



ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES – 2024 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 25 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 14 countries in North America, Europe, the Middle East and the Asia Pacific.

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 *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, 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.

PLUS COMPANY's Multi-Year accessibility plan outlines PLUS COMPANY's past achievements and 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 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 Past Achievements

Initiative	Requirement	Action
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 was completed and posted on PLUS COMPANY external website. Actions are being followed and monitored.
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 provide the plan in an accessible format upon request; and (c) review and update the accessibility plan at least once every five years.	Multi-year plan was completed and posted on PLUS COMPANY website. Actions are being followed and monitored.
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.

Initiative	Requirement	Action
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.
Accessible Formats & Communication Supports	<p>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,</p> <p>(a) in a timely manner that takes into account the person’s accessibility needs due to disability; and</p> <p>(b) at a cost that is no more than the regular cost charged to other persons.</p> <p>The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.</p>	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.
	Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	All public facing communications have reference to the availability of accessible formats and communication supports
Accessible Websites & Web Content	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.	All 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

Initiative	Requirement	Action
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.
Recruitment Assessment or Selection Process	<p>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>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 in a manner that takes into account the applicant's accessibility needs due to disability.</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>
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.
Informing Employees of Supports	<p>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>Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.</p> <p>Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job</p>	<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</p>

	accommodations that take into account an employee's accessibility needs due to disability	information as it is updated.
Accessible Formats and Communication Supports for Employees	<p>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>The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</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>
Workplace Emergency Response Information	<p>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>If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.</p> <p>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>Every employer shall review the individualized workplace emergency response information,</p> <p>(a) when the employee moves to a different location in the organization;</p> <p>(b) when the employee's overall accommodations needs or plans are reviewed; and</p>	<p>A process was established 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 work with the individual requiring accommodation to ensure they are provided with the proper emergency response information as soon as possible.</p>

	(c) when the employer reviews its general emergency response policies.	
Documented Individual Accommodation Plans	<p>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>The process for the development of documented individual accommodation plans shall include the following elements:</p> <p>(a) The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</p> <p>(b) The means by which the employee is assessed on an individual basis.</p> <p>(c) 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. (d) 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>(e) The steps taken to protect the privacy of the employee's personal information.</p> <p>(f) The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> <p>(g) If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>(h) The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</p>	<p>An SOP document was created to outline the process for developing individual accommodation plans which includes 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.
Return to Work Process	<p>Every employer, other than an employer that is a small organization,</p> <p>(a) shall develop and have in place a return-to-work process for its employees who have</p>	<p>Liaised with insurance carrier to conduct a review of the return-to-work process.</p>

	<p>been absent from work due to a disability and require disability related accommodations in order to return to work; and (b) shall document the process.</p> <p>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>Updated and documented return to work process based on gaps and compliance requirements.</p>
<p>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>Assessed performance review processes to ensure accessibility features were incorporated (<i>i.e.</i>, forms accessible, conversations in plain text).</p> <ul style="list-style-type: none"> • Ensured updated/new performance management processes to be rolled out incorporated accessibility features • Ensured training or communications to performance managers provided awareness on effective communication strategies, timing to allow for employees to review and understand feedback prior to meeting, and reasonable accommodation.
<p>Career Development & Advancement</p>	<p>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>	<p>Reviewed of any training and professional development materials to determine accessibility features.</p> <p>Ensured 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>Tracked career progression of individuals with disabilities.</p>
Redeployment	<p>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>	<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>

Part 4 : Strategies and Actions

Customer Service

PLUS COMPANY is committed to providing accessible customer service to people with disabilities. This means that we will provide goods, services and facilities to people with disabilities with the same high quality and timeliness as others.

We commit to training all new staff on the Customer Service Standard as part of our onboarding program.

Information and Communications

PLUS COMPANY is committed to making our information and communications accessible to people with disabilities.

We commit to training making our information and communications accessible to any disabled person upon request.

Employment

PLUS COMPANY is committed to fair and accessible employment practices.

We commit to expanding our talent pool to include more individuals with disabilities and ensuring more inclusive employment practices by 2026.

Training

PLUS COMPANY is committed to providing training in the requirements of Ontario's accessibility laws and the Ontario Human Rights Code as it applies to people with disabilities.

We commit to expanding our training curriculum to include more inclusive leadership training as part of our EDI roadmap by 2025.

Design of Public Spaces

PLUS COMPANY will meet accessibility laws when building or making major changes to public spaces.

We commit to ensuring an accessible space complying with applicable accessibility laws in the course of our major offices renovations by 2025.

Part 5: 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@pluscompany.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