

Accessibility for Ontarians with Disabilities Act (AODA) Policy and Protocols

March 2021



The PwC Approach:

- PwC is committed to being an organization where you can be yourself in an open, supportive and engaging environment.
- We strive at all times to create an environment that respects the dignity and independence of all people with disabilities and that demonstrates our commitment to fair and accessible workplace practices, by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act, 2005 and its regulations (the “AODA”).

Our policy:

The purpose of this policy is to outline the practices and procedures approved by PwC in order to meet the obligations under AODA and create accessibility for all.

This Policy applies to all staff, Partners, and all persons who attend a PwC workplace or PwC sanctioned events, including, but not limited to, all visitors, clients, contractors, vendors and delivery persons.

Accessibility plan

PwC will develop, maintain and document an Accessibility Plan outlining the Firm’s strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities.

A copy of PwC’s Accessibility Plan is available upon request.

Communication

We will communicate with all people with disabilities in ways that take into account their disability.

Accessible format and communication

Upon request, PwC will provide, or will arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person’s accessibility needs due to disability. PwC will consult with the person making the request in determining the suitability of an accessible format or communication support.

Upon the request of a staff or Partners with a disability, PwC will consult with the individual to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his or her job, and information that is generally available to other staff and Partners. In determining the suitability of an accessible format or communication support, PwC will consult with the individual making the request. Please see the [Workplace Accommodation](#) policy for more information. A copy of the PwC Workplace Accommodation policy can be made available externally upon request.

Informing staff and Partners of supports

PwC will continue to inform its staff and Partners of its policies (and any updates to those policies) used to support individuals with disabilities, including policies on the provision of [job accommodations](#) that take into account an individual’s accessibility needs due to disability. This information will be provided to new staff and Partners as soon as practicable after commencing employment. A copy of the Workplace Accommodation policy can be made available externally upon request.

Accessible website and web Content

PwC will ensure that all PwC websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, except where this is impracticable.

Assistive devices

People with disabilities may use their own personal assistive devices, or those that may be provided by PwC, whether as staff, Partners, or while obtaining any services provided on our premises that are open to the public.

A person with a disability may enter any part of our premises that are open to the public (or, if a staff member or Partner, any part of our premises that is open to PwC) with that assistive device unless not allowed by law. If the device is not allowed by law, the person will be so advised and alternate options will be explored. If barriers to the use of an assistive device exist at any premises, these barriers, where reasonably possible, will be removed.

We will ensure that our staff and Partners are trained in and familiar with various assistive devices that may be used by anyone with disabilities while accessing our services.

Service animals

We welcome people with disabilities and their service animals. Service animals are allowed on our premises except where animals are not allowed by law. Where an animal is not allowed by law, alternate options will be explored to provide the service to the person with a disability.

Support persons

A person with a disability, whether a staff member, Partner, or otherwise, who is accompanied by a support person will be allowed to have that person accompany them on our premises. Fees will not be charged for support persons.

Depending on the nature of the service being provided, for the benefit of the person with the disability PwC may require the support person to sign a confidentiality agreement, agreeing not to disclose any information or documents obtained in his/her role as a support person to any third parties without the written consent of the person with the disability (and PwC as it pertains to proprietary firm related information).

Training

PwC will provide training to all staff and Partners who deal with other staff, Partners, clients or other third parties on our behalf, and all those who are involved in the development and approvals of client service policies and procedures.

Training will include:

- The purpose of the Act and the requirements of the customer service standard
- How to interact and communicate with people with various types of disabilities
- How to interact with people with disabilities who use assistive devices or require assistance of a service animal or support person
- What to do if a person with a disability has difficulty accessing PwC's services or publicly-accessible premises
- PwC's policies, practices and procedures relating to the customer service standard

New staff and Partners are provided training during on-boarding. Staff and Partners will also be trained on an ongoing basis when changes are made to these policies, practices and procedures.

PwC will keep a record of the training it provides.

Workplace response

Workplace emergency response and individual accommodation plans

PwC provides individualized workplace emergency response information to individuals 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 individual's disability. PwC provides this information as soon as practicable after becoming aware of the need for accommodation.

Where the individual requires assistance, PwC will, with the consent of the individual, provide the workplace emergency response information to any persons designated by PwC to provide assistance to the individual.

PwC will review the individualized workplace emergency response information when the staff member or Partner moves to a different location in the organization, when the individual's overall accommodations needs or plans are reviewed, and when PwC reviews its general emergency response policies.

PwC has a documented process in place for the development of individual accommodation plans for staff members and Partners with disabilities in accordance with the requirements set out in the Regulation. Please refer to the [Workplace Accommodation policy](#) for more information. A copy of the PwC Workplace Accommodation policy can be made available externally upon request.

Notice of temporary disruptions

PwC will provide clients or other third parties with notice in the event of a planned or unexpected disruption to services or facilities for clients with disabilities which could impact their visit to our premises. This notice will include information about the reason for the disruption, how long the disruption is expected to last, and a description of any alternative facilities or services, if available.

