



ACCESSIBILITY PLAN

IHR Télécom

2024-2027



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Accessibility Plan
2024-2027**

TABLE OF CONTENTS

	Page
Measures to Help Overcome Barriers to Accessible Employment	2
Key Definitions Pertaining to Accessibility	2
About IHR Télécom	2-3
Accessibility Policy	3
Available Formats	3
IHR Télécom’s Key Principles and Vision Concerning Accessibility	3-4
Section A	4
Introduction to the <i>Accessible Canada Act</i>	4
Section B	4
IHR Télécom’s Commitment to Inclusion and Accessibility	4-5
Summary of First Opportunities Identified by IHR Télécom	5
Your Opinion and Comments are Important for IHR Télécom	6
Methods of Contact	6
Accessibility Commitment Statement	6
Reports concerning our Accessibility Plan	7
Barrier 1:	7
Actions to Overcome Barriers to Employment for People with Disabilities	7-8
Actions	8
Barrier 2:	8
Actions to Overcome Accommodation Obstacles for Employees with Disabilities	8-9
Actions	9
Built Environment	9
Barrier 3:	9
Certain Areas in our Offices may Limit Mobility for Employees and Visitors with Disabilities	9-10-11
Information and Communication Technologies (<i>ICT</i>)	11
Barrier 4:	11
Actions	11-12
Barrier 5:	12
Actions	12-13
Communication, Other than ICT	13
Barrier 6:	13

Actions	13-14
Barrier 7:	14
Actions	14
Integrate Accessibility in the Procurement of Goods, Services, and Facilities	14
Barrier 8:	14-15
Actions	15
Transportation	15
Ongoing Consultations and Commitment to Accessibility	15
Consultation Methods Used	15-16
Future Commitments	16
Consulting People	16
Section C	17
References	17

MEASURES TO HELP OVERCOME BARRIERS TO ACCESSIBLE EMPLOYMENT

The following definitions apply to the Accessibility Plan in its entirety:

1. **Non-Profit Organization (NPO):** An organization which purpose is not to generate profit destined to its shareholders, but to pursue social, educational, or such other objectives.
2. **Accessible Canada Act:** a legislation introduced to remove and prevent barriers to accessibility in areas of federal jurisdiction in order to enable those living with disabilities to participate fully and equally in society.
3. **Disability:** a significant functional limitation, whether permanent or temporary, that may affect a person’s ability to carry out normal daily activities.
4. **Feedback:** comments, opinions, and suggestions provided by customers, partners and employees regarding their experience with IHR Télécom's services and products.
5. **Action Plan:** A document describing the specific steps and measures to be taken in order to improve accessibility and meet the needs of people with disabilities, as identified through the survey results and in compliance with the *Canadian Accessibility Act*.

These definitions will serve as a framework to put in place and communicate IHR Télécom’s different accessibility initiatives.

ABOUT IHR TÉLÉCOM

IHR Télécom is a non-profit organization (NPO) which was established in January 2008 and stemmed from a desire to offer telecommunication services to a part of the population that did not have access to a telecommunications network. Since then, IHR Télécom plays an essential role in a world where habits evolve constantly. Against such a background, our organization is strongly committed to make the future brighter thanks to large-scale deployment of our products and, therefore, offering our services to a greater share of the population.

IHR Télécom is located in the Haut-Richelieu regional county municipality (RCM) and offers Internet, Television and Residential phone services through its optical fibre network. Thanks to our

expertise, we are able to answer our customer's specific needs, even when located in remote areas, whether they are residential customers or business.

Because we are a NPO with such a mission, we are committed to meeting the needs of our community and customers. Not only are we proud of our excellent customer service, but at IHR Télécom, we are dedicated to meeting accessibility objectives for all our customers, including those who may have functional limitations at various levels. We continually strive to adapt our services and technologies to ensure maximum accessibility, enabling everyone to benefit fully from our telecom solutions. Our commitment to inclusivity guides our every action, with the aim of guaranteeing an optimal and equitable customer experience for all.

