Better infrastructure solutions.
Better lives.



CPCS Accessibility Policy

Upholding our Integrity Standards

This policy is applicable to:

CPCS

CPCS Transcom Limited and all its subsidiaries.

All CPCS People

Employees, directors, associates and exclusive associates.

OUR COMMITMENT

Our success is based on our individual and collective integrity, never on unethical and illegal behaviour.

We provide and foster a workplace that is diverse, inclusive, free from barriers and psychologically safe.

Your responsibility

We expect that you'll always act with integrity as each of us represents CPCS and share a collective responsibility to safeguard our organization's values.



To prevent discrimination

CPCS strictly prohibits illegal conduct of any kind, including discrimination and harassment.

We value integrity in all our personal and professional interactions and relationships with all our stakeholders, including clients, partners, competitors, and government officials alike.

We're committed to upholding the highest integrity standards. And you must too.



Statement of Organizational Commitment to Accessibility

CPCS Transcom Limited (CPCS) is committed to working towards providing a barrier-free environment in our offices for all stakeholders including our clients/customers, employees, job applicants, suppliers, and any visitors who may enter our premises, access our information, or use our services. As an organization, we respect and uphold the requirements set forth under all relevant regulations and standards*.

CPCS understands that we have a responsibility for ensuring a safe, dignified, and welcoming environment for everyone. We are committed to ensuring our organization's compliance by incorporating accessibility legislation into our policies, procedures, equipment requirements, training, and best practices. We will review these policies and practices annually, as organizational changes occur, or in anticipation of compliance deadlines. In addition, we will strive to meet the needs of individuals with disabilities in a timely and effective manner.

Providing an accessible and barrier-free environment is a shared effort, and as an organization, CPCS is committed to working with the necessary parties to make accessibility for all a reality. For more detailed information on our accessibility policies, plans, and training programs, please contact our Senior Director of HR and Talent.

Accessibility for Ontarians with Disabilities Act (2005), and its associated standards and regulations.

Including the following:

- Accessibility Standards for Customer Service, Ontario Regulation 429/07
- Integrated Accessibility Standards, Ontario Regulation 191/11 for the Information and Communications Standard
- Integrated Accessibility Standards, Ontario Regulation 191/11 for the Employment Standard

The *American With Disabilities Act* and all other applicable laws. As well as principles of Equal Employment Opportunity.



Standards for Customer Service

The Use of Assistive Devices, Service Animals, and Support Persons

Persons with disabilities may:

- Use their own assistive devices as required when accessing goods or services provided by CPCS.
- Be accompanied by a guide dog, service animal or service dog on premises that are open to the public unless otherwise excluded by law.
- May be accompanied by a support person.

Where a safety concern presents itself, or where accessibility might be an issue, other reasonable measures will be used to ensure access.

Notice of Disruptions in Services

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of CPCS. In the event of any disruptions to facilities or services that customers with disabilities rely on to access or use CPCS's goods or services, reasonable efforts will be made to provide advance notice. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

Notice of Availability and Format of Documents

CPCS shall notify customers that the documents related to the Accessibility Standard for Customer Service are available upon request and in a format that considers the customer's disability. Notification will be given by posting the information on CPCS's website (https://cpcs.ca/accessibility/).



Developing Accessible Documents for Client Work

From time to time, clients of CPCS may request that documents such as reports and proposals be made available in an accessible format for those who are visually impaired. Should a client make this request, CPCS can develop accessible documents.

Given the substantial workload required to develop an accessible document, please be sure to inform the Ottawa Office Manager as soon as you are notified that an accessible format will be required so that the appropriate arrangements can be made.

Standards for Communications

Accessible Formats and Communication Supports

Unless deemed unconvertible CPCS will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, upon request. These will be provided in a timely manner and at no additional cost to the individual.

CPCS will consider the person's accessibility needs when customizing individual requests and shall consult with the individual making the request to ensure suitability.

