



Multi-Year Accessibility Plan

November 2023

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Introduction

VGW Canada is committed to fulfilling our requirements under the Accessibility for Ontarians with Disabilities Act, 2005 and O. Reg. 191/11: Integrated Accessibility Standards Regulation.

VGW's Multi-Year Accessibility Plan outlines how the company will ensure we meet these requirements and improve opportunities for persons with disabilities in the following areas:

- Customer Service
- Information and Communications
- Employment
- Training
- Built Environment and Design of Public Spaces

The Multi-Year Plan applies to VGW Canada Inc as required by the AODA. The Accessibility Plan will be reviewed and updated at least once every five (5) years.

VGW will train all employees as soon as practicable after being hired and provide training in respect of any changes to the policies. We maintain records of the training provided including dates on when the training was completed and number of individuals to whom it was provided.

Statement of Commitment

VGW is committed to ensuring equal access for people with disabilities and treating people with disabilities in a way that allows them to maintain their dignity and independence and embodies the principles of integration and equal opportunity.

VGW is committed to being a barrier-free environment for persons with disabilities in employment, in its communications and information, in the delivery of services and in its environment. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the Accessibility for Ontarians with Disabilities Act (the "Act") and associated regulations, including O. Reg. 191/11: *Integrated Accessibility Standards Regulations* (the "Regulation") and the *Ontario Human Rights Code*.

VGW is committed to ensuring that all its employees are aware of their responsibilities to foster an accessible and inclusive environment with and for persons with disabilities.

Accessibility Plan 2023-2028

VGW has made significant progress to identify, remove and prevent accessibility barriers in the areas of Customer Service, Information and Communications, Employment, and establishing a Feedback Process.

Part 1: General

Accessibility Policy

We are committed to maintaining an AODA policy. The policy includes an organizational statement of commitment and requirements for employees at all levels of the organization to meet the accessibility requirements for persons with disabilities in a timely manner.

Actions Taken:

- The AODA policy was developed and approved on November 29, 2023.
- The AODA policy will be made available in an accessible format to customers requesting a copy of the policy.
- Statement of Commitment to Accessibility Standard for Employment was developed and approved in November 2023.

Actions Planned:

- Continue to review the AODA policy at least once every three (3) years or when VGW's practices and/or procedures change to ensure it is up to date and all AODA requirements are integrated.
- Continue to make AODA policy available in an accessible format to customers requesting a copy of the policy.

Multi-Year Accessibility Plan

VGW is committed to developing and implementing a multi-year accessibility plan to meet the requirements of the AODA.

Actions Taken:

- A multi-year accessibility was developed in November 2023.
- Post multi-year accessibility plan to VGW's website.

Actions Planned:

- Review and update the multi-year accessibility plan at least once every five (5) years based on changing accessibility requirements and feedback from internal and external stakeholders.

Part 2: Accessible Customer Service

VGW is committed to maintaining an accessible environment for persons with disabilities in the delivery of its services.

Actions Taken:

- Communicate in ways that take into account the needs of the persons with disabilities;
- Notify the public about the availability of accessible formats and communication supports and, upon request, VGW will arrange for the provision of accessible formats and communication supports for persons with disabilities;
- Ensure persons with disabilities who use assistive devices are able to obtain, use or benefit from our services;
- Allow a person with disabilities who is accompanied by a service animal or support person to enter the premise with the animal or support person;
- Provide notification on VGW's website, internal communication channels and bulletin boards in the event of a planned or unexpected disruption of services used by persons with disabilities if required;
- Provide information about emergency procedures in an accessible format or with appropriate communications support upon request.

VGW will continue to strive to provide services that are accessible to and inclusive of employees with disabilities.

Actions Planned:

- Continue to evaluate existing programs and services to ensure inclusion and equitable participation of persons with disabilities;
- Continue to embed the focus on accessibility in the development of any new programs or services;
- Continue to train new employees on accessible customer service and ensure training is completed within the first 30 days of employment;
- Continue to enable customers to use assistive devices and welcoming the assistance of service animals and support persons on VGW's premises;
- Continue to review emergency procedures to ensure customers with varying disabilities are assisted in building emergencies.

Part 3: Information and Communications

We are committed to making information and communication accessible to people with disabilities. We will incorporate accessibility requirements under the IASR information and communication standard to ensure that its information and communications systems are accessible and meet the needs of persons with disabilities.

Actions Taken:

- Ensure VGW's public website and web content conforms with Level AA of the WCAG 2.0 as required by the standard;
- Arrange for the provision of documents in an accessible format or with communication support to persons with disabilities in a timely manner and at a cost that is no more than the regular cost charred to other persons;
- Implemented feedback process. Feedback can be provided to hr.operations@vgw.co.

