Accessibility Multi-Year Accessibility Plan
Accessibility Policies and Multi-Year Accessibility Plan
(the "Accessibility Plan")
(Ontario Regulation 191/11) of the *Accessibility for Ontarians with Disabilities Act, 2005*

Introduction

The Integrated Accessibility Standards Regulations ("IASR") under the *Accessibility for Ontarians with Disabilities Act, 2005* (the "AODA") require that EPAM Systems Canada, ULC. ("EPAM") establish, implement, maintain, and document its accessibility policies and multi-year accessibility plan (the "Accessibility Plan"), which outlines EPAM's strategy to prevent and remove barriers for persons with disabilities and to meet its requirements under the IASR.

The Accessibility Plan will be available in an accessible format upon request. The Accessibility Plan will be reviewed and updated, if applicable, at least once every five years.

Application

The Accessibility Plan applies to all employees and clients of EPAM, and, where indicated, to any independent contractor representatives working for the company.

Our Commitment

In fulfilling our mission, EPAM strives to treat all individuals in a manner that allows them to maintain their dignity and independence. EPAM promotes integration and equal opportunity and is committed to meeting the needs of people with disabilities in a timely manner. We seek to achieve this by preventing and removing barriers to accessibility and by meeting accessibility requirements under the AODA. This Accessibility Plan sets out EPAM's policy on how we will achieve accessibility generally, as well as in employment, information and communications, and the design of public spaces (built environment).
Under the IASR, the following accessibility strategies set out the requirements that are applicable to EPAM:

1. Workplace Emergency Response Information;
2. Training;
3. Information and Communication;
4. Employment; and
5. Design of Public Spaces Standards

Accessibility Standards for Customer Service

EPAM is committed to compliance with the Accessibility Standards for Customer Service Regulation (O.Reg.429/07) under the AODA, which involves providing its services in ways that respects the dignity and independence of people with disabilities.

EPAM's employees who are involved in providing customer service to its customers and the general public have been trained on EPAM's Customer Service Policy, and all new employees hired to provide such services will receive such training as part of their orientation with the company.

Copies of EPAM's AODA Customer Service Policy will be made available to members of the public and third parties on request.

Integrated Accessibility Standards Regulations (IASR)

The following sets out how EPAM is committed to complying with the IASR.

1. Workplace Emergency Response Information

Where EPAM is aware that an employee has a disability and that there is a need for accommodation, individualized workplace emergency response information will be provided to the employee as soon as practicable if such information is necessary given the nature of the employee's disability.

Action Taken:

EPAM will be implementing the following measures to address Emergency Response for employees who have disabilities:

- individualized workplace emergency response information procedures will be developed for employees with disabilities where required;
- where employees disclose a disability and are being accommodated according to their disabilities, workplace emergency response information forms will be prepared where required;
- where required, EPAM provides assistance to specific disabled employees, with the disabled employees' prior consent, to help them evacuate the workplace in case of an emergency or disaster. Plans for providing assistance will be set out in individualized emergency plans for the employees;
- individualized emergency plans will be communicated to the employees' respective managers and safety personnel on an 'as needed' basis;
- on an ongoing and regular basis, and as per the applicable terms of the IASR, EPAM will review and assess general workplace emergency response procedures and individualized emergency plans to ensure accessibility issues are addressed.

Legislated Compliance Date: January 1, 2012
Review Date: November 2026
Compliance Status: Compliant

2. Training

EPAM is committed to providing training on the requirements of the accessibility standards referred to in the IASR and on the *Human Rights Code*, as it pertains to persons with disabilities.

Action Taken:

In accordance with the IASR, EPAM has:

- determine and ensure that appropriate training on the requirements of the IASR and on the *Human Rights Code* as it pertains to persons with disabilities, is provided to all employees, independent contractor representatives, volunteers, third-party service providers who provide services related to products, services and facilities on EPAM's behalf, and persons participating in the development and approval of EPAM's policies;
- ensure that the training is provided to persons referenced above as soon as practicable;
- keep and maintain a record of the training provided, including dates the training was provided and number of individuals to whom it was provided; and
- ensure training is provided on any changes to EPAM's policies on an ongoing basis.

Required Legislative Compliance: January 1, 2015
Review Date: November 2026
Compliance Status: Compliant

3. Information and Communication

EPAM is committed to making company information and communications accessible to persons with disabilities. EPAM will incorporate new accessibility requirements under the information and communication standards to ensure that its information and communications systems and platforms are

accessible and are provided, upon request, in accessible formats that meet the needs of persons with disabilities.

Feedback, Accessible Formats and Communication Supports

Action Taken:

In accordance with the IASR, EPAM will:

- ensure that existing and new processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request and in a timely manner;
- more broadly, as a general principle where accessible formats and communication supports for persons with disabilities are requested:
- provide or arrange for the provision of such accessible formats and communication supports;
- consult with the person making the request to determine the suitability of the accessible format or communication support;
- provide or arrange for the provision of accessible formats and communication supports in a timely manner that takes into account the person's accessibility needs due to disability, and at a cost no more than the regular cost charged to other persons; and
- notify the public about the availability of accessible formats and communication supports.

Accessible formats and communication supports: January 1, 2016.
Review Date: November 2026
Compliance Status: compliant

Accessible Websites and Web Content

Action Taken:

In accordance with the IASR, EPAM recognizes its obligation to provide web content which conforms with the Worldwide Consortium Web Content Accessibility Guidelines (WCAG 2.0) Level AA.

- Any website hosted by EPAM Canada shall meet the requirements set out in the IASR.
  Compliance Status: Compliant
- WCAG 2.0 Level A – new Internet websites and web content: January 1, 2014
  Compliance Status: Compliant
- WCAG 2.0 Level AA – all Internet websites and web content, except for exclusions set out in the IASR: January 1, 2021.

