

CANADA PENSION PLAN INVESTMENT BOARD

Accessibility Policies and Accessibility Plan (the “Plan”)

Introduction

CPP Investments is a global investment management organization established to help provide a foundation on which Canadians build financial security in retirement. We are committed to building and maintaining an inclusive workplace where all employees feel supported, respected and valued, enabling all employees to do their best work and contribute to our success. This Accessibility Plan (**Plan**) outlines CPP Investments’ strategy for preventing and removing barriers for persons with disabilities and meeting our obligations under the Accessible Canada Regulations and the *Accessible Canada Act (ACA)*. The Plan applies to all Canadian-based employees and locations, as defined in the Accessible Canada Regulations; we are, however, committed to applying the Plan across our offices where possible.

Commitment

In fulfilling its mission, CPP Investments strives to treat all individuals in a manner that allows them to maintain their dignity and independence. The organization promotes inclusion and equal opportunity and is committed to meeting the needs of people with disabilities in a timely manner by preventing and removing barriers to accessibility and meeting accessibility requirements under the ACA. This Plan sets out how CPP Investments proposes to achieve accessibility in all areas of operation.

Executive Summary

The Plan finds its basis in the four strategic priorities of our equity, diversity and inclusion work, including inclusive: engagement for all employees, capability-building, partnerships, and organizational practices and policies. CPP Investments is driven to learn and grow, with this Plan serving as the base for future plans to expand dialogue, discussion, expectations and accountability.

This Plan documents our approach to reduce barriers and prevent new ones under the following sections:

- **Employment;**
- **The built environment;**
- **Information and communication technologies (ICT);**
- **Communication (other than ICT);**
- **The procurement of goods, services and facilities; and**
- **The design and delivery of programs and services.**

Any other requirements under the ACA not otherwise addressed in this Plan are not applicable to CPP Investments and have been noted as such. Each section includes an objective statement defining our long-term mission, key barriers and action items. The Plan also outlines how we have engaged and will continue to engage with our workforce to ensure ongoing input and evaluation.

Areas of Focus

The following sets out how CPP Investments is committed to complying with the relevant elements of section 5 of the ACA:

1. Employment

CPP Investments is committed to fair and accessible employment practices in all stages of the employment process that will respect current and prospective team members with disabilities.

Current Level of Accessibility in the Area of Employment:

As of Dec. 31, 2022, 4.4% of Canada-based CPP Investments employees identify as living with a disability. CPP Investments acknowledges the importance of a barrier-free inclusive experience at all stages of the employment cycle.

Barriers in Employment as Identified by Consultation Participants:

- employees are unsure of what accommodation resources are available to them
- employees feel there is a stigma associated with making accommodation requests
- employees feel colleagues are not well equipped to talk about disabilities

Accessibility Goals in the Area of Employment:

Potential and existing employees with disabilities view CPP Investments as their employer of choice where they can do their best work and unlock their professional possibilities.

Planned Action to Achieve Accessibility Goals:

(a) Recruitment

CPP Investments is committed to fair and accessible employment recruiting practices that attract and retain employees with disabilities and plans to do the following:

(i) Recruitment, General

CPP Investments aims to highlight the availability of opportunities and accommodations for applicants with disabilities in the recruitment process, including:

- expanding targeted outreach so people with disabilities are aware of opportunities
- specifying accommodations are available for applicants with disabilities on job postings and the external website;

(ii) Recruitment, Assessment and Selection

CPP Investments aims to notify job applicants when 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 for the assessment or selection process, including:

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

(iii) Notice to Successful Applicants

When making offers of employment, CPP Investments will strive to notify the successful applicant of its policies for providing accommodations for employees with disabilities, including:

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

Anticipated Compliance Date: December 2024

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

CPP Investments aims to inform employees of policies supporting employees with disabilities, including policy provisions of job accommodations that consider an employee's accessibility needs, including:

- informing all employees of policies supporting employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take account for disabilities;
- providing information soon after new employees join, specifically in the onboarding process;
- keeping employees informed of policy changes on job accommodations affecting disabilities;
- where an employee with a disability so requests it, CPP Investments will provide or arrange for provision of suitable accessible formats and communications supports for information generally available to employees and needed to perform a job; and
- to provide the information set out above, CPP Investments will consult with employees to assess the suitability of accessible formats or communication supports.

Anticipated Compliance Date: December 2024

c. Documented Individual Accommodation Plans/Return to Work Process

CPP Investments aims to incorporate new accessibility requirements under the Accessible Canada Regulations to eliminate barriers in accommodation and return to work processes, and for corporate policies surrounding accommodation and return to work to be adhered to, where applicable. Existing policies and practices include steps CPP Investments will take to accommodate employees with disabilities and to facilitate return to work for employees after absence due to disability. CPP Investments will review and assess existing policies to ensure they continue to do so while also ensuring they include a process for the development of documented individual accommodation plans for employees with disabilities, if required.

