

**Accessibility Plan 2023 – 2026**  
**June 1 2023 Poynt360 Inc.**

## Executive Summary

Poynt360 and its operations as of June 1, 2023, are reflected in our 2023-2025 Accessibility Plan. Our accessibility team assisted us in gathering feedback and developing our plan. This plan was developed by consultation and listening to our customers, staff, and groups representing people with disabilities. We observed from our discussions that some customers have challenges at Poynt360 physical location, online, and while dealing with us. We also discovered that there are chances to enhance how and how quickly we provide accommodation to employees with impairments.

Our strategy describes the hurdles identified through consultations, the steps we will take to resolve them, and how we will avoid additional potential barriers over the next three years. It also incorporates some of the previous accessibility efforts on which we have been working.

We will examine our plan on an annual basis and provide a status report. We will offer an updated plan that builds on our progress every three years. We recognize that making employee and customer experiences more accessible is a process that will last well beyond 2025.

This Accessibility Plan represents Poynt360 expectations as of the date this plan was released and may be subject to revision, in compliance with relevant law, to reflect the increasing accessibility needs of Poynt360 workers and customers.

## **1. Statement**

Poynt360 Inc. is devoted to making our products and services more accessible as part of our commitment to offering a customer-focused service. We endeavor to provide our services and handle our staff in a way that respects all people's dignity and independence. This plan explains the steps we want to take in order to attain these objectives.

## **2. General**

### **2.1. Providing Feedback**

We encourage comments, concerns, and other input on any accessibility issues from our customers or other interested parties. This can include any accessibility-related feedback you have, such as comments on this Accessibility Plan or any difficulties you have encountered when dealing with Poynt360 or utilizing our goods or services.

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

By telephone:

Sales & Support line: 1-855-921-7211

By email: [accessibility@poynt360.ca](mailto:accessibility@poynt360.ca)

Through our feedback form: <https://poynt360.ca/accessibility-feedback-form>

Social Media Channels

Facebook: <https://www.facebook.com/poynt360>

Instagram: <https://www.instagram.com/poynt360/>

By mail:

POYNT360 Inc.

295 Waterloo Street, London, Ontario N6B2N5

Our CEO is the designated individual in charge of accepting accessibility feedback. Any comments or suggestions on this plan or accessibility should be directed to our Chief Executive Officer by mail at 295 Waterloo Street London, Ontario N6B2N5 or electronically at [accessibility@poynt360.ca](mailto:accessibility@poynt360.ca).

If you would prefer to provide feedback anonymously, we will contact you to confirm receipt and work with you to determine the best way to address the issue.

If you require an alternative format. Please contact us in one of the ways indicated above if you would like to request an alternative format of this plan. Poynt 360 can supply this strategy in either of the following formats: • Physical printed copy; • Audio recording; • Braille.

We are also happy to work with you and will do our best to accommodate you. If you require another format, please feel free to reach out and we will be glad to accommodate.

In addition to addressing accessibility concerns directly with you on a case-by-case basis, our personnel are trained to pass all input to our accessibility manager, who is our Chief Executive Officer and is responsible for receiving accessibility feedback. Our team will track and evaluate feedback as part of the process of upgrading our Accessibility Plan and policies.

### **3. Consultations**

We began our consultations in 2022 with an assessment of our accessibility gaps and opportunities. To ensure Poynt360 employees felt comfortable providing honest feedback.

This Accessibility Plan was created by a team comprised of internal personnel as well as two third-party consultancy groups. Employees were asked to assess their understanding of existing barriers and challenges to overcoming those barriers, as well as where present policies and practises may fall short. In addition, the consultant group examined our facilities, work practises, onboarding, client contacts, and information and communication technology before drafting our initial strategy.

In order to prepare this accessibility plan, representatives from various departments were consulted, including those in charge of all our departments. During the planning and preparation process, staff members considered their understanding of present obstacles, difficulties, and potential gaps in current procedures and policies.

Employees who took part in the consultation were not asked to disclose whether they were disabled out of respect for their privacy. The consultation process led to adjustments being made to the proposed plan. After going through this procedure, a final version of the plan was created, suitable for outside consultation.

At that point, Poynt360 identified two outside consultant teams that would review and consult internally on their initial accessibility strategy so that they could get valuable input. These consultants had experience in multiple fields that helped us

with our plan, as well had multiple members who identified with various forms of disabilities.

The feedback obtained proved beneficial in pinpointing enhancements for the Plan. These included methods to enhance the plan's accessibility obstacles that Poynt360 staff had not initially recognized, and additional actions that could be implemented to tackle the detected obstacles. The final plan includes the feedback received.

The seven main principles are outlined in the Accessible Canada Act.

