2023 – 2026 Accessibility Plan

June 1 2023

TekSavvy Solutions Inc.

1. Statement of Commitment

As part of providing customer-focused service, TekSavvy Solutions Inc. is committed to improving the accessibility of our products and services. We strive to provide our services and treat our employees in a way that respects the dignity and independence of all people. This plan outlines the steps we plan to take to achieve these goals.

2. General

2.1. Providing Feedback

We welcome questions, concerns or other feedback on any issues involving accessibility from our customers or other interested persons. This can include any feedback you feel is related to accessibility, including comments on this Accessibility Plan or relating to any barriers you have identified in dealing with TekSavvy or accessing our products or services.

You may provide feedback on accessibility through your usual way of contacting us, including:

By telephone: Sales & Support line: 1-877-779-1575

By email: accessibility@teksavvy.ca

Through our feedback form: https://teksavvy.com/accessibility-feedback-form

Through our online community: https://community.teksavvy.com

By mail:

Attn: Accessibility TekSavvy Solutions Inc. 800 Richmond Street Chatham, Ontario N7M 5J5

Or through one of our social media channels:

Facebook: www.facebook.com/TekSavvySolutionsInc/

Twitter: https://twitter.com/TekSavvyBuzz/

If you would like to be contacted in response to your concern, please let us know your preferred method of communication. Otherwise, we will respond to you through the same method that you used to contact us.

You also have the option of providing feedback anonymously. If you do, we will take note of your feedback through our usual internal process but will not respond to you directly.

Our Chief Operations Officer is the designated employee responsible for receiving feedback on accessibility. Any feedback on this plan or accessibility can be addressed directly to our Chief Operations Officer by mail at 800 Richmond Street Chatham, Ontario N7M 5J5 or electronically at accessibility@teksavvy.ca.

Unless you elect to provide feedback anonymously, we will contact you in response to confirm receipt and to work with you on how we can best address the issue.

In addition to addressing accessibility issues on a case-by-case basis directly with you, our agents are trained to forward all feedback to our accessibility team, which includes our Chief Operations Officer who is responsible for receiving feedback on accessibility. Feedback will be tracked and assessed by our team as part of the process for updating our Accessibility Plan and policies.

Any personal information you disclose to us while providing feedback on accessibility will be kept confidential. As with all personal information you provide to us, your personal information will be treated in accordance with our Privacy Policy available here in **English** and here in **French**.

2.2. Requesting Alternative Formats of this Plan

If you would like to request an alternative format of this plan, free of charge, upon request, please contact us in one of the ways listed above.

An electronic version in large print (that is compatible with assistive technology) of this plan can be downloaded immediately from our website: <u>Large Print Format</u>.

TekSavvy can provide this plan in any of the formats below:

- Printed physical copy;
- Audio recording;
- Braille;

If you have another format in mind, we are also happy to work with you to find an alternative format that will work best for you.

2.3. Definitions

The following key terms are used throughout this plan. We use these key terms as they are defined in the <u>Accessible Canada Act</u>:

- Accessibility: The design of products, devices, services, environments, technologies, policies and rules in a way that allows all people, including people with a variety of disabilities, to access them.
- Barrier: means anything including anything physical, architectural, technological or attitudinal, anything that is based on information or communications or anything that is the result of a policy or a practice that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation.
- Disability: means any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation whether permanent, temporary or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person's full and equal participation in society.

3. Key Areas

3.1. Employment

Where we want to be:

TekSavvy is committed to fair and accessible employment practices to promote an inclusive and accessible work environment that is affirming and safe for our employees.

