

Sierra Wireless Accessibility Plan

This Accessibility Plan (the “**Plan**”) outlines the policies, practices, and actions that Sierra Wireless, ULC (the “**Company**”) has implemented or intends to implement in its operations to improve accessibility within the Company. The Plan also incorporates and references the Company’s existing accessibility policies and practices, where applicable.

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1. General

As a subsidiary of Semtech Corporation (“**Semtech**”), the Company operates under and is guided by Semtech’s [Core Values and Code of Conduct](#) (the “**Code of Conduct**”).

It is a core value under the Code of Conduct that all individuals should be treated with dignity and respect. The Code of Conduct also recognizes that all employees should have equal opportunities to achieve their potential, and recognizes the importance of providing a workplace where individuals feel respected, appreciated and satisfied. Discrimination of any kind is not tolerated, including discrimination based on disability.

In keeping with these principles, the Company is committed to treating all people, including individuals with disabilities, in a manner that respects their dignity and independence. To this end, we are committed to meeting the needs of individuals with disabilities in a timely manner and will endeavour to identify and remove barriers to accessibility in all aspects of the Company’s operations. The Company is also committed to complying with the accessibility requirements contained in the *Accessible Canada Act* and its regulations (collectively the “**Act**”). This Plan outlines the steps the Company is taking to meet those requirements and to improve opportunities for people with disabilities.

Feedback regarding the Plan or any barriers that may be identified can be provided by calling 1-877-207-4284, emailing accessibility@sierrawireless.com or by sending a letter to 13811 Wireless Way, Richmond, British Columbia, V6V 3A4, Canada. An individual submitting feedback may do so anonymously. The designated person responsible for receiving accessibility feedback on behalf of the Company is Ross Gray, Vice President & General Manager, IoT Connected Services Group. Employees of the Company may also provide feedback to their manager or their local human resources representative.

The Company will take such steps as are appropriate in the circumstances to rectify any issues or concerns raised in a manner consistent with the Plan. The steps taken will depend on the nature of the issue or concerns but will in general involve engagement with appropriate functional leads in the Company responsible for the area in question to assess whether organizational changes can be made to remove or mitigate the issue or concern. The Company will advise the individual providing the feedback of the results of the feedback review process as appropriate in the circumstances.

The Plan and a description of the Company’s feedback process is available upon request, using the contact information above. Both the Plan and the feedback process description are available in other accessible formats. Requests will be answered as soon as is feasible, but no later than the deadlines set forth in the Act.

2. Overview of the Company’s Operations

The Company is a subsidiary of Semtech, a multinational company based in the United States. Semtech is a high-performance semiconductor, Internet-of-things (IoT) systems, and cloud and connectivity services provider. Semtech designs, develops, manufactures, and markets a wide range of products for commercial applications, the majority of which are sold into the infrastructure, high-end consumer and industrial end markets. Semtech and its subsidiaries (including the Company) generally provide their products and services on a “business-to-business” basis and do not generally provide products or services to members of the public.

The Company’s operations generally consist of the following groups:

- Engineering;
- Product Management;
- Operations;
- Sales; and
- Corporate and administrative functions, including Finance, Facilities, Human Resources, Legal, Procurement and Marketing.

The Engineering, Product Management and Operations groups have important responsibilities for Semtech's IoT systems business. In some cases, the Company also provides support for other Semtech products or services (including cloud and connectivity services). The Company's sales are focused on the Canadian market, and are small as a percentage of Semtech's overall sales.

3. Glossary

Accessible formats: Refers to print, large print, Braille, audio format or an electronic format that is compatible with adaptive technology that is intended to assist persons with disabilities.

Barrier: As defined under the Act, a "barrier" means anything that hinders the full and equal participation in society of persons with an impairment, including those with a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation, and includes:

- a physical barrier
- an architectural barrier
- an information or communications barrier
- an attitudinal behavioral barrier
- a technological barrier
- anything that is the result of a policy or a practice

Disability: As defined under the Act, "Disability" refers to 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.

WCAG: As defined under the Act, "WCAG" refers to the most recent version that is available in both English and French of the *Web Content Accessibility Guidelines*, published by the World Wide Web Consortium.

4. Principles

This Plan was prepared while taking into account the following principles:

- all persons must be treated with dignity regardless of their disabilities;
- 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;
- 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;
- 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;

- persons with disabilities must be involved in the development and design of laws, policies, programs, services and structures; and
- 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.

5. Areas Described under Section 5 of the Act

In accordance with the Act, accessibility standards have been developed in the following areas. Barriers have been identified in each of these areas and the strategies and mechanisms for removing or mitigating them are outlined below.

Employment

The Company employs approximately 420 people in Canada. Most employees are in the greater Vancouver region, while some employees live in different parts of British Columbia and in other provinces. Most employees work remotely at least some of the time.

