

### ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

# MS CANADA INC. INTEGRATED ACCESSIBILITY STANDARDS – MULTI YEAR PLAN (UPDATED JUNE 2021)

#### Part I – GENERAL REQUIREMENTS

Section	Initiative	Description	Action	Status	Compliance Date
3	Establishment of Accessibility Policies	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.	Policy Approved and Posted to MS Canada Inc. Website	Complete	January 1, 2014
4	Accessibility Plans	<ul> <li>4.(1) Large organizations shall,</li> <li>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.</li> <li>b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and</li> <li>c) review and update the accessibility plan at least once every five years.</li> </ul>	Attended public workshop regarding AODA requirements. Policy developed, reviewed, and approved. Ensure formal review 1 year from implementation date in December 2014 and on-going as required	Complete	March 10, 2021
6			Not Applicable		Not Applicable

	Self-Serve Kiosks	6.(2) Large organizations and small organizations shall have regard to the accessibility for persons with disabilities when designing, procuring, or acquiring self-service kiosks.		Not Applicable	
7	Training	<ul> <li>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,</li> <li>(a) all employees, and volunteers;</li> <li>(b) all persons who participate in developing the organization 's policies; and</li> <li>(c) all other persons who provide goods, services, or facilities on behalf of the organization.</li> </ul>	Integrated Accessibility Standards Training to be developed and implemented in 2014 with all MS Canada Inc. employees to have completed training by December 31, 2014	Complete	May 10, 2021

### PART II – Information and Communications Standards

Section	Initiative	Description	Action	Status	Compliance Date
11	Feedback	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.	Conduct a review of all feedback processes across the organization (internally and externally). Consult with all functional areas to make sure all feedback processes are captured. Determine what accessible formats and communication supports we will provide upon request.	Complete	May 10, 2021
12	Accessible Formats &	12.(1) Except as otherwise provided, every obligated organization shall upon request	Providing accessible formats and communication supports to	Complete	May 10, 2021

	Communication Supports	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.	persons with disabilities upon request. Ensuring these formats and supports can be provided in a timely manner (ex. Same time, 24 hours) Communicating to staff and management that no <u>additional</u> charge is required		
12		12.(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	Communicated to staff and management this requirement. Developed protocol for situations where a suitable agreement cannot be made	Complete	May 10, 2021
12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Posted electronically and within public areas of office spaces. Included on certain external print materials	Complete	May 10, 2021
13	Emergency Procedures, Plans or Public Safety Info	13.(1) In addition to its obligations under section 12, if an obligated organization prepares emergency procedures, plans or public safety information and makes the information available to the public, the obligated organization shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.	Current system in place to captured this, help within Facilities/Security Teams	Complete	May 10, 2021
14	Accessible Websites & Web Content	14.(2) Designated public sector organizations and large organizations shall make their internet websites and web content conform with the World Wide Web	Continuously review WCAG guidelines to be informed of changes and updates.	Complete	January 1, 2014 New internet websites and web content on

	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.	Currently in compliance with WCAG	Complete	those sites must conform with WCAG 2.0 Level A. <b>January 1, 2021</b> All internet websites and web content must conform with WCAG 2.0 Level AA, other than, • success criteria 1.2.4 Captions (Live) • success criteria 1.2.5 Audio Descriptions (Pre- recorded).
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# PART III – Employment Standard

Section	Initiative	Description	Action	Status	Compliance Date
22	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.	Current practices and procedures to be reviewed. Determine what areas need to be addressed/revised to ensure compliance.	Complete Implemented three key components. 1. On the global career site, including the Quebecois site, there is a link for candidates to request an accessibility request. That link is at the bottom of the page, along with the data privacy notification. 2. The interview scheduling templates include language reminding candidates that they can request an accommodation prior to their interviews by following a link in the template. 3. All recruitment staff were required to	May 10, 2021

				complete an accessibility awareness course in FY20.	
23	Recruitment, Assessment or Selection Process	<ul> <li>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.</li> <li>(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.</li> </ul>	Current practices and procedures to be reviewed. Determine what areas need to be addressed/revised to ensure compliance.	Complete As per above, recruitment has implemented an additional notification and extended the accommodations process to Canada. 1. The interview scheduling templates include language reminding candidates that they can request an accommodation prior to their interviews by following a link in the template. 2. There is a Project Manager (PM) on the Recruiting Excellence team who manages all accommodation requests. The PM communicates directly with the	May 10, 2021

