POLICY STATEMENT

FCC Canada is committed to providing a safe work environment for all internal and external stakeholders including the person with disability with the purpose to:

- ❖ Meet the current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination.
- ❖ Achieve excellence in providing services, or facilities to all customers including people with disabilities.
- ❖ Ensure equal access for people with disabilities that allows them to maintain their dignity and independence.
- ❖ Meet the needs of people with disabilities in a timely manner by removing and preventing barriers to accessibility under the Accessibility for Ontarians with Disabilities Act (AODA), 2005, and Ontario's accessibility laws.

At FCC Canada, we understand that obligations under the AODA and the accessibility standards do not substitute or limit our obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law. We believe in integration and our accessible policies are consistent with the principles of independence, dignity, integration, and equal opportunity for people with disabilities. Therefore, our obligations will cover aspects such as:

Training

We are providing training to all staff, volunteers, and our employees according to their specific role to ensure accessible service as per Ontario's accessibility standards, and Ontario Human Rights Code related to persons with disabilities. We also train our personnel who develops our organization's policies as well as subcontractors and suppliers who provide services, or facilities on behalf of our organization. Our training topics includes the following aspects:

- ❖ Our policies, purpose, scope, and the requirements of the AODA, and the customer service standards.
- ❖ Means and methods:
  - ✓ on how to interact and communicate with people with various types of disabilities,
  - ✓ on how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person.
  - ✓ how to use the equipment or devices available on-site or otherwise that may help with providing goods, services, or facilities to people with disabilities.
  - ✓ on what to do if a person with a disability is having difficulty in accessing our services, or facilities.

We train every person first day of their employment in respect of any policies established within our company and we maintain accurate records.

Assistive Devices

At FCC, people with disabilities may use their personal assistive devices when accessing our services, or facilities. In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, we are providing other measures to ensure the person with a disability can access our goods, services, or facilities. FCC currently does not use any assistive device. In the future, if we have people with disabilities, we will accommodate them with their requirement of assistive devices and we will provide the associated training.

Communication

We communicate with people with disabilities in ways that consider their disability including sign language, or written communication based on their accommodating requirement. We are working with the person with disabilities to determine what communication is better for them. We also have an accessible process for receiving and responding to feedback to persons with disabilities upon request according with the internationally recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements and in accordance with Ontario's accessibility laws.

Service Animals

We welcome people with disabilities and their service animals who are allowed on the parts of our premises that are open to the public and third parties. When we cannot easily identify that an animal is a service animal, our staff may ask for documentation from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability identified through visual harness or a vest, or when it helps the person perform certain tasks. A regulated health professional is defined as a member of one of the following colleges:

- ❖ College of Audiologists and Speech-Language Pathologists of Ontario
- ❖ College of Chiropractors of Ontario

❖ **College of Nurses of Ontario**
❖ **College of Occupational Therapists of Ontario**
❖ **College of Optometrists of Ontario**
❖ **College of Physicians and Surgeons of Ontario**
❖ **College of Physiotherapists of Ontario**
❖ **College of Psychologists of Ontario**
❖ **College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.**

If service animals are prohibited by another law, we are explaining why the animal is excluded, under which law and we are discussing another way of providing goods, services, or facilities.

<u>Notice of Availability of Documents</u>

FCC Canada notifies the employees, subcontractors, suppliers, and visitors that documents related to accessible customer service, are available upon request by posting a notice on the safety board. We provide these documents in an accessible format, in a timely manner and, at no additional cost, printed/hard copy, or electronic support, on request. We consult with the person making the request to determine the suitability of the format or communication support.

<u>Employment</u>

At FCC Canada, we notify employees, job applicants, and the public that accommodations can be made during recruitment and hiring. We consult with the applicants and provide or arrange for suitable accommodation. We notify successful applicants of policies for accommodating employees with disabilities through our onboarding experience after accepting offers of employment.

Job postings include an accessibility and accommodation statement to encourage applications from people with disabilities. FCC Canada welcomes and values diversity. We encourage people with disabilities to apply and are committed to providing support during the hiring process. If they need accommodations for their application or interview, they must contact us at tacanada@fccco.com. We will work with everyone to ensure a fair and accessible experience.

During onboarding, all new hires will receive a copy of this policy which and their rights under AODA. HR will implement an inclusive interview process, offering accessible formats for tests or interviews upon request.

