

2024 - 2026 Accessibility Plan

June 1 2024

Vaxxine Computer Systems Inc

1. Statement of Commitment

Vaxxine 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 Vaxxine or accessing our products or services.

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

By telephone: 1-866-595-8473

By email: feedback@vaxxine.com

Through our feedback form: <https://web.vaxxine.com/feedback-form>

By mail:

Vaxxine Computers Systems Inc
80 Grantham Ave S
St. Catharines, ON
L2P 3H1
Attn: Accessibility

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.

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.

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 at <https://web.vaxxine.com/legal>

2.2. Requesting Alternative Formats of this Plan

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

2.3 Definitions

The following key terms are used throughout this plan. We use these key terms as they are defined in the [Accessible Canada Act](#):

- **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

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

As part of our job postings, we advise potential applicants about the availability of accommodations for applicants with disabilities in our recruitment processes. 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.

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.

We notify our employees of our program and any further updates to the policies. This information is provided to new hires as soon as practical after they begin employment.

3.2. The Built Environment

Vaxxine 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 their offices.

Our employees may face physical discomfort or mobility issues in working at their remote workstations. As with other employee accommodations, requested accommodations to workstations are addressed on a case- by-case basis by our human resources department.

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Our employees may face barriers in physically accessing our office buildings. These may include barriers posed by exterior and interior paths of travel, building entrances, stairs, doorways, washrooms, signage, illumination levels, parking and flooring.

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.

Vaxxine 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, Vaxxine 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 Vaxxine; (ii) the employee's overall accommodation needs or plans are reviewed, or (iii) there is a change in the physical environment.

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

Vaxxine'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. Vaxxine is committed to ensuring its clients are satisfied with the design and delivery of our services.

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.

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.

Vaxxine 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-conformance. We will also continue to update our website based on any feedback we receive related to accessibility issues.

Remote installations and troubleshooting: we have identified that our customers may experience barriers to receiving customer support, 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, Vaxxine'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.

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.

In Vaxxine's current practice, our agents will work with customers to 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.

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. Under special circumstances Vaxxine will send an agent onsite to the customer's premises.

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.

Vaxxine currently allows customers to contact us through a variety of methods, including by phone, email, and our customer portal. Our agents are trained in communicating clearly and on accessibility considerations, including tools for accommodating customer needs. Our staff are also trained on how to identify when to escalate complaints where they cannot find a way to assist.

Accessibility of our customer policies: communication may pose a barrier for understanding our existing policies, such as our customer terms and privacy policies.

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.

3.4. Procurement of goods, services and facilities

Vaxxine 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 Vaxxine procured will be accessible by default. Vaxxine is committed to incorporating accessibility awareness into its procurement practices so that they are accessible to all vendors

3.5. Transportation

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

As with most accommodations relating to employment, Vaxxine currently addresses accommodation requests relating to transportation on a case-by-case basis.

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.

Vaxxine is also subject to some requirements relating to accessibility as part of decisions made by the Canadian Radio-television and Telecommunications Commission (CRTC) under the Telecommunications Act. We have summarized the requirements relevant to Vaxxine in this section. We note that as a smaller provider of telecommunications services, Vaxxine is not subject to all CRTC decisions relating to accessibility, and therefore only those that apply to Vaxxine are listed below.

4.1. Paper-Billing

As part of Telecom and Broadcasting Decision CRTC 2022-28, Vaxxine is required to provide paper bills upon request to certain customers, including those who self-identify as having a disability and seniors. Vaxxine 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.

Since its inception Vaxxine's policy has been to make paper billing available upon request. There is no need to self-identify as a senior or as having a disability.

4.2. Making Information About our Telecom Services Accessible

As part of Telecom Regulatory Policy 2017-11, service providers like Vaxxine 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.

4.3. 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.

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

4.4. Call Centre Accessibility

As part of Telecom Regulatory Policy 2017-11, service providers like Vaxxine are required to make their general call centre 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.

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 Vaxxine, 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 Vaxxine since June 2022, including through our internal processes for ensuring 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 Vaxxine does not currently have a formal network of stakeholders in the accessibility space, we identified potential external consultants working in the area.

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. Vaxxine has taken into 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.

Vaxxine 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.

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