To learn more, visit <https://ihrtelecom.com/en>.

ACCESSIBILITY POLICY

IHR Télécom is firmly committed to removing accessibility barriers to all its employees and customers.

AVAILABLE FORMATS

To obtain a copy of this plan in another format or for information on how to submit such a request, please refer to the methods described below. Also, the timeframes in which we commit to supplying our employees and customers with the initial plan in the different formats are the following:

Formats available within fifteen (15) days following the initial request:

- Paper in a standard-sized font; and
- Paper in a large-sized font.

Formats available within thirty (30) days following the initial request:

- Audio (recording of the text read aloud).

We are committed to providing an accessible version of our plan within the specified timeframe, in order to meet the specific needs of our customers and partners. Should you have any questions, or for personalized assistance, please refer to the contact method outlined below.

IHR TÉLÉCOM'S KEY PRINCIPLES AND VISION CONCERNING ACCESSIBILITY

At IHR Télécom, we strongly believe that accessibility is the key to allowing every customer, whatever their age, physical condition, abilities or limitations, to fully take advantage of our services and discover opportunities offered at our offices. For us, accessibility means equal rights and opportunities for all.

We stand for the following fundamental principles:

- **Human Dignity:** Every individual deserves to be treated with dignity and respect;

- **Equal Rights:** Everyone should have equal access to our services and facilities; and
- **Solidarity:** We are committed to supporting and including all individuals, in particular those with special needs.

We are determined to taking concrete actions to enhance accessibility at all levels of interaction and this policy reflects our commitment to the rights and well-being of every individual. Furthermore, we are working together to promote a more inclusive and accessible society for all.

At IHR Télécom, our commitment to accessibility is the demonstration of our corporate values. We strive to make our facilities, customer service centre, services and technologies accessible to all, no exception made.

By working together to make our company more accessible, we strengthen our community and foster an environment where everyone can thrive.

SECTION A

INTRODUCTION TO THE ACCESSIBLE CANADA ACT

The *Accessible Canada Act* is a federal law that was adopted in 2019, and aims to identify, remove and prevent barriers for people with disabilities. Its goal is to ensure a barrier-free Canada by January 1, 2040.

By its adoption and efforts put towards removing and preventing accessibility obstacles, the *Accessible Canada Act* marks an important step towards a more inclusive and fair society, in which each individual, regardless of his or her disability, can participate fully in the social, economic and cultural life of the country and be acknowledged for his or her contribution.

SECTION B

IHR TÉLÉCOM'S COMMITMENT TO INCLUSION AND ACCESSIBILITY

At IHR Télécom, we are firmly committed to cultivating a culture of inclusion and accessibility. This is more than just a simple component of our corporate culture; we see it as being essential to our continued growth and competitiveness as a telecommunications employer. We seek to contribute to a barrier-free municipality, city, region, Quebec and Canada by developing an accessibility framework that ensures that, by choosing our services, products and facilities, our employees as well as the public we serve benefit with an optimal experience.

We know that removing obstacles requires a fair amount of time and constant commitment, and that's why we have chosen *KÉROUL*, our partner who specializes in standardization, to work alongside us in our ongoing efforts. Together, we will assess needs, develop adapted solutions and comply with the requirements of the Accessible Canada Act. This plan will guide us in fulfilling our accessibility commitments, and in creating a culture where accessibility is a synonym of trust.

To achieve our goal, it is essential to identify and understand the needs of people with disabilities and that is the reason why this plan was developed through surveys and in close consultation with our employees and customers with disabilities. Furthermore, we have consulted an external

organization that supports people with disabilities to ensure an inclusive and comprehensive approach in the development of our strategies.

At IHR Télécom, we strongly believe that accessibility is a fundamental pillar of our commitment to a fair and inclusive society for all.