Identified Barrier	Job searchers and applicants may face barriers in applying for jobs with TekSavvy.
Policies and Action(s)	As part of our job postings, we advise potential applicants about the availability of accommodations for applicants with disabilities in our recruitment processes. We notify job applicants when they are selected to participate further in the assessment/selection process that accommodations are available upon request. If an applicant requests accommodation, we further consult with the individual and make arrangements for the provision

	of suitable accommodations to the extent possible that take into account the applicant's needs.
	Next steps:
	 Ongoing review of our hiring practices based on feedback relating to accessibility.
Timeline	1. Ongoing

Identified Barrier	Employees may face barriers in performing their work that require accommodation.
Policies and Action(s)	We have a disability management and wellness program to explain our practices for supporting employees with disabilities, including our policies regarding the provision of job accommodations. We maintain written documentation of individual accommodation plans for employees with disabilities, which can be accessed by the employee themselves. In the event employees return to office, these plans will also include individualized workplace emergency response information. We notify our employees of our program and any further updates to the policies. This information is provided to new hires as soon as practicable after they begin employment.
	Next steps:
	 Update staff onboarding training to improve employee awareness of our programs relating to disability management and wellness. Ongoing review of our disability management and wellness program based on feedback.
Timeline	 June 2024 Ongoing

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Policies and Action(s)	Together with an external human resources partner, we develop a graduated return-to-work program for employees when it is recommended for their individual needs. TekSavvy's current process for developing graduated return-to-work programs includes working with the individual employee and our external human resources firm, who assists the employee with obtaining documentation from their medical practitioner. Our external human resources firm then drafts an accommodation letter outlining the employee's needs, based on this medical documentation. Next steps: 1. Ongoing review of our graduated return-to-work program based on any feedback received.
Timeline	1. Ongoing

3.2. The Built Environment

Where we want to be:

TekSavvy is committed to ensuring that the public has barrier-free access to the parts of its premises open to the public, and its employees have barrier-free access to its offices.

As a result of the covid-19 pandemic, a majority of TekSavvy's workforce is currently remote. TekSavvy's offices are also not currently open to the public. TekSavvy does not currently have set plans for employees' return to office. With that in mind, many of our goals for the built environment are difficult to plan. For the purposes of this plan, therefore, we have extended our consideration of the "built environment" to cover our employees' day-to-day workstations in their own homes.

Identified Barrier	Our employees may face physical discomfort or mobility issues in working at their remote workstations.
Policies and Action(s)	As with other employee accommodations, requested accommodations to workstations are addressed on a case-by-case basis by our human resources department. Next steps:

	We will review our disability management and wellness program and policies on an ongoing basis based on feedback.
Timeline	Ongoing review

Identified Barrier	Our employees may face barriers in physically accessing our office buildings. These may include for example barriers posed by exterior and interior paths of travel, building entrances, ramps, stairs, doorways, washrooms, signage, illumination levels, parking and flooring.
Policies and Action(s)	As noted above, our offices are currently closed to public visitors and the vast majority of TekSavvy staff work from home. Employees who may require building access from time to time as part of their duties can receive accommodations through our usual accommodation process, described above. Next steps: 1. Review the physical accessibility of our offices to identify remaining barriers to accessing our premises.
Timeline	Within one year of opening our offices

Identified Barrier	Employees may face barriers in being aware of or participating in emergency responses in the workplace.
Policies and Action(s)	In the event that employees will return to in-person work, we will provide individualized workplace emergency response information to employees with disabilities where the employee's location and disability is such that individualized information is necessary and TekSavvy is aware of the need for accommodation. TekSavvy will provide workplace emergency response information as soon as practicable after learning of the need for accommodation due to an employee's disability. If an employee would likely require assistance in the event of
	a workplace emergency response, TekSavvy will designate a person(s) to provide assistance and, with the employee's

	consent we will provide the workplace emergency response information to the designated person(s). Individualized workplace emergency response information will be reviewed at minimum each time (i) the employee moves to a different location within TekSavvy; (ii) the employee's overall accommodation needs or plans are reviewed, or (iii) there is a change in the physical environment. Next steps: 1. Ongoing review of our individualized workplace
	emergency response program based on requests from employees and feedback.
Timeline	Within six months of re-opening our offices

3.3. Information and Communication Technologies and Design and Delivery of Programs and Services

Where we want to be:

TekSavvy's goal is to provide barrier-free access to its Information and Communications Technologies (ICT), and to ensure the design and delivery of its services takes accessibility into account. TekSavvy is committed to ensuring its clients are satisfied with the design and delivery of our services.