We also notify staff that supports are available for those with disabilities as soon as practicable after they begin their employment. We provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that consider an employee's accessibility needs due to a disability. We consult with employees when arranging for the provision of suitable accommodation in a manner that considers the accessibility needs due to disability. We consult with the person making the request in determining the suitability of an accessible format or communication supports specifically for information needed to perform the employee's job, and information that is generally available to employees in the workplace. Where needed, we are also providing customized emergency information to help an employee with a disability during an emergency. With the employee's consent, we are providing workplace emergency information to a designated person who is helping that employee during an emergency. We are providing the information as soon as practicable after we become aware of the need for accommodation due to the employee's disability. We are reviewing the individualized workplace emergency response information in the following situation:

❖ **When the employee moves to a different location within our organization.**
❖ **When the employee's overall accommodations needs or plans are more current; and**
❖ **When FCC review its general emergency response policies.**

We have developed written process to establish individual accommodation plans for employees who have been absent from work due to a disability and require disability-related accommodations to return to work. At FCC, we are committed to establish, revise, or remove any policies that do not respect and promote the principles of dignity, independence, integration, and equal opportunity for people with disabilities. This policy is made available in accessible formats upon request.

Signed by:

Pedro Lopez-Bravo

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Pedro Lopez-Bravo
Sr. VP of Operations Director

1/10/2025

AODA – MULTI-YEAR ACCESSIBILITY PLAN (MYAP)

REVISIONS DESCRIPTION:

Rev.0: First Issue

		Signed by: Dhruv Joshi 4C8D909D9EB347B...	**Signed by:** Yolisel Reyes Livia Mihaescu 0908040E04EA4D9...		**Signed by:** Pedro Lopez-Bravo 0ACFB2CCDC04418...
0	1.10.2025	DJ (HSEC)	YR (HR Dir.)	LM (QHSE Dir.)	PLB (Sr. VP Op. Dir.)
REV.	**DATE**	**PREPARED**	**REVIEWED**		**APPROVED**

"Confidential"

TABLE OF CONTENTS

1. PURPOSE AND SCOPE

The purpose of this plan is to establish *FCC Canada's (FCC)* best approach for compliance with the legal requirements under the Accessibility for Ontarians with Disabilities Act (AODA), 2005.

The scope of this plan encompasses several key areas aimed at ensuring that individuals with disabilities can fully participate in FCC's operations.

Firstly, it includes the development and implementation of policies that promote accessibility in public spaces, workplaces, and services. This involves adhering to the AODA, which mandates that organizations identify, remove, and prevent barriers to accessibility. The scope also requires regular assessments and updates to ensure compliance with accessibility standards.

Secondly, the plan focuses on training and awareness programs for staff and stakeholders to foster a culture of inclusivity. This includes educating employees about the needs of individuals with disabilities and the importance of providing accessible services and environments. By promoting understanding and empathy, organizations can create a supportive atmosphere that encourages participation from all individuals, regardless of their abilities.

Lastly, the scope involves the establishment of feedback mechanisms that allow individuals with disabilities to voice their experiences and suggestions regarding accessibility. This could include surveys, focus groups, or direct communication channels that facilitate ongoing dialogue between organizations and the community. By actively seeking input from those affected, organizations can continuously improve their accessibility procedures and ensure that they meet the evolving needs of individuals with disabilities in Ontario.

2. REFERENCE DOCUMENTS

- **FCC H&S Manual**.
- **FCC Code of Ethics**
- **FCC AODA Policy**
- **Accessibility for Ontarians with Disabilities Act, 2005**
- **Ontario Human Rights Code**

3. DEFINITIONS AND ABBREVIATIONS

- **Compliance**: the act of obeying a law or rule.
- **Law**: a rule of conduct developed by the government or society over a certain territory.
- **Multi-year accessibility plan:** a written document that outlines the organization's strategy to identify, prevent and remove accessibility barriers.

4. RESPONSIBILITIES

FCC's main responsibilities and interfaces concerning the activities covered by this procedure are shown in the Responsibility Matrix below:

- *Responsible***:** person responsible with carrying out the activity.

- *Accountable***:** person responsible with the results/deliverables of activity.

- *Consulted***:** person collaborating with the activity responsible, for the execution of the same.

- *Informed***:** person who must be informed about the activity and who provide information when needed.