Here is a summary of the first opportunities identified by IHR Télécom:

- **Getting people with disabilities interested in our work environment:** Improve the attractiveness of jobs within our company and in the telecommunications sector for people with disabilities;
- **More extensive accommodations:** Expand the range and options of accommodations offered to disabled employees in order to meet their specific needs;
- **Information made available in accessible formats:** Be better prepared to provide information in accessible formats on demand;
- **Improve IT knowledge:** Strengthen the skills of our IT team to exploit the accessibility features of current and future equipment, programs and systems;
- **Review accessibility approaches:** Introduce processes with a more in-depth evaluation and accessibility-focused perspective when reviewing facilities, procurement procedures, corporate programs, new initiatives and proposed services.

These initiatives aim to promote inclusion and to ensure that IHR Télécom proactively responds to the needs and rights of people with disabilities, while reinforcing its commitment to accessibility at all levels of the organization. By working together to make our society more accessible, we strengthen our community and foster an environment where everyone can thrive.

YOUR OPINION AND COMMENTS ARE IMPORTANT FOR IHR TÉLÉCOM

At IHR Télécom, we appreciate reading your comments on our accessibility plan, whether you are an employee, a partner or a member of the public. This essential feedback allows us to outline and overcome accessibility barriers, which in turn reinforces our engagement towards a more inclusive society.

Should you have any questions or comments, please contact us through one of the methods indicated below. We will answer each comment we receive quickly. If you need assistance to submit feedback, you are welcome to let us know, and we will do our best to help you in this matter.

Methods of contact:

By mail:

Josée BOUCHER
Paralegal
8 Frère André Boulevard
Mont-Saint-Grégoire

By phone:

450-346-4140, extension 314
From Monday to Friday, 8:30 a.m. to 5:00 p.m.

Quebec, J0J 1K0

E-mail Address:
josee@ihrtelecom.com

Online Form:
Please visit our website to fill out our
Accessibility Form

We look forward to receiving your feedback and to pursue our goal of improving accessibility and inclusion at IHR Télécom.

ACCESSIBILITY COMMITMENT STATEMENT

At IHR Télécom, we are strongly committed to making our organization and services accessible to everyone, including people with disabilities. We firmly believe that all Quebecers and Canadians have the right to have an equal access to our services and installations, and that those who work with us should be able to perform their duties in an environment free of all barriers.

We are determined to:

- Identify and eliminate accessibility barriers in our operations and services;
- Raise awareness among members of our staff about the needs of people with disabilities in order to promote a culture of inclusion and sensitivity;
- Develop and implement policies and procedures that promote accessibility for all our customers and employees;
- Continue to improve our practices to meet the highest standards of accessibility.

For IHR Télécom, accessibility is not just a legal obligation, it's a deep commitment to social justice and equal opportunities for all.

REPORTS CONCERNING OUR ACCESSIBILITY PLAN

As required by the *Accessible Canada Act*, we commit to publishing a Progress Report every year that shows our progress concerning accessibility against our commitments. Furthermore, we will review and update our accessibility plan every three (3) years.

Such Progress Reports and updates will be guided by ongoing consultations with people with disabilities. We firmly believe that their input is essential to guide our actions and ensure continuous improvement.

At IHR Télécom, we consider that transparency and commitment to accessibility are an essential pillar of our social responsibility and our promise to a more inclusive society.

Barrier 1:

ACTIONS TO OVERCOME BARRIERS TO EMPLOYMENT FOR PEOPLE WITH DISABILITIES

It's important to acknowledge that some positions, for instance those requiring outdoor tasks such as service installation technicians and network construction technicians, may not be suitable for certain types of disability due to physical requirements or work environment.

However, we are pleased to underline that other positions within our organization offer opportunities for people with disabilities. These positions can be adapted to meet the specific needs of disabled candidates, taking into account individual skills, qualifications and abilities.

At IHR Télécom, we are committed to promoting an inclusive environment where all everybody, regardless of their physical abilities, have the opportunity to contribute meaningfully to our mission and organizational success.