CPCS will make the availability of accessible formats and communication supports publicly known.



Exceptions

The Information and Communications Standard does not apply to:

- Products and product labels;
- Unconvertible information or communications; or
- Information that the organization does not control either directly or indirectly through a contractual relationship.

Unconvertible Information or Communications

If it is determined, in consultation with the requesting party, that information or communications are unconvertible, CPCS will ensure that the individual who made the request is provided with an explanation and a summary of the information.

CPCS will classify information or communications as unconvertible where:

- It is not technically practicable to convert; or
- The technology required to make the conversion is not readily available.

Accessibility Standards for Employment

Recruitment, Assessment and Selection

CPCS will notify employees and the public about the availability of accommodation for job applicants who have disabilities.

Successful applicants will be reminded of CPCS's policies and supports for accommodating people with disabilities.



Accessible Formats and Communication Supports for Employees

If an employee with a disability requests it, CPCS will provide or arrange for the provision of accessible formats and communication supports for information needed in order to perform his/her job or Information that is generally available to all employees in the workplace.

Workplace Emergency Response Information

Where required, CPCS will create individual workplace emergency response information for employees with disabilities.

Performance Management and Career Development and Advancement

CPCS will consider the accessibility needs of employees with disabilities when implementing performance management processes, or when offering career development or advancement opportunities.

Individual accommodation plans will be consulted, as required.

Redeployment/Reassignment

The accessibility needs of employees with disabilities will be taken into account in the event of redeployment or reassignment.

Individual accommodation plans will be consulted, as required.

Accessible Websites and Web Content

CPCS internet websites and web content conforms to the WCAG 2.0 Level AA.

Documented Individual Accommodation Plans

CPCS has in place processes for developing documented individual accommodation plans for employees with disabilities.



Return to Work

CPCS has a documented return-to-work process for employees who are absent from work due to a disability and require disability-related accommodation(s) in order to return to work.

This process outlines the steps CPCS will take to facilitate the employee's return to work and uses documented individual accommodation plans as part of the process.

Feedback

CPCS has established a feedback process for clients/customers or employees with disabilities, upon request. Information about the feedback process, including accessible documents, is available to all clients/customers or employees and notice of the process is made available on our website at https://cpcs.ca/accessibility/.

Submitting Feedback

Customers can submit feedback to:

613-237-2500
613-237-4494
accessibility@cpcs.ca

CPCS Accessibility
150 Isabella St., Suite 701
Ottawa, ON
K1S 1V7

Customers that provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.



Training

Training will be provided to all employees covering all elements required by Regulation 429/07 and the Integrated Accessibility Standards, Ontario Regulation 191/11 under the *Accessibility for Ontarians with Disabilities Act*, 2005.

Training is conducted via an online training provider as part of the orientation for all Ontario based staff.

CPCS maintains a record of training that includes the dates training was provided and the number of employees who participated in the training.

Administration

If you have any questions or concerns about this policy or its related procedures, please contact accessibility@cpcs.ca.

This policy and its related procedures will be reviewed as required in the event of legislative changes, or changes to company procedures.



Appendix I

CPCS Multi-Year Accessibility Plan for Ontario-based Offices

Introduction

Building on our statement of commitment, our current 2026-2030 multi-year accessibility plan follows our earlier 2021-2025 plan and outlines how CPCS Transcom Limited will continue to improve policies and take actions to remove and prevent accessibility barriers. in accordance with the requirements communicated under the Integrated Accessibility Standards, Ontario Regulation 191/11.

