

Wirecomm Systems (2008) Inc.

## **Accessibility Policies and Accessibility Plan (the “Accessibility Plan”)**

### **General**

#### **Introduction**

This Accessibility Plan is in compliance with the Accessible Canada Regulations: SOR/2021-241 under the *Accessible Canada Act* (“ACA”).

The Accessible Canada Regulations under the ACA require that Wirecomm Systems (2008) Inc. (“Wirecomm”) establish, implement, maintain and document its accessibility plan (the “Accessibility Plan”). The Accessibility Plan outlines Wirecomm’s strategy for preventing and removing barriers for persons with disabilities and meets our obligations under the Accessible Canada Regulations and the ACA.

The Accessibility Plan will be publicly available, including in an accessible format upon request. The Accessibility Plan will be reviewed and updated, if applicable, at least once every three years.

#### **Application**

The Accessibility Plan applies to all employees, as defined in the Accessible Canada Regulations, as well as the customers of Wirecomm in Canada.

#### **Our Commitment**

In fulfilling our mission, Wirecomm strives to treat all individuals in a manner that allows them to maintain their dignity and independence. Wirecomm promotes integration and equal opportunity and is committed to meeting the needs of people with disabilities in a timely manner. We will seek to achieve this by preventing and removing barriers to accessibility and by meeting accessibility requirements under the ACA. This Accessibility Plan sets out Wirecomm’s policy on how we will achieve accessibility in all areas of Wirecomm’s operations.

The following accessibility strategies set out the requirements that are applicable to Wirecomm:

1. Employment
2. The Built Environment
3. Information and Communication Technologies
4. Communication, Other than Information and Communication Technologies
5. The Procurement of Goods, Services and Facilities
6. The Design and Delivery of Programs and Services
7. Transportation

## **Feedback**

Wirecomm has a designated accessibility representative. The representative is designated to receive feedback relating to accessibility and accessibility barriers on behalf of Wirecomm.

Wirecomm's **Designated Accessibility Representative** is as follows:

Manisha Arora  
HR Generalist

You can provide feedback and/or communicate with Wirecomm and the Designated Accessibility Representative in any of the following manners:

**Mail:** 107 Corstate Ave, Concord, ON L4K 4Y2

**Telephone:** 905-760-8018 (234)

**E-mail:** marora@wirecommca.com

## **Consultation**

As part of developing Wirecomm's Accessibility Plan, Wirecomm engaged in consultations with its employees and an accessibility expert. In particular, Wirecomm sought feedback from persons with disabilities regarding its operations in order to identify, remove, and prevent accessibility barriers.

Persons with were consulted using online and in-person measures. Wirecomm conducted an online survey named the "Employment Equity Survey" where all the employees, new and old inclusive; were given a chance to voluntarily declare their impairment or disability, free from discrimination. This survey was confidential and employees participated with the knowledge that this information would not be broadcasted and that Wirecomm takes pride in having a diverse workforce.

The constraints faced during consultations were related to self-identification where individuals did not necessarily perceive themselves as having a disability. This likely stems from the perception that a disability can only be physical or overt. Wirecomm has provided education and awareness about the importance of declaration so that appropriate measures can be taken, and accommodation can be provided to make the work environment much more conducive. Another consultation barrier that Wirecomm faced was that in the telecommunications industry, which Wirecomm is a part of, the type of work its employees do is considered physically demanding, resulting in a smaller pool of applications and less feedback from women and persons with physical disabilities.

## **Areas Described Under Section 5 of the ACA**

The following sets out how Wirecomm is committed to complying with the ACA:

## **1. Employment**

Wirecomm is committed to fair and accessible employment practices in all stages of the employment cycle that will respect the dignity and independence of current and prospective employees with disabilities.

### **Current Level of Accessibility in the Area of Employment:**

The COVID-19 pandemic disrupted traditional structures in the workplace, causing employers to rethink solutions using new technologies. During this time, Wirecomm adopted remote work, which is still currently available to persons with disabilities. A hybrid work model is still being provided to all employees post pandemic. The expansion of Wirecomm has opened new positions and now there has been a focus on recruitment. Currently, Wirecomm is on track to reduce accessibility issues in the area of employment but there are several areas that require improvement in both recruitment and existing employment.

