

SYMANTEC (CANADA) CORPORATION ACCESSIBILITY POLICY INTEGRATED ACCESSIBILITY STANDARDS

Statement of Commitment. Symantec (Canada) Corporation ("Symantec") is committed to meeting the accessibility needs of people with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the *Accessibility for Ontarians with Disabilities Act, 2005*. In that regard, Symantec has established an accessibility policy and a multi-year accessibility plan to meet its obligations under Regulation 191/11, "Integrated Accessibility Standards" ("Regulation") under the *Accessibility for Ontarians with Disabilities Act, 2005*.

The Symantec vision for accessibility is that people with disabilities, visible or invisible, are given the same opportunity as others to obtain and benefit from services offered by Symantec. Symantec's goal is to make reasonable efforts to provide services in such a way that the key principles of independence, dignity, integration and equality of opportunity for persons with disabilities are respected.

Application. This policy applies to all employees, volunteers and agents of Symantec who interact with Symantec's current and prospective employees, volunteers, agents, customers, clients, suppliers, and any other users of Symantec's services. This policy is available to the public and will be provided in an accessible format upon request.

Multi-Year Accessibility Plan. Symantec's Multi-Year Accessibility Plan outlines a phased-in strategy to prevent and remove barriers and meet its requirements under the Regulation. On or before January 15, 2016, Symantec will post the plan on its website and will provide it in an accessible format upon request. The plan will be reviewed and updated at least once every five (5) years.

Training. Symantec will ensure that training is provided to all employees, and volunteers, and all persons who participate in developing Symantec's polices, on the requirements of the accessibility standards referred to in the Regulation and on the *Human Rights Code* as it pertains to persons with disabilities. Training is currently being provided and will be completed for the current population of affected employees as soon as practicable. If any changes are made to this policy or the requirements, training will be provided to include those changes. Symantec shall maintain a record of the dates when training was provided and the number of individuals to whom it was provided.

Information and Communications Standard.

<u>Feedback Processes.</u> Symantec will ensure that its processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and with communication supports upon request. Symantec will notify the public about the availability of accessible formats and communication supports and will make accessible formats available for receiving or responding to customer comments within a reasonable time after request by a customer for such accommodation, and where appropriate, by discussion with the customer to determine the customer's accessibility needs as further described below.



Accessible Formats and Communication Supports. By January 1, 2016, Symantec will, upon request, provide or arrange for accessible formats and communication supports for persons with disabilities as follows:

- (i) In a timely manner that takes into account the person's accessibility needs due to a disability;
- (ii) At a cost that is no more than the regular cost charged to other persons;
- (iii) In consultation with the person making the request and determine suitability of an accessible format or communication support;
- (iv) By notifying the public about the availability of accessible formats and communication supports.

<u>Unconvertible Information or Communications.</u> If Symantec determines that information or communications are unconvertible, Symantec will provide the person requesting the information or communication with,

- (i) an explanation as to why the information or communications are unconvertible; and
- (ii) a summary of the unconvertible information or communications.

Information or communications are unconvertible if,

- (i) it is not technically feasible to convert the information or communications; or
- (ii) the technology to convert the information or communications is not readily available.

<u>Emergency Information</u>. If Symantec prepares emergency procedures, plans or public safety information and makes the information available to the public, Symantec shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

<u>Website Accessibility</u>. Symantec will make any new internet website and web content on those sites conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 initially at Level A and increasing to Level AA. By January 1, 2021 all internet website and web content will conform with WCAG 2.0 Level AA.

Employment Standards. Symantec will comply with the requirements of the Employment Standards in the Regulation by January 1, 2016. The Employment Standards apply with respect to employees, and not volunteers or other non-paid individuals.

<u>Recruitment.</u> Symantec will notify employees and the public about the availability of accommodations for applicants and employees, as the case may be with disabilities as follows:

- (i) In its recruitment processes;
- (ii) During the recruitment process, when job applicants are individually selected to participate in an assessment or selection process;
- (iii) If a selected applicant requests an accommodation, Symantec will consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability;
- (iv) When making offers of employment to a successful applicant. The successful applicant will also be notified of Symantec's policies for accommodating employees with disabilities.



<u>Employee Notification</u>. Symantec shall inform its employees of its policies used to support employees with disabilities, including but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability. Such information will be provided as follows:

- (i) To new employees as soon as practicable after they begin their employment;
- (ii) To existing employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability.

<u>Accessible Formats and Communication Supports.</u> Upon request by an employee with a disability, Symantec will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:

- (i) Information that is needed in order to perform the employee's job; and
- (ii) Information that is generally available to employees in the workplace.

Symantec will consult with the employee making the request in determining the suitability of an accessible format or communication support.

<u>Individual Accommodation Plan (IAP)</u>. Symantec will develop and have in place a written process for developing a documented individual accommodation plan for employees with a disability. The process will include the following elements:

- (i) The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
- (ii) The means by which the employee is assessed on an individual basis.
- (iii) The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved.
- (iv) The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.
- (v) The steps taken to protect the privacy of the employee's personal information.
- (vi) The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
- (vii) If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
- (viii) The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

<u>Return to Work</u>. Symantec will have in place a return to work process for employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work. Such processes shall be documented and must outline the steps that Symantec will take to facilitate the return to work and include an individual accommodation plan.



<u>Performance Management, Career Development and Advancement and Redeployment</u>. Performance management processes related to assessing and improving employee performance, productivity and effectiveness will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans.

Symantec will take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans when providing career development and advancement to its employees. Career development and advancement includes providing additional responsibilities within an employee's current position, the movement of an employee from one job to another which may provide greater responsibility, compensation and or place the employee at a higher level in the organization, or any combination of these.

