

## Introduction

CloudMD recognizes the importance of environmental and societal issues and challenges, and we are committed to making a difference in the world in which we live. We are on a journey to embed Environmental, Social Responsibility and Corporate Governance (ESG) in all that we do, integrating it into the various aspects of our business operations and decision-making.

Through our purpose to Empower Healthier Living, we are committed to actively contributing to sustainable change for a better future. By engaging with and removing barriers for our stakeholders – employees, customers, clients, partners, and shareholders, we are working to create a meaningful impact and difference in our workplace, through our healthcare products, services, and offerings, and in our communities, while simultaneously delivering value to all our stakeholders.

In alignment with our commitment to inclusivity and social responsibility, CloudMD is proud to present our comprehensive Multi-Year Accessibility Plan under the Accessibility for Ontarians with Disabilities Act (AODA). This strategic initiative reinforces our purpose to Empower Healthier Living by creating an accessible and barrier-free environment for our employees, clients, and communities: and fostering a workplace culture that prioritizes diversity, equity, and inclusion.

CloudMD's value proposition and operating model are defined by its healthcare navigation delivery that is nurse-or other regulated healthcare provider-led. This affords CloudMD healthcare practitioners an inherent understanding and application of accessibility standards, practice, and support mindset that is core to the AODA principles.

This plan, further aligns our accessibility objectives with important aspects of our ESG focus, CloudMD's people and culture priorities, and operating practices. Our goal is to ensure that every individual, regardless of ability, can fully participate in the opportunities we provide and contribute to our shared success.

The CloudMD Accessibility Plan highlights its past achievements and forward-looking focus areas relative to the AODA standards most relevant to the organization: **Customer Service, Employment, and Information and Communications**. (The other two AODA standards - transportation and the design of public spaces - are not deemed applicable, although CloudMD maintains responsibility to ensure adequate availability of accessible space, even if it is not CloudMD-owned space). The plan is intended to demonstrate CloudMD's focus and strategy around making Ontario an accessible province for all Ontarians and with an approach that is scalable across all our geographical regions. The AODA core principles of Dignity, Independence, Integration, and Equal Opportunity guide the accessibility-related deliverables CloudMD dispatches.

The plan is reviewed and updated at least once every five years. We train every person on the AODA during their New Hire on-boarding and update the existing workforce on applicable AODA policies, practices, and changes. We maintain records of the training provided, including the dates on which the training was provided and the number of individuals to whom it was provided.

## 1. Establishing our Foundation for Accessibility 2021-2023

From 2021 to 2022, CloudMD was focused on building its organization through the strategic acquisition of 15+ healthcare-focused/supporting organizations – all of which aligned with its core value proposition on healthcare navigation and as a full-spectrum healthcare needs service provider. Although CloudMD originated as a BC-based company (for which the AODA was not applicable), its acquisition of Ontario-based firms over the 2019-2022 period prompted the need for organizational adherence to the AODA requirements. Throughout this period, CloudMD sought to establish the baseline of the AODA-related deliverables and achievements from its newly acquired organizations, as well as to establish CloudMD-level standards.

During the first year(s) following its acquisitions, CloudMD primarily comprised building the AODA foundation and compliance. The main focus areas were the following:

- Assessment and Benchmarking - CloudMD conducted a company-wide accessibility audit and benchmarked current AODA progress relative to industry standards and legal requirements.
- Policy Development – CloudMD confirmed the availability of accessibility policies from its subsidiaries, including goals and objectives.
- Initial Training and Awareness – CloudMD rolled out mandatory training on accessibility to in-scope employees.
- Technology and Infrastructure Review – CloudMD assessed current technology and infrastructure for accessibility gaps.
- Stakeholder Engagement – CloudMD initiated dialogue with employees, customers, and accessibility subject matter experts and specialists to gather input.

The following section summarizes CloudMD’s achievements relative to the AODA standards around **Customer Service, Employment, and Information and Communications.**

### A. Customer Service

CloudMD is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner, and will do so by identifying, preventing and removing barriers to accessibility. To establish and comply with Customer Service standards aligned with the AODA, CloudMD has taken the following actions:

- Developed Customer Service Expectations and Practices that outline CloudMD's commitment to accessibility and compliance with the AODA standards.
- Facilitated Accessibility Training, particularly (though not limited) to employees who interact with customers, on providing accessible customer service. This training includes driving awareness of diverse types of disabilities and appropriate communication and interaction tactics to effectively respond to /support them.
- Established communication support mechanisms (e.g., assistive devices, accessible formats, multi-lingual services) available to customers upon request.

