

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

MULTI-YEAR ACCESSIBILITY PLAN

Introduction and Background Information

Virtu ITG Canada Corp. (“**Virtu**”) is committed to treating all people in a way that allows them to maintain their dignity and independence. Virtu believes in integration and equal opportunity. Virtu is committed to meeting the needs of persons with disabilities in a timely manner, and will do so by removing barriers to accessibility and meeting accessibility requirements under the *Integrated Accessibility Standards Regulation* (the “**IASR**”) enacted under the *Accessibility for Ontarians with Disabilities Act, 2005* (“**AODA**”).

Accessibility at Virtu

Accessibility Plan

The AODA seeks to provide a fully accessible Ontario by 2025. Consistent with this objective, there are many obligations placed on organizations, including Virtu, to ensure their workplaces and services are fully accessible to the public and employees, including persons with disabilities.

Under the AODA, and specifically the IASR, Virtu is required to develop a multi-year accessibility plan outlining its strategy to remove barriers to accessibility, and to meet requirements under the IASR.

This Multi-Year Accessibility Plan will assist Virtu in coordinating efforts to meet the needs of persons with disabilities. Virtu is committed to the principles of independence, dignity, integration and equality of opportunity as described in the AODA.

Our Multi-Year Accessibility Plan outlines a phased-in strategy to remove barriers and addresses the current and future requirements applicable to Virtu under the IASR. The Multi-Year Accessibility Plan will be posted on our external Internet website.

Virtu’s Multi-Year Accessibility Plan



Part I — General Requirements

Initiative	IASR Requirement	Action	Status
Establishing Accessibility Policies	3(1) Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this Regulation.	<ul style="list-style-type: none"> The Integrated Accessibility Standards Policy (the “Accessibility Policy”) has been developed and implemented. 	Complete
	3(2) Obligated organizations, other than small organizations, shall include a statement of organizational commitment to meet the accessibility needs of persons with disabilities in a timely manner in their policies.	<ul style="list-style-type: none"> The statement of organizational commitment is included in the Accessibility Policy. 	Complete
	(3) Large organizations shall, (a) prepare one or more written documents describing its policies; and (b) make the documents publicly available, and shall provide them in an accessible format upon request.	<ul style="list-style-type: none"> Accessibility Policy and Multi-year Accessibility Plan (the “MYAP”) posted on Virtu’s external website and internal intranet. Virtu will provide copies of the Accessibility Policy in an accessible format upon request. 	Complete Ongoing
Accessibility Plans	4(1) Large organizations shall, (a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization’s strategy to remove barriers and meet its requirements under this Regulation; (b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and	<ul style="list-style-type: none"> The MYAP has been drafted and implemented. MYAP posted on Virtu’s external website and internal intranet. MYAP will be reviewed and updated as necessary, but, in any event, the MYAP will be reviewed at least once every 5 years. The next review will be January 1, 2019. 	Complete Complete Ongoing



	(c) review and update the accessibility plan at least once every five years.		
Training	<p>7(1) Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the <i>Human Rights Code</i> as it pertains to persons with disabilities to,</p> <p>(a) all employees, and volunteers;</p> <p>(b) all persons who participate in developing the organization's policies; and</p> <p>(c) all other persons who provide goods, services or facilities on behalf of the organization.</p>	<ul style="list-style-type: none"> • Training on the requirements of the IASR and the <i>Human Rights Code</i> has been incorporated into our online Code of Conduct training. • Virtu will ensure that all current and new employees, volunteers and other individuals as required by the IASR in all Ontario locations receive training on the IASR requirements and the <i>Human Rights Code</i> as it pertains to persons with disabilities. 	<p>Ongoing</p> <p>Ongoing</p>
	<p>7(5) Every large organization shall keep a record of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided.</p>	<ul style="list-style-type: none"> • Virtu maintains a record of the training provided to all personnel in all its Ontario offices. 	Ongoing