These principles were to be recognized and followed when implementing our action plan. These guidelines were considered by Poynt360 when creating its accessibility plan: All people must:

- a. be treated with dignity regardless of their disabilities
- b. have the same opportunity to live the lives they can
- c. be able to participate fully and equally in society without facing barriers
- d. has meaningful options and be free to make their own decisions with support if needed.
- e. have laws, policies, programs, services, and structures that take into consideration the needs of all people.
- f. People with disabilities must be involved in the development and design of laws, policies, programs, services, and structures.
- g. the creation and revision of accessibility standards and regulations must be done with the goal of achieving the highest level of accessibility for people with disabilities. account for people's disabilities, the various ways that people interact with their environments, and the multiple and intersecting forms of marginalization and discrimination that people face.

Before starting to create our action plan we reviewed these key principles to ensure they were the primary thought behind our plan. Poynt360 ensured that each group understood these guidelines so their feedback would be impactful.

## **Our Accessibility Plan**

Our accessibility plan is made up of six parts.

### **4. Employment:**

Employment" at Poynt360 relates to the recruiting, retention, and advancement of individuals. It also includes assisting people who need workplace accommodations.

#### **Identified Barriers**

Job searchers and applicants may face barriers in applying for jobs with Poynt360.

#### **Action**

In our job postings, we provide guidance to prospective candidates regarding the accessibility options offered to individuals with disabilities during our recruitment procedures. Once candidates are chosen to proceed with the assessment/selection phase, we inform them that accommodations can be provided upon request. Should an applicant require such accommodations, we engage in a consultative process with the individual to make suitable arrangements.

#### **Timeline**

Ongoing.

#### **Identified Barriers**

Employees may face barriers in performing their work that require accommodation.

#### **Action**

We have constituted a disability assessment team to delineate our approaches to accommodating our employees with disabilities, including our policies for the supply of accommodations relevant to their jobs. We provide employees with access to individual accommodation plans for employees with disabilities, and we keep thorough written records of these plans.

Future steps include:

1. Enhancing staff onboarding training to heighten employee awareness.

2. Continuously evaluating and assessing our workplace to meet our guidelines and find possible new areas to improve on and always taking feedback into account.

### **Timeline**

1. June 2024
2. Ongoing

### **Identified Barriers**

Employees might encounter obstacles when resuming work after or during a disability-related absence.

### **Action**

Working along with an outside human resources partner, we create a phased return-to-work program that is customized to each employee's unique needs as advised. The way Poynt360 now creates these programs is in partnership with our external human resources partner as well as the affected employee. The employee receives assistance from the external HR business in collecting the required medical practitioner documentation. Based on the medical records, the HR department then creates an accommodation letter that outlines the needs of the employee. upcoming activities consist of:

1. Continuously evaluating our phased return-to-work program, incorporating feedback as it arises.

### **Timeline**

Ongoing.

## **5. Built Environment**

POYNT360 is dedicated to ensuring that its premises, accessible to the public, are free of barriers, and its employees can access its offices without hindrance. Due to the ongoing impact of the COVID-19 pandemic, a significant portion of POYNT360's workforce currently operates remotely, and the company's offices are not open to the public. POYNT360 has not yet finalized plans for employees' return to the office. Given these circumstances, many of our objectives for physical infrastructure are challenging to establish. Consequently, for the purpose of this plan, we have

expanded our definition of the 'built environment' to encompass our employees' day-to-day workspaces within their own homes.

### **Identified Barriers**

Our employees might experience physical discomfort or mobility challenges while operating from their remote workstations.

### **Action**

Similar to other employee accommodation requests, workstation accommodations are individually considered by our human resources department. Future actions include:

1. Continual evaluation of our disability management and wellness program and policies, taking into account feedback received.

### **Timeline**

Ongoing.

### **Identified Barriers**

Employees may encounter challenges in staying informed about or engaging in workplace emergency responses.

### **Action**

When employees are set to return to in-person work, we will furnish customized workplace emergency response details to employees with disabilities, specifically when the employee's location and disability necessitate such individualized information, and Poynt360 is aware of the accommodation requirement. We will provide this information as promptly as possible upon identifying the need for accommodation due to an employee's disability. If an employee is likely to require assistance during a workplace emergency response, Poynt360 will designate a person or persons to provide the necessary support, and we will share the workplace emergency response information with these designated individuals with the employee's consent.

### **Timeline**

Ongoing.

## **6. Information and Communication Technologies, Design and Delivery of Program & Services**

Poynt360 is committed to delivering Information and Communications Technologies (ICT) with accessibility in mind, striving to offer barrier-free access to our services. Our dedication extends to ensuring that the design and delivery of our services prioritize accessibility, all aimed at ensuring client satisfaction. Poynt360 is dedicated to delivering Information and Communications Technologies (ICT) with accessibility at the forefront, striving to offer unobstructed access to our services. Our commitment extends to ensuring that accessibility is a key consideration in the design and delivery of our services, all aimed at ensuring client satisfaction.