### **Barriers in Employment as Identified by Consultation Participants:**

One barrier that Wirecomm identified after consulting with participants, is that some individuals did not feel comfortable self-identifying with an impairment or disability, as there is still a social stigma or stereotype surrounding certain disabilities. This was primarily the case in underrepresented groups. Another issue identified was the lack of an accountable structure to provide consistent support and hold meetings with a frequency that can identify and remove issues faced by persons with disabilities. There is high turnover in this industry and employees do not always gain a sense of belonging. Wirecomm noted if an employee has not been with the company for a long time to openly discuss their issues, they are less likely to raise accessibility issues. This is one of the reasons Wirecomm instills an open-door policy.

### **Accessibility Goals in the Area of Employment:**

Some areas that Wirecomm would like to address in terms of accessibility include: the recruitment of women into the skilled trades positions, improvement in how individuals request reasonable accommodations, encouragement of referrals for various vacancies posted on a new Recruitment module, and an ATS tracking system linked with Wirecomm website. There is constant revision of job descriptions for vacancies to hire and retain the best talent, focusing on human potential. Wirecomm's Employment Equity policy is a core part of all the new hire orientations as well and employees are made aware of this as soon as they begin working with the company.

Wirecomm plans to implement Accessibility plans and policies within the stipulated time frame to firstly, ensure all employees that, not only have physical disabilities accommodated under our accessibility and employment equity policy, but also non-physical disabilities are adequately accommodated. Moreover, Wirecomm has a goal of improving the facilities and workplace to improve infrastructural accessibility. Wirecomm

would like to focus on changing attitudes around accessibility in the workplace. Specifically, Wirecomm's goal is to better display visible support for persons with disabilities, facilitate an attitude of inclusivity, and work on reducing informational and communication barriers. Respecting privacy and confidentiality would always be the top priority and open-door work culture for giving space to persons with disabilities to come forth and address their issues, if any. Additionally, the process of recruitment, performance reviews and career development to be based on experience and skills rather than credentialism as many persons with disabilities do not always receive the same opportunities or supports earn degrees or formal education.

### **Planned Action to Achieve Accessibility Goals:**

Based on the foregoing, Wirecomm has identified several barriers and goals it wishes to achieve when it comes to employment accessibility. To achieve these goals, Wirecomm will implement measures in the following areas:

- **Recruitment:** Wirecomm has implemented a new recruitment module as ATS system. Wirecomm will continue to ensure this performance driven hiring platform takes into consideration disabilities and barriers facing applicants. Wirecomm will continue to evaluate its job descriptions, referrals practice, and job fair practices to ensure they are accessibility and accommodating. More details below.
- **During Employment:** Wirecomm will continue promoting its open-door policy and encourage employees to utilize the supports available. Wirecomm will reduce barriers and attempt to end the "stigma" associated with disabilities in the workplace through continued communications, education/training, and updating policies/programs. More details below.

### ***Recruitment***

Wirecomm is committed to fair and accessible employment recruiting practices that attract and retain employees with disabilities.

Wirecomm will do the following:

#### **(i) Recruitment General**

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

This will include:

- review and, as necessary, modification of existing recruitment policies, procedures and processes;

- specifying that accommodation is available for applicants with disabilities, on Wirecomm's website and on job postings on recruitment platforms and the ATS system adopted by the company; and

**(ii) Recruitment, Assessment and Selection**

Wirecomm will notify job applicants, when they are individually selected to participate in an assessment or selection process and inform them that accommodations are available upon request in relation to the materials or processes to be used in the assessment/selection process. This will include:

- a review and, as necessary, modification of existing recruitment policies, procedures and processes;
- inclusion of availability of accommodation notice as part of the script in the scheduling of an interview and/or assessment; and
- if a selected applicant requests an accommodation, a consultation with the applicant and arrangement for provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to the disability; and

**(iii) Notice to Successful Applicants**

When making offers of employment, Wirecomm will notify the successful applicant of its policies for accommodating employees with disabilities. This will include:

- a review and, as necessary, modification of existing recruitment policies, procedures and processes; and
- inclusion of notification of Wirecomm's policies on accommodating employees with disabilities in offer of employment letters.

