Accessibility Plan Progress Report

2024

This Accessibility Plan Progress Report (the "**Progress Report**") outlines the progress made by Sierra Wireless, ULC (the "**Company**") in the preceding 12 months towards implementing its Accessibility Plan.

The Company's Accessibility Plan was last updated on May 31, 2023 and is available on the Company's website.[1]

This Progress Report is intended to meet the Company's requirements to publish an annual progress report pursuant to the *Accessible Canada Act* and its regulations (collectively the "**Act**").

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[1] https://www.sierrawireless.com/wp-content/uploads/2023/06/Sierra-Wireless-Accessibility-Plan-2023.05.31.pdf

1. General

Interested persons can contact the Company using the mailing address, email address or phone number below to:

(a) request a copy of the Progress Report in a format prescribed by the Act;

(b) request a description of the Company's feedback process in a format referred to in the Act; or

(c) provide feedback regarding the Accessibility Plan, this Progress Report, or any barriers that may be identified.

Address:	13811 Wireless Way Richmond, British Columbia, V6V 3A4 Canada
Email:	accessibility@sierrawireless.com
Phone:	1-877-207-4284

Requests will be answered as soon as is feasible, but no later than the deadlines set forth in the Act.

The designated person responsible for receiving accessibility feedback on behalf of the Company is Ross Gray, Senior Vice President & General Manager, IoT Systems and Connectivity Products Group.

Employees of the Company may also provide feedback to their manager or their local human resources representative.

2. Report on Progress Under Areas Described in Section 5 of the Act

The Accessibility Plan identified certain accessibility barriers in the areas described below, and described both existing and planned steps to eliminate or mitigate those barriers. This Progress Report provides a summary of progress in the past 12 months towards eliminating or mitigating these barriers.

Employment

	Barriers Identified	Existing Mitigations	Prior Planned Mitigations & Updates
Recruitment, promotions	Individuals with disabilities may face barriers during the hiring and promotion process that are not faced by other individuals.	Job posting language is assessed to ensure it is inclusive and that required qualifications are actually required for the job. All duties and responsibilities are essential job functions and requirements and are subject to possible.	Continue existing practices.

		modification to reasonably accommodate individuals with disabilities. Managers are encouraged to take diversity into consideration when hiring and promoting employees.	
Attitudinal biases	Employees and managers may have conscious or unconscious attitudinal biases towards persons with disabilities.	Diversity and inclusion are actively promoted in the Company. Managers are provided with training and support where necessary.	Continue existing practices.
Training	Limited employee training focused specifically on accessibility topics.	LinkedIn learning courses are available to employees: • Accessibility-First Design • Practical Accessibility for Designers • Accessibility for Web Design • Digital Accessibility for the Modern Workplace • Making a Case for Accessibility in Your Organization • Supporting Accessibility in a Hybrid Workplace • Supporting Workers with Disabilities • Inclusion and Equity for Workers with Disabilities • Inclusive Design • Inclusive Mindset • Inclusive Leadership • Diversity & Inclusion • Creating Inclusive Content • Diversity, Inclusion, and Belonging	Annual mandatory AODA and ABCA training and supporting resources provided on interacting with individuals with disabilities. Encourage increased participation in accessibility training.

Statistics / data	Company does not actively collect information about employees' accessibility requirements, which makes it challenging to identify the nature and extend of barriers in the workplace.	None	Ongoing consideration of options to collect additional information about barriers faced by employees in the workplace. Privacy considerations need to be considered to ensure that information is used only for the purpose of accommodating accessibility needs and mitigating barriers. Active email address available for employees to report concerns and provide feedback on accessibility: accessibility@sierrawireless.com Annual email sent to all site employees requesting feedback on accessibility requirements with follow up consultation and appropriate actioning.

The Built Environment

The Company has a single office in Richmond, British Columbia. The office consists of three floors of office and lab space – covering 76,000 square feet. The office contains workstations, offices, meeting rooms, washrooms, lab space and a café.

