

# CANADA PENSION PLAN INVESTMENT BOARD

## Accessibility Plan Progress Report (the “Progress Report”)

Published December 31, 2023

### General

#### Introduction

This Progress Report has been prepared in compliance with the Accessible Canada Regulations: SOR/2021-241 under the *Accessible Canada Act* (“**ACA**”).

The Accessible Canada Regulations under the ACA require that the Canada Pension Plan Investment Board (“**CPP Investments**”) establish, implement, maintain and document its accessibility plan (the “**Accessibility Plan**”). CPP Investments must also publish a Progress Report with respect to the implementation of its Accessibility Plan.

This Progress Report, dated December 31, 2023, is publicly available, including in an accessible format upon request.

#### Our Commitment

In fulfilling our mission, CPP Investments strives to treat all individuals in a manner that allows them to maintain their dignity and independence. CPP Investments promotes integration and equal opportunity and is committed to helping meet the needs of people with disabilities in a timely manner. We will seek to achieve this by preventing and removing barriers to accessibility and by meeting accessibility requirements under the ACA. This Progress Report sets out the progress of CPP Investments with respect to achieving accessibility in the operations of CPP Investments, through its Accessibility Plan.

#### Designated Accessibility Representative

CPP Investments has a designated accessibility representative. The representative is designated to:

- receive feedback relating to accessibility and accessibility barriers on behalf of CPP Investments;
- receive requests for a copy of this Progress Report in an accessible format; or
- receive requests for a description of CPP Investments’ feedback process in print, large print, Braille, audio format or an electronic format that is compatible with adaptive technology that assists persons with disabilities.

CPP Investments’ **Designated Accessibility Representative** is as follows:

Melanie Johnson  
Manager, Equity, Diversity & Inclusion

You can provide feedback and/or communicate with CPP Investments and the Designated Accessibility Representative in any of the following manners:

**Mail:** 2500-1 Queen St East  
Toronto, ON M5C 2W5

**Telephone:** 416-868-5073

**E-mail:** [contact@cppib.com](mailto:contact@cppib.com)

### **Consultation**

As part of developing CPP Investments' Progress Report, CPP Investments engaged in consultations with its employees. Our Accessibility Plan is also available on our website and allows members of the public to contact the organization with any questions or feedback. We engaged with our Canadian employees broadly, including those who may have identified as persons with disabilities, regarding our operations to identify, remove, and prevent accessibility barriers.

- CPP Investments shared a progress update against our goals via intranet, with all Canada-based employees, to solicit feedback and/or comment.
- CPP Investments posted its Accessibility Plan to its external website, ensuring that members of the public were granted the opportunity to provide feedback.
- CPP Investments consulted with employees on the design of our future state workplace via individualized surveys.

To date, no additional barriers have been identified during the consultations.

### **Feedback**

In its Accessibility Plan, CPP Investments explored accessibility goals in the following areas:

1. Employment
2. The Built Environment
3. Information and Communication Technologies
4. Communication, Other than Information and Communication Technologies
5. The Procurement of Goods, Services and Facilities
6. The Design and Delivery of Programs and Services (Not Applicable)
7. Transportation (Not Applicable)

The following sets out any feedback CPP Investments received with respect to each of the applicable areas noted above, and how that feedback has been taken into consideration by CPP Investments in the implementation of its Accessibility Plan:

**1. Employment**

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

<b>Action</b>	<b>Target</b>
<p>CPP Investments aims to highlight the availability of opportunities and accommodations for applicants with disabilities in the recruitment process, including:</p> <ul style="list-style-type: none"> <li>• expanding targeted outreach so people with disabilities are aware of opportunities</li> <li>• specifying accommodations are available for applicants with disabilities on job postings and the external website</li> </ul>	<p>December 2024</p>
<p><b>Notes</b></p> <ul style="list-style-type: none"> <li>➤ In 2023, following a review of potential agencies, CPP Investments’ partnered with Specialisterne to pilot an education session on neurodivergent talent in the workforce.</li> <li>➤ We continue to work with specific agencies (e.g. Spinal Cord Injury Canada) to expand our candidate pool.</li> <li>➤ All job postings and candidate outreach specify that accommodations are available for applicants who may need them, including for disabilities.</li> </ul>	
<p>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:</p> <ul style="list-style-type: none"> <li>• a review and, as necessary, modification of existing recruitment policies, procedures and processes;</li> <li>• inclusion of availability of accommodation notices as part of the script in the scheduling of an interview and/or assessment; and</li> </ul>	<p>December 2024</p>