PART II — Information and Communications Standards

Initiative	IASR Requirement	Action	Status
	<p>11(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 accessible formats and communications supports, upon request.</p>	<p>Individuals may provide feedback to Virtu in any number of ways:</p> <ul style="list-style-type: none"> • by email at: HR@virtu.com • electronically, by visiting our website: www.virtu.com • in writing, by sending or hand delivering feedback to Virtu at the following address: Virtu HR, 200 Bay Street, Suite 2600, Toronto, Ontario, M5K 1B7 • in person, by visiting Virtu's offices at: 200 Bay Street, Suite 2600, Toronto, Ontario, M5K 1B7; and • additionally, a customer may request for their Virtu contact to submit feedback on their behalf. 	<p>Complete</p>
<p>Feedback</p>	<p>11(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.</p>	<ul style="list-style-type: none"> • Information regarding how an individual may provide feedback to Virtu is provided in our Customer Service Standards Policy, Accessibility Policy and this MYAP, which are posted on Virtu's website. • Virtu's Customer Service Standards Policy, Accessibility Policy and MYAP, all of which are available on Virtu's website, state that accessible formats and communication supports. 	<p>Complete</p>
<p>Accessible Formats & Communication Supports</p>	<p>12(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,</p> <p>(a) in a timely manner that takes into account the person's accessibility needs due to disability; and</p>	<ul style="list-style-type: none"> • Virtu strives to communicate with persons with a disability in a manner that takes into account both the disability and the individual person's preferred method of communication. Virtu can communicate with members of the public in writing, via telephone, email, or meetings, either in person or via video conference. Virtu recognizes that not all persons will wish to communicate in the same manner. 	<p>Ongoing</p>



PART III — Employment Standards

Initiative	IASR Requirement	Action	Status
<p>Recruitment, General</p>	<p>22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.</p>	<ul style="list-style-type: none"> Virtu will notify its employees in Ontario and the public about the availability of accommodation for applicants with disabilities in its recruitment process by including such information in any job posting, whether such posting is made internally or externally. 	<p>Ongoing</p>
<p>Recruitment, Assessment or Selection Process</p>	<p>23(1) During a recruitment process, an employer shall 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.</p>	<ul style="list-style-type: none"> For positions based in Ontario, when Virtu notifies job applicants that they have been selected to participate further in the recruitment process, Virtu will notify those job applicants that accommodations are available upon request in relation to the materials or processes to be used during the assessment process by including a statement to this effect in its communication to applicants. 	<p>Ongoing</p>
	<p>23(2) If a selected applicant requests an accommodation, the employer shall 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.</p>	<ul style="list-style-type: none"> For positions based in Ontario, if a selected applicant requests an accommodation, Virtu will consult with the applicant and provide, or will arrange to provide, suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability. 	<p>Ongoing</p>
<p>Notice to Successful Applicants</p>	<p>24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.</p>	<ul style="list-style-type: none"> Virtu will notify the successful applicant of its policies for accommodating employees with disabilities by including copies of its policies for accommodating employees in Ontario with disabilities along with an offer letter or employment contract. 	<p>Ongoing</p>



Informing Employees of Supports	<p>25(1) Every employer shall inform its employees of its 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 due to disability.</p>	<ul style="list-style-type: none"> Virtu will inform its employees in Ontario of its policies used to support its employees in Ontario with disabilities by posting such policies on its internal intranet. 	Ongoing
	<p>25(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.</p>	<ul style="list-style-type: none"> Virtu will provide copies of its policies used to support its employees with disabilities in Ontario to new employees in Ontario as soon as practicable after commencing employment. 	Ongoing
	<p>25(3) Employers shall provide updated information to its 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 disability.</p>	<ul style="list-style-type: none"> Virtu will provide updated information to its employees in Ontario whenever there is a change to its existing policies on the provision of job accommodations that take into account an Ontario employee's accessibility needs due to disability by updating the information on its internal intranet. 	Ongoing
Accessible Formats and Communication Supports for Employees	<p>26(1) In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for,</p> <p>(a) information that is needed in order to perform the employee's job; and</p> <p>(b) information that is generally available to employees in the workplace.</p>	<ul style="list-style-type: none"> Upon the request of an employee with a disability in Ontario, Virtu will consult with the employee to provide, or arrange to provide, accessible formats and communication supports for information that is: <ul style="list-style-type: none"> (i) needed to perform the employee's job; and (ii) generally available to other employees. 	Ongoing