How we will get there:

As most of our products and services are either ICT themselves, or facilitate the use of ICT, we have considered ICT together with the design and delivery of our programs and services.

Identified Barrier	Branding colours: Our brand colours are not ideal for ensuring readability for all individuals, including individuals with colour blindness or vision impairment.
Policies and Action(s)	TekSavvy identified that its brand colours do not have a maximum degree of visual contrast, which may make them difficult to read for some individuals. TekSavvy plans to ensure any future branding reviews will improve the accessibility of its brand colours.

	Next steps:
	Incorporate accessibility lens into future branding reviews.
Timeline	At next branding review

Identified Barrier	Website accessibility: The primary source of information about our ICT products and services is our website. The information on our website may not be accessible for all potential customers. For example, issues such as drop-down menus, hyperlinks and online selection forms may not be functional for all screen-reader tools.
Policies and Action(s)	TekSavvy currently employs a tool to ensure its website is compliant with Web Content Accessibility Guidelines (WCAG). Our existing website content, and any new website content, is assessed for compliance against this tool. We will continue to ensure that our website is accessible through ongoing testing with our WCAG compliance tool, and identify any new sources of non-conformation. We will also continue to update our website based on any feedback we receive related to accessibility issues. Next steps: 1. Ongoing review of accessibility of our website.
Timeline	1. Ongoing

Identified Barrier	Social Media and Advertising Accessibility: TekSavvy's social media and advertising posts may not be accessible to all users.
Policies and Action(s)	TekSavvy does not currently have in place a specific policy for ensuring the accessibility of its social media and advertising posts. This means that TekSavvy employees posting on its social media accounts may not be familiar with best practices for ensuring accessibility of its posts, such as providing alternative text for images and closed captioning for any videos. Next steps:

	 Include accessibility guidelines into our standard advertising review checklist to promote better internal awareness. Develop social media policy identifying barriers to accessibility on social media and establishing best practices for posts.
Timeline	 December 2023 June 2024

Identified Barrier

Remote installations and troubleshooting: we have identified that our customers may experience barriers to receiving customer support remotely, including when setting up internet or other services for the first time, or when they require technical support. For instance, when a customer is experiencing certain issues, such as connectivity, TekSavvy's agents will assist the customer remotely and guide the customer through different troubleshooting tasks. This may include for example guiding the customer through accessing a web portal or reading a light pattern on hardware.

TekSavvy does not have an in-person technical support team.

Remote troubleshooting of this type can pose a barrier to accessing service in several ways. For example, people may have difficulty reading visual cues on hardware, or have difficulty with using technology. People may have physical mobility restrictions that may not allow them to easily access their hardware.

Policies and Action(s)

In TekSavvy's current practice, our agents will work with customers to find support various accommodations on a case-by-case basis. For example, customers may choose to ask a family member or friend, or personal support worker, to join them for a call. Customers are also able to provide a limited form of account access to allow a specific individual to take care of all troubleshooting.

However, our agents may not be familiar with all available accommodations or may have difficulty identifying that a customer requires an accommodation. Our employees receive training on accessibility when they are onboarded but delivering similar training on an ongoing basis and through other methods may improve our overall training.

