



ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES – MULTI-YEAR ACCESSIBILITY PLAN

Part 1: Introduction and Background Information

PLUS COMPANY

“Plus Company, founded in 2021, is a 21st-century alliance of best-in-class creative brands, representing a new model for interagency teamwork. With over 20 agencies that deliver creativity fueled by an innate understanding of culture, technology, and data. Plus Company's work adds tangible value to the human experience and is instrumental to the success of their clients. Plus Company has more than 3,000 employees, across 12 countries in North America, Europe, the Middle East and the Asia Pacific.

(SOURCE: <http://www.pluscompany.com>)

PLUS COMPANY’S Commitment to an Inclusive and Accessible Work Environment

PLUS COMPANY is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of persons with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the *Integrated Accessibility Regulation* (the “ISAR”) of the *Accessibility for Ontarians with Disabilities Act* (“AODA”).

PLUS COMPANY’S Commitment to Accommodation

PLUS COMPANY is committed to making every reasonable effort to accommodate people with disabilities, provided such accommodation does not cause PLUS COMPANY undue hardship.

Business Case for Accessibility

In an effort to facilitate the full participation of persons with disabilities in all aspects of society, including the achievement of accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises on or before January 1, 2025, the AODA was passed in 2005.

Inclusivity and accessibility are not only legislative requirements; they align with PLUS COMPANY’S core values. Preventing and removing barriers to PLUS COMPANY’S services and in our workplace makes sound business and economic sense. An accessible PLUS COMPANY allows PLUS COMPANY to provide services to our communities and retain diverse talent; supporting our company’s competitive advantage.

Part 2: Accessibility at PLUS COMPANY

Accessibility Plan:

The AODA seeks to provide a fully accessible Ontario by 2025. Consistent with this objective, there are many obligations placed on organizations, including PLUS COMPANY, to ensure their workplaces and services are fully accessible to the public and employees, including persons with disabilities.

The ISAR requires every employer with 50 or more employees, to develop and post a Multi-Year Accessibility Plan on their website by January 1, 2014. In accordance with the ISAR, PLUS COMPANY's Multi-Year accessibility plan outlines PLUS COMPANY's comprehensive strategy to prevent and remove barriers to accessibility.

The objective of the Multi-Year Accessibility Plan is to support PLUS COMPANY's compliance with the AODA and the ISAR and PLUS COMPANY's commitment to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity.

Barrier Assessment—Methodology

In accordance with the AODA and with PLUS COMPANY's commitment to treating all people in a way that allows them to maintain their dignity and independence while creating an inclusive work environment for PLUS COMPANY's people to develop to their full potential, our plan seeks to prevent and remove barriers to accessibility for persons with disabilities.

A "barrier" is anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability. Typical barriers to accessibility encountered by persons with disabilities include Physical / Architectural, Attitudinal, Informational/Communication, Systemic, and Technological barriers.

In an effort to better understand the barriers to accessibility encountered at PLUS COMPANY, feedback was gathered from relevant stakeholders, including PLUS COMPANY's people who may have, or have an awareness of, disabilities along with internal subject-matter experts in Diversity and Disability Management.

Barrier Definitions:

1. **Physical/Architectural:** design elements of a building or a space that cause problems for persons with disabilities.
2. **Attitudinal:** our perceptions of, and how we interact with, persons with disabilities.
3. **Informational/Communication:** things/situations that make it difficult for a person with a disability to give, receive or understand information.
4. **Systemic:** organizational policies or practices that (often unwittingly) restrict the participation of persons with disabilities.

5. **Technological:** poor or inexistent technology system that can prevent people from accessing information. Common tools like computers, telephones and other aids can all present barriers if they are not set up or designed with accessibility in mind.

