



Accessibility Plan

2026-2028

Public Sector Pension Investment board
(PSP Investments)

December 19, 2025

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Purposes

PSP Investments is one of Canada's largest pension investment managers with C\$299.7 billion of net assets under management as of March 31, 2025. Established in 1999, PSP Investments manages and invests amounts transferred to it by the Government of Canada for the pension plans of the federal Public Service, the Canadian Forces, the Royal Canadian Mounted Police and the Reserve Force. Headquartered in Ottawa, PSP Investments has its principal business office in Montréal and offices in New York, London and Hong Kong.

At PSP Investments, we strive to treat all people with respect and in a manner that allows them to maintain their dignity and independence. We are firmly committed to meeting our obligations under the Accessible Canada Act (ACA) with respect to appropriate accommodation for persons with disabilities.

The purposes of this Accessibility Plan are to:

- Ensure that workplace accommodation requirements are addressed on a case-by-case basis for job applicants, employees and consultants working in our offices with a disability;
- Achieve a work environment that promotes dignity, integration and equal opportunity and is supportive of job applicants, employees, consultants and others working in and visiting our offices;
- Provide accessible internal and external communications and events for job applicants, employees, consultants and members of the public;
- Comply with all applicable legislation; and
- Establish an efficient process for accommodating disabilities that is consistent with the principles of confidentiality and shared responsibility.

Accommodating disabilities in the workplace is PSP Investments' shared responsibility along with any other relevant parties as needed.

This Accessibility Plan will include information on the identification and removal of barriers, and the prevention of new barriers, in the areas described in Section 5 of the ACA, which are:

- Employment
- The built environment
- Information and communication technologies (ICT)
- Communication, other than ICT
- The procurement of goods, services and facilities
- The design and delivery of programs and services
- Transportation

Definitions

Barrier is defined by the ACA as anything — including anything physical, architectural, technological or attitudinal, anything that is based on information or communications or anything that is the result of a policy or a practice — that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation.

Disability(ies), as defined in the ACA means any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment — or a functional limitation — whether permanent, temporary or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person's full and equal participation in society.

Feedback

Sarah Cavanagh, Manager, Equity, Inclusion and Diversity, is responsible for receiving feedback on behalf of PSP Investments. Sarah Cavanagh can be contacted at:

1250, boul. René-Lévesque West,
Suite 1400
Montréal, Québec
Canada H3B 5E9

E.i.D@investpsp.ca
514-989-3917

Please contact **Sarah Cavanagh, Manager, Equity, Inclusion and Diversity** for any information regarding PSP Investments' Accessibility Plan, including:

- A copy of the Accessibility Plan in one of the alternate formats described in subsection 8(2) of the Accessible Canada Regulations (Regulations);
- A description of PSP Investments' feedback process in one of the alternate formats described in subsection 9(5) of the Regulations; and
- To provide feedback to PSP Investments.

Areas described under section 5 of the ACA

1. Employment

Current State

- A job applicant self-identification survey is included in the application process.
- This self-identification information allows us to assess whether our candidate pool is representative of market availability as well as monitor the percentage of candidates who identify as having a disability in ratio-comparison to the percentage hired allowing us to see if the numbers indicate a potential hiring barrier.
- As part of our job postings, we proactively ask candidates to reach out if they require any accommodations, “At PSP, we aim to provide an inclusive workplace where we welcome diversity and where everyone feels valued, safe, respected and empowered to grow. As part of this leadership commitment, we strongly encourage applications from all qualified applicants and strive to offer an inclusive and accessible candidate experience. If you require any accommodation for any part of the recruitment process, please let us know.”
- Our DiversAbilities in Action Affinity Group offer awareness-building initiatives, on neurodiversity, mental health and other disabilities, which are available to all employees to help remove stigma and stereotypes
- We have development offerings and support for people leaders to ensure they create an inclusive work environment
- Our flexible benefits program allows employees to tailor their benefits to their individual and family needs
- We offer virtual healthcare, including for mental health
- Employees with medical conditions or disabilities can contact our human resources department to find a reasonable accommodation solution
- Personalized ergonomics consultations are available to all employees

