

Gap Canada Inc.

Advocating Accessibility
For
Gap Inc. Customers & Employees

MULTI-YEAR ACCESSIBILITY PLAN
2013-2021



Introduction and Statement of Commitment

In 2005, the government of Ontario passed the Accessibility for Ontarians with Disabilities Act (the "AODA"). It is the goal of the Ontario government to make Ontario accessible by 2025. The Integrated Accessibility Standards Regulations ("IASR") under the AODA require Gap Canada Inc. establishes, implements, maintains and documents a multi-year accessibility plan which outlines the organization's strategy to prevent and remove barriers for persons with disabilities to meet its requirements under the IASR effective January 1, 2014.

This multi-year plan outlines Gap Inc.'s strategy to prevent and remove barriers to address the current and future requirements of the IASR, and in order to fulfill Gap Canada Inc. commitment as outlined in our Accessibility Policy.

In accordance with the requirements set out in the IASR, Gap Inc. will:

- Establish, review and update this plan at least once every five years;
- Post this plan on its website; and
- Provide this plan in an accessible format, upon request

Accessible Emergency Information

Commitment:

Gap Canada Inc. is committed to providing customers and clients with publicly available emergency information in an accessible format, upon request. We will also provide employees with disabilities with individualized emergency response information when necessary.

Action Taken:

The following measures were implemented by Gap Canada Inc.:

- Emergency procedures, plans and public safety information that are prepared by Gap Canada Inc. and made available to the public, will be made available in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

The following measures were implemented by Gap Canada Inc. effective January 1, 2012:

- Individualized workplace emergency response information procedures have been developed for employees with disabilities, as required;
- Where required, Gap Canada Inc. provides assistance to specific disabled employees, with the disabled employee's prior consent, to help them evacuate the workplace in case of an emergency or disaster. These plans for providing assistance have been set out in individualized emergency plans for the employees;
- These individualized emergency plans have been communicated to the employees' respective managers and safety personnel (if required LP), on 'as needed' basis;
- On an ongoing and regular basis, as per the applicable terms of the IASR, Gap Canada Inc. will review and assess general workplace emergency response procedures and individualized emergency plans to ensure accessibility needs continue to be addressed.

Required legislative compliance: January 1, 2012

Status: Complete

Completion date: January 1, 2012

Kiosks

Commitment

Gap Canada commits to ensuring that employees consider the needs of persons with disabilities when designing, procuring or acquiring self service kiosks.

Planned Action

- Advise staff responsible for the procurement of self service kiosks of the requirements of the IASR.

Required legislative compliance: January 1, 2014

Status: In progress

Completion date: January 1, 2014

Training

Commitment:

Gap Canada Inc. is committed to providing training to employees on the requirements of the IASR and on the Human Rights Code as it pertains to persons with disabilities. Gap Canada Inc. will provide such training as soon as practicable.

Planned Action:

In accordance with the IASR, Gap Canada Inc. will:

- Determine and ensure that appropriate training on the requirements of the IASR and on the Ontario Human Rights Code as it pertains to persons with disabilities, is provided to employees in a way that best suits the duties of the employees.
- Ensure that the training is provided to persons referenced above as soon as practicable;
- Keep and maintain a record of the training provided, including the dates that the training was provided and the number of individuals to whom it was provided;
- Ensure that the training is provided on any changes to the prescribed policies on an ongoing basis, as needed.

Required legislative compliance: January 1, 2015

Status: In progress

Completion date: January 1, 2015

Information and Communication Standards

Commitment:

Gap Canada Inc. is committed to meeting the communication needs of persons with disabilities. Gap Canada Inc. will incorporate new accessibility requirements under the Information and communication standard to ensure that its information and communications systems and

platforms are accessible and are provided in accessible formats that meet the needs of persons with disabilities.

1. Feedback, Accessible Formats and Communication

Planned Action:

In accordance with the IASR, Gap Canada Inc. will:

- Consult with people with disabilities to determine their information and communication needs
- 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 communications 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;
 - Notify the public about the availability of accessible formats and communication supports.