Part 3: PLUS COMPANY's Multi-Year Accessibility Plan Part I: General Requirements

Initiative	ISAR Requirement	Action	Commencement	Compliance Date
1.1 Establishment of Accessibility Policies	Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this Regulation.	Policy complete and posted on PLUS COMPANY external website. Actions are being followed and monitored.	Completed	January 1, 2014
1.2 Accessibility Plans	Large organizations shall, (a) 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; (b) post the accessibility plan on their website, if any, and	Multi-year plan complete and posted on PLUS COMPANY website. Actions are being followed and monitored.	Completed	January 1, 2014

	provide the plan in an accessible format upon request; and (c) review and update the accessibility plan at least once every five years.			
1.3 Training	Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to, (a) all employees, and volunteers; (b) all persons who participate in developing the organization's policies; and (c) all other persons who provide goods, services or facilities on behalf of the organization.	All employees are provided the policy to be reviewed and signed off on. All employees that are involved in the development of policies and have interface with the public have been trained in AODA compliance. All training documentation is saved and filed.	Completed	January 1, 2015

Part II: Information and Communication Standards

Initiative	ISAR Requirement	Action	Status	Compliance Date
2.1 Feedback	Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request.	Process for receiving and responding to feedback has been granted through a specific email address and upon request provision or arrangement for accessible formats and communications supports are given.	Completed	January 1, 2015
2.2 Accessible Formats & Communication Supports	2.2.1 Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, (a) in a timely manner that takes into account the person's accessibility needs due to disability; and (b) at a cost that is no more than the regular cost charged to other persons.	All requests made for accommodations are reviewed promptly, individuals making the request are consulted and appropriate accommodations are met with no costs to the individual(s) making the request.	Completed	January 1, 2016

	<p>2.2.2 The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.</p>			
	<p>2.2.3 Every obligated organization shall notify the public about the availability of accessible formats and communication supports.</p>	<p>All public facing communications have reference to the availability of accessible formats and communication supports</p>	<p>Completed</p>	<p>January 1, 2016</p>
<p>2.3 Accessible Websites & Web Content</p>	<p>Large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out in this section.</p>	<p>All new websites take into account the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA</p>	<p>In progress</p>	<p>2014 - New Websites 2021 – All Websites</p>

Part III: Employment Standard

Initiative	ISAR Requirement	Action	Status	Compliance Date
3.1 General Recruitment	Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	All recruitment sites and documents have clear verbiage indicating our availability to accommodate any applicant with a disability throughout the recruitment process.	Completed	January 1, 2016
3.2 Recruitment Assessment or Selection Process	<p>3.2.1 During a recruitment process, an employer shall 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.</p> <p>3.2.2 If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation</p>	<p>All candidates, through the recruitment process, are notified that accommodations are available for anyone that requires it.</p> <p>If a candidate is selected we consult with them in arranging any provisions that are required.</p>	Completed	January 1, 2016

	in a manner that takes into account the applicant's accessibility needs due to disability.			
3.3 Notice to Successful Applicants	Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	If an offer is made to an individual that requires any accommodation, the candidate is be consulted in how best to accommodate his/her needs in his/her new roles.	Completed	January 1, 2016
3.4 Informing Employees of Supports	<p>3.4.1 Every employer shall inform its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.</p> <p>3.4.2 Employers shall provide the information required under this section to new employees as soon as practicable after</p>	All employees are provided the appropriate information regarding our policy on accommodating people with disabilities. The policy is also accessible on our internal Intranet site. All new employees are provided the policy with their welcome package and are required to sign off that they have read and understand the policy. All employees are provided updated policy information as it is updated.	Completed	January 1, 2016

	<p>they begin their employment.</p> <p>3.4.3 Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability</p>			
<p>3.5 Accessible Formats and Communication Supports for Employees</p>	<p>3.5.1 In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for,</p> <p>(a) information that is needed in order to perform the employee's job; and</p> <p>(b) information that is generally available to employees in the workplace.</p>	<p>Upon request, PLUS COMPANY provides or arranges for the provision of accessible formats and communication supports for,</p> <p>(a) information that is needed in order to perform the employee's job; and</p> <p>(b) information that is generally available to employees in the workplace.</p>	<p>Completed</p>	<p>January 1, 2016</p>