**Anticipated Compliance Date: 30-10-2023**

***b. Informing Employees of Supports and General Provision of Accessible Formats and Communications Supports***

Wirecomm will inform all employees of policies that support 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 a disability. This will include:

- informing current employees and new hires of Wirecomm’s policies supporting employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee’s needs due to disability;
- providing information as soon as practicable after the new employee begins employment, specifically in the orientation process;
- keeping employees up to date on changes to existing policies on job accommodations with respect to disabilities;
- where an employee with a disability so requests it, Wirecomm will provide or arrange for provision of suitable accessible formats and communications supports for:
  - information that is needed in order to perform the employee’s job;
  - information that is generally available to employees in the workplace; and
- in meeting the obligations to provide the information that is set out above, Wirecomm will consult with the requesting employee in determining the suitability of an accessible format or communication support.

**Anticipated Compliance Date:** 31-03-2024

***c. Documented Individual Accommodation Plans/Return to Work Process***

Wirecomm will incorporate new accessibility requirements under the Accessible Canada Regulations to ensure that barriers in accommodation and return to work processes are eliminated and corporate policies surrounding accommodation and return to work are followed, where applicable.

Wirecomm’s existing policies and practices include steps that Wirecomm will take to accommodate employees with disabilities and to facilitate employees’ return to work after absence due to disability.

Wirecomm will review and assess existing policies to ensure that they include steps that Wirecomm will take to accommodate employees with disabilities and to facilitate employees’ return to work after absence due to disability. Wirecomm will also ensure that they include a process for the development of documented individual accommodation plans for employees with disabilities, if such plans are required.

Wirecomm will ensure that the process for the development of documented individual accommodation plans includes the following elements:

- information regarding the manner in which the employee requesting accommodation can participate in the development of the plan;

- information regarding the means by which the employee is assessed on an individual basis;
- information regarding the manner in which the employee can request the participation of a representative from their union, where the employee is represented by a union rep, in the development of the accommodation plan;
- steps to protect the privacy of the employee's personal information;
- information regarding the frequency with which individual accommodation plans will be reviewed and updated and the manner in which this will be done;
- the reasons for a denial if an individual accommodation plan is denied;
- information regarding the means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs;
- the following will be included if individual accommodation plans are established:
  - any information regarding accessible formats and communication supports that have been provided for or arranged, in order to provide the employee with:
    - information that is needed in order to perform the employee's job;
    - information that is generally available to employees in the workplace;
    - and
- identify any other accommodation that is to be provided to the employee.

Wirecomm will ensure that the return-to-work process as set out in its existing policies outlines:

- the steps Wirecomm will take to facilitate the employee's return to work after a disability-related absence;
- the development of a written individualized return to work plan for such employees; and
- the use of individual accommodation plans, as discussed above, in the return to work process.

**Anticipated Compliance Date:** 30-10-2023

***d. Performance Management, Career Development and Redeployment***

Wirecomm will 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;
- when providing career development and advancement to employees with disabilities; and
- when redeploying employees with disabilities.

Wirecomm will:

- review, assess and, as necessary, modify existing policies, procedures and practices to ensure compliance with the Accessible Canada Regulations and ACA;
- take the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account when:
  - assessing performance;
  - managing career development and advancement; and
  - redeployment is required.
- review, assess and, as necessary, include in performance management workshops, accessibility criteria;
- take into account the accessibility needs of employees with disabilities when providing career development and advancement to its employees with disabilities, including notification of the ability to provide accommodations on internal or external job postings; and
- take into account the accessibility needs of employees with disabilities when redeploying employees, including review and, as necessary, modification of employee transfer checklist.

**Anticipated Compliance Date:** 31-12-2023

## **2. The Built Environment**

Wirecomm is committed to removing barriers in public spaces and buildings that will uphold the dignity and independence of persons with disabilities.

### **Current Level of Accessibility in the Area of the Built Environment:**

Wirecomm's newly renovated office structure has allowed for proper lighting fixtures, blinds, windows, counter-tops, work stations and personal offices. These measures have assisted in eliminating certain built environment barriers to accessibility.

### **Barriers in the Built Environment as Identified by Consultation Participants:**

The consultation process identified that the built environment requires improvement in understanding and addressing the barriers specific individuals face. This includes understanding what barriers face individuals with the following types of impairments or disabilities:

- vision
- hearing
- mobility



- flexibility
- dexterity
- pain-related
- learning
- developmental
- mental health-related
- memory

Many disabilities fit into one of these categories, while others fit into more than one category (such as mobility, flexibility, or dexterity disabilities). At present, Wirecomm has identified that the built environment does not necessarily address the barriers that employees with these types of disabilities would face.

