



2024-2026 Accessibility Plan

September 30, 2024

For

Bruce Telecom LP

Table of Contents

- 1. General 3
 - Statement of Commitment..... 3
 - Contact Information and Feedback Process..... 3
 - Alternative Formats..... 3
 - Executive Summary of this Plan 4
 - Definitions 4

- 2. Areas Described under Section 5 of the ACA 5
 - The Built Environment..... 5
 - Employment 5
 - Information and Communication Technologies (ICT) 6
 - Communication, other than ICT..... 6
 - The Procurement of Goods 7
 - The Design and Delivery of Programs and Services 7
 - Transportation..... 8

- 3. Consultations 9

- 4. Conclusion 10

1. General

1.1 Statement of Commitment:

Bruce Telecom is committed to providing a barrier-free environment for all stakeholders, including clients, employees, job applicants, suppliers and any visitors who enter the premises, access information provided by the company, or use the company's goods and services.

This Accessibility Plan contains details of the companies' policies, practices, and services in relation to the identification and removal of barriers. This plan is also used to establish prevention measures against new barriers emerging to ensure a barrier-free environment at the company.

1.2 Contact Information and Feedback Process

The company welcomes any feedback from the general public. Any feedback or questions regarding this plan or requests for copies of the Accessibility Plan in an alternative format can be addressed to the following designated company representative:

Stephanie Brunato, Director of Customer Experience
519-368-1207
3145 Highway 21, Tiverton, ON, N0G 2T0
stephanie.brunato@brucetelecom.com

Feedback can be provided anonymously if desired. Feedback can be received in the following formats:

Telephone: 1-519-368-2000 or 1-866-517-2000
Email: accessible@brucetelecom.com
Mail: 3145 Highway 21, Tiverton, ON, N0G 2T0
Website: <https://brucetelecom.com/accessibility-feedback/>

1.3 Alternative Formats

This accessibility Plan is offered in any of the following formats upon request:

- Regular Print: We can provide within 15 days of when we receive your request.
- Large Print: We can provide a large font printed copy of this plan. We can provide this within 15 days of when we receive your request.
- Braille: We can provide a braille copy of the plan within 45 days of when we receive your request
- Audio: We can provide an audio copy (an audio file with a person's voice reading the text) of this plan within 45 days of when we receive the request.

1.4 Executive Summary of this Plan

Bruce Telecom wants to engage with our employees, customers and business partners in a way that makes everyone feel inclusive when it comes to accessibility. Our Health and Safety Representative and management will continue to monitor and update our Accessibility Plan as issues arise.

1.5 Definitions

The following definitions apply throughout this plan:

Disability: An impairment or difference in physical, mental, intellectual, cognitive, learning or communication ability. Disabilities can be permanent, temporary or can change over time.

Barrier: Anything that might prevent people with disabilities from full and equal participation. Barriers can be based on attitudes, built environment, communication of information and procedures and policies.

Accessibility: The design of products, devices, services, environments, technologies, policies and rules in way that allows all people, including people with a variety of disabilities, to access them.

1.6 Budget and Resources

Bruce Telecom will continue to work and identify and remove barriers, and prevent new barriers, for persons with disabilities as they relate to employment, communication, the build environment, and transportation at the company. To achieve this purpose, the company has allocated resources to ensure that ongoing feedback, consultations, improvements and implementation of short- and long-term goals occur to eliminate barriers for persons with disabilities.

In addition, the company has allocated the following resources to ensure accessibility improvements:

- The Joint Health and Safety Committee (JHSC) will continue to monitor accessibility issues.
- Management has committed to ensure that accessibility issues are resolved in a timely manner wherever possible.

2. Areas Described under Section 5 of the ACA

2.1 The Built Environment

Bruce Telecom built environment refers to our physical workspaces including but not limited to our offices and retail spaces. Bruce Telecom understands the importance of making our location to be accessible for employees, customers and the public. During the development of this plan, we reviewed and assessed our locations.

Identified Barriers:

- During our assessment of Bruce Telecom physical locations, we identify an automatic door opener was not available.
- We also identify some challenges navigating our entrances.

Actions:

- Automatic door opener has been installed and operational.
- Customers will be made aware and advise that they can call prior to arrival and an employee would be available to assist them from their vehicle.
- Conduct a review at each retail location to ensure entrances are free and clear of obstacles hinder accessibility to our stores.
- The Joint Health and Safety Committee (JHSC) will continue to monitor accessibility.

2.2 Employment

Bruce Telecom understands that improving workplace accessibility and ensuring an accessible recruitment and selection process for applicants with disabilities can contribute to a more diverse and welcoming workplace culture.

Identified Barriers:

- During the recruitment process we do not advise potential candidates to notify us if accommodation is required.
- Training and development programs do not consider an employee's barriers and abilities.
- Not all fire alarms are audio and visual
- Lack of training regarding accessibility for persons with disabilities. As the types of disabilities are vast, as an organization it is critical that resources and information be made available to the supervisors, managers and executive to ensure they appropriately support the employee. Training must also be provided to all employees so they may engage appropriately with customers in the public.

