

# Multi-year Accessibility Plan: 2025 to 2029

## Statement of Commitment

Citation Canada believes in equal opportunity and is committed to providing a barrier-free environment for all stakeholders, including our clients, customers, colleagues, job applicants, suppliers, the public, and any other 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 the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and its associated standards and regulations. Citation Canada has incorporated accessibility measures into its policies, procedures, training, websites, environment, and workplace best practices in accordance with AODA and its associated standards and regulations. Citation Canada is committed to providing a safe and welcoming environment that aligns with the AODA's principles and respects individual needs.

These key principles of integration, equality, dignity, and independence apply regardless of whether an individual is:

- Working in or visiting our office;
- Accessing our information online, in person, or by phone;
- Procuring our services and support online or by our phone-in services; or
- Welcoming us into their place of employment.

As an organization, Citation Canada is dedicated to meeting the needs of individuals with disabilities in accordance with applicable requirements. We understand that providing a barrier-free environment is a shared effort, and as an organization, we are committed to working with the necessary parties to make accessibility a reality for all.

Citation Canada is committed to ensuring its public website and digital content meet the applicable AODA accessibility requirements.

Questions or concerns regarding Citation Canada's Accessibility Policy and Multi-year Accessibility Plan are to be directed to [hr@citationcanada.com](mailto:hr@citationcanada.com) or submitted via the company's AODA feedback process.



## Overview

Citation Canada's Multi-Year Accessibility Plan is intended to outline and identify the policies, processes, and plans the company currently has in place, or will implement as required to meet the requirements of the *Integrated Accessibility Standards Regulation* (IASR).

Citation Canada will review and update this plan at least once every five years (or more frequently if required) and will make the plan publicly available.



Accessibility Requirement	Status	Compliance Deadline	Responsibility
<b>Customer Service</b>			
<p><i>Accessible Customer Service Policy</i></p> <ol style="list-style-type: none"> <li>1. Develop and implement a Customer Service Policy addressing all requirements under the regulation.</li> <li>2. Develop and deliver training to all colleagues, volunteers, and individuals completing work on behalf of Citation Canada who may aid the public. Provide training to all new colleagues.</li> <li>3. Develop and make public a process for receiving and responding to feedback from customers with disabilities.</li> </ol>	Completed/Ongoing	2012-01-01	Client Facing Department Leaders
<p><i>Citation Canada Action Plan</i></p> <ol style="list-style-type: none"> <li>1. Citation Canada has developed and implemented an Accessible Customer Service Policy specific to the organization. The policy is reviewed and updated as required and a copy is available upon request.</li> <li>2. Citation Canada provides AODA Customer Service Standards training* to employees and others who interact with customers on the company's behalf. New employees complete the training as part of onboarding and additional training is provided when accessibility-related policies or practices are updated. Records of completed AODA Customer Service Standards training are maintained.</li> <li>3. Citation Canada has developed and made public a process for receiving and responding to feedback from customers with disabilities. The feedback may be submitted through accessible communication methods, and client-facing colleagues have been informed of and trained on the company's feedback process.</li> </ol> <p><i>*Alternative formats of the AODA Customer Service Standards Training are also available upon request, including live presentations.</i></p>			
<p>Additional Information (Customer Service)</p> <ul style="list-style-type: none"> <li>• Citation Canada primarily provides customer service through digital and telephone channels. Accessibility obligations are met through accessible communication methods and accommodations as required under the Accessible Customer Service Policy.</li> </ul>			
<b>Part I: General Requirements</b>			
<p><i>Accessibility Policies</i></p> <ol style="list-style-type: none"> <li>1. Create and make public a statement of commitment.</li> <li>2. Develop and implement company-specific accessibility policies.</li> </ol>	Completed/Ongoing	2014-01-01	Human Resources
<p><i>Citation Canada Action Plan</i></p> <ol style="list-style-type: none"> <li>1. Citation Canada has created and made public a statement of commitment. The statement of commitment is located on the company's website.</li> <li>2. Citation Canada has developed and implemented company-specific accessibility policies in accordance with the Accessibility for Ontarians with Disabilities Act (AODA).</li> </ol> <p><i>* Alternative formats of all policies will be made available upon request.</i></p>			



