Xpera Risk Mitigation & Investigation Accessibility Policy	Version:	1.1
	Owner:	Director, Human Resources
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1. Purpose

Xpera Risk Mitigation & Investigation LP ("Xpera") is committed to ensuring accessibility for persons with disabilities in Canada and compliance with diverse accessibility laws. This policy outlines our commitment to accessibility and the actions we will take to achieve accessibility standards. Xpera is dedicated to demonstrating commitment to inclusion and equity, promote a consistent employee and customer experience, provide guidance for implementation, and support talent attraction and retention.

2. Policy Statement

Xpera is dedicated to providing a barrier-free environment for all stakeholders, including our clients/customers, employees, job applicants, suppliers, and any visitors who may enter our premises, access our information, or use our goods and services. We are committed to treating all people in a way that allows them to maintain their dignity and independence. Our goal is to ensure that accessibility is integrated into all aspects of our workplace and operations, and that we comply with — and where possible, exceed — the requirements of all **provincial and territorial accessibility standards**.

3. Scope

This policy applies to all Xpera employees who deal with clients, third parties, or others on behalf of Xpera in any capacity.

Further, this policy applies to all persons who participate in the development of Xpera's policies, practices, or procedures governing the provision of services to employees, members of the public, and third parties.

4. Accessibility Standards

Xpera will adhere to the accessibility standards set out under all applicable provincial and territorial legislation in Canada. We will comply with each province's or territory's specific requirements while striving to apply a **consistent, organization-wide standard of accessibility** that reflects our commitment to inclusion, dignity, and equal opportunity.

We recognize that accessibility laws vary by jurisdiction — including, but not limited to:

- the *Accessibility for Ontarians with Disabilities Act*;
- the *Accessible British Columbia Act*;
- the *Accessible Saskatchewan Act;*
- the *Nova Scotia Accessibility Act*;
- the *New Brunswick Accessibility Act*;
- the *Newfoundland and Labrador Accessibility Act*;
- the *Accessibility for Manitobans Act*;
- the *Quebec Act to Secure Handicapped Persons in the Exercise of Their Rights* – Quebec;
- and all other applicable provincial or territorial standards as they are developed.

Xpera is committed to adhering to the following standards – including, but not limited to:

- Customer Service
- Employment
- Information & Communication
- Transportation
- Design of Public Spaces
- Service Animals
- Any other prescribed activities

5. Providing Services to People with Disabilities

Xpera will:

a) provide accessible customer service training to employees and volunteers; training will be documented and dated and retained as per appropriate legislation;
b) ensure that our policies, practices, and procedures are consistent with the principles of dignity, independence, integration, and equal opportunity;
c) identify, remove, and prevent barriers that may restrict access to our services, programs, or facilities;
d) accommodate assistive devices, service animals, and support persons as part of our regular service delivery otherwise restricted by law;
e) communicate effectively with people with disabilities by providing information in accessible formats or through accessible communication supports, upon request that take into account their disability;
f) train employees and contractors who interact with the public or provide services on behalf of Xpera to service people with disabilities respectfully and effectively; and
g) provide a feedback process that is accessible to all, allowing individuals to share concerns or suggestions about accessibility in our services.

Xpera will apply these principles consistently across all Canadian provinces and territories, while meeting or exceeding the specific accessibility standards in each jurisdiction where we operate.

6. Recruitment and Employment

Xpera is committed to ensuring that all stages of the employment lifecycle – from recruitment and hiring to career development and advancement – are accessible and inclusive for people with disabilities.

Recruitment

Xpera will:

- Notify job applicants that accommodations are available during the recruitment and selection process;
- Provide, upon request, reasonable accommodations to ensure that candidates with disabilities can fully participate in interviews, assessments, and other hiring-related activities;
- Ensure that job postings and application processes are accessible and available in alternate formats or through accessible technologies where needed;
- Work with candidates to identify and implement appropriate accommodations that remove barriers to participation;
- When making offers of employment, Human Resources will provide successful candidates of Xpera's policies for accommodating employees with disabilities; and
- Have a written process for the development of documented individual accommodation plans for employees with disabilities. If requested, information regarding accessible formats and communication supports provided will also be included in individual accommodation plans.

Employment

Once hired, Xpera will:

- Ensure that workplace information, policies, and tools are accessible to employees with disabilities;
- Provide or arrange for accessible formats and communication supports for job-related information, upon request;
- Consider accessibility needs and accommodation requirements in performance management, career development, and redeployment processes; and
- Provide ongoing training and awareness to leaders and employees on accessibility, inclusion, and the duty to accommodate.