<p>Accessible Formats and Communication Supports for Employees</p>	<p>26(2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>	<ul style="list-style-type: none"> When determining the suitability of an accessible format or communication support, Virtu will consult with the employee making the request. 	<p>Ongoing</p>
<p>Accessible Formats & Communication Supports</p>	<p>27(1) Every employer shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability.</p>	<ul style="list-style-type: none"> Virtu will provide individualized workplace emergency response information to employees in Ontario who have a disability, where this information is necessary and where Virtu is aware of the employee's need for accommodation due to the employee's disability. 	<p>Ongoing</p>
	<p>27(2) If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.</p>	<ul style="list-style-type: none"> Included in the process established for the providing individualized workplace emergency response information, if Virtu receives the employee's consent. 	<p>Ongoing</p>
	<p>27(3) Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.</p>	<ul style="list-style-type: none"> Included in the process for the provision of individualized workplace emergency response information. 	<p>Ongoing</p>



	<p>27(4) Every employer shall review the individualized workplace emergency response information,</p> <p>(a) when the employee moves to a different location in the organization;</p> <p>(b) when the employee's overall accommodations needs or plans are reviewed; and</p> <p>(c) when the employer reviews its general emergency response policies.</p>	<ul style="list-style-type: none"> • Included in the process established for providing individualized workplace emergency response information. 	Ongoing
	<p>28(1) Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.</p>	<ul style="list-style-type: none"> • Virtu has developed and maintains a written process for the development of documented individual workplace accommodation plans for employees in Ontario with disabilities. 	Complete
<p>Documented Individual Accommodation Plans</p>	<p>28(2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none"> 1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. 2. The means by which the employee is assessed on an individual basis. 3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if 	<ul style="list-style-type: none"> • Virtu's written process for the development of individual workplace accommodation plans in Ontario addresses: <ol style="list-style-type: none"> 1. The manner in which an employee requesting accommodation can participate in the development of their individual workplace accommodation plan. 2. The means by which the employee is assessed on an individual basis. 3. The manner in which Virtu can request an evaluation by an outside medical or other expert, at Virtu's expense, to determine if accommodation can be achieved and, if so, how. 	Complete



	<p>accommodation can be achieved and, if so, how accommodation can be achieved.</p> <ol style="list-style-type: none">4. 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.5. The steps taken to protect the privacy of the employee's personal information.6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.	<ol style="list-style-type: none">4. The manner in which the employee can request the participation of a representative from Virtu.5. The steps taken to protect the privacy of the employee's personal information.6. How often the individual workplace accommodation plan will be reviewed and updated, and how this update will be accomplished.7. The manner in which Virtu will provide the reasons for denying an individual workplace accommodation plan to the employee, if an individual workplace accommodation plan is denied.8. The means of providing the individual workplace accommodation plan in a format that takes into account the employee's accessibility needs due to disability.	
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Performance Management	30(1) An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.	<ul style="list-style-type: none">• Virtu will take into account the accessibility needs of employees in Ontario with disabilities, as well as individual workplace accommodation plans, when conducting performance management.	Ongoing
Career Development & Advancement	31(1) An employer that provides career development and advancement to its employees shall 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 with disabilities.	<ul style="list-style-type: none">• Virtu will take into account the accessibility needs of employees in Ontario with disabilities, as well as individual workplace accommodation plans, when providing career development and advancement to employees.	Ongoing
Redeployment	32(1) An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.	<ul style="list-style-type: none">• Virtu will take into account the accessibility needs of employees in Ontario with disabilities, as well as individual workplace accommodation plans, when redeploying employees.	Ongoing



