

# ONX ENTERPRISE SOLUTIONS LTD.

## Accessible Canada Act 2024 Progress Report

Available at: <https://www.onx.com/accessibility-standards>

### ONX ENTERPRISE SOLUTIONS LTD. ACCESSIBILITY PLAN

Accessible Canada Act

Updated September 3, 2024

#### Background

In July 2016, the government of Canada began their consultations with more than 6,000 Canadians to determine what an accessible Canada means to them. As a result of these consultations, *Bill C-81: An Act to Ensure a Barrier-Free Canada* was tabled in June 2018. The Accessible Canada Act (“ACA”), which aims to make Canada a barrier-free country by January 1, 2040, became effective in July 2019. To attain that goal, OnX Enterprise Solutions Ltd. (“OnX” or “We”) must proactively identify, remove, and prevent barriers in the following seven (7) priority areas:

- employment;
- the built environment (buildings and public spaces);
- information and communication technologies;
- communication, other than information and communication technologies;
- the procurement of goods, services and facilities;
- the design and delivery of programs and services; and
- transportation (airlines, as well as rail, road and marine transportation providers that cross provincial or international borders)

#### Guiding principles

- "nothing without us": persons with disabilities are involved in the design and implementation of the strategy

- collaboration: departments and agencies work in collaboration with each other, with bargaining agents, and with other public, private, and not-for-profit organizations
- sustainability: the strategy prioritizes actions that will have an enduring impact
- transparency: the strategy is developed and implemented transparently, and departments and agencies will report openly and transparently on their efforts to remove barriers

## Goals

Five goals to realizing the vision:

- employment – improve recruitment, retention, and promotion of persons with disabilities
- built environment – enhance accessibility
- technology – make information and communications technology usable by all
- services – equip employees to design and deliver accessible programs and services
- culture – build an accessibility-confident workplace

The Accessible Canada Act has the following planning and reporting requirements for federally regulated organizations:

- **prepare and publish accessibility plans:**
  - make accessibility plans to identify, remove, and prevent barriers in the priority areas in their policies, programs, practices and services
  - update federally regulated organizations plans every three (3) years or as specified in regulations, and
  - consult people with disabilities when creating and updating their plans
- **set up a feedback process:**
  - have a way to receive and deal with feedback about their accessibility
- **prepare and publish progress reports:**
  - make regular progress reports that describe the actions the organization has taken to implement their accessibility plans
  - include information in their reports on feedback received and how the organization took the feedback into consideration, and
  - consult people with disabilities when preparing their reports

Companies preparing plans under the Accessible Canada Act must annually report on their progress in implementing its plan.

## General

OnX partners with businesses to provide IT solutions that solve their biggest challenges whilst achieving outstanding business results. As a federally regulated private organization with over 100 employees, OnX must comply with the ACA. Under the ACA, the organization must develop

a Multi-Year Accessibility Plan (the “Plan”) to identify and eliminate barriers for people with disabilities. The Plan has been developed with input from employees, people with disabilities and other stakeholders and lays out a three-year journey to increased accessibility.

### Feedback Mechanism

The ACA requires organizations to establish a departmental process for receiving and dealing with feedback regarding the implementation of the Plan. OnX will regularly monitor and evaluate feedback and ensure that it is incorporated into future plans when possible. OnX will acknowledge any accessibility feedback received, other than feedback provided anonymously. If contact information is shared and you do not ask to be anonymous, we may follow up with you. Any personal information you provide will remain confidential and will be managed following privacy laws. This information will only be shared per these laws or with your consent.

If you have any questions, feedback, or suggestions, you can communicate with us by mail, email, or telephone to the following designated representative:

Michael Puza, Sr. Corporate Counsel  
OnX Enterprise Solutions Ltd.  
20 Toronto Street, Suite 800  
Toronto, ON M5C 2B8  
Telephone: 888-783-2506  
Email: LegalRegulatory@cbts.com

You may provide feedback anonymously if desired.

**Alternate formats of this progress report are available upon request.** Please contact OnX for information and support.

### Executive Summary

OnX’s first ever plan was developed by conducting several focus groups where employees of the organization had the opportunity to provide feedback on current processes and experiences regarding accessibility.