The notice will be placed on PwC's website.

Employment

PwC is committed to fair and accessible employment practices.

Recruitment

PwC will notify staff members and Partners, and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

PwC will notify job applicants when they are individually selected to participate further in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.

If a selected applicant requests an accommodation, PwC will consult with the applicant and provide, or arrange for the provision of, suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

When making offers of employment, PwC will notify the successful applicant of its policies for accommodating individuals with disabilities.

Performance management, career development and advancement & redeployment

PwC will take into account the accessibility needs of individuals with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to individuals, or when redeploying them.

Feedback process

The ultimate goal of PwC is to meet and surpass expectations while serving people with disabilities. Anyone who wishes to provide feedback on the way PwC provides services to people with disabilities, has questions about this policy or has concerns regarding its application, can contact the [Human Capital Service Centre](#) at 1 877 792 5535, option 3, through our [website](#), or in person (see website link for all [office locations](#) and their addresses).

Where possible, concerns will be addressed immediately. However, some concerns may require more effort to address. You can expect to hear back from PwC within two business days with details on the resolution of the concern or, in more complex cases, on the steps being taken to resolve the concern.

Modifications to this or other policies

Any PwC policy that does not respect and promote the dignity and independence of people with disabilities will be modified or revoked.

Questions about this policy

For more information, please see our quick guide to providing accessible service. A copy of this PwC internal document can be made available externally upon request.

If anyone has questions about this policy, please contact the [Human Capital Service Centre](#) at 1-877-792-5535, option 3.

Appendix A: Multi-year plan

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.	Developed policy	Complete	Updated March 2021
4	Accessibility Plans	4.(1) Large organizations shall, <ol style="list-style-type: none"> 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; post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and review and update the accessibility plan at least once every five years. 	D&I Office will review and update the accessibility plan at least once every five years.	Complete Review every 5 years	Updated March 1, 2021
7	Training	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, <ol style="list-style-type: none"> all employees, and volunteers; all persons who participate in developing the organization's policies; and all other persons who provide goods, services or facilities on behalf of the organization. 	Developed firm wide e-learning	Complete	February 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.	Human Capital Service Centre is central point of contact for feedback and questions.	Complete	February 2021
12	Accessible Formats & Communication Supports	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, <ul style="list-style-type: none"> 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. 	Integrated into Individual Workplace Accommodation Plan	Complete	January 2021
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.	Integrated into Individual Workplace Accommodation Plan	Complete	January 2021
12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Integrated into Individual Workplace Accommodation Plan	Complete	January 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.	Developed process and policy https://www.pwc.com/ca/en/accessibility-policy.html	Complete	January 1, 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 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.	Developed web site as per requirement and will continue to leverage current guidelines for future changes.	Complete	February 2021

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.	Job posting disclaimer on on job postings	Complete	February 2021
23	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. (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.	Request for accommodation information included in interview confirmation communication.	Complete	February 2021
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.	Request for accommodation information included in offer of employment letter	Complete	March 2021
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.	Developed process [communicated annually via ACC]	Complete	January 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.	Included in our Day 1 onboarding material and as a module in firmwide risk management training.	Complete	February 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.	Developed process	Complete	January 2021
26	Accessible Formats & Communication Supports for Employees	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.	Integrated into Individual Workplace Accommodation Plan	Complete	January 2021
26		26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	Integrated into Individual Workplace Accommodation Plan	Complete	January 2021

Section	Initiative	Description	Action	Status	Compliance Date
27	Accessible Formats & Communication Supports for Employees	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.	Developed process and policy	Complete	January 2021
27		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.	Developed process and policy	Complete	January 2021
27		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.	Developed process and policy	Complete	January 2021
27		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.	Developed process and policy	Complete	January 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.	Developed process and policy	Complete
28	28 (2) The process for the development of documented individual accommodation plans shall include the following elements: a. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. b. The means by which the employee is assessed on an individual basis. 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 and 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		Developed process and policy	Complete	January 2021

Section	Initiative	Description	Action	Status	Compliance Date
		<p>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>			
29	Return to Work Process	<p>29.(1) 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 been absent from work due to a disability and require disability-related accommodations in order to return to work; and</p> <p>b. shall document the process.</p>	Developed process and policy	Complete	January 2021
29		<p>29.(2) The return to work process shall,</p> <p>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</p> <p>b. use individual documented accommodation plans, as described in section 28, as part of the process.</p>	Developed process and policy	Complete	January 2021
29		<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>	Developed process and policy	Complete	January 2021
30	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>	Integrated into Individual Workplace Accommodation Plan	Complete	January 2021
31	Career Development & Advancement	<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</p>	Integrated into Workplace Accommodation process.	Complete	January 2021

Section	Initiative	Description	Action	Status	Compliance Date
32		<p>accommodation plans, when providing career development and advancement to its employees with disabilities.</p> <p>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.</p>	Integrated into Workplace Accommodation process.	Complete	January 2021



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