

Panasonic

PANASONIC CANADA INC. – Multi-year Accessibility Plan, (2013 – 2023)

Reference: Integrated Accessibility Standards, Ontario Regulation 191/11 (sometimes referred to below as “this regulation”) – a copy of this document is available upon request.

Sections

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Part I: General

Section of Regulation and Description

3. Establishment of Accessibility Policies.

Develop, implement, and maintain policies governing how PCI will achieve accessibility.

4. Accessibility Plans

- Establish, implement, maintain, and document a multi-year accessibility plan.
- Post the accessibility plan on our websites.
- Provide the plan in an accessible format upon request.
- Review and update the accessibility plan at least once every 5 years.

Action: Arrangements will be made to provide plans in accessible format upon request.

Responsibility: Legal/Brand Management/Compliance Teams

Status: Completed

Date: 2014

Section of Regulation and Description

7. Training Ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to:

- (a) all employees and volunteers.
- (b) all persons who participate in developing the organization's policies; and
- (c) all other persons who provide goods, services, or facilities on behalf of the organization.

Action: Continue to administer AODA to new hires and third party Customer Service agents upon start with Panasonic Canada and provide refresher training as needed.

Responsibility: Human Resources/Service

Status: Completed

Date: 2015

Part II: Information and Communications Standard

Section of Regulation and Description

9. Definitions and exceptions

(1) In this Part,

- “communications” means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent, or received; (“communications”)
- “conversion ready” means an electronic or digital format that facilitates conversion into an accessible format; (“prêt à être converti”)
- “information” includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning. (“information”) O. Reg. 191/11, s. 9 (1).

(2) The information and communications standards do not apply to the following:

1. Products and product labels, except as specifically provided by this Part.
2. Unconvertible information or communications.
3. Information that the obligated organization does not control directly or indirectly through a contractual relationship, except as required under sections 15 and 18. O. Reg. 191/11, s. 9 (2).

(3) If an obligated organization determines that information or communications are unconvertible, the organization shall provide the person requesting the information or communication with,

- a) an explanation as to why the information or communications are unconvertible; and
- b) a summary of the unconvertible information or communications. O. Reg. 191/11, s. 9 (3).

(4) For the purposes of this Part, information or communications are unconvertible if,

- a) it is not technically feasible to convert the information or communications; or
- b) the technology to convert the information or communications is not readily available. O. Reg. 191/11, s. 9

Action:

- a) Any complaints received regarding web formatting will be treated with priority and put into compliance in a timely manner.
- b) PCI engaged an accessibility agency to audit all websites; 100% of all web framework has been made compliant
- c) Currently reviewing and remediating all old content and sunseting all non-compliant sites that PCI does not have control over.
- d) See Appendix A for remediation details.

Responsibility: Brand Management/IT/Service

Status: Complete

Date: 2021

Section of Regulation and Description

10. Application: Sections 9, 11, 12 and 13 apply to all obligated organizations. O. Reg. 191/11, s. 10.

Section of Regulation and Description

11. Feedback

- 1) Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request. O. Reg. 191/11, s. 11 (1).
- 2) The organization shall notify the public about accessible formats and communications supports regarding the feedback process. O. Reg. 165/16, s. 7.
- 3) Nothing in this section detracts from the obligations imposed by section 80.50. O. Reg. 165/16, s. 7.
- 4) Revoked: O. Reg. 165/16, s. 7.

12. Accessible formats and communication supports

- 1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities,
 - a. in a timely manner that takes into account the person's accessibility needs due to disability; and
 - b. at a cost that is no more than the regular cost charged to other persons. O. Reg. 191/11, s. 12 (1).
- 2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support. O. Reg. 191/11, s. 12 (2).
- 3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports. O. Reg. 191/11, s. 12 (3).
- 4) Every obligated organization that is required to provide accessible formats or accessible formats and communication supports by section 3, 4, 11, 13, 19, 26, 28, 34, 37, 44 or 64 shall meet the requirements of subsections (1) and (2) but shall do so in accordance with the schedule set out in the referenced section and shall do so only to the extent that the requirements in subsections (1) and (2) are applicable to the requirements set out in the referenced section. O. Reg. 191/11, s. 12 (4).
- 5) Obligated organizations shall meet the requirements under this section in accordance with the following schedule:
 - 1) For the Government of Ontario and the Legislative Assembly, January 1, 2014.
 - 2) For large designated public sector organizations, January 1, 2015.
 - 3) For small designated public sector organizations, January 1, 2016.

