

## ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES, 2005

### INTEGRATED ACCESSIBILITY STANDARDS POLICY

In Ontario, the Accessibility for Ontarians with Disabilities Act, 2005 (the “AODA”) aims to create a more accessible Ontario by identifying and, to the extent possible, eliminating barriers experienced by people with disabilities.

The Integrated Accessibility Standards regulation (the “IASR”), enacted under the AODA, sets out obligations with respect to five accessibility standards in the areas of Information and Communications, Employment, Transportation, Design of Public Spaces, and Customer Service, in addition to certain general requirements. Virtu ITG Canada Corp. (“Virtu”) has implemented the Virtu Multi-Year Accessibility Plan, which sets out Virtu’s commitment to meeting its obligations under the IASR.

Virtu is further committed to ensuring that every Virtu employee receives equitable treatment with respect to employment, without discrimination, and receives accommodation in a timely manner where required, in accordance with the provisions of the Ontario Human Rights Code and the AODA and its regulations.

#### Policy Statement

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 identifying, removing and preventing barriers to accessibility and meeting accessibility standards in accordance with the AODA.

#### To Whom Does this Policy Apply?

This policy applies to Virtu’s operations in Ontario and to all Virtu’s personnel, as defined below, who perform services for Virtu in the Province of Ontario

#### Defined Terms

The following terms as used in this policy have the following meanings:

- **“barrier”** - means anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice
- **“disability”** – means:
  - a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device;
  - b) a condition of mental impairment of a developmental disability;
  - c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
  - d) a mental disorder; or
  - e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.



- “**employee**” – means an employee of Virtu in Ontario, whether engaged on a full-time, part-time, temporary or casual basis.
- “**personnel**” – means all Virtu’s employees, contractors and volunteers in Ontario

## **GENERAL STANDARDS**

### **Multi-Year Accessibility Plan**

Virtu has established and implemented and will maintain and document a Multi-Year Accessibility Plan outlining Virtu’s strategy to identify and remove barriers and increase accessibility for persons with disabilities, in accordance with Virtu’s obligations under the AODA.

The Multi-Year Accessibility Plan will be reviewed and updated at least once every five (5) years and will be posted on Virtu’s website. Upon request, Virtu will provide a copy of the Multi-Year Accessibility Plan in an accessible format.

### **Training Personnel and Other Persons**

Virtu will ensure that training is provided on the requirements of the accessibility standards referred to in the IASR and on the *Human Rights Code* as it pertains to persons with disabilities to:

- all Virtu’s personnel;
- all persons who participate in developing Virtu’s policies; and,
- all other persons who provide goods, services or facilities on Virtu’s behalf.

The training will be appropriate to the duties of the personnel and such other persons.

Personnel and such other persons will be trained when changes are made to Virtu’s Integrated Accessibility Standards Policy. New personnel and such other persons will be trained as soon as practicable.

Virtu will keep a record of the training it provides, including the dates on which the training is provided and the number of individuals to whom it is provided.

## **INFORMATION AND COMMUNICATIONS STANDARDS**

### **Feedback**

Virtu will ensure that Virtu’s process for receiving and responding to feedback are accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communications supports, upon request. Virtu will notify the public about the availability of accessible formats and communication supports.

### **Accessible Formats and Communication Supports**

Upon request, Virtu will provide, or will arrange to provide, accessible formats and communication



supports for persons with disabilities in connection with their communications with Virtu or when accessing information or documents from Virtu. Virtu will do so in a timely manner that takes into account the person's accessibility needs due to disability and at a cost that is no more than the regular cost charged to other persons.

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

Virtu will also notify the public via its website about the availability of accessible formats and communication supports.

## **EMPLOYMENT STANDARDS**

### **Workplace Emergency Response Information**

Virtu will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if Virtu is aware of the need for accommodation due to the employee's disability. Virtu will provide this information as soon as practicable after becoming aware of the need for accommodation.