Actions:

- **In job offers:** Include a statement indicating that our organization is open to accommodate candidates with disabilities;
- **Improve the 'Careers' section:** Create a dedicated section where we explain our commitment to inclusion and candidates can find information on how to request accommodation during the recruitment process;
- **When communicating with candidates:** Ensure that recruiters and hiring managers are trained to inform candidates with disabilities of their right to request accommodation, as well as to facilitate this process in a respectful and efficient manner;
- **At each step of the recruitment process:** Reassert our commitment to inclusion and equal access by reminding candidates with disabilities that they are encouraged to inform the organization of their accommodation needs; and
- **Training of hiring managers:** Educate our hiring managers on the principles of accessibility. Provide them with the tools they need to conduct barrier-free processes related to hiring, selection and accommodation.

These actions are not only crucial in order to attract more candidates with disabilities, but also to ensure smooth integration and ongoing support throughout the employment cycle. At IHR Télécom, we are committed to creating an inclusive working environment where every individual, regardless of disability, can flourish and contribute fully to our success.

Completion deadline within the three (3) year plan: One (1) year.

Barrier 2:

ACTIONS TO OVERCOME ACCOMMODATION OBSTACLES FOR EMPLOYEES WITH DISABILITIES

We need to better understand the range of and different accommodation options available to disabled people interested in working in telecommunications.

Actions:

- **Developing an accountability framework:** Develop a clear framework to help managers understand their responsibilities related to the process of accommodation. This framework will guide them in supporting employees and implementing appropriate adjustments in the workplace;
- **Creating a dedicated work team:** Put together a team of managers, employees, people with disabilities and an accommodation consultant to define and evaluate a broad range of potential accommodations. This team will work together to ensure that all needs are addressed in an inclusive and informed manner;
- **Comparative analysis of best practices:** Analyze and compare our current practices related to recruitment, selection and integration with the best accessibility practices in other telecommunication companies as well as in other industries; and
- **Budget dedicated to accommodations:** Work with management and accounting departments to establish a specific budget for accommodations. This budget allows us to purchase assistive equipment such as electric adjustable desks, audio enhancements, improved lighting, etc. This will ensure that the necessary resources are available to meet the specific needs of disabled employees.

The purpose of these actions is to create an inclusive and accessible working environment where people with disabilities can not only be recruited, but proactively supported throughout their career at IHR Télécom. We are committed to going beyond mere compliance to ensure truly equal opportunity and support for all our employees.

Completion deadline within the three (3) year plan: One (1) year.

BUILT ENVIRONMENT

Relevant to 'built environment' are the measures taken to ensure that the workspace and environment are accessible to all.

Barrier 3:

CERTAIN AREAS IN OUR OFFICES MAY LIMIT MOBILITY FOR EMPLOYEES AND VISITORS WITH DISABILITIES.

Our installations in **Saint-Jean-sur-Richelieu** (Iberville), where is located our Customer Service:

An assessment of our **Saint-Jean-sur-Richelieu** (Iberville) facility revealed that a number of elements had already been put in place in the past to make this workplace accessible to all:

- A clearly identified parking area reserved for people with disabilities;
- An outdoor access ramp;
- An automatic entrance door;
- An elevator which is inspected regularly;
- Wide and accessible aisles;
- Staircases with handrails;
- Clearly identified emergency exits; and

- Sufficient lighting.

Actions:

- Installation of one (1) universal toilet with grab bars, a lower paper dispenser and a coat hook placed at a height accessible for a person in a seated position.

This action will allow us improve accessibility to the toilet, ensuring that all employees and visitors, including those with mobility limitations, can access it safely and efficiently.

Completion deadline within the three (3) year plan: three (3) years.

