

## **DXC** Technology

# Multi-Year Accessibility Plan 2021- 2026

The following plan is in relation to the requirements under Accessibility for Ontarians with Disabilities Act (AODA) for large private sector organizations.

Updated: March 2024



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## DXC Technology Multi-Year Accessibility Plan 2021-2026

The DXC Technology Multi-Year Accessibility Plan outlines strategies and actions to identify, remove and prevent barriers for persons with disabilities in DXC Technology's programs, services, and facilities therefore increasing accessibility. The plan also details our strategy for meeting Ontario's accessibility legislation, the Accessibility for Ontarians with Disabilities Act, 2005 (AODA).

#### **Objectives of the DXC Accessibility Plan**

This document describes the measures that DXC Technology or its predecessors in interest (collectively referred to as "DXC Technology") has taken or will take to identify, remove and prevent barriers to persons with disabilities. The 2021 - 2026 Accessibility Plan has been prepared in accordance with the requirements of the AODA, 2005 and the Integrated Accessibility Standards, Ontario Regulation 191/11.

As part of our commitment to accessibility, it is DXC Technology's goal to implement the standards to help create accessible programs, services and a workplace that allows full participation of persons with disabilities and thus improve opportunities for persons with disabilities.

In accordance with the standards, DXC Technology will review and update our organization's plan at least every five years and post it on our website for our employees and the public to access. During that time, we will highlight our organization's accomplishments to date.

The 2021 - 2026 Accessibility Plan includes:

- Initiatives that were completed in 2014-2023.
- Actions to be taken to implement the Integrated Accessibility Standards, Ontario Regulation 191/11.
- Measures that DXC Technology will be taking until 2026 to identify, remove and prevent barriers to persons with disabilities.
- The monitoring process for the Accessibility Plan.
- The communication process for the Plan.



## Description of the Accessibility for Ontarians with Disabilities Act (AODA)

The Accessibility for Ontarians with Disabilities Act, 2005 is legislation designed to make Ontario barrier-free to persons with disabilities by 2025. Businesses and organizations that provide goods and services to people in Ontario will have to meet certain accessibility standards in five areas: customer service, employment, information and communications, transportation and built environment.

With the introduction of AODA, the Province of Ontario created sets of standards in accessibility which will apply to both public and private sector organizations. The standards are:

- **Customer Service** The Accessibility Standards for Customer Service (Ontario Regulation 429/07) was passed in January 2008. As a private sector organization, DXC Technology met the requirements of this standard before the deadline of January 2013.
- Information and Communication, Employment, and Transportation, have been combined into the Integrated Accessibility Standards Regulation (IASR). The IASR came into effect July 1, 2011, with requirements that are to be phased in over time, which for DXC Technology means implementing standards from 2012 to 2021. The areas are further explained below:

**The Accessibility Standard for Information and Communications** will help Ontario businesses and organizations make their information accessible for persons with disabilities. Organizations are expected to:

- Make their websites and web content accessible according to the World Wide Web Consortium's Web Content Accessibility Guidelines (WCAG) 2.0.
- Provide accessible formats and communications supports as quickly as possible and at no additional cost when a person with a disability asks for them.
- Make feedback processes accessible by providing accessible formats and communications supports when requested.
- > Make public emergency information accessible when requested.

The **Accessibility Standard for Employment** will help Ontario businesses and organizations make accessibility a regular part of finding, hiring and supporting employees with disabilities. Organizations are expected to:

- Let job applicants know that recruitment and hiring processes will be modified to accommodate their disabilities, if requested.
- > Build the accessibility needs of employees into their human resources practices.
- Create a written process for developing and documenting individual accommodation plans for employees with disabilities.
- Help employees stay safe in an emergency by providing them with individualized emergency response information when necessary.
- **Built Environment** These standards are designed to remove barriers applying to public spaces and buildings. The standard for the design of public spaces only applies to new construction and major changes to existing features. Enhancements to accessibility in buildings will happen at a later date through Ontario's Building Code, which governs new construction and renovations in buildings.