### **Accessibility Goals in the Area of the Built Environment:**

Wirecomm's goal is to implement reasonable infrastructure measures that allow for accessibility. These measures include:

- Tactile walking surface indicators;
- Staircases;
- Handrails;
- Counters at appropriate heights;
- Appropriate Lighting;
- Signage;
- Ramp design/ Path of travel measures;
- Wheelchair accessible seating arrangements;
- Consider the paths that employees or visitors take when accessible upper floors;
- Develop a maintenance plan and ensure prompt response times when equipment is broken.

### **Planned Action to Achieve Accessibility Goals:**

While Wirecomm has no current plans to engage in new construction or significant redevelopment of its facilities at present, Wirecomm will meet the ACA for all built obligations should any such construction take place in the future.

Wirecomm will put procedures in place to prevent service disruption to its accessible parts of employee spaces. In the event of a service disruption, Wirecomm will notify the employees of the service disruption and alternatives available.

**Anticipated Compliance Date:** 31-03-2024

### **3. Information and Communication Technologies (“ICT”)**

Wirecomm is committed to making company information and communications accessible to persons with disabilities.

#### **Current Level of Accessibility in the Area of Information and Communication Technologies:**

Wirecomm’s Web Accessibility is not sufficient to ensure that all information and communications technology products, services, and digital content are accessible in accordance with the World Wide Consortium Web Content Accessibility Guidelines (WCAG 2.0) Level AA.

#### **Barriers in Information and Communication Technologies as Identified by Consultation Participants:**

Barriers identified under this section include Wirecomm’s screen readers not being equipped with alternative text, training programs lacking visual presentation, and training programs not utilizing subtitles. Another barrier identified was that all employee handbooks and manuals are provided in one format. We do not have alternative formats presently that accommodate visual impairments or provide for example, contrasting colors, bold texts and readable content. This is a barrier as it does not allow users with a visual disability to navigate content quickly and efficiently.

#### **Accessibility Goals in the Area of Information and Communication Technologies:**

Wirecomm’s goals includes, but is not limited to reducing barriers and setting the following ICT goals:

- Conduct a review of Wirecomm’s web presence to identify issues with navigability and improve user experience for persons with disabilities;
- Involve persons with disabilities to test accessibility and identify issues with Wirecomm’s web presence, mobile phones, and Wirecomm software/systems;
- Ensure accessibility considerations are part of the process for introducing any new ICT and upgrading existing programs/systems.

#### **Planned Action to Achieve Accessibility Goals:**

Wirecomm will incorporate new accessibility requirements under the information and communication standards to ensure that its information and communications systems and platforms are accessible and are provided, upon request, in accessible formats that meet the needs of persons with disabilities.

##### **(a) *Feedback, Accessible Formats and Communication Supports***

Wirecomm will:

- ensure that existing and new processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request and in a timely manner;
- more broadly, as a general principle where accessible formats and communication supports for persons with disabilities are requested:
  - provide or arrange for the provision of such accessible formats and communication supports;
  - consult with the person making the request to determine the suitability of the accessible format or communication support;
  - provide or arrange for the provision of accessible formats and communication supports in a timely manner that takes into account the person's accessibility needs due to disability, and at a cost no more than the regular cost charged to other persons; and
- Develop a template for slide decks using large fonts, high contrast colours and clean layout.
- Provide a visual description of the slides when making a presentation.
- Provide captions for videos and, when this is not possible, provide a text transcript of the video.
- Use plain language, symbols and pictures to convey our message across.

**Anticipated Compliance Date:** 31-12-2023

***(b) Accessible Websites and Web Content***

Wirecomm will work toward making any Canadian-based websites and web content conform with the World Wide Consortium Web Content Accessibility Guidelines (WCAG 2.0) Level AA. Furthermore, Wirecomm will take reasonable steps to ensure that all new Canadian-based websites controlled by Wirecomm, and web content on those sites, will conform with the World Wide Consortium Web Content Accessibility Guidelines (WCAG 2.0) Level AA, except where meeting the requirement is not practicable.

**Anticipated Compliance Date:** 31-03-2024

**4. Communication, Other than Information and Communication Technologies**

Wirecomm is committed to making company information and communications accessible to deaf persons in Canada.

Communication, other than information and communication technologies (“ICT”) includes the use of American Sign Language, Quebec Sign Language and Indigenous sign languages. American Sign Language, Quebec Sign Language and Indigenous sign languages are recognized as the primary languages for communication by deaf persons in Canada.

