

## **Accessibility Policy and Multi-Year Accessibility Plan for iWorkGlobal Canada Ltd. and Velocity Global International Ltd.**

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Last Update: September 24, 2021*

In 2005, the Ontario Government set the goal of a “barrier-free Ontario” for people with disabilities by creating the *Accessibility for Ontarians with Disabilities Act, 2005* (“the *Act*” or “*AODA*”). The *Integrated Accessibility Standards, Ontario Regulation 191/11* (the “*IASR*”), was also created to set out the steps that organizations, including iWorkGlobal Canada Ltd. (“iWorkGlobal”) and Velocity Global International Ltd. (“Velocity Global”), (collectively “Company”), must take to meet this laudable goal. The *IASR* covers accessibility standards in customer service, information and communications, employment, transportation, and design of public spaces.

The **Company** is committed to helping Ontario become more accessible. The **Company** has already complied with the *IASR*’s Accessibility Standards for Customer Service by creating internal policies, practices and procedures, where applicable, which recognize the role the **Company** will play in making Ontario more accessible. These initiatives include the creation of a training program for employees on the *AODA*. The **Company** has also developed a feedback process, via web form.

This Accessibility Policy and Multi-Year Accessibility Plan outlines the policies, procedures and actions that the **Company** will put and has put in place to comply with the remaining requirements of the *Act* and the *IASR*. The policies, procedures and actions reflect that the **Company** has no physical premises in Ontario and does not provide goods, services or facilities directly to the public.

### **Statement of Commitment**

The Company is committed to the accessibility of our goods, services and facilities to people with disabilities.

The Company strives at all times to provide its services in a way that respects the dignity and independence of people with disabilities. We are also committed to giving people with disabilities the same opportunity to access our goods and services and allowing them to benefit from the same services, in the same place and in a similar way as other customers.

**The Company is committed to meeting the needs of our clients, including people with disabilities and will do so in a timely manner. Barrier Assessment**

In accordance with *AODA* and the **Company's** goal of providing an inclusive workplace, this Accessibility Policy and Multi-Year Accessibility Plan seeks to eliminate and prevent barriers to accessibility. Typical barriers experienced by individuals with disabilities include physical and architectural, informational and communication, technological, attitudinal and systemic barriers. Given the lack of a physical premises, the **Company** has focused its barrier assessment on the non-architectural barriers identified above.

**Accessible Emergency Information and Workplace Emergency Response Information**

The **Company**, given the lack of physical premises (or a workplace) does not have Workplace Emergency Response Information for its own physical premises. However, the Company has developed an Individualized Workplace Emergency Response Information form which is provided to our clients and employees upon request when the form is applicable to the employee's individual circumstances.

**Implementation Timeframe:**

Completed and ongoing as applicable.

**Training**

The **Company** is committed to providing training to its employees on Ontario's accessibility laws, as applicable, and on the *Human Rights Code* (the "*Code*") as it relates to people with disabilities. Training will be provided in a way that best suits the duties and specific roles of persons being trained.

In accordance with the *IASR*, the **Company** has taken the following steps to ensure employees are provided with the training needed to meet Ontario's accessibility laws and will continue to take these steps, as applicable:

- The **Company** has determined the training requirements of the accessibility standards referred to under the *IASR* and on the *Code* as it pertains to persons with disabilities;
- The **Company** will utilize its training resources provided by the Government of Ontario to determine appropriate training methods and delivery;
- The **Company** will ensure every person is trained as soon as practicable and will maintain records of the training, including the training dates and the number of individuals to whom the training has been provided;
- The **Company** will provide training in respect of any related policy changes on an ongoing basis;
- The **Company** will post accessibility training materials onto its intranet portal for internal use by its employees; and

- The **Company** will prepare a document that describes the Company's training policy, summarizes the content of the training, and specifies when the training is to be provided, and give a copy of the document to any person upon request. Notice that such document is available, on request, to the public will be posted on the **Company's** website.

**Implementation Timeframe:**

Ongoing as applicable.

**Information and Communications**

The **Company** is committed to meeting the information and communication needs of people with disabilities. We will consult with customers with disabilities to determine their specific information and communication needs.

***Accessible Formats and Communication Supports***

The **Company** has taken or will take the following steps to make sure all information about our Company and its services, including public safety information, is provided in accessible formats or with communication supports upon request.

- The **Company** will respond to requests in a timely manner that takes into account the person making the request's accessibility needs due to disability;
- The **Company** will consult with the person making the request in determining the suitability of an accessible format or communication support;
- The **Company** will have a process in place for persons with disabilities to be provided with information and communication in an accessible format and provide such information or explain, in writing, when an accessible format is not feasible and why;
- The **Company** will train staff who may receive requests for accessible information on how to manage requests and obtain accessible formats;
- The **Company** will provide publicly available information at a cost that is no more than the regular cost charged to other persons; and
- The **Company** will notify the public about the availability of accessible formats and communications supports.

**Implementation Timeframe:**

Ongoing as applicable.

### **Websites**

The **Company** has taken or will take the following steps to ensure all new websites and new web content developed in Ontario conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, Level AA.

- The **Company** will incorporate into the Company's website project management a requirement that all new Ontario-based websites and web content conform with the WCAG 2.0 Level AA;
- The **Company** will assess and evaluate all Ontario-based public websites and public web content in Ontario for conformance with accessibility standards;
- If not in conformance with WCAG 2.0 Level AA, the **Company** will consult with its internal IT department and external consultants, as needed, regarding necessary changes to bring to the websites and web content into compliance;
- The **Company** will engage the services of an external website consultant who will be engaged to make the above improvements to the websites and web content to the extent the internal IT department is unable to make the necessary changes; and
- The **Company** will ensure that necessary improvements to the Ontario-based website and/or web content are made by the internal IT department or third party provider.