Where the employee requires assistance, Virtu will, with the employee's consent, provide the workplace emergency response information to the person Virtu has designated to provide assistance to the employee.

Virtu will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodation needs or plans are reviewed and when Virtu reviews its general emergency response policies.

### **Recruitment, Assessment or Selection Process**

Virtu will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

Virtu will notify job applicants when they are individually selected to participate further 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, Virtu will 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.

### **Notice to Successful Applicants**

When making offers of employment, Virtu will notify the successful applicant of its policies for accommodating employees with disabilities.

### **Accessible Formats and Communication Supports for Employees**

Upon the request of an employee with a disability, Virtu will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform the employee's job, and information that is generally available to other employees.



In determining the suitability of an accessible format or communication support, Virtu will consult with the employee making the request.

### **Documented Individual Workplace Accommodation Plans**

Virtu will maintain a written process for the development of documented individual workplace accommodation plans for employees with disabilities.

If requested, information regarding accessible formats and communications supports provided will also be included in individual workplace accommodation plans.

In addition, the plans will include individualized workplace emergency response information (where required), and will identify any other accommodation that is to be provided.

### **Return to Work Process**

Virtu will develop and have in place a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

The return to work process will outline the steps Virtu will take to facilitate the return to work and will include documented individual workplace accommodation plans as part of the process.

This return to work process will not replace or override any other return to work process created by or under any other statute (e.g., the Ontario Workplace Safety Insurance Act, 1997).

### **Performance Management, Career Development and Advancement & Redeployment**

Virtu will take into account the accessibility needs of employees with disabilities, as well as individual workplace accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.

## **CUSTOMER SERVICE STANDARDS**

### **Accessibility of Services**

Virtu strives to communicate with customers with a disability in a manner that takes into account both the customer's disability and the customer's preferred method of communication. To the extent possible, upon request, Virtu will provide all published information or communications for its customers in accessible formats or electronic/digital formats that facilitate conversion of the information or communication into an accessible format.

Virtu will allow customers with a disability, where possible, to use their own assistive devices. Where a barrier prevents the use of an assistive device, Virtu will endeavor to remove the barrier or make best efforts to accommodate the customer by an alternative means.

Virtu will allow customers with a disability to be accompanied by a service animal and to keep the service animal with them on Virtu's premises, unless excluded by law.

Virtu will allow customers with a disability to be accompanied by a support person and will ensure the customers have access to their support person while on Virtu's premises.

### **Notice of Temporary Service Disruptions**



Virtu will notify customers if there is a planned or unexpected disruption of a facility or service that customers with a disability usually use to access their services.

### **Training and Records**

Virtu will provide training, and ongoing training as required under the AODA, to all of Virtu's personnel to whom this policy applies as well as to those persons charged with developing this policy and related procedures and practices.

Training will be provided to all Virtu personnel to whom this policy applies within thirty (30) days of their start date with Virtu.

Virtu will maintain records of all the training provided.

### **Feedback**

Virtu will provide, or arrange to provide, a feedback process in accessible formats and communication supports, on request.

Virtu will maintain a number of channels through which customers can provide their feedback, including electronically, in writing and in person.

Virtu will strive to respond to all feedback received as soon as practicable, and will acknowledge the receipt of the feedback within ten (10) business days of receipt.

### **Notice of Availability of Documents**

Virtu will make its Customer Service Standards Policy available to the public and its customers upon request. Virtu will notify the public and its customers on its website that the Customer Service Standards Policy is available upon request.

### **CONTACT FOR QUESTIONS**

This Integrated Accessibility Standards Policy exists to ensure accessible service excellence to customers and employees with disabilities. Enquiries, questions or complaints in regards to this Integrated Accessibility Standards Policy should be referred to:

Virtu ITG Canada Corp.  
Human Resources  
222 Bay Street, Suite 2600  
Toronto, Ontario  
M5K 1B7

Inquiries can also be made by telephone at +1(212) 588-4222 or by email to [HR@virtu.com](mailto:HR@virtu.com).