- Implemented Accessible Feedback Processes for receiving and responding to customer feedback. Multi-media / multi-channel options for customers (including but not limited to phone and email) to facilitate customers having the opportunity to provide feedback, comments, or concerns related to accessibility.
- Accessible websites and information on CloudMD’s client-facing websites, ancillary systems, and online information. This includes providing alternative formats for documents and ensuring compatibility with assistive technologies.
- Enabled availability of accessibility-related customer service policies and customer healthcare education and engagement resources in accessible formats upon request, especially but not limited to customers with disabilities.
- Facilitated the use of assistive devices by customers and training for employees who interact with individuals using such devices.
- Accommodate service animals to allow individuals with disabilities to be accompanied by their service animals in areas open to the public unless there is a legitimate safety concern.
- Conduct Periodic Accessibility Reviews of customer service practices to identify and address any barriers to accessibility. Update policies and practices accordingly.
- Provided clear communication of the company’s accessibility policies to customers through various channels, such as websites, and informational materials.

Our AODA-focused initiatives in customer service reflect and reinforce our commitment to providing an inclusive and welcoming experience for all and, in turn, Empower Healthier Living.

## **B. Employment**

CloudMD is committed to the principles of equity, diversity, and inclusion in all aspects of our organization. We believe we are stronger when we celebrate our many differences, values, and voices, and incorporate them in practice. This means our organization will actively work to understand and remove barriers to equity and inclusion, be they systematic, physical, or otherwise. In addition, we are committed to ongoing learning and development in the areas of equity, diversity, and inclusion; so that we can apply an “equity lens” in all areas of our business operations. To establish and comply with Employment standards aligned to the AODA, CloudMD has taken the following actions:

- Created an Accessible Recruitment Process that includes providing alternative formats for job postings and making accommodations for candidates with disabilities during interviews.
- Provided Employee Training Programs to raise awareness about disabilities, inclusivity, and the company’s commitment to AODA compliance.
- Communicated Reasonable Accommodation Policies outlining the process for requesting and providing reasonable accommodations for employees with disabilities.
- Facilitated Flexible Work Arrangements that would also apply to accommodating employees with disabilities. This includes flexible hours, remote work options, or adjusted workspaces to enhance accessibility.
- Conducted regular Accessibility Audits to assess the accessibility of the workplace environment. This includes physical spaces, digital platforms, and any other areas that impact employees.

At CloudMD, we strive to ensure everyone is treated equally and to be a culturally proficient and accessible organization. We value diversity and will continue to actively work to build a diverse workforce that is inclusive of persons of various groups in terms of age, sex, race, ethnicity, physical and intellectual ability, religion, sexual orientation, educational background and expertise.

### **B.1. Training**

As a critical component of our accessibility-related Employment Standard, we recognize the importance of equipping our team members with the knowledge and skills needed to embrace diversity and support colleagues with disabilities. Our commitment to the AODA training initiatives reflects our dedication to creating an environment where everyone can thrive, irrespective of their abilities. This summary provides additional training details referenced in the Employment Standards section. To establish and comply with Information and Communication standards aligned with the AODA, CloudMD has taken the following actions:

- Conducted training to raise awareness about various disabilities, accessibility challenges, and the importance of creating an inclusive environment. Content and delivery were tailored to healthcare contexts and patient interactions.
- Provided specialized customer service training for employees who interact directly with patients. The focus is on effective communication, accommodating diverse needs, and understanding the range of assistive devices patients may use.
- Trained staff on accessible communication methods, including plain language, providing information in alternative formats and communicating effectively with individuals with different communication needs.
- Provided Online Accessibility Training - online modules or courses covering digital accessibility for employees involved in creating or managing online content. This includes ensuring that the corporate websites are accessible.
- Provided Emergency Response and Preparedness Training to staff on ensuring that emergency procedures and preparedness plans are accessible to all clients and patients, including those with disabilities. Focus was targeted – but not limited to – employees who are working in-office or clinics.
- Targeted role-specific training to specific roles within the healthcare organization, addressing the unique accessibility considerations of each department or position.

By prioritizing the AODA training within our Multi-Year Accessibility Plan, CloudMD is adhering to regulatory requirements and is actively fostering a culture of understanding, empathy, and collaboration. We are proud to be at the forefront of promoting accessibility in the Canadian healthcare sector and are committed to ensuring that our workforce remains well-informed and empowered to contribute to a truly inclusive workplace.

