

## FRAGOMEN (CANADA) CO.

# MULTI-YEAR ACCESSIBILITY PLAN, 2026-2030

### Message from Fragomen (Canada) Co.

Fragomen (Canada) Co. (“Fragomen” or “the Company”) recognizes the important role that immigration plays in the Canadian economy. As such, Fragomen established its Toronto office to serve the needs of local and global businesses in Toronto and other Canadian cities. Canada is home to so many diverse and multicultural communities and is a major destination for immigrants. We are committed to serving our diverse clients, supporting both immigrants and the businesses seeking to relocate their staff, in an accessible and inclusive manner.

We are proud of our commitment to improving accessibility and inclusion by identifying, removing, and preventing barriers for people with disabilities. We realize that providing an inclusive environment is a shared effort. As a community, all businesses and services must work together to make accessibility happen.

As part of our commitment to increasing accessibility in our organization, we have prepared this Multi-year Accessibility Plan that will serve as a roadmap for management and employees to work towards becoming a more accessible and inclusive organization. The goals included in this plan will assist us in meeting the requirements of the Accessibility for Ontarians with Disability Act (AODA) and applicable Human Rights legislation, as well as our own policies and goals related to identifying, removing and preventing accessibility barriers for persons with disabilities. Fragomen is committed to providing an environment in which all individuals have equal access to our services, in a way that ensures the dignity and independence of persons with disabilities.

This Plan has been reviewed by lead members of the Fragomen Health and Safety Committee and Diversity, Equity and Inclusion Committee and approved by our senior management team. We commit to reviewing the Plan annually and to using it as a resource to help us comply with applicable accessibility laws and to meet our own ongoing accessibility commitments and goals

Cosmina Morariu, Managing Partner Fragomen (Canada) Co.

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## Purpose

This Multi-year Accessibility Plan will:

- Summarize the actions taken by Fragomen to identify, remove and prevent barriers for persons with disabilities;
- Describe ongoing and planned measures to ensure ongoing compliance with accessibility legislation;
- Describe planned “beyond compliance” measures to achieve greater accessibility and inclusion for Fragomen employees and customers; and
- Describe how the plan will be communicated internally & externally.

## Statement of Commitment to Accessibility

Fragomen (Canada) Co. is committed to providing a safe, dignified, and welcoming environment for everyone. We are committed to providing accessible and inclusive services, goods, information, and facilities, wherever possible. The Company is committed to meeting the requirements of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and all applicable accessibility and human rights legislation in our

## Accessibility Policies and Procedures

For more information on Fragomen accessibility services and options or to access online versions of the Accessibility Policy and Multi-year Accessibility Plan, go to <https://www.fragomen.com/about/offices/ca/toronto/overview>.

## AODA Compliance Achievements

Fragomen (Canada) Co. is committed to meeting all of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) compliance requirements and deadlines for a large (50+ employees) business or non-profit organization. This includes filing accessibility compliance reports and status updates by the deadlines applicable to the Company.

Category	AODA Compliance Requirement	Compliance Status as of January 2026
Customer Service Training	Provide accessible customer service training for staff to serve customers of all abilities and keep a written record of accessibility training provided	Compliant
Customer Service Feedback	Create accessible ways for people to provide feedback	Compliant
Emergency Information	Provide accessible emergency and public safety information  Provide accessible emergency information to staff	Compliant

Transportation	Provide accessible transportation services	Not Applicable – Fragomen does not manage or provide transportation services
Accessibility Policies	Create an accessibility policy  Make the accessibility policy public	Compliant
Accessibility Plan	Create a multi-year accessibility plan to help achieve accessibility goals  Make the multi-year accessibility plan public	Compliant
Self-service Kiosks	Include accessibility features when purchasing or designing self-service kiosks – including any interactive electronic terminals that people use to pay parking fees, validate tickets, or access information	Not Applicable – Fragomen does not manage or provide any self-service kiosks
Accessible Website Content	Ensure that any public websites and website content controlled or managed by Fragomen (Canada) Co. are accessible	Compliant
Category	AODA Compliance Requirement	Compliant
Training	Train all employees on accessibility requirements that apply to their job duties  Train all employees on accessibility policies and procedures	Compliant
Feedback	Make it easy for people with disabilities to provide feedback	Compliant
Employment Practices	Make employment practices accessible, including how the organization hires, retains, and provides career development opportunities	Compliant
Individual Accommodation and Return-to-work Plans	Document processes for developing individual accommodation plans and return-to-work plans	Compliant
Public Information	Make public information accessible when requested	Compliant

New or Redeveloped Public Spaces	Make new or redeveloped public spaces accessible	Compliant
Accessibility Reports	File accessibility reports based on stated deadlines in the AODA	Compliant

## Accessibility Achievements Beyond Compliance

In addition to meeting its AODA compliance requirements, the Company has also accomplished a number of “beyond compliance” accessibility achievements. Key achievements include the following:

- The Company has consulted with an external organization, AIM for Inclusion, to review its AODA compliance status and to update or create accessibility documentation, including Company policies, procedures, and plans related to accessibility.
- The Company hosts inclusive Mental Health initiatives to raise awareness of Fragomen mental health initiatives and services with its employees.
- The Company has developed a Diversity, Equity, and Inclusion Committee that considers accessibility when applying its four pillars: Education, Recruitment, Career Development and Retention, and Non-Profit Support.
- The Company has established an internal Accessibility Resources site for employees and Fragomen content creators. The site includes resources on how to create information in accessible formats (e.g., accessible Word, PowerPoint, and PDF documents) and with accessible content and language (e.g., clear language and appropriate terminology).