CPP Investments will strive to ensure the process for developing individual accommodation plans includes:

- information regarding the manner in which employees requesting accommodation can participate in the development of their respective plan;
- information regarding the means by which employees are assessed on an individual basis;
- information regarding the manner in which CPP Investments can request a professional evaluation, at the organization's expense, to assess the potential need for accommodations;
- information regarding the manner in which employees can request the participation of a representative from the workplace in the development of the accommodation plan;
- steps to protect the privacy of an 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 denial if 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 information regarding accessible formats and communication supports that have been provided for or arranged, 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.

CPP Investments will strive to ensure the return-to-work process outlines:

- the steps required to expedite return to work after an employee's disability-related absence;
- the development of a written individualized return to work plan for such employees; and
- the use of individual accommodation plans in the return-to-work process.

Anticipated Compliance Date: December 2024

d. Performance Management, Career Development and Redeployment

CPP Investments will make every effort to honour accessibility needs and individual accommodation plans, specifically:

- 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.

CPP Investments aim to:

- review, assess and, as necessary, modify existing policies, procedures and practices to ensure compliance with the Accessible Canada Regulations and ACA;
- take accessibility needs and individualized accommodation plans into account when:
 - assessing performance for people with disabilities;
 - managing career development and advancement for people with disabilities; and
 - redeployment, as required, including for people with disabilities.
- review, assess and, as necessary, include in performance management workshops and accessibility criteria;
- consider 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
- consider the accessibility needs of employees with disabilities when redeploying employees, including review and, as necessary, modification of employee transfer checklist.

Anticipated Compliance Date: December 2024

2. The Built Environment

CPP Investments is committed to removing barriers in public spaces and buildings that house our Canadian offices to uphold the dignity and independence of persons with disabilities.

Current Level of Accessibility in the Area of the Built Environment:

CPP Investments provides a “Certified Accessible” level of accessibility¹ up to and throughout common areas and office spaces in our Canadian offices, which provides workplace accessibility for people with disabilities, including:

- Parkade levels offer accessible parking options and are differentiated by colour.
- The building is identified on all three street-facing sides with signage displaying the address.
- All building entrances are equipped with power door operators providing accessible entry; the ground floor and concourse level have accessible exits.

¹ According to the RHFACF rating system

- Primary corridors are wide and entrances are equipped with two types of door operators (touchless or operable); elevators have adaptive hearing technology; exit stairs have glow strips; and most reception counters include accessible height portions with knee clearance.
- Staff have access to a health room, quiet room and nursing rooms; including scent-free zones.
- Meeting rooms and seating areas have been soundproofed; select meeting and boardrooms have tables with individual microphones for improved communication. Workspaces are equipped with ergonomic workstations and seating areas to promote privacy and collaboration.
- Accessible and/or universal washrooms are available on all floors; the universal washroom on the concourse level is large and includes a roll-in shower and an emergency call system with an immediate security response with two-way communication, when activated.
- All floors provide information directories in the main foyer and elevator lobbies.
- A Persons Requiring Assistance (PRA) program is in place to ensure persons unable to negotiate stairs during an emergency evacuation are provided with the assistance required for a safe exit.

Barriers in the Built Environment as Identified by Consultation Participants:

The Rick Hansen Foundation Accessibility Certification (RHFAC) highlighted certain areas which could be improved, including: (a) vehicular access; (b) interior circulation; (c) interior services; (d) washrooms and showers; (e) wayfinding and signage; and (f) use of space.

Accessibility Goals in the Area of the Built Environment:

CPP Investments aims to attain a “Gold Certified” rating of 80% or above from the RHFAC.

Planned Action to Achieve Accessibility Goals:

CPP Investments has addressed several areas of opportunity to increase our accessibility, including:

- The creation of a demarcated landing near elevator lobby doors to stay clear of the drive aisle.
- The installation of accessible height vision panels in vestibule entrance doors.
- The installation of signage near escalators to indicate the nearest set of elevators.
- The installation of slip-resistant, colour-contrasting strips along the thread nosing of steps.

For the built environment of CPP Investments to be eligible for RHFAC Gold Certification, there are mandatory items to be met, including an overall rating of 80% or more, specifically:

- The deployment of tactile attention indicators to areas which pose a potential hazard.
- The implementation of adaptive-hearing technology available in additional designated areas.

Anticipated Compliance Date: December 2025

3. Information and Communication Technologies

CPP Investments aims to make company information and communications accessible to persons with disabilities.

