

Entrust HR Policy		
Multi-Year Accessibility Plan	Document Version	1.2
	Date	12-Dec-2023
	Region	Ontario, Canada

1. Purpose

The purpose of this document is to affirm the commitment of Entrust Limited (“Entrust”) to meeting the diverse needs of persons with disabilities and to set forth our policy and multi-year accessibility plan for compliance with the requirements of the Integrated Accessibility Standards (the “IAS”) under the Accessibility for Ontarians with Disabilities Act, 2005 (the “AODA”).

2. Statement of Commitment

Entrust is committed to providing an accessible and inclusive environment in which all individuals have equal access as required by the IAS, O. Reg. 191/11, made under the AODA,

Entrust will take steps to meet the diverse needs of persons with disabilities in a timely manner that is consistent with the principles of independence, dignity, integration and equality of opportunity, and will do so by striving to identify, prevent and remove barriers to accessibility wherever possible.

3. Definitions

Accessible formats include, but are not limited to large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

Communication supports include, but are not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Disability is defined by the *Human Rights Code* as follows:

- a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device;
- b) a condition of mental impairment or a developmental disability;
- c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- d) a mental disorder; or

- e) an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

4. Multi-Year Accessibility Plan

General Requirements	
Self-Serve Kiosks	Compliance Date: January 1, 2014
<p>If and when Entrust designs, procures or acquires “self-service kiosks”, we will consider what, if any, accessibility features could be built into the kiosks to best meet the needs of customers and clients with disabilities – having regard to the accessibility needs, preferences and abilities of the widest range of users – and we will strive to include accessibility features in the self-service kiosks being designed, procured or acquired where possible.</p> <p>A “self-service kiosk” means an interactive electronic terminal, including a point-of-sale device, intended for public use that allows users to access one or more services or products or both.</p>	
Training	Compliance Date: January 1, 2015
<p>Entrust will ensure that all employees in Ontario that deal with the public and any other persons who provide goods, services or facilities to the public or other third parties in Ontario on behalf of Entrust or who participate in developing Entrust’s policies on the provision of goods, services or facilities to the public or other third parties in Ontario, will receive training on the requirements of the IAS and on the Ontario Human Rights Code as it pertains to persons with disabilities.</p> <p>Training will be provided in a manner that is appropriate to the duties of the employees and other persons and will be provided as soon as practicable after employees or other third parties commence their duties and on an ongoing basis with respect to any changes to this policy.</p> <p>Entrust will maintain training records of all individuals who complete AODA training, including the names and dates on which the training is completed. Entrust’s Accessibility Policies are posted on our internal website.</p>	

Information and Communication	
Emergency Procedure, Plans or Public Safety Information	Compliance Date: January 1, 2012
<p>Wherever Entrust prepares emergency procedures, plans or public safety information and makes the information available to the public, we are committed to providing the information in an accessible format or with appropriate communication supports as soon as practicable upon request.</p>	
Accessible Websites and Web Content	Compliance Date: January 1, 2014

The accessible website and web content requirements apply only with respect to:

- Entrust’s websites that are accessible to the public (i.e., excludes intranet websites but includes websites accessible only by customers);
- websites and web content, including web-based applications, that Entrust controls directly or through a contractual relationship that allows for modification of the product; and
- web content published on a website after January 1, 2012.

Entrust will ensure that all “new internet websites and web content” conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAB) 2.0 Level A requirements, except where doing so is not practicable having regard to, among other things, the availability of commercial software or tools or both, and any significant impact on an implementation timeline that was planned or initiated before January 1, 2012.

“New internet websites and web content” means either a website with a new domain name or a website with an existing domain name undergoing a “significant refresh”.

A “significant refresh” means changing more than 50% of the content, design or technology of the website, such as:

- creating, rewriting or reorganizing more than 50% of the website’s content, including graphics, text, widgets, etc.;
- changing more than 50% of the design elements, including layout, navigation, placement and style; or
- changing more than 50% of the web publishing platform/model such as the content management system (CMS), Cascading Style Sheet (CSS) or HTML structure.

Feedback	Compliance Date: January 1, 2015
Wherever Entrust has existing processes for receiving and responding to feedback, we will provide or arrange for the provision of accessible formats and communication supports upon request in order to ensure that all such processes are accessible to people with disabilities.	