## DXC Technology's Philosophy, Statement of Commitment to Accessibility

#### DXC Technology's Philosophy

Consistent with our commitment to equal opportunity and fairness, Code of Business Conduct, Global Human Rights Policy, and Accessibility and Standards for Customer Service, in compliance with Accessibility for Ontarians with Disabilities Act (AODA), it is the policy and practice of DXC Technology that we treat customers, employees, suppliers, business partners, visitors and shareowners with fairness, dignity, respect and courtesy.

We also comply with all applicable national and local laws pertaining to non-discrimination and equal opportunity.

## **Organizational Statement of Commitment**

DXC Technology is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to creating accessible programs, services, and a workplace that allows full participation of persons with disabilities and improved opportunities for persons with disabilities. This commitment supports our company's diversity objectives and is in compliance with the Accessibility for Ontarians with Disabilities Act.

## Product and Service Accessibility at DXC Technology

DXC Technology is committed to providing products and services that are accessible for persons with disabilities. This commitment supports our company's diversity objectives and helps us ensure that the benefits of technology are available to all. This is part of our Accessibility Commitment.

DXC Technology's Accessibility Policy further outlines our commitment. Our accessibility goal is create accessible programs, services, and a workplace that allows full participation of persons with disabilities and thus improve opportunities for persons with disabilities.

To achieve our goal, this Accessibility Policy establishes three key objectives to guide our actions as a company. All DXC Technology managers and employees are expected to support these objectives and their implementation in accordance with their roles and responsibilities.

DXC Technology is committed to the following:

- Raising the level of awareness of accessibility issues within our company by providing our employees with the training they need to understand the concept of accessibility and what they can do to ensure persons with disabilities are treated with respect, integrity, courtesy and fairness during all their interactions (in whatever form that might be).
- Addressing any feedback provided to DXC Technology regarding its accessibility.
- Removing barriers to employment, promotion and career advancement for current and potential employees by reviewing companywide programs on an annual basis.



## The DXC Technology Strategic Road Map to Accessibility

## **Completed Initiatives**

#### Accessible Customer Service Standard

*Please note that all initiatives listed below were developed and implemented by DXC Technology's predecessor in interest, Hewlett-Packard (Canada) Co., but adopted by DXC Technology.* 

- The project commenced in 2011, and appropriate parties were engaged to review meeting the requirements of AODA, particularly the first standard that came into effect, the Customer Service Standard.
- The process to gather feedback and request information in an accessible format was implemented and posted on the internet for the public to access.
- AODA Customer Service Standard Training was implemented for all employees in Ontario, not only those who provide service to the public (of which there are few given the nature of DXC Technology's business).
- Information was added as part of the onboarding process to educate new employees on AODA, as well as the
  requirement to take the Customer Service Standard Training within 45 days of hire. This information is included as a
  task that is automatically generated in Workday for a new hire asking them to review AODA overview information
  and informing them of the requirement to take the training within 45 days of their hire. In addition, e-mails are sent
  directly to new hires to remind them to take the training.
- A DXC Technology Canada Website was created with the AODA multi-year plan and posted for the public.
- Filing the AODA Customer Service Standard Certification to the government via the on-line tool.

#### **Accessible Emergency Information**

- DXC Technology provides employees with disabilities with individualized emergency response information when necessary.
- DXC Response Operations Center (DROC) was created: At DXC, our people's health, safety, security and well-being
  are paramount. The DXC Response Operations Center (DROC) is a hotline available to DXC colleagues 24x365 for
  reporting and obtaining assistance with urgent matters concerning our people, physical and data assets, or
  reputation.

#### **Integrated Accessibility Standard**

#### Training

- In 2014, DXC Technology provided training, appropriate to the duties, on the requirements of the accessibility standards referred to in this Regulation (Reg. 191/11) and on the Human Rights Code as it pertain to persons with disabilities to all employees in Ontario, regardless of their role, and to their managers, regardless of where they were located in the world.
- New employees are required to take the training within 45 days of hire.
- The training continues to be available to all employees through the DXC Learning online training platform.