Identified barriers:

Recruitment

- Low representation in certain job roles and candidate pools

Onboarding and Training

- Programming that is tailored for persons with disabilities

Accommodation Support

- Improved communication of the accommodation request process

Retention

- No barriers have been identified

IMPROVEMENT PLAN:	
Future State	Target Implementation date
Offer education to managers who are managing employees who are neurodivergent to help better support and understand their employee's needs.	Available as of January 2026
Offer tailored coaching to employees and managers who are neurodivergent on a case-by-case basis	Available as of January 2026
Explore other possible training options to support employees and managers with other types of disabilities.	By December 2026
Implementation and monitoring of the accommodation request process to ensure it meets employee needs and make any adjustments as needed	Ongoing with annual review

2. The Built Environment

Current State:

For all offices:

- Ability to provide specific equipment for different needs, including footrests, desks, chairs, back support, anti-reflective screen, larger high-contrast screens, ergonomic mouse, ergonomic keyboards, earphones for hearing impaired and other depending on individual's needs
- Ergonomic internal team to provide support
- Ergonomic equipment attribution process is aligned throughout all PSP offices.
- As part of their onboarding, employees are informed of ergonomic workspace options and can discuss needs

For our Montréal office:

- Building is built according to construction code
- Four automatic doors
- White noise system to enhance tranquility
- Lighting accommodation
- Access to the building is accessible
- Accessible vehicle parking available in parking garage
- Specific evacuation plan for employees with reduced mobility
- Evacuation procedures are clearly indicated on each floor and in addition to the emergency alarm, a mass email notification is sent to all employees when the building alarm reaches 120 bpm, which indicates the need to evacuate
- Workspaces are modular and can be easily tailored to accommodate specific needs and spaces can be offered to take into account sound, ergonomics, and other spatial issues

Identified barriers:

Workspaces

- No barriers have been identified

Physical structures

- Some toilets would not be accessible for a wheelchair
- Not all floors have automated doors

Emergency Measures

- No barriers have been identified

IMPROVEMENT PLAN:	
Future State	Target Implementation date
Workspace	
Perform an internal assessment to identify facility gaps within premises and plan actions as required.	By December 2028
Evaluate cost of additional automated doors and prioritize accordingly, starting with key common areas.	By December 2026
In 2026, PSP's Ottawa office will be moving. As part of the move, we will ensure that the same (or better) accessibility standards as our Montréal office are met.	Dy December 2026
Physical structures	
Inform employees of the process for any accessibility question related to the building	By December 2026
Add building access details to our security procedures for external guests	By December 2026

3. Information and communication technologies (ICT)

Current State:

- PSP is a member of the International Association of Accessibility Professionals (IAAP). The IAAP is a membership-based association of individuals and organizations working towards building a global community to advance the fundamental human rights of persons with disabilities to digital access according to the principles of the convention on the rights of Persons with Disabilities (CRPD), the eighth Human rights treaty of the United Nations.
- Accessibility champions have been identified, trained and further training needs are regularly evaluated as technology evolves.
- PSP's target Web Content Accessibility Guidelines (WCAG) have been defined as well as our implementation approach
- Use of Microsoft Office which allows for possibility to change resolution, possibility to modify text (font, size, etc.), high contrast, text to speech, live captions and other desktop settings

Identified barriers:

- Limited offerings of software, tools and equipment to persons with Disabilities
- Unknown level of internal and external Web Content Accessibility Guidelines (WCAG) compliance, including applications provided by third parties
- Limited resources for onboarding new employees with disabilities
- Limited internal expertise on accessibility

IMPROVEMENT PLAN:

Future State	Target Implementation date
Renew the membership of one of our Accessibility Champions with the IAAP (International Association of Accessibility Professionals)	January 1, 2026
Explore other resources to support our needs for additional expertise and further increase awareness	By December 2026
Accessibility Champions will review PSP's implementation approach as well as our target WCAG level to ensure it continues to meet our accessibility requirements	June 30, 2026
Select and deploy new WCAG training to Accessibility Champions and other IT group members to ensure they are knowledgeable on IT accessibility requirements	September 30, 2026
Present Accessibility implementation planning to Accessibility Champions and IT Management, obtain feedback and agree on final implementation plan.	September 30, 2026
Assess our most used internal and external applications (most users). <ul style="list-style-type: none"> – For internal applications: Include accessibility guidelines in our solution reviews (for example AA). – For new external applications: Include questions about WCAG in our software acquisition process, ask vendors to commit to a road map. – For existing external systems: Remind vendors about our commitment to WCAG principles. 	Three assessment waves, prioritized by user numbers, will be performed from 2027 to 2028
Based on the results of the assessments, improve the accessibility of our internal applications that did not meet the required accessibility level.	To be performed after each assessment wave as described in previous step.
Review PSP process and policies to facilitate specialized software and devices provided by the employee (Bring Your Own Device/Software program – BYOD/S) in the PSP environment: <ul style="list-style-type: none"> – Integration of personal technology (BYOD) – Streamline new equipment acquisition process (Braille keyboard, etc.). – Increase visibility for the specialized equipment. – Leverage the buddy system currently in place to facilitate accessibility requests. 	To be performed annually by April 1 st from 2026 to 2028
Review our support related to new accessibility requests and new technology options and implement a group responsible for monitoring new options available.	To be performed annually every April from 2026 to 2028
Provide training on the fundamentals of digital technology accessibility to employees involved in developing, maintaining, and/or purchasing of digital technologies.	December 5, 2027, with refresher training every three years

All non-employee and employee-facing web pages (including web applications) that are newly published or updated on or after December 5, 2027 must meet clauses 4-7 and 9 of the ICT Standard .	December 5, 2027
All digital documents that are newly published or updated on non-employee facing web pages and mobile applications on or after December 5, 2028 must meet clauses 4-7 and 10 of the ICT Standard .	December 5, 2028
All non-employee facing mobile applications that are newly published on or after December 5, 2028 must meet clauses 4-7 and 11 of the ICT Standard .	December 5, 2028
Conduct or obtain a conformity assessment with gap analysis against the ICT Standard for existing non-employee facing mobile applications.	December 5, 2028
<p>Publish Accessibility statement(s) that:</p> <ul style="list-style-type: none"> – provide an overview and describe the accessibility features of the regulated digital technologies – provide an overview of non-conforming digital technologies and plans to address those gaps – explain how users can access barrier-free alternatives 	<p>December 5, 2027 for web pages December 5, 2028 for mobile applications and digital documents (updated every 12 months thereafter)</p>
<p>Obtain a conformity assessment with gap analysis against the ICT Standard for products or services purchased on or after December 5, 2028, in connection with the development or provision of:</p> <ul style="list-style-type: none"> – new and updated non-employee and employee-facing web pages, and – new non-employee facing mobile applications 	December 5, 2028

4. Communications, other than ICT

Current State:

- When events take place at our offices or elsewhere, we ensure venues are always accessible for individuals with reduced mobility and adapted transportation is available upon request
- Other accessibility accommodations such as sign language interpretation, recordings, transcriptions, sound control, are available upon request
- Presentations are offered virtually as needed
- Subtitles are added to all our video communications
- Internal and external communications are drafted using clear and concise language, simple syntax, and visually presented to simplify reading (titles, subtitles, colour contrast, font size, etc)
- Key documents on our website are offered in an accessible format and any document published after June 2022.
- Training has been provided on accessibility aspects and standards to our design team to allow for ongoing application of these elements.

Identified barriers:

Written Communications

- Internal communication documents on our intranet are not consistently written and designed in accessible format

Multimedia

- Consistency in providing multimedia in accessible formats
- WCAG 2.0 compliance
- Offering all content in accessible formats

IMPROVEMENT PLAN:	
Future State	Target Implementation date
Develop communication plan to remind employees of accommodation options and request process	By December 2026
Add additional information in the employee handbook on possible accommodation options	By December 2026
Establish and communicate accessibility standards to our internal teams for documents to be published on our Intranet	By December 2027
Assess PSP's external website to ensure it meets relevant accessibility requirements and identify opportunities for enhancements.	By December 2029

5. The Procurement of Goods, Services and Facilities

Current state:

- A contractual clause has been developed to include accessibility requirements.