The Company is committed to accessible employment practices and to removing any barriers that prevent or hinder the career development of employees with disabilities, and accommodates the accessibility needs of candidates and employees as they arise. The Company has also developed a Diversity and Inclusion Recruitment Program to ensure that employment opportunities are available to a diverse range of individuals, including those with disabilities or other barriers to employment.

	Barriers Identified	Existing Mitigations	Planned Mitigations
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. Managers are encouraged to take diversity into consideration when hiring and promoting employees.	Continue existing practices.
Attitudinal biases	Employees and managers may have conscious or unconscious attitudinal biases towards persons with disabilities.	Diversity and inclusion is actively promoted in the Company. Managers are provided with training and support where necessary.	Continue existing practices.
Training	Limited employee training focused specifically on	LinkedIn learning courses are available to employees (e.g., “Supporting Workers with Disabilities”, “Digital Accessibility for the Modern	Encourage increased participation in accessibility training.

	accessibility topics.	Workplace” and “Inclusive Instructional Design”).	
Statistics/data	Company does not actively collect information about employees’ accessibility requirements, which makes it challenging to identify the nature and extent of barriers in the workplace.	None	Consider 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.

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	Planned Mitigations
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 Occupation Health and Safety team.	Continue existing practices.
Emergency protocols	Elevators may be unsafe for	Emergency protocols provide that employees who are unable	Employees with disabilities will be provided with

	emergency evacuation. Exit by stairs is a barrier to persons with disabilities.	to use the stairs will wait in the area of refuge on each floor, and first responders will be alerted so that they can provide assistance.	individualized emergency response information where necessary. Floor wardens will be made aware of these requirements. The Company's human resources and occupational health and safety team will take steps on an ongoing basis to determine whether employees require individualized emergency response information.
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.	Upgrade workspaces to include sit-stand desks over time. Consider accommodations for employees who need to use engineering laboratories on a case-by-case basis.
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.

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	Planned Mitigations
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.	Include survey of employee needs as part of new employee onboarding process. Privacy considerations need to be 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.	Develop and communicate accessibility capabilities & features for major business applications to all employees.
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.	Continuation of 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.	Continuation of 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	Planned Mitigations
Alt text. (Alt text is an alternative text description that is read by screen readers when an image cannot	Lack of alt text for certain images.	Most images on the website contain alt text (using the default image title).	Conduct an annual audit for all images on the website to ensure that they have alt text descriptions. Add alt text

be displayed. Without alt text, users with visual impairments will not be able to understand the content of the image.			descriptions 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.
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.	Colour contrast between text and background has been assessed for most content on the website.	Identify areas on the website where the colour contrast is insufficient. Choose and implement a colour palette that meets accessibility standards for text and background contrast.
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.	Test the accessibility of web forms. Add clear and concise instructions for completing forms. Label all form fields using descriptive text. Provide descriptive error messages that explain how to correct errors. Add form validation to prevent errors before the form is submitted.
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.	Test the website to ensure interactive elements can be accessed using a keyboard alone. Ensure that keyboard focus is visible and clear.
Multimedia content accessibility	Not all multimedia content on the website	Most videos and audio files include captions, transcripts, and audio descriptions as applicable. Most multimedia	Review multimedia content to ensure it is accessible. Add captions and transcripts for all

	(e.g. videos) meets best practices for accessibility.	controls are accessible and can be operated using a keyboard.	videos and audio files. Provide audio descriptions for videos that contain important visual information. Ensure that multimedia controls can be operated using a keyboard.
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.	Test the accessibility of headings and link text. Use descriptive link text to provide context for links whenever possible.

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	Planned Mitigations
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	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.

	requests for accommodations.		
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.
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.
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.

Transportation

Employees and visitors to the Company's office generally arrive by personal vehicle, shuttle bus, public transit, or bicycle. The shuttle bus is operated by the property manager for the office park in which the Company's office is located.

	Barriers Identified	Existing Mitigations	Planned Mitigations
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.
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.
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.

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

Pursuant to the Act, this Plan 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.

7. Specific Provisions of Regulations under the Telecommunications Act

Pursuant to the Act, this Plan 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.

8. Manner of Consultation

The Company recognizes the importance of involving persons with disabilities in the preparation and implementation of the Plan 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 Plan is inclusive, effective, and reflects the diversity of the community it serves.

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 all employees by email and invited employees who identify as having disabilities (or otherwise face accessibility challenges) to assist the Company in preparing the Plan. A consultation session was held and a number of barriers were identified that had not previously been considered. The ideas from this session were taken into consideration when preparing the Plan.

9. Modification of the Plan

This Plan will be reviewed and updated by the Company at least every 3 years in accordance with the Act. At the time of revision, information regarding accessibility policies and practices adopted by the Company in accordance with the Plan or otherwise will be included in the revised Plan.

Last updated: May 31, 2023