	1. We will develop a specific "quick reference" checklist for our agents to advise on: a. how to identify barriers to accessibility in troubleshooting; b. common types of accommodations for addressing specific barriers. 2. We will provide ongoing refresher training to agents to ensure they understand best practices for accommodating customers during troubleshooting. 3. We will develop a team of agents with specialized
	We will develop a team of agents with specialized training for handling accessibility issues during troubleshooting.
Timeline	 December 2023 December 2023 and ongoing June 2024

Identified Barrier	Communication with customers: customers may face barriers in seeking to communicate with our sales and support agents in general. This includes for example customers with visual, auditory or cognitive impairments, and customers with difficulties accessing technology typically used for communicating with our agents.
Policies and Action(s)	TekSavvy currently allows customers to contact us through a variety of methods, including by phone, email, social media chats and our online community. Our agents are trained in communicating clearly and on accessibility considerations, including tools for accommodating customer needs, when they are onboarded. Our agents are also trained on how to identify when to escalate complaints where they cannot find a way to assist. Next steps:
	We will create additional refresher training materials for our agents to ensure they are aware of the best communication practices, including those for reducing barriers. This will include explanations of the availability of TTY and IP Relay services to connect with our customers.

	 Review internal policies and training to ensure all front-line staff and future hires are knowledgeable about best communication practices. Establish specialized team with enhanced training for escalations. All accessibility training resources will be available to all employees on our internal resource site.
Timeline	 December 2023 and ongoing June 2024 June 2024

Identified Barrier	Accessibility of our customer policies: communication may pose a barrier for understanding our existing policies, such as our customer terms and privacy policies. For example, policies may not be written in plain language, or alternative formats are not readily available.
Policies and Action(s)	Our existing policies are made available publicly on our website in conformation with the WCAG standard. We also provide copies upon request in alternative formats. Next steps: 1. As existing policies are updated and new policies are created, ensure plain language is used throughout, targeting at a grade 6-8 reading comprehension level. 2. Provide alternative formats for policies available for download on our website.
Timeline	1. Ongoing 2. June 2024

3.4. Procurement of goods, services and facilities

Where we want to be:

TekSavvy's goal is to ensure its employees involved in procurement consider accessibility from the start of a procurement process, such that all new goods, services and facilities TekSavvy procured will be accessible by default. TekSavvy is committed to incorporating accessibility awareness into its procurement practices so that they are accessible to all vendors.

Identified Barrier	Not all employees who may engage in procurement are aware of the importance of accessibility in the procurement process. Moreover, TekSavvy typically engages in informal procurement processes, which means that accessibility considerations of a product or service may not be identified at the outset of the process.
Policies and Action(s)	 Update TekSavvy's internal contract request templates to ensure the procurement individual has considered accessibility requirements of the products or services, if applicable. Develop an accessibility policy for procurement that: Identifies potential barriers to persons with disabilities looking to participate in procurement processes; and Explains how accessibility considerations of a product or service should be identified at the procurement stage.
Timeline	 December 2023 June 2024

3.5. Transportation

Where we want to be:

TekSavvy does not itself provide any transportation services and this key area does not therefore directly apply to TekSavvy's operations. That said, TekSavvy is committed to ensuring that its employees will have barrier-free access to transportation as needed in order to accomplish their work.

Identified Barrier	Employees may face barriers in accessing transportation needed to accomplish their work, such as where off-site work requires the use of a vehicle.
Policies and Action(s)	As with most accommodations relating to employment, TekSavvy currently addresses accommodation requests relating to transportation on a case-by-case basis. As these

	requests are rare, more consideration of possible barriers faced by employees to transportation is required. Next steps:
	Develop transportation guidelines to plan for alternative transportation to worksites to ensure employees with disabilities can perform off-site work as needed.
Timeline	1. June 2024

3.6. Communication, other than ICT

We are required to identify areas where communication (other than information and communication technologies) can pose a barrier to the subject areas described above. For ease, we have integrated this discussion into the specific areas where we have identified communication as posing a potential barrier.