Our installations in **Stanbridge Station** where our warehouse is located:

An assessment of our **Stanbridge Station** facility revealed that a number of elements had already been put in place in the past to make this workplace accessible to all:

- A bell at the entrance to the building so that customers can alert staff if assistance is required;
- The building is easily accessible to mobility-impaired people and/or people in wheelchairs thanks to its large entrance door with a threshold at the same level, this area is free and allows maneuvering and moving around the warehouse;
- Clearly identified emergency exits; and
- Sufficient lighting.

Actions:

Even if there are very few visitors who stop by our warehouse, we are committed to:

- Reserve a clearly identified parking space for mobility-impaired people or people with disabilities which is located near the main entrance;
- Install a strip of contrasting colour and texture at the bottom and top of the steps, as well as on the landing to make them easily identifiable;
- Install grab bars in the toilet, lower the paper dispenser and place a coat hook at a height accessible to a person in a seated position.

Completion deadline within the three (3) year plan: less that (1) year.

These actions are designed to improve access to our facilities for our visitors, including those with mobility limitations, in a safe and efficient manner.

Our installations in **Mont-Saint-Grégoire** where our administrative offices are located:

An assessment of our **Mont-Saint-Grégoire** facility revealed that a number of elements had already been put in place in the past to make this workplace accessible to all:

- An outdoor access ramp;
- An automatic entrance door;
- Wide and accessible aisles;
- Clearly identified emergency exits; and
- Sufficient lighting.

Actions:

- Reserve a clearly identified parking area reserved for people with disabilities;
- Install a lowered curb to compensate for the level difference between the parking area and the pathway while maintaining the existing sidewalk;
- Install an automatic door opener in the vestibule to provide easy access to our reception area;
- Lower part of the reception desk;
- Reduce amount of furniture to free the required maneuvering space for wheelchair users and/or people with reduced mobility; and
- Installation of one (1) universal toilet with grab bars, a lower paper dispenser, a coat hook placed at a height accessible for a person in a seated position, and installation of a lever type door handle.

All renovation work, repair work or new installation in our buildings must be carried out with due consideration for potential accessibility needs.

Completion deadline within the three (3) year plan: between one (1) year and three (3) years.

INFORMATION AND COMMUNICATION TECHNOLOGIES (ICT)

Information and communication technology covers different tools used to send, save, create, share or exchange information.

Barrier 4:

Information and communication technology (ICT) must be made accessible in order to allow inclusive use by people with disabilities.

Actions:

- **Training of the ICT employees:** In order to increase their knowledge in relation with accessibility and learn how to adapt services and improve their interactions with people with disabilities;

- **Promoting software accessibility features:** Provide training and promote the use of Accessibility features in all available software;
- **Providing and promoting training material for people with disabilities**
 - Ease access to information by adjusting the display size on the screen;
 - Activate the reading function; and
 - Activate subtitles and other adaptation measures.
- **Development of checklists and support documents:** for employees who develop and supply information and communication technology.

The purpose of these actions is to eliminate barriers to ICT accessibility at IHR TÉLÉCOM, and therefore enabling all employees to work effectively and inclusively. By promoting optimal use of ICT by all members of the organization, we reaffirm our commitment to an inclusive corporate culture that respects diversity.

Many of the tools and software used within the organization have accessibility capabilities that are not used in an accessible way.

Actions:

- **Draw up a list of all IT systems:** used by the company to evaluate their accessibility capabilities;
- **Assess accessibility capabilities:** assess, for each system identified, current accessibility capabilities. This could include features such as keyboard navigation, high contrast options, screen reader compatibility, and other features relevant to users with disabilities;
- **Integrate new accessibility features:** gradually introduce new accessibility features in the existing IT systems.

The purpose of these actions is to optimize the use of accessibility capabilities already present in the tools and software used by IHR Télécom. By improving digital accessibility, the company is reinforcing its commitment to an inclusive culture where all employees can work effectively and equitably.

Barrier 5:

Lack of access to technologies used in meeting spaces can limit the ability of host and attendees to take part in a significant ways.

