

THE GROUP OF COMPANIES OF CANADA INC.'S MULTI-YEAR ACCESSIBILITY PLAN

The Group of Companies of Canada Inc., (FCB Toronto, FCB Health, Rivet, and Fuel) is committed to meeting the objectives and requirements outlined in the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)* and meeting the accessibility needs of persons with disabilities, through the implementation of the AODA requirements. This Multi-Year Accessibility Plan applies to all employees of The Group of Companies of Canada Inc.

The definition of the word “disability” is understood to be that which is identified in the *Ontarians with Disabilities Act, 2001* and the *Accessibility for Ontarians with Disabilities Act, 2005*. The *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)* defines a disability as:

- ✓ 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 coordination, blindness, 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;
- ✓ A condition of mental impairment or a developmental disability;
- ✓ A learning disability, or a dysfunction in one or more processes involved in learning or understanding or using symbols or spoken language;
- ✓ A mental disorder; or
- ✓ An injury or disability for which benefits were claimed or received under the insurance plan under the Workplace Safety and Insurance Act, 1997.

Accessibility for Ontarians with Disabilities Act, 2005 (“AODA”)

The AODA develops, implements, and enforces accessibility standards so that goods, services, facilities, accommodation, employment, buildings, structures, and premises are accessible to persons with disabilities. The AODA intends to achieve an accessible Ontario by Jan 1, 2025. In order to achieve accessibility by 2025, mandatory standards have been implemented.

The Standards include:

Customer Service Standard – Ontario Regulation 429/07

- The Customer Service Standard (Ontario Regulation 429/07) was the first standard under the AODA to become law. It ensures that people with disabilities can receive goods and services in a manner that takes into account one’s disability.
- Requirements include development of a policy, practices, procedures as well as the provision of training for staff and volunteers.
- The Group of Companies of Canada Inc. submitted compliance reports to the Ontario government indicating we had addressed the requirements of the Regulation and were meeting the compliance obligation. We will continue to ensure compliance with the Customer Service Standard.
- We developed feedback processes to respond to inquiries and suggestions received by phone, email, mail, in person. This has been communicated to internal and external stakeholders.

Integrated Accessibility Standard Regulation (IASR) – Ontario Regulation 191/11

- The IASR brings together the following standard areas in one Regulation: Information and Communication, Employment, Built Environment and Transportation. The Transportation and Built Environment Standard does not apply to us. General requirements common to all standard areas include policy development and training (on the requirements of the IASR and the *Ontario Human Rights Code*).
- The requirements have staggered compliance dates up to the year 2021

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Our Human Resources Department reviewed the requirements of the IASR. An IASR Policy was drafted to address how the Company achieves or will achieve accessibility through meeting the IASR’s requirements. The Multi Year Accessibility Plan was developed in accordance with the IASR. It outlines a strategy to prevent and remove barriers and address the current and future requirements of the AODA.

Action	Compliance Date	Responsibility	Status
Part I – General			
<p>This section of the Regulation requires us to:</p> <ul style="list-style-type: none"> • Develop & maintain an accessibility policy and a multi-year accessibility plan • Ensure staff and volunteers are trained on the Integrated Accessibility Standards Regulation (IASR) and Human Rights Code. 			
<p>Accessibility Policies</p> <ul style="list-style-type: none"> ✓ Develop and implement Integrated Accessibility Standards Regulation Policy (ISAR). ✓ Make the IASR policy publicly available and provide it in a accessible format, upon request. ✓ Review & update as required. 	January 1, 2012	Human Resources	Completed/Ongoing
<p>Develop a multi-year accessibility plan</p> <ul style="list-style-type: none"> ✓ A multi-year accessibility plan was developed. ✓ Make our multi-year accessibility plan publically available and provide it in an accessible format upon request. ✓ Review our multi-year plan and update it every five years. 	January 1, 2015	Human Resources	Completed/Ongoing
<p>Training</p> <ul style="list-style-type: none"> ✓ Ensure all employees (full-time, part-time, seasonal and contract) who provide services on behalf of the IPG Group of Companies are trained on the Integrated Accessibility Standards Regulation and Human Rights Code. Update Training as required. ✓ Keep a record of dates and individuals who have received training. 	January 1, 2015	Human Resources	Ongoing
Part II – Information and Communication Standards			
<p>This section of the Regulation includes requirements related to:</p> <ul style="list-style-type: none"> • Accessible feedback processes • Accessible formats and communication supports • Emergency procedures and plans • Accessible websites and web content 			
<p>Feedback Processes</p> <ul style="list-style-type: none"> ✓ Ensure all processes for receiving and responding to client feedback are accessible and meet the requirements under the IASR. 	January 1, 2012	Human Resources	Completed/Ongoing
<p>Accessible Format and Communication Supports</p> <ul style="list-style-type: none"> ✓ Upon request, provide accessible format and communication support for persons with disabilities ✓ Notify clients that we shall, upon request provide and arrange for the provision of accessible formats and communication supports for persons with disabilities. 	January 1, 2012	Human Resources	Completed/Ongoing
<p>Emergency Procedures, plans or public safety information</p> <ul style="list-style-type: none"> ✓ All emergency procedures and plans are publically available and shall be provided in an accessible format for persons with disabilities, upon request. 	January 1, 2015	Human Resources	Completed/Ongoing