Part IV — Customer Service Standards

Initiative	IASR Requirement	Action	Status
<p align="center">Establishment of Policies</p>	<p>80.46(1) In addition to the requirements in section 3, every provider shall develop, implement and maintain policies governing its provision of goods, services or facilities, as the case may be, to persons with disabilities.</p>	<ul style="list-style-type: none"> Virtu has developed, implemented and maintains policies governing the provision of its goods, services and facilities to persons with disabilities. 	<p>Ongoing</p>
	<p>80.46(4) Every provider, other than a small organization, shall prepare one or more documents describing the policies established under this section and, on request, shall give a copy of any such document to any person.</p>	<ul style="list-style-type: none"> Virtu has prepared a document, called the Customer Service Standards Policy, which includes a description of Virtu’s policy concerning the provision of goods, services and facilities. Virtu will provide a copy of the Customer Service Standards Policy to any person upon request. 	<p>Complete</p>
	<p>80.46(5) Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the documents required by subsection (4) are available on request.</p>	<ul style="list-style-type: none"> Virtu will notify persons through its external website that the Customer Service Standards Policy is available upon request. 	<p>Complete</p>
<p align="center">Use of Service Animals and Support Persons</p>	<p>80.47(2) If a person with a disability is accompanied by a guide dog or other service animal, the provider shall ensure that the person is permitted to enter the premises with the animal and to keep the animal with him or her, unless the animal is otherwise excluded by law from the premises.</p>	<ul style="list-style-type: none"> Virtu will ensure that a person with a disability who is accompanied by a guide dog or other service animal is permitted to enter Virtu’s premises with the animal to keep the animal with him or her. 	<p>Ongoing</p>
	<p>80.47(4) If a person with a disability is accompanied by a support person, the provider shall ensure that both persons are permitted to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the premises.</p>	<ul style="list-style-type: none"> Virtu will ensure that both the person with a disability and the accompanying support person are permitted to enter Virtu’s premises together and that the person with a disability is not prevented from having access to the support person while on Virtu’s premises. 	<p>Ongoing</p>



Use of Service Animals and Support Persons	80.47(8) Every provider, other than a small organization, shall prepare one or more documents describing its policies with respect to the matters governed by this section and, on request, shall give a copy of any such document to any person.	<ul style="list-style-type: none"> Virtu has prepared a document, called the Customer Service Standards Policy, which includes descriptions of Virtu's service animal and support person policies. Virtu will provide a copy of the Customer Service Standards Policy to any person upon request. 	Complete
	80.47(9) Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the documents required by subsection (8) are available on request.	<ul style="list-style-type: none"> Virtu will notify persons through its external website that the Customer Service Standards Policy is available upon request. 	Ongoing
Notice of Temporary Disruptions	80.48(1) If, in order to obtain, use or benefit from a provider's goods, services or facilities, persons with disabilities usually use other particular facilities or services of the provider and if there is a temporary disruption in those other facilities or services in whole or in part, the provider shall give notice of the disruption to the public.	<ul style="list-style-type: none"> Virtu will notify persons with disabilities if there is a temporary disruption in facilities and services the persons with a disability usually uses. 	Ongoing
	80.48(3) Every provider, other than a small organization, shall prepare a document setting out the steps that the provider will ensure are taken in connection with a temporary disruption and, on request, shall give a copy of the document to any person.	<ul style="list-style-type: none"> Virtu has prepared a document setting out the steps Virtu will take in the event of a temporary disruption. Virtu will provide the temporary disruption process document to any person on request. Virtu will notify those affected by posting the information on its external website. 	Ongoing Ongoing Ongoing



	<p>80.49(1) In addition to the requirements in section 7, every provider shall ensure that the following persons receive training about the provision of the provider's goods, services or facilities, as the case may be, to persons with disabilities:</p> <ol style="list-style-type: none"> 1. Every person who is an employee of, or a volunteer with, the provider. 2. Every person who participates in developing the provider's policies. 3. Every other person who provides goods, services or facilities on behalf of the provider. 	<ul style="list-style-type: none"> • Virtu will ensure that all current and new employees, volunteers and other individuals as required by the IASR in all Ontario locations receive training on providing goods, services or facilities to persons with disabilities. 	Ongoing
Training for Personnel	<p>80.49(5) Every provider, other than a small organization, shall keep records of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided.</p>	<ul style="list-style-type: none"> • Virtu has established a file in which Virtu will store all records of the training provided under the Customer Service Standards Policy. The records will include the dates on which the training was provided and the number of individuals to whom the training was provided. 	Ongoing
	<p>80.49(6) Every provider, other than a small organization, shall,</p> <ol style="list-style-type: none"> (a) prepare a document that describes its training policy, summarizes the content of the training and specifies when the training is to be provided; and (b) on request, give a copy of the document to any person. 	<ul style="list-style-type: none"> • Virtu has prepared a document that describes Virtu's training policies, summarizes the content of the training and specifies when training will be provided. • The training document addresses: <ul style="list-style-type: none"> ○ a review the AODA's purposes; ○ how to interact and communicate with persons with various types of disability; ○ how to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person; ○ how to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods, services or 	Complete