Actions:

- **Review the technology used:** In our learning and meeting spaces, which includes audiovisual equipment, videoconferencing platforms, meeting management systems, and more;

- **Compliance with legal requirements and policies:** Ensure all technologies comply with legal accessibility requirements, such as the Accessible Canadian Act and the company's internal policies on digital accessibility;
- **Training and awareness:** Ensure all technologies comply with legal accessibility requirements, such as the Accessible Canadian Act and the company's internal policies on digital accessibility;
- **Monitoring and continuous improvement:** To assess the effectiveness of our accessibility technologies and gather user feedback. This information will be used to make ongoing improvements and ensure optimal accessibility.

The purpose of these actions is to create an inclusive meeting environment where all participants, whether they are hosts or attendees, can participate fully and effectively. By integrating accessible technologies, IHR Télécom reinforces its commitment to inclusion and meets the different needs of its teams and partners.

Completion deadline within the three (3) year plan: two (2) years.

COMMUNICATION, OTHER THAN ICT

Offer a barrier-free access to all communications produced by the organization for the public, customers and employees.

Barrier 6

Actions:

- **Review of current practices:** Carry out a complete review of the company's current communications practices, including print media, verbal communications, public presentations, internal announcements, etc.;
- **Adoption of accessible formats:** Ensure that all printed and digital documents are available in accessible formats. This includes the use of easily readable fonts and colours, images with alternative descriptions for the visually impaired, and electronic documents compatible with assistive technologies;
- **Personnel training:** Provide regular training to staff on how to create accessible communications. This includes the use of tools for creating accessible documents and raising awareness regarding good accessibility practices;
- **Accessibility during events and meetings:** Ensure that all events, meetings and training sessions organized by the company are accessible to all participants. This can include the provision of sign language interpretation, making auditory enhancement systems available, and supplying documents in accessible formats in advance;
- **Feedback and continuous improvement:** Establish a mechanism for collecting feedback on accessibility of corporate communications. Use this feedback to make continuous

improvements and ensure that all communications meet the diverse needs of all audiences; and

- **Compliance with standards:** Ensure that all communication practices comply with accessibility standards and regulations, such as the requirements of the *Accessible Canada Act*;

Completion deadline within the three (3) year plan: two (2) years.

The company has yet to put in place a continuous procedure that ensures that alternative formats of communications shared with employees and other stakeholders are available and provided in a timely manner.

Barrier 7:

Actions:

- **Identification of services providers:** Identify and establish partnerships with service providers capable of creating alternative formats such as large print, audio, and electronic formats compatible with adapted technologies;
- **Contracts or agreements:** Enter into contracts or agreements with these suppliers to ensure rapid availability of alternative formats when needed;
- **Preparation of resources and communications:** Implement a process to prepare on a regular basis resources and communications commonly distributed in alternative formats. Ensure that these formats are ready for distribution as soon as a request is made;
- **Reasonable delays:** Commit to providing the requested alternative formats within the timeframes specified by the Accessible Canada Regulations. This includes print, large print, Braille, audio and electronic formats compatible with adaptive technologies;
- **Personnel training:** Offer training to staff responsible for creating and distributing communications on the importance of accessibility and how to respond effectively to requests for alternative formats;
- **Request management system:** Implement an efficient request management system to track and process requests for alternative formats quickly and seamlessly; and
- **Assessment and adjustment:** Regularly assess the effectiveness of processes in place and adjust procedures as necessary to ensure continuous improvement regarding the provision of alternative formats.

Completion deadline within the three (3) year plan: two (2) years.

INTEGRATE ACCESSIBILITY IN THE PROCUREMENT OF GOODS, SERVICES AND FACILITIES.

Barrier 8:

IHR Télécom's procurement processes and practices do not take into account accessibility requirements.