- *Verified***:** person checking the compliance with the criteria (in case of a deliverable or when the activity needs a verification of conformity before the approval/authorization);

- *Signatory***:** person Approving/Authorizing the decision of *verified* (in the case of deliverable or when the activity needs an approval/authorization).

DESCRIPTION	VPOD	QHSED	HSC	HRD	All Staff
Establish & implement the AODA policy and MYAP	S	C/V	R/A	R/A	I
Perform AODA training, information & communication	I	V	R/A	R/A	I
Ensure compliance with employment standards	V/S	I	C	R/A	I
Ensure compliance with customer service standards	I	I	R/A	R/A	I
Ensure compliance with office/works space	S	I	R/A	R/A	I
Ensure compliance with procurement & transportation	V/S	I	C	R/A	I

R: Responsible   **A: Accountable**   **C: Consulted/Collaborates**   **I: Informed**   **V: Verified**   **S: Sign**

Abbreviations:

VPOD: Vice-President of Operations Director   **HSC:** Health & Safety Coordinator

QHSED: Quality, Health & Safety and Environment Director   **HR:** Human Resources Director

5. PROCESS

5.1. CUSTOMER SERVICE

FCC is committed to providing accessible customer service to people with disabilities. This means that we will provide goods, services, and facilities to people with disabilities with the same high quality and timeliness as others. We will focus on:

- Establishing a customer service that outlines how to assist individuals with disabilities effectively.
- Providing training for all customer-facing staff on disability awareness and effective communication strategies.
- Create feedback mechanisms for people with disability to report accessibility issues and suggestions for improvement.

To enhance customer service within our accessibility plan for our organization, we will first implement comprehensive training programs for all staff members. This training will focus on disability awareness, effective communication techniques, and the specific needs of individuals with various disabilities. By fostering an understanding of the diverse challenges faced by people with disability at FCC, our employees will be better equipped to provide empathetic and responsive service. Additionally, we will create accessible resources, such as guides and FAQs, that outline our services and accommodations available for individuals with disabilities.

Next, we will establish clear protocols for handling accessibility requests and feedback from our employees. This will include a dedicated point of contact for accessibility inquiries, ensuring that customers can easily reach out for assistance. We will also implement a system for tracking and addressing accessibility-related complaints and suggestions, allowing us to continuously improve our services based on real customer experiences. All suggestions and complaints are welcomed via email at HRCanada@fccco.com. Additionally, HR team will create a feedback form to receive feedback if needed. Regular reviews of this feedback will help us identify trends and areas needing further attention.

Lastly, we will focus on creating an inclusive environment within our office space that encourages open communication. This can be achieved by designing customer service areas that are physically accessible, including adjustable counters, clear signage, and seating arrangements that accommodate various needs. We will also promote a culture of inclusivity by encouraging staff to engage with all visitors, employees, and customers proactively and to seek feedback on their experiences. By prioritizing accessibility in our work culture approach, we aim to create a welcoming atmosphere that ensures all individuals feel valued and supported.

5.2. INFORMATION AND COMMUNICATION

FCC is committed to making our information and communications accessible to people with disabilities. We will comply with the information and communication standards so we can communicate with more people with disability. We will focus on:

- Conducting an accessibility audit of all communication materials, including websites, brochures, and social media platforms.
- Implementing accessible formats for all information, ensuring compatibility with screen readers and other assistive technologies.
- Developing guidelines for creating accessible content and train staff on these standards.

The first step in the information and communication program will be to conduct a thorough audit of all existing communication materials. This includes reviewing our brochures, and internal documents to identify areas that may not be accessible to individuals with disabilities. We will ensure that all digital content is compatible with screen readers and that printed materials are available in alternative formats, such as large print or braille. This audit will serve as the foundation for our ongoing efforts to improve accessibility and ensure that everyone can access important information.

Following the audit, we will develop and implement guidelines for creating accessible content across all platforms. These guidelines will include best practices for writing clear and concise language, using appropriate color contrasts, and incorporating alt text for images. To ensure that all staff members are equipped to follow these guidelines, we will provide training sessions focused on accessibility standards and the importance of inclusive communication. By empowering our team with the knowledge and tools needed, we can create a more accessible and informative environment for all.