	Barriers Identified	Existing Mitigations	Prior Planned Mitigations & Updates
Physical accessibility of doorways, elevators, washrooms and other common areas	Not all entrances and interior doorways are accessible (e.g. some entrances have stairs and some doorways do not include push plates).	Common areas are spacious and are generally accessible to people using mobility aids. Each floor, the main public access door, and washrooms are equipped with a push plate for automatic door entry. Washrooms have stalls with wider doors, grab bars and additional space. Public spaces are monitored on an ongoing basis and obstacles are removed. Monthly walkthroughs are also scheduled to ensure that action is taken and documented by Occupational Health and Safety team.	Continue existing practices.

Emergency protocols	Elevators may be unsafe for emergency evacuation. Exit by stairs is a barrier to persons with disabilities.	Emergency protocols provide that employees who are unable to use the stairs will wait in the area of refuse on each floor, and first responders will be alerted so that they can provide assistance.	Employees with disabilities provided with individualized emergency response information where necessary. Floor wardens are made aware of these requirements. The Company's human resources and occupational health and safety team take steps on an ongoing basis to determine whether employees require individualized emergency response information. Continue existing practices.
Ergonomics	Employees have differing ergonomic requirements for their workstation. Engineering laboratories have some accessibility barriers due to countertop seating.	Most workstations are height adjustable and are fitted with adjustable monitor arms and chairs. Periodic ergonomic consultations are available for employees. Special accommodations (including ergonomic accessories) are provided as needed.	Upgraded workspaces to include sit-stand desks. Consider accommodations for employees who need to use engineering laboratories on a case-by-case basis. Continue existing practices.
Choice of workplace	None.	Most employees have the option of working remotely some or all of the time, depending on their role. This gives employees the flexibility to work in the location most suited to their unique needs.	Continue to show flexibility and willingness to accommodate different preferences and needs. Continue existing practices.

Information and Communications Technologies ("ICT")

The Company makes various information and communication technologies available for use by employees, including desktop and portable computers, software applications and operating systems, web-based resources (e.g. corporate Intranet), and telecommunications tools (e.g. videoconferencing software and associated hardware).

The Company also uses information and communication technologies to provide services to its customers and operates a corporate website at www.sierrawireless.com. These customer-facing technologies, including the website, are addressed under the section "Design and Delivery of Programs and Services" below.

	Barriers Identified	Existing Mitigations	Prior Planned Mitigations & Updates
Desktop and portable computers and peripherals	Some employees require or benefit from specific computer hardware and peripherals to meet their unique needs.	Employees may request accessible peripherals and accommodations including tactile/reactive input controllers, audio/visual clarity enhancements, and workstation ergonomics improvements.	Survey of employee needs as part of employee onboarding process. Privacy considerations considered to ensure that information is used only for the purpose of accommodating accessibility needs and mitigating barriers.
Software applications and operating systems	Employees use third party software extensively. Some software may present sensory or other barriers to full usability by persons with disabilities.	Accessibility features are made available where they are supported in commercial applications and operating systems used by the Company. The availability of, and how to use, these features are highlighted through the corporate intranet website.	Continue existing practices.
Web-based Intranet and Internet information and applications	Employees use web-based tools (such as the corporate intranet). Web-based tools may present various accessibility challenges.	Major internal web-based tools are evaluated against common accessibility standards to minimize barriers.	Continue existing practices.

Telecommunications tools	Employees use a variety of telecommunication tools, some of which may present accessibility challenges.	Diverse conferencing and communication solutions are implemented including TTY and Hearing Aid Compatible (HAC v3/4) phones. Employee remote conference solutions support real-time transcription.	Continue existing practices.

Communication, Other than ICT

The Company communicates with employees, potential employees, customers and suppliers through various methods including in person, phone, email, and the internal and external website. The Company's employees communicate with each other through similar methods.

Barriers associated with these communications are addressed under "Employment" (in the case of barriers faced by employees and candidates) and "The Design and Delivery of Programs and Services" (in the case of barriers faced by customers and other stakeholders).