				candidate to determine how best to meet their needs. This may include providing sighted guides, interpretation services, mobility aids, etc. Prior to interview loops, recruiters are made aware that a candidate has requested an accommodation and are given information on how to manage that accommodation during their interview.	
24	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.	Current practices and procedures to be reviewed. Determine what areas need to be addressed/revised in order to ensure compliance.	Pending - Microsoft Canada is working with HR Services in order to ensure that post- interview accommodations for a successful candidate can be requested, and are continued and communicated following the interview accomodation process,	January 1, 2016

				upon hire and prior to the first day of employment.	
25	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.	Current practices and procedures to be reviewed. Determine what areas need to be addressed/revised in order to ensure compliance. Reviewing employee Health & Safety training for this topic.	Pending – See response in 24	May 10, 2021
25		25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	Current practices and procedures to be reviewed. Determine what areas need to be addressed/revised in order to ensure compliance. Reviewing employee Health & Safety training for this topic.	Pending – See response in 24	May 10, 2021
25		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.	Policies reviewed and changes communicated as needed.	Complete	May 10, 2021
26	Accessible Formats & Communication	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	Practices and procedures reviewed and compliant.	Complete	May 10, 2021

	Supports for Employees	<ul> <li>employee to provide or arrange for the provision of accessible formats and communication supports for,</li> <li>(a) information that is needed in order to perform the employee's job; and</li> <li>(b) information that is generally available to employees in the workplace.</li> </ul>			
26		26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	Practices and procedures reviewed and compliant.	Complete	May 10, 2021
27	Workplace Emergency Response Information	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.	Incorporated into current emergency procedures. Current system in place to captured this, help within Facilities/Security Teams.	Complete	May 10, 2021
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.	Incorporated into current emergency procedures.	Complete	May 10, 2021.

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.	Incorporated into current emergency procedures.	Complete	May 10, 2021
27		<ul> <li>(4) Every employer shall review the individualized workplace emergency response information,</li> <li>(a) when the employee moves to a different location in the organization;</li> <li>(b) when the employee's overall accommodations needs or plans are reviewed; and</li> <li>(c) when the employer reviews its general emergency response policies.</li> </ul>	Incorporated into current emergency procedures.	Complete	May 10, 2021
28	Documented Individual Accommodation Plans	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.	Current practices and procedures to be reviewed. Determine what areas need to be addressed/revised in order to ensure compliance.	Pending	May 10, 2021
28		<ul> <li>28 (2) The process for the development of documented individual accommodation plans shall include the following elements:</li> <li>1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</li> </ul>	Current practices and procedures to be reviewed. Determine what areas need to be addressed/revised in order to ensure compliance.	Pending	May 10, 2021

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.
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.			
29	Return to Work Process	<ul> <li>29.(1) Every employer, other than an employer that is a small organization,</li> <li>(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</li> <li>(b) shall document the process.</li> </ul>	Current practices and procedures to be reviewed. Determine what areas need to be addressed/revised in order to ensure compliance. Return to work process in place and requires formal documentation.	Pending	May 10, 2021
29		<ul> <li>29. (2) The return to work process shall,</li> <li>(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</li> <li>(b) use individual documented accommodation plans, as described in section 28, as part of the process.</li> </ul>	Current practices and procedures to be reviewed. Determine what areas need to be addressed/revised in order to ensure compliance. Return to work process in place and requires formal documentation.	Pending	May 10, 2021
29		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.	Current practices and procedures to be reviewed. Determine what areas need to be addressed/revised in order to ensure compliance.	Pending	May 10, 2021

			Return to work process in place and requires formal documentation.		
30	Performance Management	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.	Current practices and procedures to be reviewed. Determine what areas need to be addressed/revised in order to ensure compliance. Plan to incorporate in Performance Management Leadership Discussions and Performance Management Templates.	Pending	May 10, 2021
31	Career Development & Advancement	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.	Current practices and procedures to be reviewed. Determine what areas need to be addressed/revised in order to ensure compliance. Plan to incorporate in Career Development Leadership Discussions and Career Development Templates.	Pending	May 10, 2021