4. Accessible Canada Act and the Telecommunications Act

As a federally regulated telecommunications provider, we are subject to the Accessible Canada Act (the "ACA") and its regulations: the Accessible Canada Regulations and the Canadian Radio-television and Telecommunications Commission Accessibility Reporting Regulations. At a high-level, the ACA and these regulations require us to:

- Prepare and publish this Accessibility Plan designed to identify barriers in different areas of our business, as well as outline our policies, plans and practices to remove these barriers.
- Publish an updated version of our Accessibility Plan every three years.
- Prepare annual progress reports in years we do not publish an Accessibility Plan.
- Link to the accessibility section of our website directly on our home page.
- Accept feedback related to this plan or accessibility and describe our process for accepting feedback. Our process for providing feedback is discussed in section 2.1 above.
- Ensure our materials described above, such as this Accessibility Plan, progress reports and our feedback process description, are published in a manner that conforms to most recent WCAG guidelines.

TekSavvy is also subject to some requirements relating to accessibility as part of decisions made by the Canadian Radio-television and Telecommunications Commission (CRTC) under to the *Telecommunications Act*. We have summarized the requirements relevant to TekSavvy in this section. We note that as a smaller provider of

telecommunications services, TekSavvy is not subject to all CRTC decisions relating to accessibility, and therefore only those that apply to TekSavvy are listed below.

4.1. Paper-Billing

As part of Telecom and Broadcasting Decision CRTC 2022-28, TekSavvy is required to provide paper bills upon request to certain customers, including those who self-identify as having a disability and seniors. TekSavvy is also required to ensure there is adequate awareness of paper bill options, including by:

- making information on paper billing easily available on our FAQ website, account management systems, and through their customer service representatives;
- training customer service representatives on how to answer inquiries on paper bills; and
- informing new customers about our paper bill practices.

For the last ten years, TekSavvy's policy has been to make paper billing available upon request at no cost to all its customers. There is no need to self-identify as a senior or as having a disability.

Information regarding paper billing is set out in the Frequently Asked Questions section of our website, under "Paper Billing."

4.2. Teletypewriter (TTY) relay services (711) and Internet Protocol Relay Services

Teletypewriter relay services (TTY relay or 711) are text-to-voice and voice-to-text relay services. In a TTY relay service call, the relay operator communicates with the person who has a hearing or speech disability via TTY (typewritten messages), and with the person without a hearing or speech disability via voice.

IP relay services are text-to-voice and voice-to-text relay services, but run over internet protocol. In an IP relay service call, the relay operator communicates with the person who has a hearing or speech disability via text and the person without a hearing or speech disability via voice. The person with a disability uses a device connected to the Internet (such as a computer, laptop or wireless device) or a text messaging application to reach the relay operator. The person without a disability dials a toll-free number to reach the relay operator.

As part of Telecom Regulatory Policy 2017-11, TekSavvy's phone service, TekTalk, is required to provide TTY and IP Relay services for 24 hours a day, 7 days a week. Service providers like TekSavvy are required to promote information on all our disability-specific services and products, and to incorporate an easy-to-find home page link into the special needs/disability sections of their websites, if our websites include such sections.

Information about these services is available in the "TekTalk Accessibility FAQs" section of our phone services page, available at: www.teksavvy.com/services/phone.

4.3. Making Information About our Telecom Services Accessible

As part of Telecom Regulatory Policy 2017-11, service providers like TekSavvy are required to make information about all our telecommunications services and products on our websites accessible to the point of providing reasonable accommodation for persons with disabilities.

Our efforts to make the information on our website more accessible, and our future plans for improving the accessibility of our website, are described in Section 3.3 of our Accessibility Plan.

4.4. Alternative Channels of Customer Service

As part of Telecom Regulatory Policy 2017-11, where customer service functions on our websites are not accessible, persons with disabilities must not incur a charge or otherwise be disadvantaged if they use an alternate channel of customer service to access those functions. We are also required to ensure the accessibility of any customer service functions that are available solely over the service providers' websites.

TekSavvy does not charge any fees for using alternative channels of customer service outside of our website. We look forward to serving you by phone, email or through our social media account. Our efforts to continue to make all aspects of our website more accessible are described under Section 3.3 of our Accessibility Plan.