## C. Information and Communications

Our commitment to information and communication accessibility extends across various parts of our operations. We have implemented policies to ensure that all employees, including those with disabilities, have equal access to information, communication channels, and technology within our organization. To establish and comply with Information and Communication standards aligned with the AODA, CloudMD has taken the following actions:

- Developed an accessible website: CloudMD's corporate websites are fully compliant with AODA standards.
- Established accessible communication materials: CloudMD provides healthcare information and other communication materials in accessible formats upon request, such as large print or electronic formats.
- Developed accessible client portals: CloudMD's proprietary Kii technology and other client-facing portals have been designed to be accessible to individuals with disabilities, including those who use assistive technologies.
- Implemented training for healthcare practitioners: CloudMD has conducted accessibility training for healthcare practitioners and staff to ensure they are well-equipped to communicate effectively with patients with various disabilities. This includes understanding the use of communication aids.
- Ensured telemedicine accessibility: The Telemedicine platform used is accessible to individuals with disabilities, including but not limited to those with visual or hearing impairments.
- Accessible public communication: If the company communicates information through public channels, we ensure that the information is accessible and available in alternative formats as needed.
- Established accessible multi-format/multi-media channels for patients to provide feedback or file complaints that is inclusive and responsive to the needs of individuals with disabilities.
- Emergency response preparedness: We have developed emergency response plans that provide consideration and support for the diverse accessibility needs of patients and clients. Through these initiatives and ongoing commitment, CloudMD seeks to achieve the benchmark for information and communication accessibility aligned with the AODA standards and clients and employee expectations.

Our goal is to create an environment where every employee can thrive, contribute, and access information without barriers, thereby reinforcing our dedication to inclusivity and diversity and a frictionless, accessible, and value-adding service delivery experience for our patients and clients.

## 2. Looking Forward – Next Phases for our Accessibility Plan

### 2024-2025 Focus Areas - Implementation and Integration

As we embark on the journey of enhancing accessibility within our organization, we will continue to integrate and align all newly acquired CloudMD organizations to the AODA requirements. We understand that fostering an inclusive environment requires continuous effort and dedication. Looking ahead, we will maintain a priority focus on the implementation of strategic initiatives that strengthen our accessibility framework. Our goal is to ensure that every member of our diverse community (employees, clients, patients, and communities we support), including those with disabilities, can fully participate and thrive within our organization.

#### A. Customer Service

We want to set the stage for forward-looking, accessibility-focused customer service initiatives that encompass a holistic approach to enhancing the way we engage, support, and care for all individuals within our diverse community. The focus areas CloudMD has mapped out to advance the organization through this journey include the following:

- Provide more proactive communication to clients and patients on the accessibility resources, services, and processes we avail to accommodate their needs (e.g. assistive technology, different languages, American Sign Language (ASL), multi-format accessibility resources etc.).
- Continue to staff up nurses, healthcare providers, and/or first line healthcare staff with diverse service capabilities (ASL, varied languages).
- Create processes that allow customers to communicate their accessibility needs and preferences. This information can be used to tailor interactions and services, creating a more personalized and inclusive experience.
- Continue to develop and disseminate healthcare information and resources in accessible formats.
- Expand virtual health services to ensure they are accessible to individuals with disabilities. This includes offering accessible online appointments, providing captioning or sign language interpretation, and ensuring that telehealth platforms comply with the AODA standards
- Scale applicable and relevant accessible customer service policy, training, and practices across all CloudMD geographical regions.
- Monitor and ensure organizational adherence to new and emerging accessibility standards, including but not limited to those with notable customer service /customer interaction implications. Update relevant content into customer service training and communications.

## **B. Employment Standards**

Recognizing the significance of a diverse and inclusive workforce, we are dedicated to shaping an environment where every employee, contractor, or partner to CloudMD, regardless of ability, is set up for success and contribute meaningfully to our purpose to Empower Healthier Living. Our employment practices intend to not only meet but exceed the expectations set by the AODA, reinforcing our core values and a workforce culture that is truly accessible, equitable, and productive for all. The focus areas CloudMD has mapped out to advance us through this journey include the following:

- Continue to evolve inclusive hiring practices through inclusive recruitment strategies and partnering with organizations supporting people with disabilities for talent sourcing.
- Provide leadership training programs that emphasize the importance of creating an inclusive work environment. Leaders should be equipped to foster a culture that values diversity, promotes equal opportunities, and integrates accessibility considerations into decision-making processes.
- Implement specialized training programs for healthcare professionals to enhance their understanding of disability-related issues, communication strategies, and inclusive practices. This training can improve the overall patient experience and ensure healthcare services are tailored to individual needs.
- Develop an Accessibility Champion Program that designates employees as accessibility champions. These individuals can serve as advocates, providing support to colleagues and helping to ensure ongoing AODA compliance. The HR Team will be the initial control for this.