Finally, we will establish a feedback mechanism that allows customers and employees to report any accessibility issues they encounter with our communication materials. This could take the form of a dedicated email address or an online form that simplifies the process of submitting concerns or suggestions. All suggestions and feedback are welcomed via email at HRCanada@fccco.com. Regularly reviewing this feedback will enable us to identify recurring issues and make necessary adjustments to our communication strategies. By fostering an open dialogue about accessibility, we can continually improve our practices and ensure that all individuals feel included and informed.

5.3. EMPLOYMENT STANDARDS

FCC is committed to fair and accessible employment practices. We will:

- Review and revise the recruitment processes to ensure they are inclusive and accessible to all candidates.
- Implement reasonable accommodation policies to support employees with disabilities in the workplace.
- Develop mentorship programs for employees with disabilities to promote career advancement.

At FCC Canada, we notify employees, job applicants, and the public that accommodations can be made during recruitment and hiring. We consult with the applicants and provide or arrange for suitable accommodation. We notify successful applicants of policies for accommodating employees with disabilities through our onboarding experience after accepting offers of employment.

Job postings include an accessibility and accommodation statement to encourage applications from people with disabilities. Additionally, we invite individuals with disabilities to contact tacanada@fccco.com if they require accommodations for the application or interview process.

❖ **Accommodation Statement:** *FCC Canada welcomes and values diversity. We encourage people with disabilities to apply and are committed to providing support during the hiring process. If you need accommodations for your application or interview, please contact us at tacanada@fccco.com. We will work with you to ensure a fair and accessible experience.*

During onboarding, all new hires will receive a copy of this policy and their rights under AODA. HR will implement an inclusive interview process, offering accessible formats for tests or interviews upon request.

In our accessibility plan for office space, the employment program will begin with a commitment to inclusive recruitment practices. This involves actively promoting job openings through channels that reach diverse

communities, including individuals with disabilities. We will ensure that our job descriptions are written in clear, accessible language and that application processes are designed to accommodate various needs. This may include providing alternative methods for submitting applications, such as video submissions or in-person interviews that are tailored to the candidate's comfort.

To support employees with disabilities once they are hired, we will implement a comprehensive onboarding program that includes accessibility training for all new staff. This training will cover topics such as understanding accommodations, fostering an inclusive workplace culture, and recognizing the importance of diversity in the workplace. Additionally, we will assign a mentor or buddy to each new employee with a disability to help them navigate their new environment and ensure they feel welcomed and supported from day one.

Finally, we will establish ongoing support systems for employees with disabilities, including regular check-ins to discuss their needs and any necessary accommodations. This could involve flexible work arrangements, assistive technology, or modifications to the physical workspace to enhance accessibility. By creating an environment where employees feel safe to express their needs and concerns, we can foster a culture of inclusion and empowerment that benefits everyone in the office. Regular evaluations of our employment practices will help us identify areas for improvement and ensure that we remain committed to promoting accessibility in the workplace.

5.4. PROCUREMENT

FCC is committed to fair and accessible procurement process. We will:

- Establish procurement policies that prioritize accessibility in the selection of vendors and service providers.
- Create a checklist for evaluating the accessibility of products and services before purchase.
- Train procurement staff on the importance of accessibility and how to assess vendor compliance.

In our accessibility plan for office space, the procurement program will focus on ensuring that all products and services acquired are accessible to individuals with disabilities. This begins with establishing clear guidelines for evaluating potential vendors and suppliers based on their commitment to accessibility. We will prioritize partnerships with companies that offer products designed with accessibility in mind, such as ergonomic furniture, assistive technologies, and accessible communication tools. By integrating these requirements into our procurement process, we can create a workspace that meets the diverse needs of all employees.

By equipping our procurement team with the knowledge and tools necessary to make informed decisions, we can ensure that accessibility is a key consideration in every purchasing choice, from office supplies to technology.

Finally, we will establish a feedback loop that allows employees, particularly those with disabilities, to provide input on the accessibility of procured products and services. This could involve surveys or focus groups to gather insights on how well the items meet their needs and any improvements that could be made. Regularly reviewing this feedback will help us refine our procurement strategy and ensure that we are continuously enhancing the accessibility of our office space. By fostering an inclusive approach to procurement, we can create a more supportive and welcoming environment for all employees.