<ul style="list-style-type: none"> <li>• 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.</li> </ul>	
<p>Notes</p> <ul style="list-style-type: none"> <li>➤ A TTY (teletypewriter) is now installed at our Reception areas on both the 25<sup>th</sup> and 22<sup>nd</sup> floors.</li> <li>➤ Candidates are not required to come into the office for first round interviews and may participate via chat, video, or telephone</li> <li>➤ Accommodation notices have been embedded into scripts for scheduling interviews and/or assessments</li> <li>➤ Refined our internal process to ensure that any accommodation granted in the recruitment phase that warrants a review and/or modification of existing recruitment policies, procedures and processes, is addressed in a timely matter</li> </ul>	
<p>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:</p> <ul style="list-style-type: none"> <li>• a review and, as necessary, modification of existing recruitment policies, procedures and processes; and</li> <li>• inclusion of notification of policies on accommodating employees with disabilities in offer letters of employment.</li> </ul>	<p>December 2024</p>
<p>Notes</p> <ul style="list-style-type: none"> <li>➤ Accommodation Policy is now included with offer letters of employment for Canada-based employees.</li> </ul>	
<p>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:</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• providing information soon after new employees join, specifically in the onboarding process;</li> </ul>	<p>December 2024</p>

<ul style="list-style-type: none"><li>• keeping employees informed of policy changes on job accommodations affecting disabilities;</li><li>• 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</li><li>• to provide the information set out above, CPP Investments will consult with employees to assess the suitability of accessible formats or communication supports.</li></ul>	
<p>Notes</p> <ul style="list-style-type: none"><li>➤ Accommodation Policy is now included in our Onboarding materials for Canada-based new hires.</li></ul>	
<p>CPP Investments will strive to ensure the process for developing individual accommodation plans includes:</p> <ul style="list-style-type: none"><li>• information regarding the manner in which employees requesting accommodation can participate in the development of their respective plan;</li><li>• information regarding the means by which employees are assessed on an individual basis;</li><li>• 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;</li><li>• information regarding the manner in which employees can request the participation of a representative from the workplace in the development of the accommodation plan;</li><li>• steps to protect the privacy of an employee's personal information;</li><li>• information regarding the frequency with which individual accommodation plans will be reviewed and updated and the manner in which this will be done;</li><li>• the reasons for denial if an individual accommodation plan is denied;</li></ul>	<p>December 2024</p>

<ul style="list-style-type: none"><li>• information regarding the means of providing the individual accommodation plan in a format that takes into account the employee’s accessibility needs;</li><li>• the following will be included if individual accommodation plans are established:<ul style="list-style-type: none"><li>○ any information regarding accessible formats and communication supports that have been provided for or arranged, to provide the employee with:<ul style="list-style-type: none"><li>▪ information that is needed in order to perform the employee’s job;</li><li>▪ information that is generally available to employees in the workplace; and</li></ul></li></ul></li><li>• identify any other accommodation that is to be provided to the employee.</li></ul>	
<p>Notes</p> <ul style="list-style-type: none"><li>➤ In 2024, CPP Investments will start work on the future state employee Accommodation/Return to Work experience, including defining project scope, process review and implementation timing.</li><li>➤ Individual Accommodation Plans (Return to Work cases only)<ul style="list-style-type: none"><li>○ For employees returning from a health leave, CPP Investments’ third-party vendor discusses accommodation needs with employees, receives information regarding job function, and assesses potential accommodation needs.</li><li>○ Workplace facilitation meetings can be arranged which can include the employee, employee’s manager, third-party vendor and HR representatives, to discuss accommodation needs when returning from a health leave</li><li>○ Data privacy requirements are included in CPP Investments’ contractual arrangement with third-party vendor</li><li>○ As part of our health leave management process, adjudicated by CPP Investments’ third-party vendor, case managers outline the requisite steps to ensure a safe and healthy return to work (including identifying potential accommodations, gradual return-to-work scheduling, etc.)</li></ul></li></ul>	
CPP Investments will strive to ensure the return-to-work process outlines:	December 2024