### **Identified Barriers**

Regarding website accessibility: Our website serves as the main information hub for our ICT products and services. However, it's important to note that the information on our website may not be fully accessible to all potential customers. For instance, certain elements like drop-down menus, hyperlinks, and online selection forms may not function properly with all screen-reader tools."

### **Action**

We consistently evaluate our current website content, as well as any new additions, for compliance. Our commitment to ensuring website accessibility remains steadfast through continuous testing. Furthermore, we will diligently incorporate feedback concerning accessibility concerns into our website updates.

### **Timeline**

Ongoing.

### **Identified Barriers**

Regarding social media and Advertising Accessibility: It's important to note that some of Poynt360's social media and advertising content may not be fully accessible to all users.

### **Action**

At present, Poynt360 does not have a dedicated policy in effect to guarantee the accessibility of its social media and advertising content. Consequently, Poynt360 employees managing its social media accounts may not possess the necessary



knowledge of accessibility best practices, which includes actions like furnishing alternative text for images and implementing closed captioning for videos.

Next steps:

1. Include accessibility guidelines into our standard advertising review checklist to promote better internal awareness.
2. Develop social media policy identifying barriers to accessibility on social media and establishing best practices for posts.

## **Timeline**

Ongoing.

## **7. Communication, other than ICT**

We must pinpoint situations in which communication, excluding information and communication technologies, might present obstacles in the areas previously mentioned. To simplify this process, we have included this discussion within the specific areas where we've recognized communication as a potential barrier.

## **8. Procurement of Goods, Services and Facilities**

Poynt360 is committed to fostering a culture where accessibility is a primary consideration for its employees engaged in procurement, ensuring that all newly acquired goods, services, and facilities are inherently accessible. We are dedicated to integrating accessibility awareness into our procurement procedures to make them accessible to all vendors.

### **Identified Barriers**

Some employees involved in procurement may lack awareness of the significance of accessibility in the procurement process. Furthermore, Poynt360 frequently employs informal procurement methods, which can result in accessibility considerations for a product or service not being recognized at the initial stages of the process.

### **Action**

Upcoming Actions:

1. Revise Poynt360's internal contract request templates to ensure that the procurement personnel consider accessibility requirements for products or services, when relevant.

2. Create a procurement accessibility policy that:

a. Identifies potential barriers that individuals with disabilities might encounter when participating in procurement processes; and

b. Clarifies how accessibility factors for a product or service should be identified during the procurement phase.

#### **Timeline**

1. June 2024
2. June 2024

## **9. Transportation**

Poynt360 does not offer transportation services, and as such, this specific aspect does not directly pertain to Poynt360's operations. However, Poynt360 is dedicated to guaranteeing that its employees will have unimpeded access to transportation when necessary to carry out their work.

#### **Identified Barriers**

Employees might encounter challenges in accessing the transportation required for their job, especially in cases where off-site work necessitates the use of a vehicle.

#### **Action**

Similar to most employment-related accommodations, Poynt360 currently handles transportation-related accommodation requests on an individual basis. Since such requests are infrequent, there is a need for increased focus on identifying potential transportation barriers faced by employees.

Future actions include:

1. Creating transportation guidelines to establish alternative transportation options to worksites, ensuring that employees with disabilities can effectively carry out off-site work as required.

#### **Timeline**

1. June 2024

## **10. 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.

## **11. Paper-Billing**

As part of Telecom and Broadcasting Decision CRTC 2022-28, Poynt 360 is required to provide paper bills upon request to certain customers, including those who self-identify as having a disability and seniors. Poynt 360 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. For the last ten years, Poynt 360 policy has been to make paper billing available upon request at no cost to all its customers. There is no need to self-identify as a senior or as having a disability.

## **12. Teletypewriter (TTY) relay services (711) and Internet Protocol Relay Services**

Teletypewriter relay services (TTY relay or 711) are text-to-voice and voice-to-text relay services. In a TTY relay service call, the relay operator communicates with the person who has a hearing or speech disability via TTY (typewritten messages), and with the person without a hearing or speech disability via voice.

IP relay services are text-to-voice and voice-to-text relay services but run over internet protocol. In an IP relay service call, the relay operator communicates with the person who has a hearing or speech disability via text and the person without a hearing or speech disability via voice. The person with a disability uses a device connected to the Internet (such as a computer, laptop or wireless device) or a text messaging application to reach the relay operator. The person without a disability dials a toll-free number to reach the relay operator.

As part of Telecom Regulatory Policy 2017-11, Poynt 360 phone service, is required to provide TTY and IP Relay services for 24 hours a day, 7 days a week. Service providers like Poynt 360 are required to promote information on all our disability specific services and products, and to incorporate an easy-to-find.

## **13. Call Centre Accessibility**

As part of Telecom Regulatory Policy 2017-11, service providers like Poynt 360 are required to make their general call centres 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.

(c) making Interactive Voice Response systems accessible. A service provider with a disability call centre can meet this requirement by developing and implementing protocols for the appropriate transfer of calls to the call centre.

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.