The Procurement of Goods, Services and Facilities

The Company's procurement group supports various other internal groups who wish to purchase goods or services to support their operations. For example, the procurement group may assist in negotiating terms and pricing for an office lease, for the purchase of IT equipment, or for the licensing of software used by employees. Accessibility considerations will be considered where appropriate when selecting vendors. For example, if the Company is seeking new office space, the accessibility of the space will be taken into consideration as part of the decision-making process. The specific accessibility barriers and considerations that are relevant to the various groups purchasing goods, services and facilities are addressed elsewhere in this Plan. For example:

- Accessibility considerations when procuring facilities are addressed under "The Built Environment" and "Transportation";

- Accessibility considerations when procuring IT equipment and software are addressed under "Information and Communications Technologies"; and

- Accessibility considerations when procuring platforms for website development and publishing are addressed under "The Design and Delivery of Programs and Services".

The Design and Delivery of Programs and Services

Corporate Website

The Company operates a website at www.sierrawireless.com. The website is used primarily as a marketing resource for customers and potential customers to obtain information about the Company, its products and services.

The Company acknowledges the importance of ensuring the website is accessible and welcoming to all users, including those with disabilities, and is committed to continually improving the accessibility of the website to meet WCAG at Level AA or above in order to better serve all users. By taking a proactive approach to accessibility, the Company hopes to create a more inclusive online experience for everyone who visits the website.

	Barriers Identified	Existing Mitigations	Prior Planned Mitigations & Updates
Alt text. (Alt text is an alternative text description that is read by screen readers when an image cannot be displayed. Without alt text, users with visual impairments will not be able to understand the content of the image.	Lack of alt text for certain images.	Most images on the website contain alt text (using the default image title).	Annual audit for all images on the website to ensure that they have alt text descriptions. Alt text descriptions added to all images that do not have them. Use descriptive and concise alt text that accurately describes the content of the image. Consider the context of the image when writing alt text. Continue existing practices. Plus, add the alt text every time when an image is uploaded on the website as a best practice.
Colour contrast.	Red colour on Sierra Wireless' website is not accessible when used in small text. Similarly, when the red is used as a background with white text on top, the contrast is too low. The main red color has been changed to Semtech's Teal color	Colour contrast between text and background has been assessed for most content on the website.	Identification of areas on the website where colour contrast is insufficient. Choose and implement a colour palette that meets accessibility standards for text and background contrast. Tests performed when we did the website reskin and implemented the color palette to meet standard. Continue with the above as an on-going task.

	now.		
Web forms	Not all web forms are fully accessible or meet WCAG guidelines.	Most forms are designed for accessibility by providing clear and concise instructions, labeling form fields, and ensuring that error messages are descriptive and easy to understand.	Testing of accessibility of web forms. Added clear and concise instructions for completing forms. Labeled all form fields using descriptive text. Provided descriptive error messages that explain how to correct errors. Added form validation to prevent errors before the form is submitted.

Continue with the above as an on-going task. |
| Keyboard accessibility | Some areas of the website may not be accessible by keyboard navigation alone. | Most areas of the website can be navigated using the tab key to navigate through links, buttons, and form fields. | Testing the website to ensure interactive elements can be accessed using a keyboard alone. Ensure that keyboard focus is visible and clear.

Continue with the above as an on-going task. |
| Multimedia content accessibility | Not all multimedia content on the website (e.g. videos) meets best practices for accessibility. | Most videos and audio files include captions, transcripts, and audio descriptions as applicable. Most multimedia controls are accessible and can be operated using a keyboard. | Reviewed multimedia content to ensure it is accessible. Added captions and transcripts for all videos and audio files. Provided audio descriptions for videos that contain important visual information. Ensured that multimedia controls can be operated using a keyboard.

Continue with the above. |
| Headings and content structure | Not all content on the website includes proper heading structure and hierarchy to assist navigation by users with screen readers. | Proper heading structure and hierarchy is generally used to ensure that users with screen readers can easily navigate and understand the content. Descriptive link text is generally used where possible to provide context and ensure that users know where the link will take them. | Testing of accessibility of headings and link text. Use descriptive link text to provide context for links whenever possible.

Continue with the above. |

Customer Support

The Company provides support to customers through various channels, including via websites, by email and by phone.

Support is provided through various websites on the sierrawireless.com domain. Some websites provide visual and textual information only, while others include audio or allow for communication with customers via textual cases.