Current Level of Accessibility in the Area of Information and Communication Technologies:

CPP Investments has taken steps to ensure tools required to effectively complete core job functions are technologically supported, including:

- A read aloud function, which reads emails and highlights the words as it advances;
- A call function, which automatically calls the person who sent an email;
- A dictate function, which allows dictation rather than type and an “Ease of Access” setting, which allows dictation function in most applications;
- A spell check function, which supports colleagues with cognitive differences;
- Calendar options designed to enable flexibility and hold daily times to cater to accessibility needs;
- Closed captioning or transcription included on all video communications;
- Integrated technological accessibility supports in the onboarding of new employees.

Barriers in Information and Communication Technologies as Identified by Consultation Participants:

CPP Investments received an accessibility compliance score of 73% upon review of its external website in 2021. This score is designed to provide an at-a-glance overview of a website’s accessibility, and to act as a benchmark for ongoing improvements. Scores of 80% are ranked as “good” and would present no significant obstacles to users with disabilities. A roundtable discussion with employees with disabilities found the need to reduce stigma and increase awareness of accessibility options available.

Accessibility Goals in the Area of Information and Communication Technologies:

Enabling technology support staff to provide guidance and assistance to colleagues whose productivity and effectiveness would be supported through technological accessibility tools with the goal of improving the external website accessibility to achieve at least an 80% compliance score.

Planned Action to Achieve Accessibility Goals:

CPP Investments is committed to providing timely and relevant information to Canadians in part through its external website. The website is also a tool for potential partners and future employees. As a result, ensuring a fully accessible site is a key objective for broad outreach and success, including plans to 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.

(a) Feedback, Accessible Formats and Communication Supports

CPP Investments will strive to:

- ensure feedback processes are accessible to persons with disabilities by providing or arranging accessible formats and communication supports in a timely manner upon request
- ensure that when accessible formats and communication supports are requested, it:

- provides or arranges for the provision of accessible formats and communication supports;
- consults with the requestor to determine the suitability of the format or support;
- provides or arranges for the provision of accessible formats and communication supports in a timely manner upon request, accounting for 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.

Anticipated Compliance Date: April 2024

(b) Accessible Websites and Web Content

CPP Investments is committed to providing timely and relevant information to Canadians through its external website. Ensuring a fully accessible site is key for outreach and success. The following measures will be taken to advance this objective as part of the fully implemented design system implementation:

- Improved alt tags and tab-index;
- Resolved descriptive links and text over image contrast;
- Corrected font and colour contrast.

CPP Investments will work toward making Canadian-based websites and web content conform with the World Wide Consortium Web Content Accessibility Guidelines (WCAG 2.0) Level AA. CPP Investments will take reasonable steps to ensure all new Canadian-based websites controlled by CPP Investments, and web content on those sites, will conform with the World Wide Consortium Web Content Accessibility Guidelines (WCAG 2.0) Level AA, except where meeting the requirement is not practicable.

Anticipated Compliance Date: April 2024

4. Communication, Other than Information and Communication Technologies

CPP Investments is committed to making information and communications accessible to all Canadians.

Current Level of Accessibility in the Area of Communication, Other than ICT:

CPP Investments’ holds public biennial meetings across Canada as required by the Canada Pension Plan Investment Board Act to communicate progress and allow Canadians and stakeholder groups to ask questions. In holding these meetings, the following priorities are maintained across the country:

- Wheelchair accessible venues;
- All videos are closed-captioned.

Barriers in Communication, Other than ICT as Identified by Consultation Participants:

No barriers identified or outlined.

Accessibility Goals in the Area of Communication, Other than ICT:

Ensure barrier-free biennial meetings across the country.

Planned Action to Achieve Accessibility Goals:

CPP Investments will aim to incorporate new accessibility requirements under the communication, other than ICT standard to ensure that its information and communications systems and platforms are accessible and are provided, upon request, in accessible formats to meet the needs of persons with disabilities in Canada.

- ASL interpretation when requested by registered participants at all biennial meetings;
- Ensure barrier-free presentations with accessible text size at a of minimum of 16 point.

(a) Feedback, Accessible Formats and Communication Supports

CPP Investments will make every effort to:

- ensure existing and new feedback processes are accessible by providing or arranging accessible formats and communication supports in a timely manner upon request;
- provide or arrange for the provision of such accessible formats and communication supports;
- consult with the requestor to ensure the accessible format or communication support;
- provide or arrange for the provision of accessible formats and communication supports in a timely manner, accounting for 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.

