



Multi-Year Accessibility Plan – *Capgemini* Accessibility for Ontarians with Disabilities Act – Integrated Accessibility Standards

Overview

With the goal to make Ontario accessible by 2025, the Ontario government passed the Accessibility for Ontarians with Disabilities Act (AODA) in 2005. The regulations associated with the AODA's "Integrated Accessibility Standards" require that Capgemini Group's Canadian entities, *Capgemini Canada Inc. and Capgemini Solutions Canada Inc.* ("*Capgemini*"), establish, implement, maintain, and document a multi-year accessibility plan.

In collaboration with our Capgemini Group's broader initiatives, this Canadian multi-year accessibility plan outlines the organization's strategy to prevent and remove barriers for persons with disabilities and to meet its requirements under the Ontario Act, as well as any other Canadian province that adopts similar laws in future.

Capgemini is committed to meet the accessibility needs of persons with disabilities in a timely manner and to comply with AODA and all of its standards. This multi-year plan outlines Capgemini's strategy to prevent and remove barriers to address the current and future requirements of the AODA. We will review and update the MYAP on a regular basis and it will also be amended as other provinces pass applicable accessibility laws in future.

In accordance with the requirements set out in the Integrated Accessibility Standards (IAS), Capgemini will:

- Post this plan on its website;
- Provide this plan in an accessible format, upon request; and
- Review and update this plan at least once every five years.

For more information, please visit www.capgemini.com/ca-en/accessibility/ and review our Canadian "Statement Regarding Accessibility" or contact us by clicking 'get in touch.' In this linked site you will also learn about Capgemini Group's Web-site accessibility standards in compliance with French law, Article 47 of Law No. 2005-102x, enacted in 2005 to provide for equal rights and opportunities, participation and citizenship of people with disabilities. Specifically, as part of Capgemini Group's pledge in [Valuable 5](#), Capgemini committed to make our Web-sites accessible to people using screen readers and assistive technology devices according to the World Wide Web Consortium's [Web Content Accessibility Initiative Guidelines \(WCAG\) 2.1](#).



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Part I – GENERAL REQUIREMENTS		
Establishment of Accessibility Policies	Actions	Status (Due Date)
<p>3.(1) 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.</p>	<p>Capgemini maintains the following policies and resources relevant to the topic of accessibility:</p> <ul style="list-style-type: none"> • Canada Accessibility Policy and external Statement • Canada Workplace Accommodations for Disabilities Policy • Canada Anti-Harassment, Anti-Discrimination and Complaint Reporting Policy • Canada Flexible Work Policy • Group Data Privacy Policy • CRES Sustainability and H&S Handbook 3.0 (Guideline on Emergency Evaluation, incl. employees with disabilities, and annual site assessments against standard. New site selection requires third party architects/engineers to assess “Compliance with all local legislative requirements for people with health conditions and disability.”) 	<p>Complete</p>

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Accessibility Plans		
<p>4.(1) Large organizations shall,</p> <ul style="list-style-type: none"> 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. 	<p>Capgemini's Multi-year Accessibility Plan (MYAP) is developed and posted on the Company's external facing website.</p>	Complete
	<p>MYAP will be provided in an accessible format upon request.</p> <p>MYAP will be reviewed and updated regularly, at least once every five years.</p>	Complete
Training		
<p>7.(1) 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,</p> <ul style="list-style-type: none"> (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. 	<p>Accessibility training course (narrated by external Canadian law firm) is a mandatory one-time module delivered by Capgemini learning management system for all existing/new Canadian employees.</p> <p>Human Rights (Canadian) training (sourced via external Ethics & Compliance vendor) is a mandatory course on a bi-annual basis delivered via Capgemini learning management system for all Canadian employees.</p>	Complete

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PART II – INFORMATION AND COMMUNICATIONS STANDARDS		
Feedback		
<p>11.(1) 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.</p>	<p>Feedback mechanism created and posted on company intranet and external website.</p>	<p>Complete</p>
Accessible Formats & Communication Supports		
<p>12.(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.</p> <p>12.(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>12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.</p>	<p>Capgemini Group and Capgemini Canada websites (internal & external) provide detailed instructions on available accessible formats and communication supports for persons with disabilities. Feedback mechanisms are established for those with additional accessibility requirements.</p>	<p>Complete</p>
Accessible Websites & Web Content		
<p>14.(2) Designated public sector organizations and 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>Capgemini continues to update our websites to be compliant with World Wide Web Consortium's <u>Web Content Accessibility Initiative Guidelines (WCAG) 2.1</u>, which ensures company web sites are accessible to people using screen readers and assistive technology devices.</p>	<p>Complete</p>