<p>Accessible Websites and Web Content</p> <ul style="list-style-type: none"> ✓ Websites and web content published after 2012 will conform to WCAG 2.0 Level A. ✓ By Jan 1, 2021 all websites and web content will conform to WCAG 2.0 Level AA. 	<p>January 1, 2015 ongoing to January 1 2021</p>	<p>Developers, HR, VP, Operations</p>	<p>Ongoing</p>
<p>Part III – Employment Standards</p> <p>This section of the Regulation includes requirements related to:</p> <ul style="list-style-type: none"> • Recruitment, assessment and selection • Accessible formats and communication supports for employees • Workplace emergency response • Individual accommodation plans and return to work processes • Performance management, career development and redeployment 			
<p>Recruitment, Assessment, Selection</p> <ul style="list-style-type: none"> ✓ Review and update existing recruitment policies, procedures and processes. ✓ Indicate on websites and job postings, that accommodation is available for candidates with disabilities. ✓ Inform candidates about the availability of accommodations: when called for an interview, during the selection process, at the time of the job offer, and at new-hire orientation. ✓ If the selected candidate requests accommodation, consult with the candidate and arrange for provision of suitable accommodation in a manner that takes into account the candidate’s accessibility needs. 	<p>January 1, 2016</p>	<p>Talent Acquisition Manager, HR Manager</p>	<p>Completed/Ongoing</p>
<p>Informing Employees of Accommodations</p> <ul style="list-style-type: none"> ✓ Inform current employees and new hires of policies supporting employees with disabilities. ✓ Keep employees up to date on changes to policies/procedures relating to accessible formats and accommodations for persons with disabilities. 	<p>January 1, 2016</p>	<p>Human Resources</p>	<p>Completed/Ongoing</p>
<p>Accessible formats and communication supports for employees</p> <ul style="list-style-type: none"> ✓ When requested by an employee with a disability, employers shall consult the employee and provide, or arrange for the provision of suitable accessible formats and communication supports for the employee to perform their job. 	<p>January 1, 2012</p>	<p>Human Resources</p>	<p>Completed/Ongoing</p>
<p>Workplace emergency response information (self-identify form)</p> <ul style="list-style-type: none"> ✓ Individualized workplace emergency response information procedures have been developed for employees with disabilities. 	<p>January 1, 2015</p>	<p>Human Resources</p>	<p>Completed/Ongoing</p>
<p>Documented individual accommodation plans/ Return to work processes</p> <ul style="list-style-type: none"> ✓ Create a written process for the development of documented individual accommodation plans and return to work plans for employees with disabilities. ✓ Include in the process and plans all of the required elements in accordance with the provisions of the IASR. 	<p>January 1, 2016</p>	<p>Human Resources</p>	<p>Completed/Ongoing</p>
<p>Performance management, career development, advancement and redeployment</p> <ul style="list-style-type: none"> ✓ Review and update existing policies, practices to ensure compliance with IASR. ✓ Take the accessibility needs of employees with disabilities and individual accommodation plans, into account as part of performance management processes, when assessing performance, providing career development & advancement opportunities and considering redeployment. 	<p>January 1, 2016</p>	<p>Human Resources</p>	<p>Completed/Ongoing</p>