Identified barriers:

- The distant deadline means suppliers currently lack established measures or are not prepared to disclose their current or future plans.
- No specific criteria to determine which types of contracts should systematically include the accessibility clause.

IMPROVEMENT PLAN:	
Future State	Target Implementation date
Develop questions with Business Technology Governance (BTG) and include them within our RFP process to better evaluate the accessibility standards of potential suppliers	December 2026
Develop clear criteria with BTG and implement them to determine which type of contracts should systematically include the accessibility requirement clause	December 2026

6. The Design and Delivery of Programs and Services

Current State:

- Training provided on accessibility aspects and standards to our design team included typography and font accessibility
- Text transcription is available for safety related documents and is available upon request for other documents

Identified Barriers:

- Inaccessible format and design of some PDFs

IMPROVEMENT PLAN:	
Future State	Target Implementation date
Ensure accessibility of all PDFs on the PSP website.	By December 2027

7. Transportation

Current state:

- Adaptive transportation to facilitate travel to events at locations outside the PSP offices available upon request.
- Parking in our building offers multiple spots reserved for people with mobility reduction.

Identified barriers:

- Doors leading to the parking lot are not automated

IMPROVEMENT PLAN:	
Future State / Ways to Improve	Target Implementation date
As tenants, make recommendation to the building to add automated doors to access parking lot.	By December 2026

Consultations

1. Whom We Consulted

PSP is committed to shaping a culture where we do our utmost to provide equal opportunity, respect and value one another for our differences and create a safe space for all to belong and thrive. In FY18, to support this commitment and help evolve our inclusion culture, our Affinity Groups were created. The five groups represent different aspects of diversity within our workforce and are composed of volunteer employees who either identify as members of the community the group represents or allies to those groups. Their main role is to drive initiatives that foster inclusion and create employee networks and support. Their co-leaders ensure alignment and monitor progress on initiatives.

One of these Affinity groups is the DiversAbilities in Action group. Its main focus is to break biases about disabilities, whether physical or mental, visible or invisible through open dialogue. We have consulted the DiversAbilities in Action Affinity Group to obtain their feedback and comments in order to improve our Accessibility Plan.

We also consulted with Kelly Bron Johnson, founder of Completely Inclusive, a social enterprise focused on helping organizations create truly inclusive and accessible workplace cultures to obtain her feedback and comments as a disabled professional and self-advocate.

2. When Consultations Occurred

Consultations with the DiversAbilities in Action Affinity group happen on an ongoing basis through their regular meetings. On November 21, 2025, we held a special meeting to gather their feedback on the final version of the action plan.

Consultations with Kelly Bron Johnson: These took place from November 26 to December 8.

3. Consultations were Conducted and Results of the Consultations

Our Manager, Equity, Inclusion and Diversity, attends all regular meetings of the DiversAbilities in Action affinity group to ensure an ongoing dialogue with the group. In the past year, the group expressed the need to better equip managers and colleagues who work with people who are neurodiverse. To address this, our action plan includes identifying and providing training and coaching options to better understand and accommodate employees who are neurodiverse.

Our new 3-year action plan was also shared with them in November 2025 for their review and a special meeting was held to gather their feedback.

The consultation with Kelly Bron Johnson was done to ensure that our new action plan was complete and inclusive of all accessibility considerations. The consultation included sharing all our processes and documentation with Completely Inclusive for their review and recommendations. This was followed by a clarifying meeting to address any questions and review recommendations to integrate into our accessibility plan and a final update of the plan.

Budget and Resources

We will allocate sufficient financial resources to comply with this Accessibility Plan and its obligations under the ACA.

We will endeavour to provide reasonable accommodation to employees, job applicants, consultants and others working in our offices with disabilities who are invited to submit requests for reasonable accommodation to their supervisor or our human resources department. We work cooperatively to determine whether reasonable accommodation is possible and to define appropriate accommodation measures to be implemented. These accommodation requests will be considered for all appropriate work locations, such as in-office or at home.



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