#### Information and Communication

As a large organization, DXC Technology shall continue to monitor and remediate any non-conformance of our internet websites and web content to 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 below:

By January 1, 2023, all internet websites and web content must conform with WCAG 2.0 Level AA, other than success criteria 1.2.4 Captions (Live), and success criteria 1.2.5 Audio Descriptions (Pre-recorded). O. Reg. 191/11, s. 14 (4).

#### Employment

- Creation and communication of the DXC Technology Individualized Employee Emergency Response Plan and Process for Employees with Disabilities. At the time, this was rolled out to all employees and managers in Canada, not just Ontario. However, information regarding this is posted on the DXC Technology Health and Safety intranet site.
- Information regarding evacuation procedures are posted throughout DXC Technology facilities and the Health and Safety website has been updated, which includes contact information for Canada and what to do in the event of an emergency.
- Creation of this document, the first DXC Technology Accessibility Plan. This document will be reviewed annually and updated at least every 5 years and posted for the public to access.
- The accommodation wording was updated in both the job postings (internal and external) as well as the offer letters.
- In 2014, the Return to Work Process in compliance with AODA was updated by the benefits team to clearly outline the return to work and accommodation process, and posted on our intranet site for employees to reference. This process is still in use.
- A review of DXC Technology's current accommodation policy and process was conducted. The team within DXC Technology responsible for the accommodation process has a program in place to assist the employee in requesting a medical accommodation and the collection of medical documentation to confirm their need for an accommodation and to assist Human Resources and the employee's manager in determining if and how the requested permanent accommodation can be met.

#### **Targets and Actions**

#### **Customer Service Standard**

• Ongoing training on Accessible Customer Service.

#### **Integrated Accessibility Standards**

- Ongoing training on IASR (General Requirements and AODA and Human Rights).
- To update and create Corporate Policies where required for requirements of IASR.

#### **Information and Communications**



It is important to meet the communication needs of persons with disabilities. Based on feedback from the public and employees, DXC Technology will take appropriate action to address information and communication gaps for persons with disabilities.

## Accessible Websites and Web Content

As a large organization, DXC Technology shall continue to monitor and remediate any non-conformance of our internet websites and web content to 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 below:

By January 1, 2023, all internet websites and web content must conform with WCAG 2.0 Level AA, other than success criteria 1.2.4 Captions (Live), and success criteria 1.2.5 Audio Descriptions (Pre-recorded). O. Reg. 191/11, s. 14 (4).

## **Receiving and Responding to Feedback**

As a large organization, processes for receiving and responding to feedback are in place. We shall ensure that the processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request. Nothing in the Information and Communication section detracts from the obligations imposed under section 7 of Ontario Regulation 429/07 (Accessibility Standards for Customer Service) made under the Act. O. Reg. 191/11, s. 11 (2)(3), which has already been put in place for providing feedback. Additionally, through the Customer Service Standard, DXC Technology has notified the public about the availability of accessible formats and communication supports. Therefore, we have completed this action. We will continue to monitor and update this area moving forward.

#### Accessible formats and communication supports

As a large organization, DXC Technology upon request provides or arranges 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; and at a cost that is no more than the regular cost charged to other persons. DXC Technology shall consult with the person making the request in determining the suitability of an accessible format or communication support. DXC Technology shall notify the public about the availability of accessible formats and communication supports.

#### Employment

DXC Technology is committed to fair and accessible employment practices.

The Employment Standard under the Integrated Accessibility Standards Regulation, requires employers to provide for accessibility across all stages of the employment life cycle. By pro-actively removing barriers across the employment life cycle, employers can help to create workplaces that are accessible and allow employees to reach their full potential.

As a large organization, DXC Technology has met the Employment Standard by January 1, 2016. The areas we have/will continue to focus upon to ensure compliance include:



#### **Talent Acquisition**

DXC Technology has taken the steps to notify the public and employees that, when requested, we will accommodate persons with disabilities during the recruitment and assessment processes and when people are hired.

DXC Technology notifies its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.

**Recruitment, assessment or selection process** - During the recruitment process, DXC Technology 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. 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.

