

## **INTEGRATED ACCESSIBILITY STANDARDS REGULATION : STATEMENT OF COMMITMENT, POLICY AND PLAN**

This policy and plan formalizes the commitment of The Boston Consulting Group (“**BCG**”) to accessibility, and outlines those steps that BCG will take to remove barriers and improve opportunities for people with disabilities through compliance with the Integrated Accessibility Standards Regulation (the “**Integrated Standard**”).

### **STATEMENT OF COMMITMENT:**

BCG is committed to treating all people in a way that allows them to maintain their dignity and independence. BCG believes in integration and equal opportunity, is committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting the accessibility requirements under the *Accessibility for Ontarians with Disabilities Act, 2005*.

### **POLICY AND PLAN:**

#### **General:**

- BCG will provide training on the requirements of the Integrated Standard and on the Ontario Human Rights Code as it relates to people with disabilities. BCG has taken the following steps to ensure that training is provided to all of our employees, and those persons who develop our policies and provide services or facilities on our behalf:
  - developing and consolidating training materials that address the requirements of the Integrated Standard, including information about achieving accessibility by 2025 and on the disability-related obligations under the *Human Rights Code*;
  - reviewing the duties of those individuals that require training, and tailoring the training to be appropriate for such duties;
  - training was delivered prior to January 1, 2015;
  - delivering the training via a method that is appropriate for the audience and the needs of BCG;
  - keeping a record detailing those employees that were trained and when; and
  - ensuring that new employees are trained as soon as practicable after being hired and when BCG’s accessibility policies change.

#### **Information and Communication:**

BCG is committed to meeting the communication needs of people with disabilities.

- BCG will ensure that our existing processes for receiving and responding to feedback are accessible to people with disabilities upon request by:

- providing multiple methods for feedback, such as in writing or via email, telephone or in person; and
  - considering and implementing those accessible formats or communication supports required elsewhere in the Integrated Standard.
- BCG ensures that, upon request, we will provide or arrange for the provision of publicly available information that is in respect of our services or facilities in an accessible format and at a cost that is not more than that charged to others by:
- consulting with the person making the request to determine the most appropriate accessible format or communication support, given the needs of the person, whether the content is convertible and BCG's capability;
  - providing the accessible format or communication support in a timely manner and at no additional cost; and
  - notifying clients and the public about the availability of accessible formats and communication supports.
- BCG is committed to meeting the communication needs of people with disabilities, and strives to ensure that all of its new websites and content on those sites conform with WCAG 2.0, Level A.
- BCG is committed to meeting the communication needs of people with disabilities. BCG will strive to ensure that internet websites over which it has direct control (or indirect control through a contractual relationship that allows for modification of the product) meets the following requirements:
- all new websites and content on those sites (posted after January 1, 2014) conforms with WCAG 2.0, Level A; and
  - all websites and content on those sites (posted after January 1, 2012) conforms with WCAG 2.0, Level AA, by January 1, 2021

### **Employment:**

- BCG is committed to fair and accessible employment practices. We will:
- notify the public, job applicants, and our staff that we will accommodate people with disabilities during the recruitment process, either through our website, via a recruiter or the applicable job posting, as applicable;
  - 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 utilized;
  - consult with job applicants who request accommodation to support them through the recruitment, selection and/or assessment process and take into account their needs, so that the accommodations provided are effective; and

- notify the successful applicant of BCG's policies for accommodating our employees with disabilities.
- BCG will inform our employees of the policies used to support 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, by:
  - consulting with our employees with disabilities to determine those accessible formats or communication supports that may be of assistance, and how such accommodation may be provided; and
  - providing the information as soon as practicable after commencement of employment, and updates whenever there is a change to the policies.
- BCG provides individualized workplace emergency response information to our employees with disabilities, if the disability is such that the individualized information is necessary and BCG is aware of the need for accommodation.
- BCG has developed and put in place a process for the creation of individual accommodation plans for those employees that have been absent from work due to a disability. This process shall be implemented by:
  - considering how employees with disabilities will participate in the development of their accommodation plan and what the plans may include;
  - establishing where the plans will be stored and what steps will be taken to protect the privacy of employee information; and
  - determining when and how the individual accommodation plans will be reviewed and updated.
- BCG has developed and put in place a documented return to work process for those employees that have been absent from work due to a disability and require disability-related accommodation in order to return to work. This process shall outline the steps that BCG will take to facilitate the return to work of the applicable employees and the use of individual documented accommodation plans.
- BCG will ensure that it takes into account the accessibility needs of employees with disabilities (as well as their individual accommodation plans) when implementing its performance management process. This will be achieved by:
  - reviewing an individual's accommodation plan to understand their needs and determine whether it should be adjusted to improve job performance;
  - providing performance-management related documents in accessible formats; and
  - providing informal and formal coaching and feedback in a manner that takes in account an employee's disability.

- BCG will take into account the accessibility needs of its employees with disabilities (as well as their individual accommodation plans) when providing career development, advancement, or redeployment. This may occur through the consideration of what accommodations employees with disabilities may need to succeed elsewhere within our organization, to take on new responsibilities in a current role, or when redeployment has become necessary.

### **Design of Public Spaces**

All of BCG's recent developed public waiting spaces have been designed consistent with standards as defined in the Design of Public Spaces Standard.

- Should any public waiting space require preventative or emergency maintenance, BCG will provide an alternative, accessible waiting area and inform visitors and employees of the maintenance and its approximate timeline.
- Should there be any temporary disruptions when accessible elements required under the Design of Public Spaces Standard are not in working order, BCG will inform all visitors and employees of the temporary disruption and provide accommodation that allows for accessibility (ie via teleworking, moving meeting spaces, etc.).

### **Going Forward:**

BCG will consider accessibility in all aspects of its business and operations, and will endeavour to identify and remove accessibility barriers going forward.

### **For More Information:**

For more information on this accessibility policy and plan, please contact Human Resources

**Reviewed and Updated: October 2023**