4.5. Call Centre Accessibility

As part of Telecom Regulatory Policy 2017-11, service providers like TekSavvy are required to make their general call centres accessible to the point of providing a reasonable accommodation to persons with disabilities. This includes by (a) training customer service representatives in handling enquiries from persons with disabilities, (b) familiarizing them with the service providers' products and services for persons with disabilities, and (c) making Interactive Voice Response systems accessible. A service provider with a disability call centre can meet this requirement by developing and implementing protocols for the appropriate transfer of calls to the call centre.

Our efforts to continue to reduce barriers to accessing our call centre, including developing a specialized team for addressing accessibility issues, are described in Section 3.3 of our Accessibility Plan.

5. Consultations

This Accessibility Plan was prepared by first discussing common barriers to accessibility with representatives from groups across TekSavvy, including employees involved in human resources, health and safety, customer service (including customer complaints and escalations), website design and specific products and services. In preparing the plan, employees considered their knowledge of existing barriers and challenges to overcoming those barriers, as well as where current policies and practices may fall short. Finally, in drafting an initial plan, employees reviewed the specific feedback on accessibility that has been received by TekSavvy since June 2022, including through our internal processes for ensuing feedback about accessibility was referred to a single accessibility hub.

Once an initial draft plan was prepared, employees across different teams in the organization were invited to consult on the plan in different ways. Initially, this was done by identifying select representatives across teams within the business with experience in various areas. In consideration of employees' privacy, employees that participated in the consultation were not asked to identify if they lived with a disability or not. Based on this consultation process, revisions to the draft plan were made.

This process led to the preparation of a finalized draft version of the plan ready for more formal consultation. At that stage, as TekSavvy does not currently have a formal network of stakeholders in the accessibility space, we identified potential external consultants working in the area. In order to receive meaningful feedback, TekSavvy retained Excellence Canada to conduct a review and internal consultation of TekSavvy's first accessibility plan. Excellence Canada organized employee focus groups to anonymously collect feedback about accessibility issues and invite persons with an interest in accessibility to be able to share their experience confidentially. Excellence Canada's Accessibility Advisory Committee, which includes persons with a lived experience with disabilities, also reviewed and commented on the draft Accessibility Plan from the perspective of people with disabilities.

The comments received were useful in identifying improvements to the Plan, including ways to improve readability of the plan for screen-assisted devices, an additional barrier to accessibility that TekSavvy employees had not initially identified, and other steps that could be taken to address identified barriers. Comments and recommendations received in this process were integrated in the final plan.

6. Section 6 of the ACA

The Accessible Canada Act sets out seven key principles. The Act should be carried out in recognition of, and in accordance with, these principles. TekSavvy has taken account these principles in preparing its Accessibility Plan:

- a. all persons must be treated with dignity regardless of their disabilities;
- b. all persons must have the same opportunity to make for themselves the lives that they are able and wish to have regardless of their disabilities;

- c. all persons must have barrier-free access to full and equal participation in society, regardless of their disabilities;
- d. all persons must have meaningful options and be free to make their own choices, with support if they desire, regardless of their disabilities;
- e. laws, policies, programs, services and structures must take into account the disabilities of persons, the different ways that persons interact with their environments and the multiple and intersecting forms of marginalization and discrimination faced by persons;
- f. persons with disabilities must be involved in the development and design of laws, policies, programs, services and structures; and
- g. the development and revision of accessibility standards and the making of regulations must be done with the objective of achieving the highest level of accessibility for persons with disabilities.

TekSavvy reviewed these principles prior to engaging in its review of barriers described above and kept these goals at the forefront in assessing what its goals should be in each element of its business described above. TekSavvy reviewed each of its "next steps" action plans against these principles and adjusted our next steps where they did not fully reflect these principles.

In consulting internally on its draft of this Accessibility Plan, TekSavvy ensured these specific principles were brought to employees' attention in order to ensure their feedback could be the most meaningful.