Requirement	IASR Requirement	Status
General Requirements ☑		
Establishment of accessibility policies	Establish and maintain a policy will meet the accessibility requirements in IASR.	*Complete/Ongoing* review of policy. The policy is available on the CPCS website.
Multi-Year Plan	Establish, implement, maintain and document a multi-year accessibility plan, outlining the organization's strategy to prevent and remove barriers and meet its requirements under this Regulation; Make the plan available on website and update at least every 5 years.	*Complete/Ongoing* The plan is available on the CPCS website.
Training on IASR and the *Human Rights Code*	Provide training on the requirements of the accessibility standards referred to in this IASR Regulation and the Human Rights Code to all employees, and volunteers and persons who provide goods, services or facilities on behalf of the organization. Maintain a record of the training provided.	*Complete/Ongoing* During onboarding, new relevant employees review and sign-off on the CPCS Accessibility Policy and complete associated training. Training records are maintained.

CPCS Accessibility Policy and Multi-Year Accessibility Plan for Ontario-Based Offices

Requirement	IASR Requirement	Status
Customer Service		
Establishment of customer service policies	Establish and maintain a policy governing the provision of goods and services to people with disabilities. Provide training on the provision of goods and services to people with disabilities to all employees, and volunteers and persons who provide goods, services or facilities on behalf of the organization. Maintain a record of the training provided.	*Complete/Ongoing* Customer service forms are part of CPCS AODA policy. During onboarding, new relevant employees review and sign-off on the CPCS Accessibility Policy and complete associated training. Training records are maintained.
Information and communications		
Feedback process	Ensure processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request.	*Complete/Ongoing* CPCS has set up accessibility@cpcs.ca for accessibility feedback/inquires.
Accessible formats and communication supports	Upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, in a timely manner, at no extra cost.	*Complete/Ongoing* CPCS accommodates requests for accessible documents and communications and notifies the public of this on the CPCS website.
Accessible websites and web content	Make internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0.	*Complete* New CPCS website and web content, compliant with WCAG 2.0 Level AA.

CPCS Accessibility Policy and Multi-Year Accessibility Plan for Ontario-Based Offices

Requirement	IASR Requirement	Status
Employment		
Recruitment, assessment and selection process	Notify employees and the public that it accommodates applicants with disabilities in its recruitment processes.	*Complete/Ongoing* Job postings include information about accessibility accommodations.
Notice to successful candidate	Notify successful applicants of its policies for accommodating employees with disabilities.	*Complete/Ongoing* Information on accessibility policies is provided to relevant staff during relevant new hire orientation.
Informing employees of supports	Inform employees of policies for supporting employees with disabilities. Inform employees whenever there is a change to policies on the provision of job accommodations.	*Complete/Ongoing* Policy and procedures are in place as part of new hire orientation for relevant employees. Employees are informed when there are policy updates via email and CPCS intranet.
Accessible formats and communication supports for employees	Consult with employees who have disabilities to provide or arrange for accessible formats and communication supports required in order to perform their job.	*Complete/Ongoing* Accommodation is provided as required.
Workplace emergency response information	Provide individualized workplace emergency response information to employees who have a disability, where necessary.	*Complete/Ongoing* Individual accommodation plans for employees include emergency response requirements.
Documented individual accommodation plans	A written process for the development of documented individual accommodation plans for employees with disabilities, including emergency response requirements.	*Complete/Ongoing* Process in place to provide individual accommodation plans, where required.

CPCS Accessibility Policy and Multi-Year Accessibility Plan for Ontario-Based Offices

Requirement	IASR Requirement	Status
Employment (*con't*)		
Return-to-Work Process	A return-to-work process for employees who have been absent from work due to a disability and require disability-related accommodation to return to work.	*Complete/Ongoing* Documented return-to-work process in place, using individual accommodation plans.
Performance Management Process	Performance management processes 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.	*Complete/Ongoing* Performance management processes consider the needs of employees with disabilities.
Career Development and Advancement	Consider the accessibility needs of employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to employees with disabilities.	*Complete/Ongoing* Processes supporting career development and advancement opportunities consider the needs of employees with disabilities.
Redeployment	Take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.	*Complete/Ongoing* Processes supporting redeployment consider the needs of employees with disabilities.