<ul style="list-style-type: none"><li>• the steps required to expedite return to work after an employee's disability-related absence;</li><li>• the development of a written individualized return to work plan for such employees; and</li><li>• the use of individual accommodation plans in the return-to-work process.</li></ul>	
<p>Notes</p> <ul style="list-style-type: none"><li>➤ In 2024, CPP Investments will start work on the future state employee Accommodation/Return to Work experience, including defining project scope, process review and implementation timing.</li></ul>	
<p>CPP Investments aims to:</p> <ul style="list-style-type: none"><li>• review, assess and, as necessary, modify existing policies, procedures and practices to ensure compliance with the Accessible Canada Regulations and ACA;</li><li>• take accessibility needs and individualized accommodation plans into account when:<ul style="list-style-type: none"><li>○ assessing performance for people with disabilities;</li><li>○ managing career development and advancement for people with disabilities; and</li><li>○ redeployment, as required, including for people with disabilities.</li></ul></li><li>• review, assess and, as necessary, include in performance management workshops and accessibility criteria;</li><li>• 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</li><li>• consider the accessibility needs of employees with disabilities when redeploying employees, including review and, as necessary, modification of employee transfer checklist.</li></ul>	<p>December 2024</p>
<p>Notes</p>	

- In 2024, CPP Investments will start work on the future state employee Accommodation/Return to Work experience, including defining project scope, process review and implementation timing.

### **Feedback Received in the Area of Employment:**

CPP Investments shared a progress update against our goals via intranet, with all Canada-based employees, to solicit feedback and/or comment.

CPP Investments posted its Accessibility Plan to its external website, ensuring that members of the public were granted the opportunity to provide feedback.

### **Consideration of Feedback:**

To date, no additional barriers have been identified by the consultations. CPP Investments will continue to review any feedback received and for consideration in the implementation of its accessibility goals.

## **2. The Built Environment**

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

<b>Action</b>	<b>Target</b>
CPP Investments will address several areas of opportunity to increase our accessibility, including: <ul style="list-style-type: none"><li>• The creation of a demarcated landing near elevator lobby doors to stay clear of the drive aisle.</li><li>• The installation of accessible height vision panels in vestibule entrance doors.</li><li>• The installation of signage near escalators to indicate the nearest set of elevators.</li><li>• The installation of slip-resistant, colour-contrasting strips along the thread nosing of steps.</li></ul>	December 2025
<b>Notes</b> <ul style="list-style-type: none"><li>➤ We have installed carpet contrast strips on ramps within the workspace to help people (especially those who are partially sighted) move more safely throughout the space.</li></ul>	



