

Multi-Year Accessibility Plan

OWNER

Candice Foster

Vice President, Human Resources and Operations

LAST UPDATED

06/15/2022

APPLICABLE TO

All Employees – Canada and US

1. Purpose

Comtech Group is committed to upholding its core values and ensuring all employees are entitled to equal employment opportunities. The purpose of the *Multi-Year Accessibility Plan* is to outline the policies and actions put in place to improve employment opportunities, remove barriers for people with disabilities and comply with the *Accessibility for Ontarians with Disabilities Act (AODA)*.

2. Definitions

Employee(s): All individuals or parties working for and/or affiliated with Comtech, including all full-time and part-time employees, independent contractors, subcontractors, consultants, temporary workers, company management, supervisory personnel or those employees who are required to oversee and/or manage other Comtech employees and/or projects.

Disability: Defined by AODA as:

- a. any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or a wheelchair or other remedial appliance or device;
- b. a condition of mental impairment or a developmental disability;
- c. a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- d. a mental disorder; or

- e. an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997* (“handicap”).

Accessibility: The degree to which a person with a disability can participate in the experiences available to a person without a disability.

Accommodation: The special arrangements or assistance provided to achieve accessibility in the workplace.

3. Scope

The scope of this document is to update the status of the *Multi-Year Accessibility Plan* each year and to revise the obligations described for all applicable employees required to coordinate, implement and monitor Comtech’s *Multi-Year Accessibility Plan*. While the *Accessibility for Ontarians with Disabilities Act* is Ontario-based legislation, Comtech’s position is that anyone working on behalf of Comtech shall follow this policy.

4. Statement of Commitment

Comtech is committed to maintaining a workplace that provides equal opportunity to everyone and accommodates the needs of a diverse workplace, including people with disabilities. Comtech will make every effort to prevent and remove barriers to accessibility in the workplace and meet all its requirements under AODA.

5. Plan

5.1 Training

Comtech continues to provide training to all employees required by AODA and the Human Rights Code as it relates to people with disabilities by:

- Ensuring appropriate training is provided to all employees during the onboarding process regarding the requirements of AODA and the Canadian Human Rights Code as it pertains to persons with disabilities
- People and Culture team maintains a record of training provided, including when the training occurred and employees who attended.
- Training updates are be provided when there are changes to accessibility laws, requirements and/or policies.

5.2 Information and Communications

Comtech is committed to meeting the communication and information needs of people with disabilities. Comtech continues to take the following steps to ensure employees are provided with accessible communication and information to meet their needs in compliance with accessibility laws:

- Comtech ensures all major revisions to its websites and web content comply with the *World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 at Level A*.
- By January 1, 2021, all website content will be compliant with *WCAG Level AA*.
- Comtech continues to maintain established practices for providing accessible information, feedback and communications, in any format or mechanism required, upon request.

5.2.1 Privacy and Protection of Personal Information

Comtech ensures employee data and information is kept confidential, including information related to accessibility and accommodation requirements. Only those required to directly support the accessibility or accommodation requests will be provided only the information required to meet the needs of the employee.

5.3 Employment Practices

Comtech is committed to fair, equitable and accessible employment practices. The company identifies, removes and prevents barriers arising during employment by evaluating existing policies/procedures to meet accessibility laws in the following areas.

5.3.1 Recruitment and Selection

Comtech accommodates people with disabilities throughout the recruitment process and throughout the employment relationship. The following actions are taken:

- Comtech encourages employment opportunities through its website and job advertisements for the designated groups, including persons with disabilities.
- Comtech specifies that accommodation is available for job applicants with disabilities on request.
- Comtech accommodates requests for alternate recruitment application, interviewing, communications processes and tools.
- Comtech offers support for participation in any aspect of the selection process.

5.3.2 Return to Work Process

Comtech maintains a return-to-work process for employees absent due to disability and actively facilitates a successful return to the workplace. Contact the People and Culture team for further information regarding return to work.

5.3.3 Performance Reviews, Career Development and Employee Relations

Comtech takes the following steps to ensure the accessibility needs of employees with disabilities are taken into account with regard to employee relations activities:

- Comtech ensures its procedures take into account the accessibility needs of employees when, and not limited to:
 - Assessing their performance
 - Managing employee relations
 - Career development and conducting transfers
 - Promotions
 - Terminations, layoffs or redeployment

6. Contact Information

Employees may ask questions, raise concerns or report instances of potential non-compliance with this policy by contacting a member of the People and Culture team or emailing PCteam@teamcomtech.com. If your concern is related to a member of the People and Culture team, please contact the CEO at hugo.blasutta@teamcomtech.com. If your concern is related to the CEO, please contact Comtech's Chair of the Board at jason.claxton@teamcomtech.com.

This policy will be reviewed on an annual basis and revised as necessary. Any changes to this policy will be communicated to all employees.

Failure to comply with this policy may be grounds for disciplinary actions, up to and including termination.