		<p>facilities to a person with a disability; and</p> <ul style="list-style-type: none"> ○ what to do if a person with a particular type of disability is having difficulty accessing the provider's goods, services or facilities. 	
Feedback Process	<p>80.49(7) Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the document required by subsection (6) is available on request.</p>	<p>Virtu will notify persons to whom it provides goods, services or facilities through its external website that Virtu's employee training document is available upon request.</p>	Complete
	<p>80.50(1) (1) Every provider shall establish a process for receiving and responding to,</p> <p style="padding-left: 40px;">(a) feedback about the manner in which it provides goods, services or facilities to persons with disabilities; and</p> <p>feedback about whether the feedback process established for purposes of clause (a) complies with subsection (3).</p>	<ul style="list-style-type: none"> • Virtu has established a process for receiving and responding to feedback about the manner in which Virtu provides goods, services or facilities to persons with disabilities. • Individuals may provide feedback to Virtu in any number of ways: <ul style="list-style-type: none"> ○ by email at: Virtu_HR@virtu.com ○ electronically, by visiting our website www.virtu.com; ○ by contacting our Human Resources Department: 212-588-4222; ○ in writing, by sending or hand delivering feedback to Virtu at the following address: Virtu HR, 200 Bay Street, Suite 2600, Toronto, Ontario, M5K 1B7 130 King Street West Suite 1040, Toronto, Ontario M5X 1B1; ○ in person, by visiting Virtu's offices 200 Bay Street, Suite 2600, Toronto, Ontario, M5K 1B7 130 King Street West Suite 1040, Toronto, Ontario M5X 1B1; and • additionally, a customer may request for their Virtu contact to submit feedback on their behalf. 	Complete



<p>Feedback Process</p>		<ul style="list-style-type: none"> Virtu will ensure the feedback process allows those providing feedback to also provide feedback on whether the feedback process itself is accessible to persons with disabilities through accessible formats and communication supports. 	
	<p>80.50(4) Every provider shall make information about the feedback process readily available to the public.</p>	<ul style="list-style-type: none"> The availability of the feedback process is set out in our Customer Service Standards Policy, Accessibility Policy and this MYAP, which are posted on our website. 	<p>Complete</p>
	<p>80.50(5) Every provider, other than a small organization, shall prepare a document describing the feedback process and, on request, shall give a copy of the document to any person.</p>	<ul style="list-style-type: none"> Virtu has prepared a document that describes Virtu's feedback process and Virtu will provide the document to any person on request. 	<p>Ongoing</p>
	<p>80.50(6) Virtu will prepare a document that describes Virtu's training policies, summarizes the content of the training and specifies when training will be provided.</p>	<ul style="list-style-type: none"> Virtu will notify persons to whom it provides goods, services or facilities through its external website that the feedback process document is available upon request. 	<p>Ongoing</p>
<p>Format of Documents</p>	<p>80.51(1) If a provider is required by this Part to give a copy of a document to a person with a disability, the provider shall, on request, provide or arrange for the provision of the document, or the information contained in the document, to the person in an accessible format or with communication support,</p> <p>(a) in a timely manner that takes into account the person's accessibility needs due to disability; and</p> <p>(b) at a cost that is no more than the regular cost charged to other persons.</p>	<ul style="list-style-type: none"> Virtu will endeavor to provide any document required under the IASR Customer Service Standards in an accessible format or with communication support within 20 business days of a request. The cost of providing the documents in an accessible format will not cost more than the regular cost charged to other customers. 	<p>Ongoing</p>



Format of Documents	80.51(2) The provider shall consult with the person making the request in determining the suitability of an accessible format or communication support.	<ul style="list-style-type: none">• Virtu will respond the person's request within 10 business days, at which point Virtu will consult with the person making the request to determine which accessible format or communication support is suitable.	Ongoing
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Closing statements

In accordance with the AODA and with Virtu's objective of treating all people in a way that allows them to maintain their dignity and independence while creating an inclusive work environment for Virtu's people to develop to their full potential, the Multi-Year Accessibility Plan is posted on Virtu's website and will be reviewed and updated at least every 5 years.

If you have any questions, or have feedback related to Virtu's Multi-Year Accessibility Plan, please contact Virtu.