### **Implementation Timeframe:**

Ongoing as applicable.

### **Feedback**

The **Company** has taken or will take the following steps to ensure existing feedback processes are accessible to persons with disabilities upon request.

- The **Company** will identify all existing feedback processes and accessibility barriers pertaining to these processes;
- The **Company** will ensure feedback processes are available in accessible formats and provide communications supports upon request;
- The **Company** will make a feedback process regarding accessibility accessible on its website(s); and
- The **Company** will advise customers and clients that feedback can be given in person, by mail, by phone, by fax or by e-mail. .

The **Company** has taken or will take the following steps to ensure a feedback process as relating to accessibility is available.

- The **Company** has established a process for receiving and responding to feedback about the manner in which it provides goods, services or facilities to persons with disabilities and the feedback process itself;

- The **Company** will advise the public, via its website, that such feedback process is available and that the Company has prepared a document describing the accessibility feedback process, which is available on request. Such document specifies the actions that the **Company** will take if a complaint is received.
- The **Company** will make known to the public the communication supports that are available to facilitate the submission of feedback; and

The **Company** will commit to responding to feedback as soon as practicable.

### ***Accessible Formats***

- The **Company** will respond to all requests for alternate accessible formats of feedback processes in a timely manner and make known to the public the communication supports available to facilitate the submission of feedback.
- The **Company** will ensure that the accessibility feedback process is itself accessible to persons with disabilities; and
- The **Company** will provide its customers and members of the public with information in an accessible format upon request. The **Company** will respond to such requests as soon as practicable.

### **Implementation Timeframe:**

Ongoing as applicable.

### **Employment**

The **Company** is committed to fair and accessible employment practices that attract and retain persons with disabilities. This includes ensuring accessibility through all stages, practices and policies of the recruitment and employment cycle.

The **Company** has taken or will take the following steps to notify the public and staff that it will accommodate people with disabilities during the recruitment and employment cycle:

- The **Company** will include a statement in any job advertisements that the **Company** will hire individuals with disabilities and will provide accommodations during the recruitment process;
- If a job applicant requests accommodation, the **Company** will consult with the individual and make adjustments that best suit his/her accessibility needs due to disability in relation to the materials or processes to be used and to the extent required by law;
- The **Company** will notify successful applicants of its policies for accommodating employees with disabilities in any offer letter;
- The **Company** will include in the the **Company's** "New Hire Orientation" training program a section on accessibility and the *Code*, as appropriate;
- The **Company** will advise current employees of the policies on accessibility and the *Code* that are accessible on the Company's intranet portal;

- The **Company** will advise employees when any changes are made to the above policies; and
- The **Company** will review existing policies and procedures, and where necessary, augment processes for persons with disabilities.

The **Company** will develop and put in place a process for designing Individual Accommodation Plans (“IAP(s)”), and a return-to-work process for employees that have been absent due to a disability and require disability-related accommodations in order to return to work with a documented process:

- The process to develop an IAP will include the following:
  - The manner in which the employee can participate in the development of the IAP;
  - The means by which an employee is to be assessed on an individual basis;
  - Identification of accommodation(s) to be provided;
  - Timelines for the provision of accommodation(s);
  - The manner in which the employee can request the participation of a representative;
  - How the **Company** may request an evaluation by an outside medical or other expert, at the Company’s expense, to assist with determining necessary accommodation(s) and how to achieve said accommodation(s);
  - Steps to be taken to protect the privacy of the employee’s personal information;
  - The frequency with which the IAP will be reviewed and updated and the manner in which this will be done;
  - If an accommodation is denied, the manner in which the reasons for denial are to be provided to the employee; and
  - The means of providing accessible formats or communication supports that take into account the employee’s accessibility needs due to disability.
- The return-to-work process shall:
  - Outline the steps that the **Company** will take to facilitate the return to work of employees who were absent because their disability required them to be away from work;
  - Use the IAPs outlined above as part of the process; and
  - IAPs may also include information regarding accessible formats and communication supports or workplace emergency response information.

The **Company** will take the following steps to ensure the accessibility needs of persons with disabilities are taken into account if the **Company** uses performance management, career development and advancement, and/or redeployment processes or systems:

- The **Company** will review existing policies and procedures and amend where necessary to ensure compliance with the *IASR*;
- The **Company** will make, where required and practicable, documents related to performance management or career development and advancement or redeployment available in accessible formats or with communication supports upon request; and
- The **Company** will update an IAP, with the employee's participation, if appropriate, in the event that the employee is promoted or redeployed by the Company.

**Implementation Timeframe:**

Ongoing as applicable.

**Policy Review**

This Multi-Year Accessibility Plan is a tool for the **Company** to communicate its accessibility initiatives internally and to the public. The **Company** will update and review this Plan at least once every five (5) years and update it as appropriate. This Multi-Year Accessibility Plan is next scheduled to be reviewed no later than **September 3, 2026**.

**Implementation Timeframe:**

By September 3, 2026 and ongoing as applicable.

**For More Information**

For more information on this accessibility plan, please contact the Company's Human Resources department:

Telephone: +1 (303) 309-2894

Email:

iWorkGlobal: [HR-iWorkglobal@velocityglobal.com](mailto:HR-iWorkglobal@velocityglobal.com)

Velocity Global: [HR@velocityglobal.com](mailto:HR@velocityglobal.com)

Please note accessible formats of this Accessibility Policy and Multi-Year Accessibility Plan are available free upon request. We will consult with customers with disabilities making the request to determine the suitability of an accessible format or communication support provided.