<p><i>Multi-year Accessibility Plan</i></p> <ol style="list-style-type: none"> <li>1. Create and make public a multi-year accessibility plan.</li> <li>2. Provide the plan in accessible formats upon request.</li> <li>3. Review the plan every five years.</li> </ol>	Completed/Ongoing	2014-01-01	Human Resources (Plan Ownership) / Department Leads
<p><i>Citation Canada Action Plan</i></p> <ol style="list-style-type: none"> <li>1. Citation Canada has developed and maintains a multi-year accessibility plan in accordance with the Integrated Accessibility Standards Regulation (IASR).</li> <li>2. Accessible formats of this plan can be requested by contacting hr@citationcanada.com</li> <li>3. The plan is publicly available and reviewed at least once every five years.</li> </ol>			
<p><i>Training</i></p> <p>Train colleagues on applicable IASR requirements and the organization's responsibilities under the <i>Human Rights Code</i> (as it pertains to persons with disabilities).</p>	Completed/Ongoing	2015-01-01	Human Resources
<p><i>Citation Canada Action Plan</i></p> <ol style="list-style-type: none"> <li>1. Training* for new colleagues is delivered via two online training modules covering required content under the IASR:             <ol style="list-style-type: none"> <li>a. AODA Customer Service Standards Training; and</li> <li>b. Understanding Human Rights Training (AODA edition).</li> </ol> </li> <li>2. New colleagues complete the above training as part of their onboarding with the company. The human resources department is responsible for assigning online training and tracking completion.</li> <li>3. Records of completed training are maintained.</li> <li>4. Additional training will be provided as required.</li> </ol> <p>* Training will also be made available via alternate formats, including in-person presentation, as requested.</p>			
<p><b>Part II: Information and Communication Standards</b></p>			
<p><i>Accessible Websites and Web Content</i></p> <ol style="list-style-type: none"> <li>1. Ensure website and web content published after January 1, 2021, conforms to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, level AA.</li> </ol>	Ongoing	2021-01-01	IT and Marketing
<p><i>Citation Canada Action Plan</i></p> <ol style="list-style-type: none"> <li>1. Citation Canada's public website and its web content are designed to conform to WCAG 2.0 level AA.</li> <li>2. The IT and Marketing teams will periodically review the website and address identified accessibility issues.</li> </ol>			
<p><i>Feedback</i></p> <p>Upon request, be able to receive and respond to feedback from clients, individuals inquiring about Citation Canada, our colleagues, and members of the public who have a disability.</p>	Completed/Ongoing	2015-01-01	Human Resources, People Managers, Client/Public-Facing Department Leads
<p><i>Citation Canada Action Plan</i></p>			