<ul style="list-style-type: none"><li>➤ Adjustments have been made to entry doors and restroom doors to reduce the amount of force required for pushing or pulling the door open.</li><li>➤ Designated Waiting Areas (DWA) have been identified on each floor; signage is being updated to reflect these locations.</li></ul>	
<p>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:</p> <ul style="list-style-type: none"><li>• The deployment of tactile attention indicators to areas which pose a potential hazard.</li><li>• The implementation of adaptive-hearing technology available in additional designated areas.</li></ul>	December 2025
<p>Notes</p> <ul style="list-style-type: none"><li>➤ CPP Investments has received the most advanced Rick Hansen Foundation Accessibility Certification™ (RHFAC), Gold Certification.</li><li>➤ We renewed our commitment to ensuring our employees home office environments are ergonomically sound with an objective, research-based, needs assessment online tool developed by board-certified ergonomists which identifies ergonomic requirement and streamlines the purchasing process.</li><li>➤ We conducted personal ergonomic assessments as and when needed to ensure the wellbeing of our employees in the office to improve their comfort and wellbeing.</li><li>➤ We have procured and installed adaptive equipment such as adjustable desks, ergonomic chairs, keyboard trays, and footrests.</li><li>➤ We have installed assistive hearing devices at all internal service counters (e.g. TechBar, Reception, etc.) and provide portable units at the 22<sup>nd</sup> and 25<sup>th</sup> floor Reception desks, for use in meeting rooms and for conducting interviews.</li><li>➤ Tactile Room signage has been installed in washrooms.</li><li>➤ We have installed Evacuchairs [throughout the built environment] to allow disabled or incapacitated individuals to be easily and safely moved down flights of stairs.</li></ul>	

**Feedback Received in the Area of the Built Environment:**

CPP Investments shared a progress update against our goals via intranet with all Canada-based employees, to solicit feedback and/or comment.

CPP Investments posted its Accessibility Plan to its external website, ensuring that members of the public were granted the opportunity to provide feedback.

CPP Investments consulted with employees on the design of our future state workplace via individualized surveys.

**Consideration of Feedback:**

To date, no additional barriers have been identified by the consultations. CPP Investments will continue to review any feedback received and for consideration in the implementation of its accessibility goals.

**3. Information and Communication Technologies**

CPP Investments is committed to making company information and communications accessible to persons with disabilities.

<b>Action</b>	<b>Target</b>
<p>CPP Investments will strive to:</p> <ul style="list-style-type: none"><li>• ensure feedback processes are accessible to PWD by providing/arranging accessible formats/comms supports in a timely manner upon request</li><li>• ensure that when accessible formats and communication supports are requested, it:<ul style="list-style-type: none"><li>○ provides or arranges for the provision of accessible formats and communication supports;</li><li>○ consults with the requestor to determine the suitability of the format or support;</li><li>○ 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</li></ul></li><li>• notify the public about the availability of accessible formats and communication supports.</li></ul>	April 2024
Notes	

<ul style="list-style-type: none"> <li>➤ The April 2024 target has been reassessed as December 2024. The Windows 11 design, build and upgrade will occur across the first three quarters of 2024, with business deployment commencing in October 2024.</li> <li>➤ Our process for technology requests will be through the regional Service Desk teams. Standardizing the way in which employees interact with our Tech &amp; Data teams ensures a consistent and streamlined experience for employees.</li> <li>➤ The team will be documenting the supported accessibility features available to our end-users as we deploy Windows 11 throughout the year. These features will be shared with our corporate users on our Intranet site and during any training.</li> <li>➤ The focus in 2024 will be raising awareness of the <a href="#">accessibility features built into Windows 11</a></li> </ul>	
<p>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:</p> <ul style="list-style-type: none"> <li>• Improved alt tags and tab-index;</li> <li>• Resolved descriptive links and text over image contrast;</li> <li>• Corrected font and colour contrast.</li> </ul>	<p>April 2024</p>
<p>Notes</p> <ul style="list-style-type: none"> <li>➤ The April 2024 target date will be reassessed. Beginning in 2024, teams will review the project plan and determine next steps for implementation.</li> </ul>	
<p>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.</p>	<p>April 2024</p>
<p>Notes</p> <ul style="list-style-type: none"> <li>➤ The April 2024 target date will be reassessed. Beginning in 2024, assigned teams will review the project plan and determine next steps for implementation.</li> </ul>	

## Feedback Received in the Area of Information and Communication Technologies

CPP Investments shared a progress update against our goals via intranet with all Canada-based employees, to solicit feedback and/or comment.