Actions:

- **Update procurement procedures:** Review and update our procurement procedures in order to take into consideration accessibility when acquiring goods and services. This could include adding specific steps to the supplier bid evaluation process to ensure compliance with accessibility standards;
- **Procurement document templates:** Incorporate accessibility considerations in procurement document templates, such as bid requests and contracts. Ensure that these documents include specific clauses to be met by suppliers in regards to accessibility requirements;
- **Training and awareness:** Offer training to our procurement team on the importance of accessibility considerations and how to evaluate our supplier bids against these criteria. Raise awareness of relevant accessibility standards, such as the *Accessible Canada Act*, so that they can make informed decisions;
- **Stakeholder consultation:** Involve relevant internal stakeholders, including employees, customers and partners with disabilities, in the development and revision of new procurement procedures and documents. Their perspective is crucial in order to ensure that accessibility requirements are properly integrated;
- **Continuous improvement:** Establish an ongoing evaluation process to monitor the effectiveness of our new accessibility procurement procedures. Identify areas for improvement and adjust our practices accordingly; and
- **Communications with suppliers:** Inform suppliers of new accessibility requirements incorporated into our procurement documents. Ensure that they clearly understand the expectations and standards which they must meet when supplying products and services to our organization.

Completion deadline within the three (3) year plan: three (3) years.

TRANSPORTATION

As IHR TÉLÉCOM does not coordinate a transportation system or fleet of vehicles, as per the *Accessible Canada Act*, specific transportation standards will not be addressed in this plan.

ONGOING CONSULTATION AND COMMITMENT TO ACCESSIBILITY

In order to fulfill IHR Télécom's commitment to making our working environment accessible to all, we have developed our accessibility plan in consultation with our employees, including those with disabilities.

Consultation methods used:

- **Organization-wide surveys:** We continue to seek the views of all our employees, including those with disabilities, through regular surveys to assess their needs and experiences;
- **Focus groups and discussions:** With disabled employees to enable open communication and gather specific ideas on barriers and improvements needed;
- **Collaboration with external organizations:** We have worked with KÉROUL, an organization for equal opportunities for people with disabilities in Quebec, Canada. This partnership enables us to benefit from specialized recommendations and external expertise to guide our accessibility initiatives.

Future commitments:

We are committed to continuing these consultations and to maintaining full transparency about our progress made in this matter. We will use feedback received to adjust our accessibility plan and will make sure that every initiative undertaken is guided by the real needs of our employees and customers. Our aim is to create an inclusive environment where everyone can contribute fully and feel valued.

We would like to thank all those who have contributed to this process, and encourage all our employees and partners to continue sharing their ideas to further our commitment to accessibility.

CONSULTING PEOPLE

To gather feedback from our customers, partners and employees, we sent an e-mail survey to many of them in June 2023. We are proud to announce that nearly seventy-three percent (73%) of those reached out to took the time to respond. The survey included nine (9) questions on various aspects of the requirements of the *Accessible Canada Act*, allowing us to gather their opinions and experiences on our services.

Also, around four percent (4%) of respondents identified themselves as people with disabilities, or as being close to a person with a disability who uses our services. Their feedback was particularly valuable in identifying the barriers they face, which helped shape our action plan.

We are very grateful to all those who took the time to participate in this feedback process, as it enables us to continually improve our services and ensure that we meet the needs of our entire community.

SECTION C

REFERENCES

You can find more information about accessibility at:

Accessible Canada Act (S.C. 2019, c.10)

<https://laws-lois.justice.gc.ca/eng/acts/a-0.6/>

Employment and Social Development Canada: Summary of the *Accessible Canada Act*

<https://www.canada.ca/en/employment-social-development/programs/accessible-canada/act-summary.html>

Employment and Social Development Canada: Summary of the *Accessible Canada Regulations*

<https://www.canada.ca/en/employment-social-development/programs/accessible-canada/regulations-summary-act.html>

This Initial Accessibility Plan shall be interpreted in accordance with the principles of equity, diversity, inclusion.

Prepared by:

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