Anticipated Compliance Date: March 2024

5. The Procurement of Goods, Services and Facilities

CPP Investments is committed to removing barriers with regard to the procurement of goods, services and facilities that will respect the dignity and independence of persons with disabilities.

Current Level of Accessibility in the Area of the Procurement of Goods, Services and Facilities

While accessibility is not currently part of the Procurement process, we aim to adopt enhancements to our processes to remove barriers and respect the dignity and independence of persons with disabilities.

Barriers in the Procurement of Goods, Services and Facilities as Identified by Consultation Participants:

No barriers identified or outlined.

Accessibility Goals in the Area of the Procurement of Goods, Services and Facilities:

Increase awareness of accessibility requirements at CPP Investments for both the end users and business groups of the procured goods, services and facilities.

Planned Action to Achieve Accessibility Goals:

CPP Investments will review accessibility from two lenses:

1. End user/business groups:

- a. Provide guidance to the business groups to incorporate accessibility requirements as part of their sourcing initiatives to ensure they are barrier-free while acknowledging the accessibility requirements of individual groups to ensure the goods/services they procure can meet those needs and are incorporated as part of sourcing events.
- b. Investigate the need to document a justification when a business group decides it is not appropriate to include accessibility criteria as part of the sourcing event.

2. Vendors:

- Collaborate with CPP Investments to incorporate appropriate accessibility language/provisions within vendor contracts, as applicable, based on jurisdictional requirements.

Use of CPP Investments' own facilities:

- Prioritize accessibility in procedures and incorporate accessibility into client-supporting services.
- Communicate with people with disabilities in a manner that considers their disability; targeted training will be provided to employees and others who are client-serving.
- Ensure employees are trained and familiar with assistive devices, where appropriate, that may be used by people with disabilities while accessing our facilities.
- Promote efforts to prevent service disruptions to accessible parts of public spaces. In the event of a service disruption, CPP Investments will notify those impacted and offer alternatives.

Anticipated Compliance Date: December 2025

6. Other Areas of the Act

The Design and Delivery of Programs and Services and Transportation requirements are not applicable to CPP Investments as we do not offer programs and services to the public or offer transportation services.

Consultations

In developing this Plan, CPP Investments engaged in consultations with its employees and accessibility experts, seeking feedback to identify, remove and prevent accessibility barriers. CPP Investments also completed an external accessibility assessment of its built environment and online communication mechanisms. An internal discussion with employees with disabilities sought to collect feedback from those willing to share their experiences to ensure a barrier-free workplace and better address employee needs.

Based on employee feedback, CPP Investments will continue to focus on building a barrier-free workplace and developing inclusive capabilities to remove stigmas and promote the inclusion of people with disabilities.

Additionally, CPP Investments partnered with the Rick Hansen Foundation to assess its built environment. The assessment identified opportunities to improve (a) vehicular access; (b) interior circulation; (c) interior services; (d) washrooms and showers; (e) wayfinding and signage; and (f) additional use of space. The RHFAC gave CPP Investments an accessible certified score of 74% for a silver rating. CPP Investments aims to achieve a gold rating of 80% and above.

CPP Investments completed an Essential Accessibility audit in 2021 to identify opportunities to ensure all internal and external digital communications are barrier-free and accessible. This audit identified opportunities to improve the (1) alt tags providing descriptive information for the screen reader; (2) descriptive links to provide accurate information about where the link is redirecting the user to; (3) font and contrast to ensure brand colour is accessible at any resolution; (4) text over image contrast to provide the necessary contrast to ensure legibility; (5) page hierarchy, tab order and screen reader text to enable accurate announcement from the screen reader. CPP Investments received a score of 73% and is working towards 80%, as outlined above.

Feedback & Accessible Formats

CPP Investments has a Designated Accessibility Representative to receive feedback on behalf of the organization. Individuals can provide feedback or communicate with CPP Investments as follows:

Contact: Karen Sihra, Managing Director, Equity, Diversity & Inclusion, CPP Investments

Mail: One Queen Street East | Suite 2500 | Toronto, ON | M5C 2W5 | Canada

Telephone: 1 866 557 9510

Email: contact@cppib.com

Accessible formats of this document are available upon request. Contact the designated Accessibility Representative as per the above.

Administration

This Plan has been prepared in compliance with the Accessible Canada Regulations: SOR/2021-241 under the *Accessible Canada Act (ACA)*, under which the Canada Pension Plan Investment Board (**CPP Investments**) has or will establish, implement, maintain and document its Plan. The Plan will be publicly available, including in an accessible format upon request, and will be reviewed and updated as required.

Maintenance & Ownership

This Plan is effective as of April 30, 2023. The Senior Managing Director & Chief Talent Officer is responsible for the administration, review and approval of this Plan.