Compliance Date: January 1, 2021
Review Date: November 2026
Compliance Status: compliant

4. Employment

Recruitment

EPAM is committed to fair and accessible employment recruiting practices that attract and retain employees with disabilities. This includes providing accessibility at all stages of the employment cycle.

Action Taken:

In accordance with the IASR, EPAM will do the following:

(i) Recruitment General

EPAM will notify employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process. This will include:

- review and, as necessary, modification of existing recruitment policies, procedures and processes; and

- specifying that accommodation is available for applicants with disabilities, on EPAM's website and on job postings.

(ii) Recruitment, assessment, and selection

EPAM will notify job applicants, when they are individually selected to participate in an assessment or selection process and inform them that accommodations are available upon request in relation to the materials or processes to be used in the assessment/selection process. This will include:

- review and, as necessary, modification of existing recruitment policies, procedures and processes;
- inclusion of availability of accommodation notice as part of the script in the scheduling of an interview and/or assessment; and
- consultation with the applicant and arrangement for provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to the disability where a selected applicant requests accommodation.

(iii) Notice to Successful Applicants

When making offers of employment, EPAM will notify the successful applicant of its policies for accommodating employees with disabilities. This will include:

- a review and, as necessary, modification of existing recruitment policies, procedures, and processes; and
- inclusion of notification of EPAM's policies on accommodating employees with disabilities in offer of employment letters.

Required legislative compliance: January 1, 2016
Compliance Date: January 1, 2016
Review Date: November 2026
Compliance Status: Compliant

Informing Employees of Supports and General Provision of Accessible Formats and Communications Supports

In accordance with the IASR, EPAM will inform all employees of policies that 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 a disability. This will include:

- informing current employees and new hires of EPAM's policies supporting employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's needs due to disability;
- providing information as soon as practicable after the new employee begins employment, specifically in the orientation process;
- keeping employees up to date on changes to existing policies on job accommodations with respect to disabilities;
- where an employee with a disability so requests it, EPAM will provide or arrange for provision of suitable accessible formats and communications supports for:
    - information that is needed in order to perform the employee's job;
    - information that is generally available to employees in the workplace; and
- in meeting the obligations to provide the information that is set out above, EPAM will consult with the requesting employee in determining the suitability of an accessible format or communication support.

Required legislative compliance: January 1, 2016
Compliance Date: January 1, 2016
Review Date: November 2026

Compliance Status: Compliant

Documented Individual Accommodation Plans/Return to Work Process

EPAM will incorporate new accessibility requirements under the IASR to ensure that barriers in accommodation and return to work processes are eliminated and corporate policies surrounding accommodation and return to work are followed, where applicable.

Action Taken:

EPAM's existing policies include steps that EPAM will take to accommodate employees with disabilities and to facilitate employees' return to work after absence due to disability.

EPAM will review and assess the existing policies to ensure that they include a process for the development of documented individual accommodation plans for employees with disabilities if such plans are required.

In accordance with the provisions of the IASR, EPAM will ensure that the process for the development of documented individual accommodation plans includes the following elements:

- information regarding the manner in which the employee requesting accommodation can participate in the development of the plan;
- information regarding the means by which the employee is assessed on an individual basis;
- information regarding the manner in which EPAM can request an evaluation by an outside medical or other expert, at EPAM's expense, to assist EPAM in determining if and how accommodation can be achieved;
- steps to protect the privacy of the employee's personal information;
- information regarding the frequency with which individual accommodation plans will be reviewed and updated and the manner in which this will be done;
- the reasons for a denial where an individual accommodation plan is denied;
- information regarding the means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs;
- the following will be included if individual accommodation plans are established:
    - any individualized workplace emergency response information that is required;
    - any information regarding accessible formats and communication supports that have been provided for or arranged, in order to provide the employee with:
        - information that is needed in order to perform the employee's job;
        - information that is generally available to employees in the workplace; and
        - identify any other accommodation that is to be provided to the employee.

EPAM will ensure that the return-to-work process as set out in its existing policies outlines:

- the steps EPAM will take to facilitate the employee's return to work after a disability-related absence;
- the development of a written individualized return to work plan for such employees; and
- the use of individual accommodation plans, as discussed above, in the return-to-work process.

Required legislative compliance: January 1, 2016
Compliance Date: January 1, 2016
Review Date: November 2026

Compliance Status: Compliant

Performance Management, Career Development and Redeployment

EPAM will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans:

- when using its performance management process in respect of employees with disabilities;
- when providing career development and advancement to employees with disabilities; and
- when redeploying employees with disabilities.

Planned Action:

In accordance with the IASR, the EPAM will:

- review, assess and, as necessary, modify existing policies, procedures and practices to ensure compliance with the IASR;
- take the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account when:
- assessing performance;
- managing career development and advancement; and
- redeployment is required.
- review, assess and, as necessary, include in performance management workshops, accessibility criteria;
- take into account the accessibility needs of employees with disabilities when providing career development and advancement to its employees with disabilities, including notification of the ability to provide accommodations on internal job postings; and
- take into account the accessibility needs of employees with disabilities when redeploying employees, including review and, as necessary, modification of employee transfer checklist.

Required legislative compliance: January 1, 2016
Compliance Date: January 1, 2016
Review Date: November 2026
Compliance Status: Compliant

5. **Integrated Accessibility Standards Regulations – Design of Public Spaces**

While EPAM has no plans to engage in new construction or redevelopment which would be captured by the requirements of the IASR concerning the Design of Public Spaces, EPAM recognizes its obligations under the relevant sections of the Regulation and is committed to incorporating barrier-free design principles into any public spaces that are newly constructed and redeveloped on or after January 1, 2017.