There are situations where accessible formats and communication support may not be provided. If we determine that information or communications are unconvertible, we will provide the person requesting the information or communication with:

- An explanation as to why the information and communications are unconvertible;
- A summary of the unconvertible information or communications.

VGW will continue to ensure digital accessibility in all services and information provided to members of the public, and the availability of accessible formants and communications support:

Actions Planned:

- Continue to improve accessibility of our information and communications by reviewing feedback received and conducting accessibility audits to identify accessibility barriers and striving for barrier removal;
- Continue to improve on ways where feedback can be provided, including exploring other methods of communications;
- Continue to evaluate and review website content to ensure it meets or exceeds accessibility compliance requirements where possible.

Part 4: Employment

VGW is an equal opportunity employer and is committed to maintaining inclusive and accessible employment practices that attract and retain talented employees with disabilities. We recognize that by removing barriers across the employment life cycle will create a workplace that is diverse, accessible and enables employees to reach their full potential.

Actions Taken:

- Notify its employees and the public about the ability of accommodation for applicants with disabilities in its recruitment and selection process. All job postings in Canada include the statement: *VGW Canada Inc. is an equal opportunity employer and will provide reasonable accommodation for qualified individuals with disabilities throughout the recruitment and selection process. Please advise our Talent Acquisition Specialist in advance should accommodation be required.*
- Notify applicants that are selected for interviews that reasonable accommodations can be provided upon request in the interview process.
- Notify successful applicants of its policies for accommodating employees with disabilities when offers of employment are made.
- Accommodation Policy was developed and approved in 2023.
- Inform employees of its policies that support employees with disabilities.
- Accommodate the needs of its employees with disabilities as required by the Ontario accessibility laws and Ontario Human Rights Code by developing individualized accommodation plans for employees with disabilities as VGW is made aware.
- Maintain a documented return to work process for employees who have been absent from work due to a disability and who require disability-related accommodations and support in order to return to work.
- Create individualized workplace emergency plans for employees who have disabilities and who require accommodation.
- Consider the accessibility needs of employees with disabilities as well as their individual accommodation plans when conducting performance management reviews, providing career development and advancement opportunities to employees, and when redeploying employees.

VGW will continue to support the recruitment and accommodation of employees with disabilities in all aspects of employment.

Actions Planned:

- Continue to identify and work to remove any existing barriers for persons with disabilities.
- Continue to develop individualized reasonable accommodation plans for employees that disclose their disabilities.
- Continue to review documented processes and procedures and identify ways to enhance the accommodation program.
- Review and develop individualized workplace emergency plans on an ongoing and regular basis.
- Develop a Diversity, Equity, Inclusion and Belonging (“DEIB”) Committee to foster a culture of inclusion in the workplace.

Part 5: Training

VGW is committed to training its employees and other individuals who provide services to the public on accessible customer service and communications.

Actions Taken:

- AODA and Human Rights trainings have been added to VGW’s onboarding process;

- All employees in Canada are required to complete the required AODA training within 30 days of their employment;
- Training records have been maintained.

Actions Planned:

- Continue to provide training to all employees during the onboarding process;
- We will institute employee training as legislative changes occur to ensure knowledge remains current.

Part 6: Design of Public Spaces

VGW recognizes the need to increase the accessibility of its public spaces where possible. As of November 2023, VGW does not have any plans for new construction or significant redevelopment of its Ontario office location to which the Design of Public Spaces Standard of the Integrated Accessibility Standard Regulation is application.

For any future plans to which this Standard would be applicable, VGW will comply with the required responsibilities under this Standard.

Feedback Process

VGW is committed to meeting accessibility requirements and continuously taking steps to improve its services and website to comply with the AODA and its regulations. VGW will continue to welcome feedback regarding the manner in which it provides services to persons with disabilities.

We welcome customer feedback on our efforts to ensure accessible customer service to people with disabilities. We invite customers to provide comments and feedback by email at hr.operations@vgw.co. All customer feedback will be reviewed and replies will be provided in a timely manner. Accessible formats and communication support can be provided upon request during the feedback process.

VGW will continue to accept feedback on its accessibility practices by developing a revised process for receiving and responding to feedback.

Planned Actions:

- Continue to identify different formats where customers can provide feedback.
- Continue to use the accessible feedback mechanism as a means of improving services to persons with different disabilities.

Conclusion

VGW is committed to the prevention, identification and removal of accessibility barriers. The Multi-Year Accessibility Plan will be monitored on an annual basis and status updates will be posted on VGW's website. The Multi-Year Accessibility Plan will be updated by 2028.

For more information on this accessibility plan, please contact the People & Culture Team at hr.operations@vgw.co.