<ol style="list-style-type: none"> <li>1. A process for receiving and responding to accessible feedback requests has been developed and communicated to relevant colleagues. Citation Canada can receive and respond to feedback through accessible communication methods upon request.</li> <li>2. Receiving and responding to feedback is included in onboarding for roles that regularly receive such requests.</li> <li>3. All other colleagues are notified of the internal process for directing any accessibility feedback they receive (to <a href="mailto:hr@citationcanada.com">hr@citationcanada.com</a> for employee accessibility feedback and to <a href="mailto:accessibilityfeedback@citationcanada.com">accessibilityfeedback@citationcanada.com</a> for client accessibility feedback).</li> </ol>			
<p><i>Accessible Formats and Communication Supports</i></p> <ol style="list-style-type: none"> <li>1. Upon request, provide accessible formats and communication supports to individuals with disabilities.</li> <li>2. Notify the public of the availability of accessible formats and communication supports.</li> <li>3. Where a communication support or accessible format cannot be provided immediately, consult the client to arrange for a suitable format as soon as possible.</li> <li>4. Citation Canada will maintain a public notice on the company's website informing users that accessible formats and communication supports are available upon request.</li> </ol>	Ongoing	2016-01-01	Marketing, IT, Human Resources
<p><i>Citation Canada Action Plan</i></p> <ol style="list-style-type: none"> <li>1. Clients and the public may submit a complaint or inquiry through the company's feedback process.</li> <li>2. Citation Canada will provide, or arrange for the provision of, accessible formats and communication supports upon request, in consultation with the requester, and in a timely manner, in accordance with applicable AODA requirements. Accessible formats and communication supports will be provided at no additional cost.</li> <li>3. If a requested format cannot be provided immediately, Citation Canada will work with the requester to provide a suitable alternative format as soon as practicable</li> <li>4. Make public Citation Canada's ability to provide for or arrange for the provision of accessible formats and communication supports by posting a statement on the company website.</li> </ol>			
<p><i>Emergency and Public Safety Information</i></p> <ol style="list-style-type: none"> <li>1. If Citation Canada makes any emergency or public safety information available to the public, it will provide such information in an accessible format or with communication supports upon request.</li> </ol>	Ongoing	2012-01-01	Health & Safety / Facilities Lead(s), Department Leaders
<p><i>Citation Canada Action Plan</i></p> <ol style="list-style-type: none"> <li>1. Citation Canada does not currently make emergency or public safety information available to the public; however, should this change, accessible formats or communication supports will be provided upon request.</li> </ol>			

<b>Part III: Employment Standards</b>			
<p><i>Workplace Emergency Response Information</i></p> <ol style="list-style-type: none"> <li>1. Create and implement individualized plans to assist colleagues with disabilities during an emergency.</li> </ol>	Ongoing	2012-01-01	Human Resources, People Managers, Health & Safety Leads



<ol style="list-style-type: none"> <li>2. Obtain consent from colleagues with individualized plans to disclose emergency response or evacuations plans to the person responsible for assisting the colleague in situations where the plan requires the assistance of a colleague.</li> <li>3. Create and provide emergency information formatted in such a way that the colleague with the disability can understand its contents and direction as soon as practicable following the receipt of the request or becoming aware of the need for an individualized plan.</li> <li>4. Review the individualized plan and information:             <ol style="list-style-type: none"> <li>a. When the colleague moves to a different location in the office;</li> <li>b. When the colleague's overall accommodation needs and plan are reviewed; and</li> <li>c. When the company reviews its general emergency response policies.</li> </ol> </li> </ol>			
<p><i>Citation Canada Action Plan</i></p> <ol style="list-style-type: none"> <li>1. Colleagues may identify emergency planning requirements through onboarding or by contact Human Resources.</li> <li>2. The process for providing emergency information includes alternative formats and will be provided as soon as practicable after a request is made or after Citation Canada becomes aware that an individualized plan is required.</li> <li>3. The process and policy used by the HR department to develop an individualized emergency response plan includes the requirement that consent is obtained from the requesting colleague to disclose the contents of the plan to the individual required to provide assistance when responding to the emergency or evacuation. The process for obtaining consent also includes obtaining the acknowledgement of the colleague designated to provide the assistance that the confidentiality of the individualized plan will be maintained, unless the health and safety of either party is potentially compromised.</li> <li>4. Individualized emergency plans include the requirement that the plan be reviewed:             <ol style="list-style-type: none"> <li>a. If the colleague moves to another location within the office that would affect their ability to respond to the emergency or evacuation (the ability of the individual designated to provide assistance, where needed, will also be considered);</li> <li>b. Individualized workplace emergency response information will be reviewed when circumstances change (including changes to an employee's accommodation needs, work location, or emergency response procedures) or at the request of a colleague. It will also be reviewed when the company reviews or amends its general emergency response procedures.</li> </ol> </li> </ol>			
<p><i>Documented Individual Accommodation Plans</i></p> <ol style="list-style-type: none"> <li>1. Develop and implement a written process for the development of documented individual accommodation plans for colleagues with disabilities.</li> </ol>	Ongoing	2016-01-01	Human Resources, People Managers
<p><i>Citation Canada Action Plan</i></p> <ol style="list-style-type: none"> <li>1. Citation Canada has developed and implemented a written process for the development of documented individual accommodation plans for colleagues with disabilities. As per IASR requirements, the plan includes the following elements:             <ol style="list-style-type: none"> <li>a. How a colleague requesting accommodation can participate in the development of the accommodation plan:                 <ol style="list-style-type: none"> <li>i. Citation Canada will work with the colleague to support their participation in the development of the accommodation plan. Limitations will be identified and clearly communicated to the colleague before the development of the plan.</li> </ol> </li> <li>b. How the colleague is assessed on an individual basis.</li> </ol> </li> </ol>			



