

Gap Canada Inc.

Advocating Accessibility
For
Gap Inc. Customers & Employees
Gap, Old Navy, Athleta and Banana Republic

MULTI-YEAR ACCESSIBILITY PLAN 2021-2025

*Reviewed and updated 11/2023



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, which were effective January 1, 2014, required Gap Canada Inc. and Old Navy (Canada), (collectively, "Gap Canada Inc." or the "Company") to establish, implement, maintain and document a multi-year accessibility plan outlining the organization's strategy to prevent and remove barriers for persons with disabilities (the "Plan").

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

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

- Reviewed and updated its Plan at least once every five years;
- Posted the Plan on its website; and
- Provides the Plan in an accessible format, upon request.

Accessible Emergency Information

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

To this end, Gap Canada Inc. has implemented the following measures:

- Emergency procedures, plans and public safety information has been made available to the public and are available in an accessible format or with appropriate communication supports as soon as practicable, upon request;
- Developed Individualized workplace emergency response information procedures for employees with disabilities;
- Where required and with the employees' prior consent, the Company will assist specific disabled employees in evacuating the workplace in case of an emergency or disaster. The plans for providing such assistance are set out in Individualized Emergency Plans and provided to applicable employees;
- Individualized Emergency Plans are communicated to the employees' respective managers, safety personnel, and Asset Protection, on 'as needed' basis.

To ensure continued compliance, Gap Canada Inc. reviews and assesses general workplace emergency response procedures and Individualized Emergency Plans on an ongoing and regular basis.

Required legislative compliance: January 1, 2012

Completion date: January 1, 2012

Training

Gap Canada Inc. is committed to providing training to employees regarding the requirements of the IASR and the Human Rights Code as it pertains to persons with disabilities.

As such, Gap Canada Inc.:

- Determines and ensures that appropriate training regarding the requirements of the IASR and 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;
- Ensures that this training is provided to employees in a time and manner that is compliant with the IASR;
- Keeps and maintains a record of the training provided, including the dates that the training was provided and the number of individuals to whom it was provided;
- Ensures that the training is provided regarding any changes to the prescribed Policies on an ongoing basis, as needed.

Required legislative compliance: January 1, 2015

Completion date: January 1, 2015

Information and Communication Standards

Gap Canada Inc. is committed to meeting the communication needs of persons with disabilities. Gap Canada Inc. has incorporated new accessibility requirements under the Information and Communication Standard to ensure that its information and communications systems/ platforms are accessible and are provided in accessible formats that meet the needs of persons with disabilities.

1. Feedback, Accessible Formats and Communication

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

- Consulted with people with disabilities to determine their information and communication needs;
- Ensured 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, Gap Canada Inc. will:

- 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 considers 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

Completion date: January 1, 2015

2. Accessible Websites and Web Content

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

- Ensured 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;
- Referenced 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;

- Partnered with Corporate Communications and, in collaboration with operating divisions, provided guidelines to all staff to ensure public documents and media are readily available in alternate accessible formats;
- Expanded 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.

Completion date: December 2019

Employment Standards

1. Recruitment

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

In accordance with the IASR, Gap Canada Inc. does the following:

Recruitment General

Gap Canada Inc. notifies employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process. This includes:

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

Recruitment, assessment and selection

Gap Canada Inc. notifies job applicants who have been 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 includes:

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

Required legislative compliance: January 1, 2016

Completion Date: December 2015

2. Informing Employees of Supports

In accordance with the IASR, Gap Canada Inc., notifies employees of policies that support employees with disabilities, including, but not limited to, policies on the provisions of job accommodations that consider an employee's accessibility needs due to a disability. This includes:

- 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

Completion Date: January 2016

3. Documented Individual Accommodation Plans/Return to Work Process

Gap Canada Inc. has incorporated 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.

Gap Canada Inc.'s Accommodation Policy include steps that the Company will take to accommodate an employee with a disability and to facilitate an employee's return to work after absenteeism due to a disability. This Accommodation policy includes a process for the development of documented Individual Accommodation Plans for employees with a disability, as required.

Gap Canada Inc.'s process for the development of documented Individual Accommodation Plans includes the following elements, in accordance with the provisions of the IASR:

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

- Steps in place to protect the privacy of the employee's personal information;
- An outline of the frequency in which the Individual Accommodation Plans will be reviewed and updated and the manner in which this will be done;
- Guidance to provide the requesting employee with the reasons for the denial if an Individual Accommodation Plan is denied;
- The means of providing the Individual Accommodation Plan in a format that considers the employee's accessibility needs;

If Individualized Accommodation Plans are established, they will include:

- Individualized workplace emergency response information, as 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
- Any other accommodation that is to be provided to the employee.

Required legislative compliance: January 1, 2016

Completion Date: December 2015

4. Performance Management, Career Development and Redeployment

Gap Canada Inc. will consider 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.

In accordance with the IASR, Gap Canada Inc.:

- Reviews, assesses, and modifies existing policies, procedures, and practices to ensure compliance with the IASR;
- Considers 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

Completion Date: December 2015

2020 IASR General Requirements

- File compliance report (REVISED and SUBMITTED June 30, 2021)

2021 Information & Communications

Make all Internet website and web content conform with WCAG 2.0 level AA (excluding live captioning and audio description)

Completed June 2021