**Current Level of Accessibility in the Area of Communication, Other than ICT:**

At this time, all communication is supplied through current traditional means of communications, for both written and verbal. Individuals that require additional communication formats are encouraged to speak with Human Resources.

**Barriers in Communication, Other than ICT as Identified by Consultation Participants:**

No barriers were identified during the communication process by individuals that participated.

**Accessibility Goals in the Area of Communication, Other than ICT:**

Address situations and specific circumstances where communication issues, other than ICT arise on a case-by-case basis. Continue monitoring and identify/address barriers as they arise.

**Planned Action to Achieve Accessibility Goals:**

Continue monitoring communication, other than ICT.

**Anticipated Compliance Date:** Ongoing

**5. The Procurement of Goods, Services and Facilities**

Wirecomm is committed to removing barriers with regard to the procurement of goods, services and facilities that will respect the dignity and independence of persons with disabilities.

**Current Level of Accessibility in the Area of the Procurement of Goods, Services and Facilities**

Third parties contract with Wirecomm to provide construction and fulfillment services for cable television/phone service providers. In fulfilling its service contracts, Wirecomm engages in the procurement of goods, services, and facilities, including the utilization of subcontractors.

Wirecomm’s systems, processes, and service contracts can be improved as there is not currently a focus on accessibility considerations.

### **Barriers in the Procurement of Goods, Services and Facilities as Identified by Consultation Participants:**

While there has been no feedback that identifies a barrier in this area, Wirecomm recognizes the need to ensure that the procurement of goods, services, and facilities do not create accessibility barriers.

### **Accessibility Goals in the Area of the Procurement of Goods, Services and Facilities:**

Wirecomm will endeavour to remain aware of accessibility considerations in the area of procurement of goods, services, and facilities. This includes reviewing its service contracts to identify any areas that require accessibility improvements and reviewing its procurement processes. Wirecomm aims to provide training on these practices as identified as applicable.

### **Planned Action to Achieve Accessibility Goals:**

- Continue monitoring accessibility in the area of procurement of goods, services, and facilities and complete the following measures:
- Review current delivery points and methods to identify accessibility barriers;
- Review the process of procurement of goods, services, and facilities from start to finish to identify any accessibility barriers;

**Anticipated Compliance Date:** 31-03-2024

## **6. The Design and Delivery of Programs and Services**

Wirecomm is committed to removing barriers in the design and delivery of programs and services that will uphold the dignity and independence of persons with disabilities. We are also committed to giving people with disabilities the same opportunity to get involved with Wirecomm and allowing people with disabilities to benefit from Wirecomm in the same place and in a similar way as other clients.

### **Current Level of Accessibility in the Area of the Design and Delivery of Programs and Services:**

Wirecomm currently delivers a variety of programs and services to customers. In the delivery of these services, Wirecomm does not currently focus on accessibility. Nonetheless, Wirecomm supports its customers' own accessibility goals and is receptive to its customer feedback and initiatives in this regard.

### **Barriers in the Design and Delivery of Programs and Services as Identified by Consultation Participants:**

Wirecomm's work is based on cable installations, burial drops, internet cables, installation at customers' premises, where customer satisfaction, completing the work accurately and with precision, and the safety of employees and customers are the topmost priorities. A barrier has been identified in terms of the physical environment Wirecomm employees complete services. Specifically, participants identified walking on uneven platforms, climbing ladders, lifting heavy boxes, cable wires and batteries as tasks that can be difficult to accomplish. Additionally, it has been noted that communication barriers, including language barriers, make communication between Wirecomm and its customers more difficult.

**Accessibility Goals in the Area of the Design and Delivery of Programs and Services:**

Wirecomm will continue to put in extra efforts to provide printed/ visual/ readable training materials and communications to aid employees. This also entails working to improve efficiency and accommodating an employee with any physical impairment in teams so that they can be helped in a ride-along system by other employees.

**Planned Action to Achieve Accessibility Goals:**

- Continue implementing and reviewing existing accessibility with a focus on physically challenging tasks;
- Improving the entire service system to ensure all employees with disabilities are accommodated in performing their job duties and communicating with customers

**Anticipated Compliance Date:** 31-03-2024

**7. Transportation**

Not Applicable

**Accessible Formats**

Accessible formats of this document are available upon request. Requests can made to the Designated Accessibility Representative in any of the following manners:

**Mail:** 107 Corstate Avenue, Concord, ON L4K 4Y2

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**E-mail:** marora@wirecommca.com