Accessible Formats and Communication Supports	Compliance Date: January 1, 2016
Upon request, Entrust will take all reasonable steps to provide or arrange for the provision of accessible formats and communication supports in a timely manner so that people with disabilities can access our publicly available information.	
In each case, Entrust will take into account the accessibility needs of the person with a disability making the request and will consult with the person to determine the suitability of an accessible format or communication support.	
Accessible formats and communication supports will be provided at no additional cost to the person with a disability making the request.	

Entrust will notify the public of the availability of accessible formats and communication supports.

Employment Standards	
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Workplace Emergency Response Information	Compliance Date: January 1, 2012
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Wherever Entrust is aware of the need for individualized emergency response information due to an employee's disability, we are committed to accommodating the employee by preparing and providing him or her with individualized emergency response information that is suitable for the circumstances.

If the employee with a disability who receives the individualized workplace emergency response information requires assistance and provides their consent, Entrust will provide the individualized workplace emergency response information to a person who is designated to assist the employee in case of an emergency.

Recruitment	Compliance Date: January 1, 2016
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Entrust will notify the public and our employees in Ontario that, when requested, we will provide accommodation for applicants with disabilities who participate in our recruitment processes.

During the recruitment process, Entrust will notify all job applicants that are selected to participate in an assessment or selection process that we will provide reasonable accommodations, upon request, to a person with a disability in relation to the materials or processes to be used in the assessment or selection process. In any case where an applicant with a disability requests an accommodation, we will 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 his or her disability.

Entrust will notify successful job applicants of our policies for accommodating employees with disabilities when they are hired.

Informing Employees of Disability-Related Supports	Compliance Date: January 1, 2016
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Entrust will notify our employees in Ontario of our existing policies in respect of employees with disabilities including, but not limited to, any policies regarding job accommodations that take into account an employee's accessibility needs due to disability. We will also provide updated information to our employees in Ontario with respect to any changes to our existing policies regarding employees with disabilities and job accommodations for disability-related needs.

<p>All new employees in Ontario will be notified of our existing policies in respect to employees with disabilities and job accommodations for disability-related needs as soon as practicable after beginning their employment.</p>	
<p>Accessible Formats and Communication Supports for Employees</p>	<p>Compliance Date: January 1, 2016</p>
<p>Upon request, Entrust will consult with an Ontario-based employee with a disability in order to provide or arrange for the provision of reasonable accessible formats and communication supports for the employee with respect to all: (i) information that is needed by the employee in order to perform his or her job; and (ii) information that is generally available to employees in the workplace.</p> <p>Entrust will also consult with the employee requesting accessible formats or communication supports to determine the suitability of an accessible format or communication support.</p>	
<p>Individual Accommodation Plans</p>	<p>Compliance Date: January 1, 2016</p>
<p>Entrust will develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities that have come to Entrust's attention.</p>	
<p>Return to Work Process</p>	<p>Compliance Date: January 1, 2016</p>
<p>Entrust will develop and have in place a documented return to work process for employees in Ontario who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.</p> <p>The return-to-work process will outline the steps that Entrust will take to facilitate the return to work of employees who have been absent from work due to disability and will incorporate the use of individual accommodation plans as part of the process.</p>	
<p>Performance Management, Career and Advancement & Redeployment</p>	<p>Compliance Date: January 1, 2016</p>
<p>Wherever Entrust uses "performance management" or "redeployment" in respect of our employees or provides "career development and advancement" to our employees, we will take into account the accessibility needs of employees with disabilities as well as their individual accommodation plans.</p>	

5. Other

All questions regarding this policy, including with respect to the steps that Entrust intends to take in order to comply with its requirements under the IAS, should be referred to Entrust's Human Resources Department.

6. Owner / Contact Information

If you have any question about this Policy, please contact the Policy Owner:

Canada HR Team

Email: Accessibility@entrust.com

Document Properties	
Property	Description
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Document Approvals		
Approver Name	Title	Date
Beth Klehr	CHRO	1-DEC-2013
Beth Klehr	CHRO	25-OCT-2018
Beth Klehr	CHRO	12-DEC-2023

Revision History			
Version	Date	Description of Changes	Revised By
1.0	1-DEC-2013	Initial Version	Human Resources
1.1	25-OCT-2018	Accessible website and web content	Human Resources
1.2	12-DEC-2023	Rebrand, removal of “datacard”	Human Resources