If Symantec has the need to reassign employees to other departments or jobs within the organization as a result of job elimination, Symantec will take into account the accessibility needs of employees with disabilities as well as individual accommodation plans.

<u>Workplace Emergency Response Information</u>. Symantec shall provide individualized workplace emergency response information to employees who have a disability if an employee's disability is such that individualized information and an accommodation are necessary due to the employee's disability.

If an employee receives individualized workplace emergency response information and requires assistance, then with the employee's consent, Symantec shall provide the workplace emergency information to the person designated by Symantec to provide assistance to the employee.

This will be done as soon as practicable after becoming aware of the need for accommodation due to the employee's disability.

Symantec will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when overall accommodations needs or plans are reviewed and when Symantec reviews its general emergency response policies.

Design of Public Spaces. Symantec will meet the Accessibility Standards for the Design of Public Spaces when building or redeveloping public spaces. Public spaces include, but are not limited to, outdoor public eating areas, outdoor paths of travel, accessible off street parking and service-related elements such as counters and waiting areas.

Questions. If anyone has questions about the Symantec accessibility policy and/or multi-year accessibility plan, or requires this information in an accessible format, please contact accessibility@symantec.com.



SYMANTEC (CANADA) CORPORATION MULTI-YEAR ACCESSIBILITY PLAN

INTEGRATED ACCESSIBILITY STANDARDS Activity	Department Responsible/ Action Plan	Status	Compliance Date in Integrated Accessibility Standards Regulation		
POLICIES & PROCEDURES					
Create Policies with Statement of Organizational Commitment in written form	HR Legal	Completed	January 1, 2014		
Make available to the Public	HR Legal	In Process	January 1, 2014		
ACCESSIBILITY PLAN - MULTI YEAR					
Develop Accessibility Plan	HR Legal	Completed	January 1, 2014		
Post to Symantec website	HR Legal	Completed	January 1, 2014		
File Accessibility Report in accordance with section 14 of the AODA.	HR Legal	Completed	Ongoing (every three years)		
Review every 5 years.	HR Legal	Next review December 2019	Next review December 2019		
Provide in alternative format upon request	HR Legal	Upon request once content is posted	Upon request		
TRAINING					
All employees & volunteers, policy developers, those providing goods or services on behalf of the organization will be trained regarding the Integrated Accessibility Standards Regulation and <i>Human Rights Code</i>	HR Legal and Ethics and Compliance	Ongoing	January 1, 2015		
Develop training content	HR Legal	Completed			
Create training schedule	HR Legal and Ethics and Compliance	Completed			
Retain record of attendance at training on each date	Hr Legal and Ethics and Compliance	Ongoing			
Information & Communications	T	1			
If Symantec prepares emergency procedures, plans or public safety information and makes the information available to the public, Symantec will provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request	Enterprise Resiliency Organization (ERO)	Completed [PEEP Plan]	January 1, 2012		
Symantec will ensure that its processes for receiving and responding to feedback	HR Legal	Upon customer request	January 1, 2015		



	I	T	
are accessible to persons with disabilities			
by providing or arranging for the			
provision of accessible formats and with			
communication supports upon request. A			
review of feedback processes and			
accessibility will be completed.			
Symantec will notify the public about the			
availability of accessible formats and			
communication supports			
Provide accessible formats and	HR Legal and	Upon customer	January 1, 2016
communication supports upon request in	Consultant	request	
respect of information that is publicly			
available, in a timely manner at a cost			
that is no more than the regular cost			
charged to other persons			
New Symantec websites and content will	HR Legal and	In process – under	January 1, 2014
comply with WCAG 2.0 Level A	Consultant	review	
All Symantec internet websites and web	HR Legal and	Per Compliance	January 1, 2021
content will comply with WCAG 2.0	Consultant	Date	
Level AA			
EMPLOYMENT			
Workplace Emergency Response for staff	ERO	Completed	January 1, 2012
		[PEEP Plan]	
Recruitment - notify employees and	HR	Ongoing	January 1, 2016
public regarding availability of			
accommodation			
Notify applicant of availability of	HR	Ongoing	January 1, 2016
accommodation upon request for			
assessments or selection process			
Notify successful applicants of	HR	Ongoing	January 1, 2016
Symantec's policies for accommodating			1, 2010
employees with disabilities			
Inform employees of policies regarding	HR	Ongoing	January 1, 2016
job accommodations		Ongoing	<i>sandary</i> 1, 2010
Providing accessible formats and	TBD	Ongoing	January 1, 2016
communication supports to perform job	TBD	Ongoing	3 and any 1, 2010
Documented Individual Accommodation	HR and HR	Ongoing	January 1, 2016
Plans	Legal	Ongoing	3 and any 1, 2010
Create a return to work process	HR and HR	Ongoing	January 1, 2016
containing all elements required by the	Legal	Oligonig	January 1, 2010
Regulation	Legai		
Performance management takes into	HR and HR	Ongoing	January 1, 2016
account an employee's accessibility	Legal	Oligoling	January 1, 2010
needs	Legai		
	HR and HR	Ongoing	January 1 2016
Career development and advancement		Ongoing	January 1, 2016
process takes into account accessibility needs	Legal		
nccus			



Redeployment process, if any exist at	HR and HR	Ongoing	January 1, 2016
Symantec, takes into account	Legal		-
accessibility needs			
DESIGN OF PUBLIC SPACES			
Meet the standards for the design of	Facilities &	Under review – in	January 1, 2017
public spaces when building or	Facilities	process	
redeveloping public spaces	Legal		