ACTION: By January 1, 2021, all internet websites and web content must conform with WCAG (Web Content Accessibility Guidelines) 2.0 Level AA, other than,

- i. success criteria 1.2.4 Captions (Live), and
 - ii. success criteria 1.2.5 Audio Descriptions (Pre-recorded). O. Reg. 191/11, s. 14 (4).
- 6) Except where meeting the requirement is not practicable, this section applies,
 - a) to websites and web content, including web-based applications, that an organization controls directly or through a contractual relationship that allows for modification of the product; and
 - b) to web content published on a website after January 1, 2012. O. Reg. 191/11, s. 14 (5).
 - 7) In determining whether meeting the requirements of this section is not practicable, organizations referenced in subsections (1) and (2) may consider, among other things,
 - a) the availability of commercial software or tools or both; and
 - b) significant impact on an implementation timeline that is planned or initiated before January 1, 2012. O. Reg. 191/11, s. 14 (6).

Glossary: In the above section,

- “extranet website” means a controlled extension of the intranet, or internal network of an organization to outside users over the Internet; (“site Web extranet”)

- “internet website” means a collection of related web pages, images, videos, or other digital assets that are addressed relative to a common Uniform Resource Identifier (URI) and is accessible to the public; (“site Web Internet”)
- “intranet website” means an organization’s internal website that is used to privately and securely share any part of the organization’s information or operational systems within the organization and includes extranet websites; (“site Web intranet”)
- “new internet website” means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh; (“nouveau site Web Internet”)
- “new intranet website” means either an intranet website with a new domain name or an intranet website with an existing domain name undergoing a significant refresh; (“nouveau site Web intranet”)
- “Web Content Accessibility Guidelines” means the World Wide Web Consortium Recommendation, dated December 2008, entitled “Web Content Accessibility Guidelines (WCAG) 2.0”; (“Règles pour l’accessibilité des contenus Web”)
- “web page” means a non-embedded resource obtained from a single Uniform Resource Identifier (URI) using Hypertext Transfer Protocol (HTTP) and any other resources that are used in the rendering or intended to be rendered together with it by a user agent. (“page Web”) O. Reg. 191/11, s. 14 (7).

Section of Regulation and Description

14. Accessible Websites & Web content

Make new PCI websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines WCAG 2.1 - Level AA.

Action: PCI has acquired new accessibility vendors (Accessibi and Siteimprove) and conducted updated audits of all PCI web properties. Areas of non-compliance were identified and will be rectified through the remainder of 2023. The accessibility software will be used to conduct regular scans of the PCI web properties so that new areas of WCAG 2.1 Level AA non-compliance can be identified and rectified in a timely manner. The PCI B2B website (na.panasonic.com/ca) will be re-platformed to a new CMS in 2024, which will meet 100% WCAG 2.1 Level AA compliance.

Responsibility: Brand Management – Web Operations

Status: Completed

Date: 2023

Section of Regulation and Description

14.1 HTML Tidy & Web content

Service support web site using HTML tool HTML Tidy to ensure HTML on site is WCA 2.1, WCA2.2, Section 508 or AODA Compliant. Tool reports on each accessibility issue, separated by Warning and Error.

Indicates which WCA 2.1, WCA2.2, Section 508 or AODA requirement was violated. Provides compliant solutions.

Responsibility: Consumer Support Web team

Status: Completed

Date:2023

Section of Regulation and Description

12. Accessible Formats & Communication Supports

Upon request, provide or arrange for the provision of accessible formats and communication supports:

- A. In a timely manner taking into account the person 's accessibility needs due to disability and
- B. at a cost that is no more than the regular cost charged to other persons.

