

# Accessibility Plan of Cambridge Global Payments<sup>1</sup>

## Table of Contents

Message from Cambridge Global Payments (“Cambridge”) .....	2
Introduction .....	2
Section One: Past Achievements to Remove and Prevent Barriers.....	3
Customer Service .....	3
Information and Communications .....	4
Information and Communications and Employment: Emergency response and evacuation plans under the Integrated Standards.....	4
Maintenance of Accessible Elements .....	5
Employment .....	5
Employment: Documented Individualized Plans.....	5
Employment: Performance Assessment, Career Development & Advancement, and Redeployment.....	6
Section Two: Strategies and Actions .....	7
Customer Service .....	7
Integrated Standards.....	7
Information and Communications .....	8
Employment: Recruitment.....	9
Employment: Support Information for Employees .....	9
Procurement.....	10
Self-service kiosks .....	10
Training .....	10
Design of Public Spaces.....	11
For More Information.....	11

---

<sup>1</sup> “Cambridge Global Payments” is a trade name used individually and collectively by the following legal entities: Cambridge Mercantile Corp., Cambridge Mercantile Corp. (U.S.A.), Cambridge Mercantile Corp. (UK) Limited, Cambridge Mercantile Risk Management (UK) Ltd, and Cambridge Mercantile (Australia) Pty. Ltd.

## **Message from Cambridge Global Payments (“Cambridge”)**

Did you know that one in seven<sup>2</sup> Ontarians has a disability? This means that we need to maximize our accessibility in order recruit employees and clients from the entire pool of the best people: unless we include that one in seven, we are leaving some of the best resources untapped. We therefore strongly encourage all Cambridge employees and others to carefully review and help action our plan so we can together remove all such barriers to inclusivity. This group effort is not only the law, it’s also good business.

### **Introduction**

*Statement of Commitment:* Cambridge, part of the FLEETCOR Technologies Inc. group of companies, is committed to providing a barrier-free environment for our clients, employees and other stakeholders: whether they enter our premises, receive services from us or access our information.

Cambridge strives to meet the needs of its employees and customers with disabilities and is working hard to remove and prevent barriers to accessibility.

Our business is committed to fulfilling our requirements under the [Accessibility for Ontarians with Disabilities Act](#) (“**AODA**”). This accessibility plan outlines the steps Cambridge is taking to meet those requirements and to improve opportunities for people with disabilities.

As an organization, we are committed to treating all people in a way that allows them to maintain their dignity and independence. Cambridge believes in integration and equal opportunity, is committed to meeting the needs of people with disabilities in a timely manner, and is committed to meeting the accessibility requirements under the AODA.

Our business has made a commitment to being increasingly accessible – not only because it is a legal obligation – but also because it aligns with our values. We believe we have an important responsibility for ensuring a safe, dignified, and welcoming environment for everyone.

---

<sup>2</sup> As of March 11, 2008, per:  
<http://www.mcsc.gov.on.ca/documents/en/mcsc/publications/accessibility/AboutAODAWeb20080311EN.pdf>

We are committed to ensuring our organization's compliance with accessibility legislation by incorporating policies, procedures, and training for employees. Specifically, we are committed to:

1. Ensuring that employees, who develop policies, hire/manage staff and /or provide goods and services to customers are aware of our obligations under the Ontario [Human Rights Code](#) and the AODA;
2. Ensuring that all our employment practices (including ,but not limited to, recruitment, candidate evaluation, and selection) provide meaningful accommodation as needed;
3. Ensuring that employees and applicants are aware that accommodation is available;
4. Ensuring that our emergency response plan includes accommodations for any employee requiring it, and that these plans are available upon request;
5. Ensuring that individual workplace accommodation plans are developed and implemented as required;
6. Ensuring our compliance with the [Integrated Accessibility Standards Regulation](#) ("**Integrated Standards**"), including the development and implementation of a multi-year plan addressing how our company intends to continually improve in terms of accessibility for all.
7. Ensuring our compliance with the Customer Service Standards set out in the Integrated Standards.

This multi-year accessibility plan shows how Cambridge will play its role in making Ontario an accessible province for all Ontarians. Moreover, it outlines the specific steps Cambridge is taking to improve opportunities for persons with disabilities and comply with the phased-in requirements of the Integrated Standards which first began on January 1, 2012.