- c. How Citation Canada can request the participation of a representative from the company in the development of the accommodation plan.
- d. The steps that will be taken to protect the privacy of the colleague's personal information:
  - i. The content of the accommodation plan will be restricted to only those required to facilitate the plan or supervise the colleague. The accommodation plan template will include a section identifying the individuals who will have knowledge of the plan and will require each person to sign an acknowledgement of the confidentiality of its contents.
- e. How often the individual accommodation plan will be reviewed and updated and how it will be done.
- f. An outline of how the reasons for a denial of an accommodation will be communicated to the requesting colleague:
  - i. Colleagues will be informed of the factors that will be taken into consideration by the company when a request for accommodation is received as well as employer and colleague expectations and responsibilities.
- g. The means of providing the individual accommodation plan in a format that considers the colleague's accessibility needs due to a disability:
  - i. Accommodation plan documents will be made available in accessible formats.
- h. The accommodation plan template will include a section regarding the provision of accessible formats and communication supports to be completed if such supports are required by the colleague.
- i. The accommodation plan will also include an emergency response and evacuation plan if required by the colleague.
- j. The accommodation plan will include a section outlining additional accommodations that are required.

*Recruitment, Assessment, and Selection*

1. Notify colleagues and the public about the availability of accommodation for applicants with disabilities in the company's recruitment processes.
2. During the recruitment process, notify applicants selected to participate in our selection and assessment processes that accommodations are available upon request and in relation to the materials and processes used by Citation Canada.
3. If a job applicant requests accommodation, consult with the individual and make adjustments to best suit their needs.
4. Notify successful applicants of the company's policies for accommodating colleagues with disabilities.

Ongoing

2016-01-01

Human Resources,  
Talent Acquisition,  
Hiring Managers

*Citation Canada Action Plan*

1. Citation Canada has an accessibility statement posted on our online careers page notifying applicants that reasonable accommodations will be made upon request to ensure that individuals with disabilities are able to fully participate in our recruitment efforts. As not all applicants apply through our careers page, this statement is also included on job postings to ensure that it is properly communicated to potential applicants.
2. Successful applicants will be informed of the availability of accommodations relating to Citation Canada's selection and assessment processes upon initial contact from the hiring manager or recruiter:
  - a. Assessment or selection methods will be reviewed, and accommodations will be provided upon request, in consultation with the applicant, to support equitable participation in the recruitment process.
  - b. Any accommodation request pertaining to the company's selection or assessment methods that cannot be met with current alternate formats will be forwarded to hr@citationcanada.com, who will work with the individual to develop an acceptable alternative.