**Notice to successful applicants** - DXC Technology shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.

**Informing employees of supports** – DXC Technology 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. DXC Technology, will also provide the information required under this section to new employees as soon as practicable after they begin their employment. In addition, DXC Technology 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.

Accessible formats and communication supports for employees - In addition to its obligations under section 12, where an employee with a disability so requests it, DXC Technology shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for information that is needed in order to perform the employee's job and information that is generally available to employees in the workplace. DXC Technology shall consult with the employee making the request in determining the suitability of an accessible format or communication support.

## **Accommodation Plans**

DXC Technology has developed and put in place a process for developing individual accommodation plans and return-towork policies for employees who have been absent due to a disability.

**Documented individual accommodation plans** – DXC Technology has already developed and has in place a written process for the development of documented individual accommodation plans for employees with disabilities and the means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability. The team is ensuring that the process, paperwork and documentation that is currently in place is reviewed to ensure DXC Technology is compliant and modifications will be made as required.

**Return to work process** – DXC Technology currently works with an external party to administer the Long Term and Short Term disability programs, including a return to work plan and what accommodations may be required. DXC Technology has 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. The return to work process outlines the steps DXC



Technology takes to facilitate the return to work of employees who were absent because their disability required them to be away from work; and use documented individual accommodation plans as part of the process.

## Performance & Career Development and Advancement

We will take appropriate steps to ensure the accessibility needs of employees with disabilities needs are taken into account in relation to our performance & career development and redeployment processes.

**Performance Development** – As DXC Technology uses performance development in respect of its employees, the company shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans.

**Career development and advancement** – As DXC Technology provides career development and advancement to its employees, the company shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.

## **Built Environment - Design of Public Spaces**

Whenever applicable, DXC Technology will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces. As per the regulation, public spaces include:

- Recreational trails/beach access routes.
- Outdoor public eating areas like rest stops or picnic areas.
- Outdoor play spaces, like playgrounds in provincial parks and local communities.
- Outdoor paths of travel, like sidewalks, ramps, stairs, curb ramps, rest areas and accessible pedestrian signals.
- Accessible off street parking.
- Service-related elements like service counters, fixed queuing lines and waiting areas.

DXC Technology does not have facilities that are accessed by the general public. However, in the event of a situation in which the accessibility of a facility is impacted, clients/visitors/employees will be notified of the alternatives available to them.

## **Other Accessibility Barriers**

As DXC Technology works through implementing the various activities under this multi-year plan, should barriers be identified that would impact persons with disabilities, DXC Technology will engage the appropriate parties and work to remove them in a timely manner.

## **Plan Consultation**

Input on this Plan was originally received from various advisors and key stakeholders within the business, including the Human Resources, Health & Safety, and Communications. Given the review done by this team, the main components of this plan have been continued by DXC Technology. Going forward, DXC Technology will review this plan with the appropriate stakeholders.



#### **Review and Monitoring Process**

Failure to comply with the AODA regulations can result in administrative penalties as outlined in Part V: *Compliance of the Integrated Accessibility Standards, Ontario Regulation 191/11*.

In regard to updating the DXC Technology Accessibility Plan, a formal progress report will be prepared and presented to the appropriate stakeholders at least once every 5 years.

Should legislative requirements change, priorities within the Accessibility Plan may also change, which will be reflected in the formal progress report.

## **Communication of the Accessibility Plan**

Copies of this Plan will be made available on DXC Technology's Health & Safety website.

Should alternate formats be required or should you have any questions about this Accessibility Plan or wish to provide feedback on the Multi-Year Accessibility Plan, please contact DXC Technology Human Resources, as noted below.

Mail: 1855 Minnesota Court Mississauga, Ontario L5N 1K7 Canada Email: canadahr@dxc.com

All feedback will be kept in confidence and be used to improve the way we do business. The person who provided the feedback will receive a response outlining the actions taken, as deemed appropriate, if any.



## Appendix – Additional information about Types of Disabilities, Barriers as well as Myths and Realities about Persons with Disabilities

## **Disability Defined**

For purposes of AODA (as taken from the Accessibility for Ontarians with Disabilities Act, 2005), "disability" means:

(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; ("handicap").