements of the	Global Operations	The Company's Global Operations, People Resources, and Legal departments have created and implemented a written policy titled the "Accessible Client Service Policy" that addresses the requirements of the Customer Services	Complete
Customer Service Standard.  Ensure policies address use of assistive devices by persons with disabilities to obtain, use or benefit from the goods, services or facilities or with the availability of other measures, if any, which enable them to do so.		Standards.  The policy is included in the Globalization Partners Canada HR Policies and is provided to all employees in Ontario and to all persons involved in policy development or the provision of the Company's goods, services and facilities in Ontario.	



Prepare one or more written documents describing the policies and on request, give a copy of any such document to any such person.  Notify persons to whom it provides goods, services or facilities that the documents are available upon request.		Notification of the availability of the policy and that it can be provided in Accessible Format or with a Communication Support upon request, is posted on the Company's website at www.globalization-partners.com.	
Allow a person with a disability to be accompanied by a service animal or guide dog while on the Company's premises and to keep the animal with him or her, unless the animal is otherwise excluded by law.  If service animal or guide dog is excluded by law, ensure other measures are available to enable a person with a disability to obtain, use or benefit from the Company's goods, services or facilities.  Prepare one or more written documents describing the policies and on request, give a copy of any such document to any such person.  Notify persons to whom it provides goods, services or facilities that the documents are available upon request.	N/A	The Company does not currently operate a physical premise in Canada. However, the Company has identified the obligation regarding service animals and guide dogs in its Accessible Client Service Policy in the event that it does operate a physical premise at some time in the future.	N/A
Support Persons  Permit a person with a disability to be accompanied by their support person and that	N/A	The Company does not currently operate physical premises in Canada. However, the Company has identified the obligation regarding support persons in	N/A



the person with a disability is not prevented from having access to the support person while on the Company's premises.  Provide advance notice of fees charged for support person.  Before requiring the presence of a support person, consult with person with a disability and consider the health and safety implications based on available evidence. If requiring presence of support person, waive fees for support person.  Prepare one or more written documents describing the policies and on request, give a copy of any such document to any such person.		its Accessible Client Service Policy in the event that it does operate a physical premise at some time in the future.	
Notify persons to whom it provides goods, services or facilities that the documents are available upon request.			
Notice of Temporary Disruptions  Provide notice of temporary disruptions to facilities or services used by persons with disabilities to access the Company's goods, services or facilities.  Notice of the disruption must include the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available.	Global Operations	The Company has established procedures for providing a notice of a temporary disruption of a facility or service used by a person with a disability to access the Company's goods, services or facilities which are included in the Company's Accessible Client Service Policy.  Employees have received training on this obligation.	Complete



Prepare one or more written documents describing the policies and on request, give a copy of any such document to any such person.  Notify persons to whom it provides goods, services or facilities that the documents are available upon request.		Notification about the availability of the policy is posted on the Company's website at <a href="https://www.globalization-partners.com">www.globalization-partners.com</a> .	
Ensure training on the provision of goods, services or facilities to persons with disabilities is provided to everyone who:  • is an employee or volunteer;  • provides goods, services or facilities on organization's behalf;  • participates in developing organization's policies.  Ensure training includes review of purpose of AODA, requirements of the Customer Service Standard and instruction on:  • how to interact and communicate with persons with various types of disability;  • how to interact with persons using assistive devices or requiring the assistance of a service animal or support person;  • how to use equipment or devices available on premises or provided by organization that may help with the provision of goods, services or facilities to a person with a disability;	Global Operations and People Resources	The Company provides training required under the Customer Service Standards to employees, volunteers, persons who deliver goods, services or facilities on the Company's behalf in Ontario and persons responsible for policy development.  The Company utilizes the training program developed by Access Forward in partnership with the Government of Ontario as well at its Accessible Client Service Policy.  Global Operations and People Resources maintain records of training.	Complete



1	Global Operations, People Resources, and Marketing Department	The Company has established a process for clients and the public to provide feedback about the manner in which it delivers goods, services and facilities to persons with disabilities.  The feedback process is described in the Company's Accessible Client Service Policy.  Notification about the feedback process and that it will be made accessible to a person with a disability by the provision of Accessible Formats or Communication Supports upon request, is posted on the Company's website at <a href="https://www.globalization-partners.com">www.globalization-partners.com</a> .	Complete
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Notify persons to whom it provides goods, services or facilities that the documents are available upon request.			
Accessible Formats & Communication Supports  Provide, or arrange for the provision of, information in document(s) describing policies with respect to the Customer Service Standards in an Accessible Format or with Communication Supports upon request in a timely manner that takes into account the person's accessibility needs and at no additional cost.  Consult with person to determine suitability of format or support.	Global Operations, People Resources and Marketing Department	Requests from the public or clients for Accessible Formats and Communication Supports are likely to be directed to Global Operations, People Resources, or Marketing departments in the first instance.  Notification about the availability of documents required to be provided under the IAS, including the Customers Service Standards, is posted on the Company's website at <a href="https://www.globalization-partners.com">www.globalization-partners.com</a> . This notification also advises as to the ability to request such documentation in an Accessible Format or with a Communication Support.  Global Operations, People Resources, and Marketing employees are trained on the obligation to provide Accessible	Complete
		Formats and Communication Supports and how to consult with a person making the request to ensure the Accessible Format or Communication Support would meet that person's individual needs.  The Company may not have Accessible Formats immediately available upon request. If a person makes a request for	



accessible documentation in these circumstances, the Company will contact and obtain the services of a company that specializes in converting written documentation into Accessible Formats.	
Accessible Formats and Communication Supports will be provided in a timely manner and at a cost that is no more than the regular cost charged to other persons.	

### QUESTIONS ABOUT THE INTEGRATED ACCESSIBILITY STANDARDS POLICY OR ACCESSIBILITY PLAN

For more information about Globalization Partners' Integrated Accessibility Standards Policy or Accessibility Plan, please contact Globalization Partners' People Resources at peopleresources@globalization-partners.com.