## **C. Information and Communication**

We recognize the pivotal role that human resources, technology, and communication play in shaping the future of healthcare services. Looking ahead, our focus is on strategic initiatives that remove barriers and ensure an inclusive, accessible, and technologically advanced healthcare experience for our employees, clients, and patients.

- Continue regular audits on all CloudMD internal and external websites, portals, and systems to ensure company information is available in accessible formats and meets or exceeds Web Content Accessibility Guidelines (WCAG) standards.
- Orient the applicable client-facing teams with appropriate knowledge and information on assistive technology like Telecommunications Device for the Deaf (TDD) and Text Telephones (TT).
- Begin integrating assistive technologies. Invest in advanced technologies and software solutions that enhance accessibility for individuals with disabilities. This includes ensuring that digital platforms, websites, and mobile applications comply with the latest accessibility standards
- Embed accessibility awareness into existing clinical programs, tools, and health education and engagement tools to inform patients, caregivers, and the general public about the accessibility features available within healthcare services. This can include providing information in various formats, such as braille, large print, and accessible digital content
- Establish a robust system for regular audits and compliance monitoring to ensure ongoing adherence to the AODA standards. This proactive approach helps identify and address accessibility gaps promptly.

### 3. Longer-Term Expansion and Enhancement

As we focus on expanding and enhancing our accessibility commitment, we are charting a strategic course to not only meet compliance requirements but also to achieve new benchmarks in accessibility and inclusivity within the healthcare sector.

#### A. Customer Service

- Continue to evolve inclusive education programs to employer audiences, clients, and patients that provide information about healthcare services, preventive care, and wellness in the most up-to-date accessible formats and empower individuals with disabilities to actively manage their health.
- Leveraging CloudMD's current thought leadership position in the mental health and well-being space, incorporate accessibility-related content into industry events, workshops, and other public venues.
- Amplify existing customer feedback mechanisms focused specifically on the accessibility of services. Encourage customers to provide input on their experiences and suggestions for further improvements in accessibility.
- Strengthen sign language interpretation services, providing on-demand video interpretation for individuals who use American Sign Language (ASL) or other sign languages. This service will be seamlessly integrated into various customer touchpoints.

#### B. Employment Standards

- Continuous Learning Modules: Implement ongoing learning modules or newsletters to keep employees informed about updates to the AODA standards, emerging best practices, and real-life case studies.
- Policy and Practice Refinement: Make necessary adjustments to policies and practices based on feedback and performance data.
- Collaborate with disability organizations and other Accessibility Subject Matter Experts to gain insights, foster partnerships, and participate in initiatives that support inclusivity in the workplace.

#### C. Information and Communications

- Establish a comprehensive accessibility framework that goes beyond regulatory requirements, incorporating industry-leading practices to create an environment where individuals of all abilities can seamlessly access and benefit from our healthcare services.
- Further advance our Telemedicine services, integrating innovative technologies to enhance accessibility. This includes real-time translation services, AI-driven accessibility features, and an intuitive telehealth platform designed with the diverse needs of our patient population in mind.
- Embed accessibility into long-term corporate sustainability goals.
- Continue to Invest in patient-centric technology solutions that empower individuals with disabilities to actively manage their health. This may include the ongoing development of accessible health apps, wearables, and tools that facilitate greater independence in healthcare management.



- Enhance and expand Telemedicine services, integrating advanced accessibility features like real-time translation services, multi-modal communication options, and user-friendly interfaces that cater to the diverse needs of patients with disabilities.

**For More Information**

For more information on this accessibility plan, please contact us at [Accessibility@CloudMD.com](mailto:Accessibility@CloudMD.com)

Our accessibility plan is publicly posted at [www.CloudMD.ca](http://www.CloudMD.ca)

Standard and accessible formats of this document are free on request from [Accessibility@CloudMD.com](mailto:Accessibility@CloudMD.com)