### **Section One: Past Achievements to Remove and Prevent Barriers**

Since 2012 Cambridge has complied with the Customer Service Standards and has continued to implement initiatives to enhance accessibility in other areas under the Integrated Standards: including Employment, Information & Communications and the Design of Public Spaces. Here follows a summary of the accessibility initiatives Cambridge has completed, which initiatives Cambridge will continue to build on in the lead up to 2025: the year by which Ontario has committed to becoming an accessible province.

### **Customer Service**

Cambridge is committed to continuous compliance with the Customer Service Standard. Cambridge has met and continues to meet the compliance requirements set out in the Customer Service Standard by:

1. Establishing policies, procedures and practices for providing goods and services to persons with disabilities and posting these on Cambridge's website. For example, Cambridge has posted its Accessible Customer Service Policy to the company intranet for all Cambridge employees to review.
2. For all staff that interact, or may interact, with persons with disabilities on behalf of the company, training was provided on:
  - a. The AODA and the Customer Service Standard
  - b. Policies, procedures and practices for providing goods and services to persons with disabilities
  - c. Accessibility Awareness
  - d. Customer Feedback Process
3. Registering compliance via the Accessibility Compliance Reporting tool at Service Ontario's ONE-Source for Business website.

For more information about Ontario's Customer Service Standard, visit [ontario.ca/accessibility](http://ontario.ca/accessibility).

## **Information and Communications**

Cambridge has, since January 1, 2014, ensured that new internet websites and web content on those sites conform to WCAG 2.0 Level A.

Since January 1, 2016, Cambridge, upon request, provides or arranges for the provision of accessible formats and communication supports to persons with disabilities in a timely manner, taking into account the persons accessibility needs.

## **Information and Communications and Employment: Emergency response and evacuation plans under the Integrated Standards**

Cambridge has incorporated accessibility considerations into its emergency and evacuation policies and procedures. Cambridge prepares individualized workplace emergency response information for employees with disabilities, as needed. Cambridge addresses such disabilities as they arise for each known persons with disabilities that require emergency-related accommodation. It is up to employees to give advance notice of such needs to Cambridge's Human Resources department. Cambridge works diligently to accommodate upon receiving such notice. This includes a policy of assigning a person designated to assist anyone identified as having a disability for the purpose of evacuation so they are aware about how to evacuate when additional assistance is needed.

## **Maintenance of Accessible Elements**

Cambridge has in place procedures for preventative and emergency maintenance of the accessible elements in public spaces, and for dealing with temporary disruptions when accessible elements are not in working order. Specifically, given Cambridge is a tenant at its Toronto office, maintenance is coordinated with the building's property management company Dream. Cambridge's Office Management team is responsible for working closely with, and frequently following up with Dream regarding maintenance issues and temporary disruptions. If any Cambridge employee notices a maintenance deficiency they should contact Office Management at [officemanagement@cambridgefx.com](mailto:officemanagement@cambridgefx.com) (telephone 416-646-6401 Ext:2425) with a brief description, a picture of the problem, and a fair estimate of the degree of urgency. Employees may follow up every few days if the matter is not resolved. Employees may also contact the Human Resources department for assistance in resolving the matter, and/or escalate to senior management to ensure any maintenance issue is solved.

## **Employment**

In the recruitment process Cambridge advises prospective employees that disability accommodation is available on request.

To comply with Employment Standards, it is Cambridge policy to inform:

1. Its employees and the public about the availability of accommodation for each applicant with disabilities in its recruitment processes;
2. Job applicants that are 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;
3. Successful applicants of its policies for accommodating employees with disabilities when making offers of employment; and
4. All employees, of the policies used to support employees with disabilities, including policies on the provision of job accommodations.

Cambridge likewise requires all employees in its Ontario offices to undergo a pertinent AODA training program.

## **Employment: Documented Individualized Plans**

Cambridge is committed to the development and implementation of individualized plans (e.g., Accommodation Plan, Return to Work Plan) as needed, in order to accommodate a disability of any type, and whether permanent or temporary.