Support is also provided by email. A separate email address is provided for requests and feedback specific to accessibility (accessibility@sierrawireless.com).

Phone support is provided through a single support number (1-877-687-7795).

	Barriers Identified	**Existing Mitigations**	**Prior Planned Mitigations & Updates**
Employee awareness and knowledge	Employees providing support to customers may have different levels of knowledge and awareness when it comes to the barriers experienced by customers with disabilities, and therefore how to respond to inquiries and requests for accommodations.	See "Employment" section above for description of various measures to improve diversity and inclusion.	Establish goals, best practices and train team members on customer service for customers with accessibility challenges. Continue existing practices.
Phone Support	Phone support requires users to be able to dial a number and communicate verbally in English.	Support is available through alternate channels (e.g. email or website).	None at this time. Continue existing practices.

Publication	The accessibility features of customer support channels are not actively promoted to customers.	None	Include information relating to accessibility aids when publicizing support channels. Continue existing practices.
Customer choice	Support is offered by a variety of channels (e.g. website, phone, email), which helps meet the needs and preferences of different customers. However, this is inconsistent.	Support is sometimes offered through multiple channels.	Continue to monitor customer surveys and feedback to identify areas for improvement. Aim to provide support through a variety of channels. Continue existing practices.

Transportation

	Barriers Identified	Existing Mitigations	Prior Planned Mitigations & Updates
Personal vehicles	Accessible parking.	Parking spaces designated for those with disabilities are positioned close to the entry and are considered sufficient at this time.	None identified. Continue existing practices.
Shuttle bus	Accessibility barriers for people using mobility aids.	Shuttle bus is not accessible to people using mobility aids.	None identified. Shuttle bus is not operated by the Company and is therefore not within the Company's control. Continue existing practices.
Public transit	Accessibility for people using mobility aids. Proximity to building.	A TransLink bus stop is located approximately 300 metres from the Company's office. TransLink buses are generally accessible to persons using mobility aids.	None identified. Continue existing practices.

3. Consultation

The Company recognizes the importance of involving persons with disabilities in the preparation and implementation of the Accessibility Plan and the Progress Reports, because they have unique perspectives and insights that can help to identify and address barriers to accessibility in a way that meets their needs. Involving people with disabilities in the planning process can help to ensure that the Accessibility Plan and the Progress Reports are inclusive, effective, and reflects the diversity of the community the serve.

The Company decided that consulting with employees who identify as having disabilities or otherwise face accessibility challenges would be the most effective consultation strategy, as these employees are already familiar with some of the Company's barriers to accessibility and are well positioned to advise on how best to address them.

The Company therefore contacted employees by email and invited employees who identify as having disabilities (or otherwise face accessibility challenges) to assist the Company in preparing this Progress Report. Two employees provided feedback. A consultation session was held with these employees on Tuesday, May 28th, 2024 which resulted in the below feedback / recommendation items. The Company will review and follow up with any appropriate actions.

Feedback / Recommendations:
- Quiet full privacy rooms (vs. glass pane dividers)
- Additional support / resources for crisis management at home
- Leadership resources for effectively leading through challenging company times
- Glare sensitivity
  - Employee asked for permanent desk in a specific location away from windows and was accommodated.
  - Company has also accommodated by assisting with the purchase of filters to minimize glare.

4. Feedback

The Company has not received any public feedback relating to accessibility in the prior 12 months.

5. Specific Conditions Imposed under Sections 24 or 24.1 of the *Telecommunications Act*

Pursuant to the Act, this Progress Report must address the conditions applicable to the Company pursuant to either Section 24 or 24.1 of the Telecommunications Act that relate to the identification and removal of barriers and the prevention of new barriers. While no such conditions are currently applicable, the Company will continue to monitor regulatory developments relating to telecommunications-specific accessibility requirements and update this section as required.

6. Specific Provisions of Regulations under the *Telecommunications Act*

Pursuant to the Act, this Progress Report must address the provisions of any regulations made under the Telecommunications Act that relate to the identification and removal of barriers and the prevention of new barriers and that apply to the Company. While no such provisions are currently applicable, the Company will continue to monitor regulatory developments relating to telecommunications-specific accessibility requirements and update this section as required.