Xpera will review and update its recruitment and employment practices regularly to ensure compliance with evolving accessibility legislation and to promote a barrier-free, inclusive workplace for all employees and applicants.

7. Return-to-Work

Xpera is committed to supporting employees who have been absent from work due to a disability and to facilitating their safe and successful return to work through individualized, accessible processes.

Return-to Work Process

Xpera will:

- Develop and maintain a documented return-to-work process that outlines the steps we will take to support employees returning from disability-related absences;
- Work collaboratively with the employee, their leader, Human Resources, and (where appropriate) health professionals to develop a personalized return-to-work plan;
- Identify and implement reasonable accommodations or workplace adjustments that enable the employee to perform their role effectively and safely;
- Ensure that return-to-work plans are reviewed regularly and updated as needed to reflect any changes in the employee's abilities, job duties, or work environment;
- Maintain the confidentiality of all medical and personal information shared during the process; and
- Train leaders and supervisors on their responsibilities in supporting accessible return-to-work processes and accommodations.

To initiate the process, the employee must notify either their leader or Human Resources of their intent to return to work and the need for accommodation as early as possible. In addition, the employee will:

- Provide appropriate and timely information or documentation (as required) from a licensed healthcare or treating professional to help the organization understand the nature and extent of any work-related limitations or restrictions;
- Actively participate in the development and implementation of their return-to-work plan, including discussing potential accommodations that would enable them to perform their role effectively;
- Communicate any changes in their medical status, functional abilities, or accommodation needs throughout the return-to-work process;
- Collaborate in good faith with Xpera to identify reasonable accommodations that balance the employee's needs with the organization's operational requirements; and
- Maintain confidentiality and professionalism throughout the process and ensuring any personal medical information is shared only with designated personnel involved in the return-to-work or accommodation process.

A written return to work plan will be created, outlining:

a) Modified duties or hours
b) Required assistive devices or ergonomic supports
c) Timeline for a phased return, if applicable

The plan will be implemented with regular check-ins to assess effectiveness and make adjustments as needed.

All medical and accommodation-related information will be kept confidential and shared only with those involved in the accommodation process.

8. Personalized Emergency Response Plans

Xpera is committed to ensuring the safety of all employees, including those with disabilities, during emergencies. To achieve this, we will provide **Personalized Emergency Response Plans** (PERPs) for employees who require individualized support to safely evacuate or respond during emergency situations.

PERPs will be reviewed regularly and updated as necessary to reflect changes in the employee's needs, work environment, or organizational emergency procedures. PERPs will be collaboratively developed with the employee, their leader, and Human Resources, taking into consideration the employee's needs, work location, and potential emergency scenarios. The plan will specify emergency procedures, required accommodations, and roles/responsibilities for assisting the employee, while maintaining confidentiality regarding personal information.

The plan will include:

a) The name of the employee with a disability;
b) The employee's department and work location (address, floor number, office, or desk location);
c) Emergency contact information (name, phone number, email address, and relationship to the employee);
d) Assistance methods and equipment, such as:
    i. Whether the employee needs assistance or a volunteer to help get out of the building or work area
    ii. How to move the employee if they have a mobility impairment
    iii. Any assistive devices the employee uses (i.e., walker, wheelchair, cane, crutches, service animal, support person)
    iv. The location of the assistive devices
    v. How to use the assistive devices
e) Emergency alert requirements (i.e., visual or vibrating alarms, public announcement system, visual signage containing images or Braille or large print, evacuation chair, coworker volunteers); directions must be clear enough to lead an employee with a disability unassisted to a general exit route, where they can seek assistance and safely exit the workplace;
f) Backup aids if stairs are the only option to exit the workplace, such as a stair-descent device; elevators should not be considered an option to use in an emergency evacuation plan; and
g) Documented training that the employee with the disability and volunteer co-workers have been trained on PERP; the volunteers will need to know how to provide assistance and how to offer physical support properly.

9. Information and Communication

Xpera is committed to ensuring that all information and communications are accessible to people with disabilities, in alignment with applicable provincial and territorial legislation. This commitment extends to all employees, clients, visitors, and members of the public interacting with Xpera across Canada. This includes websites, emergency procedures, and any other relevant information. Further, Xpera will provide accessible formats and communication supports upon request.

10. Transportation

Xpera is committed to ensuring that all transportation services and travel-related programs provided or arranged by the organization are accessible to people with disabilities across Canada. This commitment aligns with applicable provincial and territorial accessibility legislation, and the principles of dignity, independence, integration, and equal opportunity.