<p>3. When scheduling interviews, Citation Canada will include a statement in all e-mail confirmations indicating to the applicant that accommodations are available and inviting the applicant to inform the recruiter of any necessary accommodations.</p> <p>4. New hires will be informed of the company's policies for accommodating employees with disabilities, and the policies will be available upon request in accessible formats.</p>			
<p><i>Accessible Formats and Communication Supports for Colleagues</i></p> <p>1. Where a colleague with a disability requests it, work with them to provide or arrange for the provision of accessible formats and communication supports for:</p> <p>a. Information that is needed to perform the colleague's job; and</p> <p>b. Information that is generally available to colleagues in the workplace.</p> <p>2. Where a request is made, work with the requesting colleague to determine the suitability of the proposed accessible format or communication support.</p>	Ongoing	2015-01-01	Human Resources, People Managers
<p><i>Citation Canada Action Plan</i></p> <p>1. The availability of accessible formats and communication supports has been communicated to colleagues and is available upon request. Colleagues requiring accessible formats or communication supports should notify HR to request.</p> <p>2. Upon request, Citation Canada will provide or arrange accessible formats, and communication supports needed to perform a colleague's job and information generally available in the workplace, in consultation with the colleague.</p> <p>3. Citation Canada will consider available accessibility features of third-party systems used by colleagues. If a colleague encounters an accessibility barrier within these systems, Citation Canada will provide the required information in an accessible format or through an alternate method.</p> <p>4. Citation Canada will provide pre-recorded training videos for its own employees in an accessible manner and will provide closed captioning or alternative formats where practicable or upon request.</p>			
<p><i>Information for Colleagues</i></p> <p>1. Communicate the company's policy on accommodating colleagues with disabilities to all colleagues.</p> <p>2. Ensure that new hires are informed of the company's policy on accommodating colleagues with disabilities.</p>	Completed/Ongoing	2016-01-01	Human Resources
<p><i>Citation Canada Action Plan</i></p> <p>1. Citation Canada's Accommodation Policy was developed and has been made available to colleagues electronically and on the company's health and safety bulletin boards.</p> <p>2. New hires are provided with the relevant company policies and how to access them. Accessible formats and communication supports are available upon request.</p> <p>3. Policy changes will be communicated to colleagues, including via the company's online platform(s) where appropriate.</p>			
<p><i>Processes to Accommodate Colleagues and Return-to-Work Process</i></p> <ul style="list-style-type: none"> <li>Create a process to develop accommodation plans and return-to-work plans for colleagues who have been absent from work due to a disability</li> </ul>	Ongoing	2016-01-01	Human Resources, People Managers



<p>and who require disability-related accommodations in order to return to work.</p>			
<p><i>Citation Canada Action Plan</i></p> <ul style="list-style-type: none"> <li>• Use updated forms to ensure that all accommodation and RTW plans are properly recorded and retained on file. For consistency, the accommodation plan template will be used in conjunction with RTW processes.</li> <li>• Forms and associated process documentation will be reviewed and updated as required.</li> </ul>			
<p><i>Accessible Performance Management, Career Development, and Job Changes</i></p> <ul style="list-style-type: none"> <li>• Ensure the organization’s performance management and career development processes consider accessibility needs and provide accommodation where required.</li> </ul>	<p>Ongoing</p>	<p>2016-01-01</p>	<p>Human Resources, People Managers</p>
<p><i>Citation Canada Action Plan</i></p> <ul style="list-style-type: none"> <li>• Citation Canada’s performance management, career development, and job change processes will consider accessibility needs and individual accommodation plans, and accommodations will be provided where required.</li> </ul>			
<p><i>Redeployment</i></p> <ul style="list-style-type: none"> <li>• Consider the accessibility needs and accommodation plans of colleagues who are reassigned to an alternate department or position with the company as an alternative to a temporary layoff or termination.</li> </ul>	<p>Ongoing</p>	<p>2016-01-01</p>	<p>Human Resources, Senior Leadership</p>
<p><i>Citation Canada Action Plan</i></p> <ul style="list-style-type: none"> <li>• As part of the redeployment process, Citation Canada will incorporate the accessibility needs and accommodation plans of any colleague who is being redeployed to an alternate position or department. The HR department will oversee the redeployment process; however, new or amended reporting hierarchies will be reviewed to determine who is to be involved with and informed of any accessibility plans and requirements.</li> </ul>			