Actions

- Our recruitment process will be updated to reflect accommodation during the recruitment and selection stage effective immediately.
- All training and development programs provided will consider an employee's barriers and abilities with alternative formats being provided, such as in person with a tutor, paper or electronic versions.
- The Company will take steps to address the issue with the fire alarms.
- A training course designed for leadership (supervisors, managers, executive) will be sources. Training will be completed by the end of Q3 2025
- Accessibility training courses for employee and the JHSC will be source with the target that all employees are trained by the end of Q1 2026

2.3 Information and Communication Technologies (ICT)

Bruce Telecom utilizes various technologies and tools to support our customers and our business. Customer facing technologies include our public website (www.brucetelecom.com), as well as our social media platforms.

Identified Barriers:

- We have identified there are barriers when customers and employees access our website. Continue to improve our website ensuring compliance with Web Content Accessibility Guideline (WCAG) requirements.
- Develop and enhance improved communication with our customers.

Actions

- Conduct a thorough review of our public website by an external consultant by Q4 2025
- Continue to improve our website ensuring compliance with Web Content Accessibility Guidelines (WCAG) requirements.
- Enhancements to customer facing tools and channels to interact with our customers and include a review of opportunities to improve ease of use.

2.4 Communication, other than ICT

Bruce Telecom communicates with our customers, the public, our employees and our suppliers and partners in a variety of ways. These include but are not limited to one-on-one interactions, newsletters, email, social media, phone, chat and video. We make every reasonable effort to ensure internal and external information is communicated simply, clearly and concisely.

Identified Barriers:

- We identify that we do not have standard operating procedures that support accessibility guidelines.

Actions:

- We will use templates and internal communication standards (SOP) that support accessibility guidelines including the development of accessible communication training materials.
- We will continue to work to improve accessibility in our external communications including marketing and advertising materials.

2.5 The Procurement of Goods, Services and Facilities

Bruce Telecom uses goods and services purchased from external vendors to support its operations and services.

Identified Barriers:

- We have identified that some existing equipment that we procure does not necessarily meet accessibility standards.

Actions:

- Continue to listen to customer issues.
- Research alternative equipment to enhance our customers' experience.

2.6 The Design and Delivery of Programs and Services

Bruce Telecom is committed to ensuring that all its programs and services are designed in a manner accessible to all individuals. In the development of our Accessibility Plan, we recognize we have an opportunity to improve both the design and delivery of our programs and services to suit the needs of persons with disabilities.

Identified Barriers:

- Employees that are customer facing require training in how to support people with disabilities including but not limited to how to support people with disabilities through the installation and repair processes. For example, it is critically important to consult with customers regarding the accessible placement of equipment in their premises.

Actions:

- As noted earlier, we will source training or work with consultants to develop training for our customer facing employees. This will be completed by Q4 2025.

2.7 Transportation

Bruce Telecom does not offer transportation services. For this reason, there is nothing to report under this heading.

3.0 Consultations

Bruce Telecom recognizes that persons with disabilities are equal participants in all areas of life. The company is guided by the recognized principles of the Accessible Canada Act:

- All persons must be treated with dignity regardless of their disabilities;
- All persons must have the same opportunity to make themselves the lives that they can and want to have regardless of their disabilities.
- All persons must have barrier-free access to full and equal participation in society, regardless of their disabilities;
- All persons must have meaningful options and be free to make their own choices, with support if they desire, regardless of their disabilities.
- 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 persons face;
- Persons with disabilities must be involved in the development and design of policies, programs, services, and structures; and
- The development and revisions of accessibility standards and the making of regulations must be done with the objective of achieving the highest level of accessibility of persons with disability.

Accordingly, the company is committed to ensuring that persons with disabilities are involved in all decision-making regarding its policies, programs, practices, and services delivery.

Our customers have not identified any significant physical accessibility issues. The company intends to continue to address accessibility issues over time as they are identified.

4.0 Conclusion

Bruce Telecom recognizes that removing barriers for people with disabilities ensures all individuals receive the same experience. We are committed to ensuring that all individuals have access to all of our good and services without barriers. Our corporate accessibility policy reflects our commitment to inclusivity and equal opportunity for all individuals, regardless of their abilities. By implementing and adhering to this policy, we not only comply with legal requirements but also embrace a culture of diversity and respect within our organization.

We are committed to meeting the objectives and requirements outlined in the Accessible Canada Act (ACA) and to meeting the accessibility needs of persons with disabilities in a timely manner through the implementation of the requirements of the ACA and its applicable regulations.

As we move forward, we will continue to review and enhance our accessibility initiatives, seeking feedback from stakeholders and leveraging emerging technologies to further improve accessibility in all aspects of our operations. Together, we can foster a workplace and community where everyone that has the opportunity to succeed.