To meet compliance with the Employment Standards under the Integrated Regulation requirements, and remove barriers to persons with disabilities, Cambridge:

1. Allows each employee to request accommodation, and to participate in the development of the plan for that employee;
2. Includes in the process the means by which the employee is assessed on an individual basis;
3. Provides, on request, an individualized accommodation plan in writing to any employee with a disability;
4. Includes in the process 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 and how to achieve accommodation;
5. Provides an individualized Return to Work Plan in a written document for any employee who has been absent from work due to a disability and requires disability related accommodations to return to work;
6. Takes steps to protect the privacy of the employee's personal information;
7. Outlines the frequency in which individual accommodation plans will be reviewed and updated, and the manner in which review/update will take place;
8. Provides the employee with the reasons for the denial if the individual accommodation plan is denied; and
9. Includes any individualized workplace emergency response information.

### **Employment: Performance Assessment, Career Development & Advancement, and Redeployment**

Cambridge has implemented measures to ensure that barriers in performance assessment, career development and advancement, and redeployment are eliminated.

Cambridge has assessed and continues to assess its performance reviews, career development and advancement, redeployment programs, practices and procedures, methods and attitudes to identify and remove barriers to employment of people with disabilities.

Cambridge takes the accessibility needs of employees with disabilities and their individualized accommodation plans into account when assessing performance, managing career development and redeployment as needed and applicable.

## **Section Two: Strategies and Actions**

Here follows Cambridge's projects and programs through which Cambridge plans by 2021 to further remove and prevent barriers to people with disabilities, as per the AODA. Cambridge's accessibility plan focuses on the areas detailed below. These initiatives will support compliance with the Customer Service Standard. They will also help us enhance accessibility in the areas of Information and Communications, Employment, and the Design of Public Spaces.

### **Customer Service**

Cambridge is committed to providing accessible customer service to people with disabilities. This means that we will provide goods and services to people with disabilities with the same high quality and timeliness as others.

#### *Identification of Barriers*

Cambridge has not identified any customers with known disabilities. Our feedback process has not provided us with any business case for increased efforts beyond what we are currently doing with regards to providing quality customer service to all customers. We will continue to monitor our feedback, including any information provided by our front line staff. We are committed to responding promptly and fully to remove barriers for any customer with a disability that prevents him/her from fully accessing our goods and services.

#### *Planned Actions*

To meet ongoing compliance with the Customer Service Standards requirements, and removal of barriers to persons with disabilities, Cambridge will:

1. Include AODA Customer Service Standard training as part of its new hire orientation process;
2. Consider accessibility-related feedback received through all channels (i.e., online feedback form, correspondence, inquiries etc.) by assessing and responding to feedback as required; and
3. Encourage staff to consider accessibility when planning meetings and events with customers, including vendors and suppliers.

### **Integrated Standards**

Cambridge is committed to achieving accessibility through meeting the requirements of the Integrated Standards.

#### *Identification of Barriers*

People with disabilities face a range of physical and attitudinal barriers including stereotyping and prejudice.

#### *Planned Actions*

Cambridge has drafted a Statement of Organizational Commitment as well as policies that address Employment and Information & Communications that will meet the Integrated Standards requirements. The Statement of Commitment will be posted on the website, as part of the posted multiyear plan, and will be available in an accessible format upon request.

#### *Accessibility Plan*

Cambridge will establish, implement and maintain a multi-year Accessibility Plan that outlines our strategy to prevent and remove barriers for persons with disabilities that are employed by, or engaged in any way with, our business. The Plan will be reviewed at least once every five years. We will post the Plan on our website and provide the plan in an accessible format upon request.

### **Information and Communications**

Cambridge is committed to making our information and communications accessible to people with disabilities. Cambridge will ensure that its information and communications systems and platforms are accessible. Cambridge will likewise make these available in accessible formats that meet the needs of persons with disabilities. We will make every effort to provide necessary communication support in a timely manner.

#### *Identification of Barriers*

Cambridge will assess its communication methods to identify and remove barriers to information and communications with people with disabilities.

Potential barriers include:

1. Lack of website accessibility standards for the organizations websites; and
2. Lack of awareness among Cambridge's IT Department regarding website accessibility barriers

#### *Planned Actions*

To meet compliance with the Accessibility Standards for Information and Communications under the Integrated Standards requirements and remove barriers to persons with disabilities, Cambridge will:

1. Make the multi-year plan available to anyone upon request;

2. Post a statement on the website about accessibility and the availability of accessible formats and communication supports;
3. Empower and instruct our Web Adviser to:
  - a. Make our website accessible per WCAG2.0 standards,
  - b. Develop any necessary guidelines, and
  - c. Remove barriers through implementation of the website accessibility guidelines and the generation of reports identifying accessibility barriers;
4. Ensure all websites and web content conform to WCAG 2.0 Level AA other than success criteria 1.2.4 Captions (Live) and success criteria 1.2.5 Audio Descriptions (Pre-recorded) by January 1, 2021.