Consult with the person making the request in determining the suitability of an accessible format or communication support.

Notify the public about the availability of accessible formats and communication supports.

Action: Upon receipt of request, engage vendor to provide material in accessible format in a timely manner.

Responsibility: Compliance Teams/Brand Management/Legal/HR

Status: Ongoing

Date: 2016-2023

Section of Regulation and Description

11. Feedback

Ensure that the processes for receiving and responding to feedback are accessible to persons with disabilities.

Provide or arrange for accessible formats and communication support upon request.

Action: Contact information for Feedback process is posted on PCI website and will be routed to Compliance Teams to address in a timely manner as needed.

Responsibility: Compliance Teams

Status: Completed

Date: 2015-2023

Part III: Employment Standards

Section of Regulation and Description

22. Recruitment – General

Notify employees and the public about the availability of accommodation for applicants with disabilities in the recruitment processes.

Section of Regulation and Description

23. Recruitment, Assessment or Selection Process

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.

If a selected applicant requests an accommodation, consult with the applicant, and provide, or arrange for the provision of a, suitable accommodation in a manner taking into account the applicant's accessibility needs.

Action: HR (Human Resources) to consult with applicant/employee upon request for accommodation and provide supports in timely manner. If required work with Brand Management to engage vendor and provide materials in accessible format.

Responsibility: Human Resources

Status: Complete

Date: 2020

Section of Regulation and Description

24. Notice to Successful Applicants

In offers of employment, notify the successful applicant of PCI's policies for accommodating employees with disabilities.

Action: All offers of employment outline that 'Panasonic Canada Inc. has an accommodation process in place and provides accommodations for employees with disabilities as appropriate. If you require a specific accommodation because of disability or medical need, please let us know at your earliest convenience so that reasonable arrangements can be made for the appropriate accommodations to be in place.' HR is responsible for reviewing and meeting needs of accommodation alongside hiring team.

Responsibility: Human Resources

Status: Complete

Date: 2020

Section of Regulation and Description

25. Informing Employees of Supports

Inform employees of policies used to support its employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs.

Provide the information to new employees as soon as is practicable after they begin their employment.

Provide updated information to employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs.

Action: All employees are required to review and acknowledge understanding of Panasonic Canada Inc's AODA Policy and Customer Service Policy. In addition, New hires are sent the AODA policy prior to their start with

Panasonic and receive AODA training in week 1 to be complete within first 3 months of hire, policies are posted for review and in the new hire package ensuring awareness of all employees.

Responsibility: Human Resources

Status: Complete

Date: 2020

Section of Regulation and Description

26. Accessible Formats & Communication Supports for Employees

Consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:

- a) information that is needed in order to perform the employee's job and
- b) information that is generally available to employees in the workplace.

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

Action: HR to communicate changes to policies as they occur.

Responsibility: Human Resources and Legal

Status: Complete

Date: 2023 (most recent revision)

Section of Regulation and Description

27. Workplace Emergency Response Information

Provide individualized workplace emergency response information to employees who have a disability.

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

The required information will be provided as soon as is practicable after we become aware of the need for accommodation due to the employee's disability.

Individualized workplace emergency response information will be reviewed:

- a) when the employee moves to a different location in the organization,
- b) (b) when the employee's overall accommodations needs or plans are reviewed, and
- c) (c) when we review our general emergency response policies.

Status: Complete

Responsibility: Human Resources/Health and Safety

Date: 2012

Section of Regulation and Description

28. Documented Individual Accommodation Plans

Have a written process for the development of documented individual accommodation plans for employees with disabilities, which includes:

1. Employee requesting accommodation can participate in the development of the individual accommodation plan.
2. Employee is assessed on an individual basis.
3. Employer can request evaluations by outside medical or other expert at the employer's expense.