## Measures to Identify, Remove, and Prevent Barriers

Those responsible for accessibility actions and initiatives within Fragomen use various measures to identify, remove, and prevent accessibility barriers.

### Identifying Barriers

In order to meet or exceed AODA compliance requirements, Fragomen is committed to responding to staff, client, and community feedback in identifying priorities to increase accessibility and inclusion, for employees, clients, and the public.

### Removing and Preventing Barriers

Fragomen management and staff have identified the following goals and actions to remove and prevent accessibility barriers at the Company over the coming years. Key Fragomen contacts, identified as Action Owners in the tables below, are responsible for ensuring that AODA compliance requirements and Company-identified accessibility goals and initiatives are carried out as per legislative and Company-determined deadlines.

### Policies, Procedures, and Plans

Fragomen management and staff, including lead members of the Health and Safety Committee and Diversity, Equity, and Inclusion Committee, are committed to maintaining and reviewing the Fragomen Accessibility Policy and Multi-year Accessibility Plan. Reviewing the documents regularly will help ensure that the Company continues to work towards greater accessibility and inclusion and accomplishes its accessibility goals as

planned. It also enables the organization to produce an accurate and informative annual accessibility status report, as well as AODA compliance reports when required.

In addition, any Fragomen policies that present barriers to accessibility, diversity, and inclusion will be revised to remove identified barriers.

Accessibility Goal	Action Owner	Target Completion Date
Ensure that the Fragomen (Canada) Co. Statement of Commitment to Accessibility is shared broadly within the Company and made available to the public	Human Resources	December 31, 2025
Review existing policies and procedures with an accessibility, diversity and inclusion lens and develop and implement action plans to address identified barriers	Human Resources and Diversity, Equity, and Inclusion Lead	Ongoing
Work with respective landlords, tenants, and property managers to ensure that updated emergency plans are in place and available in an accessible format for employees and members of the public	Facilities Administrator	Annually
Review the multi-year accessibility plan and status of accessibility goals annually	Leads from Human Resources; Health and Safety Committee; and Diversity, Equity, and Inclusion Committee	Annually
Update multi-year accessibility plan minimum of every five years	Leads from Human Resources; Health and Safety Committee; and Diversity, Equity, and Inclusion Committee	December 31, 2030
File AODA compliance reports based on stated deadlines in the AODA	Managing Partner	June 30, 2021, and December 31, 2023

## Training

The Company is committed to ensuring that its employees receive training on applicable accessibility and human rights laws (for example, in Ontario, training will be provided on the AODA and content in the Ontario Human Rights Code as it pertains to people with disabilities). In addition, training will be provided on Fragomen accessibility policies and procedures, as soon as possible following hiring. Refresher training is provided when changes are made to accessibility legislation or to Fragomen accessibility policies and procedures.

Fragomen also ensures that those providing products or services on behalf of the Company or participating in development or approval of Company policies confirm that their staff have received accessibility training similar to Fragomen employees.

Accessibility Goal	Action Owner	Target Completion Date
Provide updated refresher training on Emergency and Safety procedures for employees	Health and Safety	Annually
Incorporate accessibility in general healthy workplace programs and training and development programs and events	Human Resources	Annually

## Customer Service

The Company is committed to providing its goods and services in a way that respects the dignity and independence of persons with disabilities. The Company is also committed to ensuring that it provides people with disabilities with integrated and equitable services and access to our goods and services in the same place and in similar way as other members of the public.

## Information and Communication

The Company is committed to making information and communications accessible to persons with disabilities. This includes a commitment to ensuring both print and online information is accessible to employees and the public, including emergency and safety information and website content. The Company is also committed to making every effort to provide information in alternate formats requested by people with disabilities.

Accessibility Goal	Action Owner	Target Completion Date
Make all public Fragomen web content that Fragomen (Canada) Co. has control or management of compliant with WCAG 2.0 level AA guidelines (excluding live captioning and audio description).	Human Resources and IT Specialist	Ongoing

## Employment

The Company is committed to providing fair and accessible employment opportunities at all stages of the employment cycle. This includes ensuring accessible recruitment and selection processes, creating individualized workplace emergency response plans, and providing formal written accommodation and return to work plans. All processes involve consultation with the employee or potential employee, when requested. The Company is also committed to informing all employees of policies and procedures that support employees with disabilities.

Accessibility Goal	Action Owner	Target Completion Date
Ensure that employee accessibility and accommodation requests are addressed and reviewed regularly, upon request by employees, and during performance reviews	Human Resources	Ongoing, with annual reviews
Continue to ensure that new employees receive AODA and accessibility training in a timely manner, including information covering general AODA knowledge, relevant Ontario Human Rights Code and accessibility legislation, and Fragomen accessibility and related policies required for staff to perform their roles effectively and inclusively	Human Resources	Ongoing

## Built Environment or Design of Public Spaces

The Company is committed to ensuring that, wherever possible, newly constructed or redeveloped built environments and public spaces are designed in a way that takes into consideration the prevention or removal of barriers.

## Communication of the Plan

The 2026-2030 Multi-year Accessibility Plan (MYAP) will be shared with Fragomen (Canada) Co. staff and the broader community. The MYAP will be available on the Company website at <https://www.fragomen.com/about/offices/ca/toronto/overview> and upon request. Every effort will be made to provide the document in alternate formats upon request.

## Contact Us

Fragomen (Canada) Co.

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