### **Employment: Recruitment**

Cambridge is committed to fair and accessible employment practices. Cambridge supports an inclusive labour pool and is committed to ensuring that hiring practices allow applicants with disabilities to apply for any jobs for which they are qualified. Internal and external job postings explicitly notify any potential applicant that accommodation during the application and interview process are available.

#### *Identification of Barriers*

Cambridge will assess recruitment policies, practices and procedures, methods and attitudes to further identify and remove barriers to employment of people with disabilities.

#### *Planned Actions*

To enhance the removal barriers to persons with disabilities in recruitment, Cambridge will:

1. Implement the practice of advising applicants that accommodation is available;
2. Consult with each accommodation-requesting applicant, and arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs; and
3. Ensure that Hiring Managers are aware of the rights of applicants with disabilities under the Human Rights Code.

### **Employment: Support Information for Employees**

Cambridge will ensure that information provided to employees is accessible and takes into account each individual's specific needs.

### *Planned Actions*

To meet compliance with the Employment Standards under the Integrated Standards requirements, and to remove barriers to persons with disabilities, Cambridge will:

1. Keep employees up to date on changes to policies;
2. Provide accessible formats and communication supports to any employee upon request; and
3. Consult with each employee with disabilities to provide an accessible format and communication support for information that is needed in order to perform the employee's job and information that is generally available to employees in the workplace.

### **Procurement**

Procurement process accessibility is not applicable to Cambridge as a private sector actor.

### **Self-service kiosks**

Cambridge is committed to incorporating accessibility features/ considering accessibility for people with disabilities when designing, procuring or acquiring self-service kiosks.

Cambridge Mercantile does not utilize self-service kiosks at this time. If Cambridge ever implements kiosks, accessibility features will be taken into account as part of implementation.

### **Training**

Cambridge is committed to providing training in the requirements of Ontario's accessibility laws and the Ontario Human Rights Code as it applies to people with disabilities.

### *Planned Actions*

Cambridge has communicated to all staff the requirements of the Integrated Standards and welcomed any questions. Information and compliance updates will be provided as needed with respect to any changes to policies/practices. Cambridge will also train all of its employees, volunteers and persons who develop the company's policies on the requirements of the Ontario Human Rights Code as it

relates to people with disabilities. Cambridge plans over the course of 2018 to improve its current AODA training for Cambridge employees: Specifically, the plan is to ensure the improved training will require greater demonstration from trainees of what they have learned, and Cambridge will likewise increase its ability to make sure employees are thoroughly going through the entirety of the training.

### **Design of Public Spaces**

Cambridge will meet accessibility laws when building or making major changes to public spaces.

At the present time, Cambridge does not plan on developing or redeveloping any of its public spaces, as defined in the Design of Public Spaces Standards. However, should it choose to do so, this policy and plan will be revised to include the applicable requirements and the path by which we will achieve compliance with the Design of Public Spaces Standards.

Cambridge will put procedures in place to enhance the prevention of service disruptions to the accessible parts of our public spaces.

### **For More Information**

For more information on this accessibility plan, please contact Michele Wagoner at telephone number: 818-728-3807, and email address [mwagoner@afex.com](mailto:mwagoner@afex.com).

Cambridge's website is [www.cambridgefx.com](http://www.cambridgefx.com)

Cambridge's social media addresses:

1. LinkedIn: <https://www.linkedin.com/company/cambridge-global-payments/>
2. Twitter: [https://twitter.com/Cambridge\\_FX](https://twitter.com/Cambridge_FX)
3. Vimeo: <https://vimeo.com/cambridgeglobalpayments>

Standard and accessible formats of this document are free on request from Michele Wagoner at telephone number: 818-728-3807, and email address [mwagoner@afex.com](mailto:mwagoner@afex.com)

This Plan was last updated on May 31, 2021.