Required legislative compliance: January 1, 2015 – **Feedback** January 1, 2016 – **Accessible formats & Communication Supports** (or other applicable date as set out in the IASR)

Status: In progress

Completion date: January 1, 2015

2. Accessible Websites and Web Content

Planned Action:

In accordance with the IASR, Gap Canada Inc. will:

- Ensure development of its next generation digital platform for public websites, mobile applications, in-store media and information technology infrastructure meet AODA Information and Communication Standards and that partnering vendors have necessary expertise with such technology;
- Use guiding principles in the development of new corporate intranet applications as outlined by the Ontario Government's new Online Design Program standard, which specifies compliance with international accessibility guidelines, W3C WCAG 2.0;

- Partner with Corporate Communications and, in collaboration with operating divisions, provide guidelines to all staff to ensure public documents and media are readily available in alternate accessible formats;
- Expand corporate awareness of requirements for compliance with Information and Communication Standards of AODA.

Required legislative compliance: January 1, 2014 – WCAG 2.0 Level A – new Internet websites and web content, January 1, 2021 – WCG 2.0 Level AA – all Internet websites and web content, except for exclusions set out in the IASR.

Status: In progress

Completion date: N/A

Employment Standards

1. Recruitment

Commitment:

Gap Canada Inc. is committed to fair and accessible employment practices. This includes providing accessibility across all stages of the employment cycle.

Planned Action:

In accordance with the IASR, Gap Canada Inc. will strive to do the following:

Recruitment General

Upon request, Gap Canada Inc. will notify employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process. This will include:

- A review and, as necessary, modifications of existing recruitment policies, procedures and processes;
- Specifying that accommodation is available for applicants with disabilities, on the website and on job postings;

Recruitment, assessment and selection

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

- A review and, as necessary, modification to the existing recruitment process;
- If a selected applicant requests an accommodation, consult with the applicant and arrange for suitable accommodations in a manner that takes into account the applicant's individual accessibility needs.

Required legislative compliance: January 1, 2016

Status: In progress

Completion Date: N/A

2. Informing Employees of Supports

In accordance with the IASR, Gap Canada Inc., will notify employees of policies that support employees with disabilities, including, but not limited to, policies on the provisions of job accommodations that take into account an employee's accessibility needs due to a disability.

This will include:

- Providing information under this section as soon as practicable after the new employee begins employment, specifically in the orientation process;
- Keeping up to date on changes to existing policies on job accommodations with respect to disability;
- Where an employee with a disability makes a request, Gap Canada Inc. will provide or arrange for 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.

Required legislative compliance: January 1, 2016

Status: In progress

Completion Date: N/A

3. Documented Individual Accommodation Plans/Return to Work Process

Commitment:

Gap Canada Inc. will incorporate the requirements under the IASR to ensure that Gap Canada Inc. has a process for developing individual accommodation plans and return to work policies for employees that have been absent due to a disability.

Planned Action:

Gap Canada Inc.'s existing policies include steps that Gap will take to accommodate an employee with a disability and to facilitate an employee's return to work after absenteeism due to a disability. Gap Canada Inc. will review and assess the existing policies to ensure that they include a process for the development of documented individual accommodation plans for the employees with a disability, if such plans are required.

Gap Canada Inc. will ensure that the process for the development of documented individual accommodation plans includes the following elements, in accordance with the provisions of the IASR:

- Include in the process the manner in which the employee requesting accommodation can participate in the development of the plan;
- Include in the process the means by which the employee is assessed on an individual basis;
- Include in the process the manner in which Gap Canada Inc., can request an evaluation by an outside medical or expert, at Gap's expense, to assist in determining if and how the accommodation can be achieved;

- Steps are in place to protect the privacy of the employee's personal information;
- Outline the frequency in which the individual accommodation plans will be reviewed and updated and the manner in which this will be done.
- Provide the employee with the reasons for the denial if an individual accommodation plan is denied;
- Include in the process the means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs;
- If Individualized accommodation plans are established, ensure that they include:
 - 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
 - Identify any other accommodation that is to be provided to the employee;

Required legislative compliance: January 1, 2016

Status: In progress

Completion Date: N/A

4. Performance Management, Career Development and Redeployment

Commitment:

Gap Canada Inc. will take into account the accessibility needs and the disabilities of an employee, as well as individual accommodation plans:

- When using its performance management process;
- When providing career development and advancement;
- When redeploying employees.

Planned Action:

In accordance with the IASR, Gap Canada Inc. will:

- Review, assess and, as necessary, modify existing policies, procedures and practices to ensure compliance with the IASR;
- Take into account the accessibility needs of the employees with disabilities and, as applicable, their individualized accommodation plans, when:
 - Assessing performance
 - Managing career development and advancement
 - Redeployment is required

Required legislative compliance: January 1, 2016

Status: In Progress

Completion Date: N/A