Accessible Transportation Services

- Xpera will provide or arrange transportation that is safe, reliable, and accessible to individuals with disabilities, including those who use mobility aids, service animals, or require support persons.
- Vehicles, equipment, and facilities used for transportation will be maintained and adapted to ensure accessibility wherever reasonably possible.
- Individuals requiring assistance will have the opportunity to request accommodations in advance, and Xpera will make every reasonable effort to meet those needs.

Staff Responsibilities

- Employees and contractors providing transportation services will receive training on accessibility requirements, including assisting individuals with disabilities, handling mobility aids, accommodating service animals, and responding to emergencies.
- Staff will ensure that all communication during transportation is clear, respectful, and accessible to passengers with diverse needs.

Xpera will regularly review transportation practices to identify and remove barriers, ensuring continuous improvement in accessibility. Feedback from employees, clients, and other users will be encouraged and acted upon to enhance accessibility in all transportation services.

11. Design of Public Spaces

Xpera is committed to ensuring that all public spaces under our control or responsibility are designed, constructed, and maintained to be accessible to people with disabilities, in accordance with applicable provincial and territorial legislation. This commitment reflects our dedication to inclusion, safety, and barrier-free access for all employees, clients, visitors, and the public.

Design and Construction

- New or redeveloped public spaces, including entrances, walkways, parking areas, service counters, restrooms, and gathering areas, will be designed and constructed to meet or exceed accessibility standards.
- Accessibility considerations will include, but are not limited to:
    - Clear paths of travel and accessible routes
    - Accessible entrances, doorways, and ramps
    - Adequate lighting and signage for navigation
    - Seating, furniture, and fixtures designed for accessibility
    - Emergency access and evacuation routes

Maintenance and Inspection

- Public spaces will be regularly inspected and maintained to ensure that accessibility features remain safe and fully functional.
- Any barriers or hazards identified in public spaces will be addressed promptly to restore safe and accessible conditions.

Staff Responsibilities

- Employees, contractors, and third-party service providers involved in the design, construction, or maintenance of public spaces will receive training on accessibility requirements and best practices.
- All design and maintenance activities will be documented and reviewed to ensure compliance with accessibility standards.

12. Service Animals

Xpera is committed to ensuring that people with disabilities who use service animals have full access to its facilities, services, and programs across all Canadian locations. This commitment aligns with applicable provincial and territorial accessibility and human rights legislation.

Access with Service Animals

- Individuals with disabilities are welcome to be accompanied by their service animals in all areas of Xpera's premises that are open to the public, unless otherwise prohibited by law.
- Service animals will not be denied access to services, programs, or facilities solely because they are animals.

Staff Responsibilities and Support

- Staff will interact respectfully with individuals using service animals and avoid touching, distracting, or interfering with the animal.
- Where necessary, staff will provide reasonable assistance to ensure the individual's safe and effective use of services while accompanied by their service animal.
- If a situation arises where the animal cannot be present due to health or safety restrictions, Xpera will work with the individual to provide alternative accommodations.

Training

- Employees who interact with the public or provide services will receive training on the rights of people with disabilities to use service animals, including identification, access, and proper support procedure

13. Feedback Process

Xpera welcomes feedback on how we provide services to people with disabilities can be made by a person with a disability in the manner most convenient to them, including in person, by telephone, TTY, in writing via email or another format to hr@xpera.ca

14. Notice of Temporary Disruptions

Temporary disruption in Xpera's services and facilities may occur due to reasons that may or may not be in Xpera's control. Temporary disruptions to facilities, services, or accessibility features may occur due to maintenance, repairs, or unforeseen circumstances. When such disruptions occur, Xpera will ensure that affected individuals are promptly informed and that alternative accommodations or support are provided whenever possible. Xpera will make reasonable efforts to provide notice of planned disruptions if possible, recognizing that in some situations, such as unplanned temporary disruptions, advance notice may not be possible.

Notice of temporary disruptions will be provided through multiple accessible formats, such as:

- Signage at affected areas
- Email or phone notifications to employees, clients, or visitors
- Updates on our website or digital platforms

Notifications will include:

- Reason for the disruption
- Expected duration
- Description of alternative services, routes, or accommodations available

Leaders and employees are responsible for reporting, documenting, and communicating temporary disruptions in a timely manner. Efforts will be made to minimize the impact of disruptions on accessibility and ensure that individuals with disabilities continue to have safe and equitable access to facilities and services.

15. Administration

Questions about Xpera's Accessibility policy should be directed to Laura Ralph, Director of Human Resources at laura.ralph@xpera.ca or the confidential HR email address hr@xpera.ca.