5.5. TRAINING

FCC is committed to providing training according with Ontario's accessibility laws and the Ontario Human Rights Code as it applies to people with disabilities. To achieve this commitment, we will:

- Develop ongoing training programs focused on accessibility awareness for all employees.
- Incorporate accessibility training into new employee onboarding processes.

- Evaluate the effectiveness of training programs and adjust as necessary based on feedback.

In our accessibility plan, the training program will be designed to equip all employees with the knowledge and skills necessary to create an inclusive environment for individuals with disabilities. This program will begin with mandatory onboarding training sessions that cover the fundamentals of accessibility, including an overview of various disabilities, the importance of inclusivity, and the legal requirements outlined in the AODA. By fostering an understanding of the challenges faced by individuals with disabilities, we aim to cultivate empathy and awareness among all staff members.

To enhance the effectiveness of the training, we will incorporate interactive workshops and role-playing exercises that simulate real-life scenarios. These activities will allow employees to experience firsthand the barriers that individuals with disabilities may encounter in the workplace. Additionally, we will invite guest speakers, including individuals with disabilities, to share their personal experiences and insights. This direct engagement will not only enrich the training but also encourage open dialogue and foster a culture of respect and understanding within the office.

We will have this plan implemented in the upcoming year 2026 after a full year of policy and MYAP is implemented.

Finally, we will monitor ongoing training opportunities to ensure that accessibility remains a priority as our workforce evolves. This could include a review of courses, updates on new accessibility technologies, and discussions on best practices for accommodating diverse needs. We will also establish a mentorship program where experienced employees can support their peers in implementing accessibility measures within their teams. By committing to continuous learning and improvement, we can create a workplace that values diversity and empowers all employees to thrive.

5.6. PUBLIC SPACE

FCC will implement procedures to prevent disruptions to the accessible parts of the public spaces in its use. We will:

- Conduct an accessibility audit of all FCC rented public spaces to identify barriers and areas for improvement.
- Develop a plan and discuss with the building management for retrofitting existing spaces to enhance accessibility, including ramps, signage, and accessible restrooms.
- Implement a particular space plan, if/when required as soon as we hire people with disabilities.

In our accessibility plan, the public areas will prioritize inclusivity and ease of access for individuals with disabilities. This will involve a comprehensive assessment of the current layout and features of the office space, identifying any barriers that may hinder accessibility. Key design elements will include wide pathways, ramps with appropriate gradients, and accessible entrances that comply with AODA guidelines. By ensuring that all public spaces are navigable for individuals with mobility challenges, we can create an environment that welcomes everyone.

We will engage employees and stakeholders in the design process through feedback sessions and workshops. By gathering input from individuals with disabilities, we can ensure that their needs and preferences are reflected in the final design space when needed. This collaborative approach will not only enhance the functionality of the public spaces but also promote a sense of ownership and community among all employees. Ultimately, our goal is to create an office environment that is not only accessible but also inviting and conducive to collaboration for everyone.

5.7. TRANSPORTATION

FCC is committed to ensure accessible transportation services are provided to people with disabilities. We will collaborate with the building management to ensure all the barriers in public spaces are removed.

In our accessibility plan, the transportation program will be designed to ensure that individuals with disabilities can easily access the workplace. This will involve a thorough evaluation of the current transportation options available to employees, including public transit routes, parking facilities, and shuttle services. We will work closely to improve accessibility features, such as designated drop-off zones, accessible routes, and clear signage that guides employees with disabilities to their dedicated office.

Additionally, we will provide information on alternative transportation options, ensuring that all employees are aware of the resources available to them. By facilitating transportation access, we can reduce barriers and promote greater participation in the workplace.

We will establish a feedback mechanism to continuously monitor and improve transportation services for individuals with disabilities. This will involve regular surveys and focus groups to gather input from employees about their experiences and any challenges they encounter. By actively engaging employees in this process, we can identify areas for improvement and make necessary adjustments to our transportation program. Our commitment to accessibility in transportation will play a crucial role in creating an inclusive office environment where everyone can thrive.

5.8. TIMELINE AND REVISION

This plan will be implemented by the end of the first semester of 2025.

Continued monitoring will be conducted, and every feedback will be taken into consideration. Every suggestion will be reviewed along with the senior management and will be implemented within 14 calendar days.

This plan will be reviewed every 3 years at a minimum. If there is a change required by the feedback, suggestions process and/or by legislation change, we will revise to ensure equal opportunities for all people with disabilities.