4. Employee can request the participation of a representative from the workplace in the development of the accommodation plan.
5. Steps to protect the privacy of the employee's personal information.
6. Frequency with which the individual accommodation plan will be reviewed and updated, and how.
7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
8. Means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs.

Section of Regulation and Description

29. Return to Work Process PCI will:

- a) develop and have in place a return to work process for its employees that require disability-related accommodations in order to return to work and
- b) shall document the process.

The return to work process shall:

- a) outline the steps to facilitate the return to work of employees who were absent because of their disability; and
- b) use individual documented accommodation plans, as described in Section 28, as part of the process.

This return to work process does not replace or override any other return to work process under any other statute.

Section of Regulation and Description

30. Performance Management

Take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using performance management process in respect of employees with disabilities

Section of Regulation and Description

31. Career Development & Advancement

Take into account the accessibility needs of employees with disabilities, as well as any individual accommodation plans, when providing career development and advancement to employees with disabilities.

Section of Regulation and Description

32. Redeployment

Take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans when redeploying employees with disabilities.

Action: HR to connect employee with insurance company and or provide functional abilities questionnaire to employee to be completed by their doctor in order to determine requirements of the individual accommodation plan and or/ gradual return to work plan. Performance is only measured against what an employee can do based on their individualized accommodation plan. HR provides consult and support to people managers regarding this process. Accommodations are considered when succession planning and planning for career development, advancement and re-deployment.

Responsibility: Human Resources

Status: Complete

Date: 2012

Appendix A

POLICY: AODA Web Process

TITLE : Compliance process and timelines for PCI websites

PURPOSE:

The company is committed to keeping Panasonic Canada websites in a state of high quality commensurate with the Panasonic brand while adhering to Ontario accessibility legislation. To that end, the governance policies outlined in this document are intended to keep these websites:

- Within brand compliance according to web styling
- In compliance with AODA accessibility WCAG guidelines (2.1, Level AA)

SCOPE:

Internal team members who create and maintain website content in all business units, PNA, PCI and approved external agencies with site access. Maximizing internal resources to be compliant with legislation.

RESPONSIBILITIES:

With agency assistance, remediation of all non compliant code on Panasonic Canada websites, with issues addressed by highest priority first.

USER ROLES, TEAM MEMBER DEFINITIONS

- **Administrator** – To edit all back end code, replace components or functions with compliant ones as needed.
- **Editors** – To address all visual and navigation issues, repair CSS and other front end usability issues.
- **Authors** – Repair all usability issues regarding existing web page content, make sure new content created adheres to compliant standards.
- **Agency** – Inclusive media inc. is our accessibility agency of record, they will provide all audits of code and content.

PROCEDURE/TIMELINES

Panasonic Canada has engaged an accessibility agency, Inclusive Media Inc., to assist in our audit process. We have identified and prioritized the highest level remediation activities. We are proceeding with the following plan:

Ongoing monitoring and resolution of WCAG 2.1 Level AA compliance issues using approved vendor(s) and software(s) to identify areas of non-compliance.

DEFINITIONS

Outstanding items are defined as:

1. Support FAQs - French
2. Video Captions
3. PCI B2B website (na.panasonic.com/ca) WCAG 2.1 Level A and AA non-compliance issues
4. Re-platforming of PCI B2B website (na.panasonic.com/ca) and 100% WCAG 2.1 Level A and AA compliance

Remediation target timelines for these outstanding items:

1. January 1, 2024
2. Sept 1, 2024

COMPLIANCE TESTING

New vendors and software (Accessibi and Siteimprove) were engaged in 2023 to conduct updated scans on Panasonic Canada web properties and identify areas of WCAG 2.1 Level A and AA non-compliance. Regular scans will be conducted moving forward to identify non-compliance issues as they appear.

DOCUMENTATION

Audit & remediation documentation for all PCI websites available upon request.

CUSTOMER FEEDBACK

In the event PCI receives customer feedback regarding website content that is not accessible, our teams will endeavor to provide that content to the customer via an alternate method or remediate the webpage, whichever is faster.