CPP Investments posted its Accessibility Plan to its external website, ensuring that members of the public were granted the opportunity to provide feedback.

### Consideration of Feedback:

To date, no additional barriers have been identified by the consultations. CPP Investments will continue to review any feedback received and for consideration in the implementation of its accessibility goals.

## 4. Communication, Other than Information and Communication Technologies

CPP Investments is committed to making company information and communications accessible to deaf persons in Canada.

Communication, other than information and communication technologies (“ICT”) includes the use of American Sign Language, Quebec Sign Language and Indigenous sign languages. American Sign Language, Quebec Sign Language and Indigenous sign languages are recognized as the primary languages for communication by deaf persons in Canada.

<b>Action</b>	<b>Target</b>
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. <ul style="list-style-type: none"><li>• ASL interpretation when requested by registered participants at all biennial meetings;</li><li>• Ensure barrier-free presentations with accessible text size at a of minimum of 16 point.</li></ul>	March 2024
<b>Notes</b> <ul style="list-style-type: none"><li>➤ Consistent with the Plan, we are incorporating new accessibility requirements including ASL interpretation upon request at registration, and barrier-free presentations with accessible text size at a minimum of 16 point into planning for the 2024 public meetings. Registrants of each meeting can also indicate if they have any other accessibility requirements.</li></ul>	

<p>CPP Investments will make every effort to:</p> <ul style="list-style-type: none"><li>• ensure existing and new feedback processes are accessible by providing or arranging accessible formats and communication supports in a timely manner upon request;</li><li>• provide or arrange for the provision of such accessible formats and communication supports;</li><li>• consult with the requestor to ensure the accessible format or communication support;</li><li>• 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</li><li>• notify the public about the availability of accessible formats and communication supports.</li></ul>	<p>March 2024</p>
<p>Notes</p> <ul style="list-style-type: none"><li>➤ As part of our ongoing commitment to accessibility, we are incorporating all measures from the Accessibility Plan into the planning of our 2024 biennial public meetings, which will take place across Canada in starting in spring 2024.</li><li>➤ We provide or arrange accessible formats and communication supports in a timely manner upon request, consult with the requestor to ensure the appropriate accessible format or communication support, and notify the public about the availability of these supports.</li><li>➤ We continue to prioritize maintaining wheelchair accessible venues and providing closed-captioned videos in all our meetings.</li></ul>	

**Feedback Received in the Area of Communication, Other than ICT:**

CPP Investments shared a progress update against our goals via intranet, with all Canada-based employees, to solicit feedback and/or comment.

CPP Investments posted its Accessibility Plan to its external website, ensuring that members of the public were granted the opportunity to provide feedback.

**Consideration of Feedback:**

To date, no additional barriers have been identified by the consultations. CPP Investments will continue to review any feedback received and for consideration in the implementation of its accessibility goals.

## 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.

Action	Target
<p>End user/business groups:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> </ul>	December 2025
<p>Notes</p> <ul style="list-style-type: none"> <li>➤ Implementation planned for the end of 2025.</li> </ul>	
<p>Vendors:</p> <ul style="list-style-type: none"> <li>• Collaborate with CPP Investments to incorporate appropriate accessibility language/provisions within vendor contracts, as applicable, based on jurisdictional requirements.</li> </ul>	December 2025
<p>Notes</p> <ul style="list-style-type: none"> <li>➤ Implementation planned for the end of 2025.</li> </ul>	

### **Feedback Received in the Area of the Procurement of Goods, Services and Facilities:**

CPP Investments shared a progress update against our goals via intranet, with all Canada-based employees, to solicit feedback and/or comment.

CPP Investments posted its Accessibility Plan to its external website, ensuring that members of the public were granted the opportunity to provide feedback.

**Consideration of Feedback:**

To date, no additional barriers have been identified by the consultations. CPP Investments will continue to review any feedback received and for consideration in the implementation of its accessibility goals.

**6. The Design and Delivery of Programs and Services**

Not Applicable

**7. Transportation**

Not Applicable