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PART III – EMPLOYMENT STANDARD		
Recruitment – General		
22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	Notice added to external website and job application form. This includes, but it not limited to, our website Statement Regarding Accessibility.	Complete
Recruitment, Assessment or Selection Process		
23.(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.	Application form notifies all job applicants of the right to request a reasonable accommodation to apply for a job or to perform their job.	Complete
23.(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 in a manner that takes into account the applicant's accessibility needs due to disability.	Capgemini consults with applicant to provide accommodation when requested.	Complete
Notice to Successful Applicants		
24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	Capgemini offer package includes notification to successful applicants about our policy and procedures for workplace accommodation for disabilities.	Complete

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Informing Employees of Supports		
25.(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.	All Company policies, including the Workplace Accommodations for Disabilities Policy and other relevant policies referenced above, are available to all staff on the Company intranet.	Complete
25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	Capgemini offer package includes notification to successful applicants about our policy and procedures for workplace accommodation for disabilities.	Complete
25.(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.	The current version of all Company policies, including the Workplace Accommodations for Disabilities Policy and other relevant policies referenced above, are available to all staff on the Company intranet. HR representatives also share policies with staff requesting accommodation.	Complete/ Ongoing
Accessible Formats & Communication Supports for Employees		

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<p>26.1 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, (a) information that is needed in order to perform the employee's job; and (b) information that is generally available to employees in the workplace.</p> <p>26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>	<p>Capgemini consults with the employee and internal and external parties as appropriate to provide accommodation when requested.</p>	<p>Complete/ Ongoing</p>
<p>Workplace Emergency Response Information</p>		
<p>27. (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>Consenting employees' disability needs are addressed with Joint Health & Safety Committee (JHSC) and in Safety / Emergency Response Action Plan at each Capgemini site.</p> <p>Each Capgemini site follows the CRES Health & Safety handbook and Site Emergency Handbook, which provides directions for "special needs assistant."</p>	<p>Complete</p>
<p>27. (2) 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>Capgemini will add new functionality to the workspace reservation tool to allow advance self-reporting of need</p>	<p>In Progress (Q4 2023)</p>

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<p>27. (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>27. (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 (c) when the employer reviews its general emergency response policies.</p>	<p>for accessibility assistance. New functionality will provide real-time digital record-keeping of individuals with accessibility needs and advance notice to coordinate support.</p>	
<p>Documented Individual Accommodation Plans</p>		
<p>28.(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>General process has been established/documentated in the Capgemini Workplace Accommodation for Disability Policy, and the Employer's obligation is set out in our Accessibility policy and training module.</p> <p>Capgemini has established policies and recurring training modules for protecting privacy of employees, which meet or exceed local laws.</p>	<p>Complete</p>



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<p>28. (2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none">1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.2. The means by which the employee is assessed on an individual basis.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 and how accommodation can be achieved.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.5. The steps taken to protect the privacy of the employee's personal information.6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.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>Capgemini will create a standard template for documenting individual accommodation plan for employees with disabilities, customizable for each individual and their unique needs.</p>	<p>In Progress (Q4 2023)</p>
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Return to Work Process		
<p>29.(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 (b) shall document the process.</p> <p>29. (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 individual documented accommodation plans, as described in section 28, as part of the process.</p> <p>29. (3) The return to work process referenced in this section does not replace or override any other return to work process created by or under any other statute.</p>	<p>General process has been established/documented in the Capgemini Workplace Accommodation for Disability Policy.</p> <p>The Employer’s obligation is set out in our Accessibility policy and training module.</p> <p>HR representatives coordinate with internal and external parties as appropriate when an employee is preparing to return to work following absence due to disability. Third party consultation is used for employee assessment, verifying objective medical info/prognosis is valid for returning, verifying restrictions and duration, and options for accessibility support.</p>	<p>Complete</p>
Performance Management		
<p>30.(1) 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>Talent management policies and processes will be reviewed for consideration of performance management of employees with</p>	<p>In Progress (Q4 2023)</p>



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Career Development & Advancement		
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<p>31.(1) 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>Talent management policies and processes will be reviewed for consideration of career development and advancement of employees with disabilities.</p>	<p>In Progress (Q4 2023)</p>
	<p>Capgemini LIFE Employee Resource Group CapAbility community provides opportunities to promote networking and career advancement for employees with disabilities.</p> <p>Capgemini employees are regularly requested to provide anonymous feedback through monthly Pulse surveys. Leadership reviews Pulse feedback and actions are taken to address adequacy of work tools,</p>	<p>Complete/ Ongoing</p>



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	environment and more to improve employees' ability to work.	
Redeployment		
32.(1) 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.	Capgemini has existing redeployment processes that consider the accessibility needs of its employees with disabilities on a case-by-case basis.	Complete