	<p>3.5.2 The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>			
<p>3.6 Workplace Emergency Response Information</p>	<p>3.6.1 Every employer shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability.</p> <p>3.6.2 If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the</p>	<p>Established process to provide people in Ontario who request, or for whom PLUS COMPANY is aware of the need for accommodation due to the employee's disability, to receive individualize workplace emergency response information</p> <p>Upon request, local office manager will work with the individual requiring accommodation to ensure they are provided with the proper emergency response information as soon as possible.</p>	<p>Completed</p>	<p>January 1, 2012</p>

	<p>employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.</p> <p>3.6.3 Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.</p> <p>3.6.4 Every employer shall review the individualized workplace emergency response information, (a) when the employee moves to a different location in the organization; (b) when the employee's overall accommodations needs or plans are reviewed; and</p>			
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	(c) when the employer reviews its general emergency response policies.			
3.7 Documented Individual Accommodation Plans	<p>3.7.1 Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.</p> <p>3.7.2 The process for the development of documented individual accommodation plans shall include the following elements:</p> <p>1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</p> <p>2. The means by which the employee is assessed on an individual basis.</p>	<p>An SOP document will be created to outline the process for developing individual accommodation plans which will included the following;</p> <ul style="list-style-type: none"> • Manner in which an employee can make a request, • Circumstances where medical will be required, • If and when to work with Great West Life on the plan, • Establishing confidentiality parameters • How to create a change and communication plan to create awareness and ensure success of the plan for the individual. 	Completed	<p>January 1, 2016</p>

	<p>3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if accommodation can be achieved and, if so, how accommodation can be achieved.</p> <p>4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.</p> <p>5. The steps taken to protect the privacy of the employee's personal information.</p> <p>6. The frequency with which the</p>			
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	<p>individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> <p>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</p>			
3.8 Return to Work Process	<p>3.8.1 Every employer, other than an employer that is a small organization, (a) shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability related accommodations in order to return to work; and</p>	<p>Liaised with Great West Life to conduct a review of the return to work process</p> <p>Updated and documented return to work process based on gaps and compliance requirements.</p>	Completed	<p>January 1, 2016</p>

	<p>(b) shall document the process.</p> <p>3.8.2 The return to work process shall, (a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and (b) use documented individual accommodation plans, as part of the process.</p>			
<p>3.9 Performance Management</p>	<p>An employer that uses performance management in respect of its employees shall 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.</p>	<p>Assess current performance review processes to ensure accessibility features are incorporated (<i>i.e.</i>, forms accessible, conversations in plain text).</p> <ul style="list-style-type: none"> • Ensure updated/new performance management processes to be rolled out incorporate accessibility features • Ensure training or communications to performance managers provides awareness on effective communication strategies, timing to allow for employees to review and understand feedback prior to meeting, and 	<p>Completed</p>	<p>January 1, 2016</p>

		reasonable accommodation		
3.10 Career Development & Advancement	An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.	<p>Review of any current training and professional development materials to determine accessibility features</p> <p>Ensure all future developed training and materials are developed with accessibility features in mind</p> <p>Ensure promotion criteria, practices and processes take into account individual accommodation needs and plans in accordance with AODA</p> <p>Track career progression of individuals with disabilities</p>	Completed	January 1, 2016
3.11 Redeployment	An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.	<p>Reviewed and updated any current transfer and redeployment practices and processes to ensure accommodation plans are referenced.</p> <p>Educate hiring managers to ensure redeployment efforts/activities take into account the employee's needs.</p>	Completed	January 1, 2016

Part 4: Closing Statements

In accordance with the AODA and with PLUS COMPANY's objective of treating all people in a way that allows them to maintain their dignity and independence while creating an inclusive work environment for PLUS COMPANY's people to develop to their full potential, the Multi-Year Accessibility plan is posted on PLUS COMPANY's website and will be reviewed and updated at least every 5 years.

For the public:

If you have any questions, or have feedback related to PLUS COMPANY's Multi-Year Accessibility Plan, please email: accessibility@v7international.com

For PLUS COMPANY people:

If you have any questions, or have feedback related to PLUS COMPANY's Multi-Year Accessibility Plan, please email: accessibility@pluscompany.com