We identified the following which were used as a basis to develop our plan:

- employees lack of confidence in the accommodation process and how to access the accommodation process
- process to be developed regarding accessibility for content being posted to our website
- process to be implemented for procurement, vendors, etc.
- develop an individual or group/committee to be champions for accessibility (resources, equipment, etc.)

- consider accessibility when new policies and practices are put in place
- expectation of accessible design rather than fixing problems as they are identified

Based on the priority areas identified in the ACA, OnX has determined several actions listed below to work towards the elimination and prevention of the identified barriers. These actions will have a direct impact on creating a culture of inclusiveness that calls attention to accessibility at OnX. Additionally, OnX will be measuring and reporting on progress with respect to the implementation of these actions.

OnX has been conducting a complete review and revision of its policies and procedures. OnX and its parent company, CBTS Technology Solutions LLC (“CBTS”), are separating from their ultimate parent company, Cincinnati Bell, Inc., also known as “altafiber”. The separation is anticipated to occur near the end of 2024. Previously, altafiber provided much of framework of policies to be followed by OnX and CBTS. Due to the separation and the undertaking required, many of the actions identified in the report are being taken concurrent with other actions in the separation.

## Accessibility Statement

OnX strives to be barrier-free, accessible and inclusive to all and is committed to providing accessible and inclusive services for all employees, clients, and other stakeholders. OnX will review and develop its programs, policies, goods, and services with the intent to increase accessibility over time.

## Consultation with Persons with Disabilities:

Once OnX gathered the current progress from the various departments on their progress with each part of the plan, OnX provided the proposed update to its employee resource groups that serve as a support group persons with disabilities. OnX is actively working with individuals with disabilities to develop and implement these below initiatives.

OnX also encourages individuals with disabilities (including employees, customers, contractors, and vendors) to provide feedback of their experiences. All feedback is reviewed monthly by management and changes to policies, procedures, and practices will be made or implemented as required. This allows OnX to continuously improve to better remove barriers.

## OnX Action Plan Updates and Timeline

Action	Expected Completion	Current Progress
Provide general reminder to all employees on how to access the accommodation process	End of 2024	OnX is developing a general annual reminder to be sent to all employees regarding OnX’s accommodation process. The reminder will be developed by the end of 2024.

Provide general training on accessibility awareness and sensitivity to employees. And provide additional training for specific employees on specific topics as identified by their role.	End of 2025	OnX is developing general training on accessibility awareness and sensitivity as part of its efforts in separating from its ultimate parent company, altafiber. OnX is developing specific training needs with respect to accessibility for employees and new hires. OnX is likely to complete this overhaul by the end of 2025. OnX has adopted a working-from-home model for all employees that do not require on-site work.
Review and determine specific training needs with respect to accessibility for all employees and new hires	2024-2026	OnX is still in the process reviewing its specific training needs with respect to accessibility as part of its efforts in separating from its ultimate parent company, altafiber.
Revise the Orientation package to include accessibility resources and information pertinent to OnX	Spring 2025	OnX is reviewing and revising its orientation package as part of its efforts in separating from its ultimate parent company, altafiber. However, this goal has been revised to be met in 2025.
Ensure a review of all emergency protocols are completed and consideration is given to those with disabilities at all locations	End of 2024	OnX is conducting a general review of all emergency protocols as part of its efforts in separating from its ultimate parent company this year. During such time, OnX will ensure the review is completed with consideration to those with disabilities.
Begin to develop in house champion (s) with overall knowledge of accessibility and available resources	Completed	OnX has created employee-led employee resource groups (“ERGs”). These groups are voluntary, formed around shared characteristics, interests, or experiences, aiming to foster inclusion and support within the workplace. The groups provide a platform for underrepresented employees to voice their experiences, concerns. They facilitate education, awareness, and allyship amongst employees. ERGs also work with company leadership to advocate for policies and practices that promote belonging to the remote workplace.  One of those groups is Neuro. Neuro’s goals include embracing the unique perspectives and abilities of all employees, including those who are neurodivergent.
Establish a process to raise accessibility issues to the building owner i.e. Power door operator functionality	Completed	OnX communicates accessibility issues to the building owner on an ad-hoc basis according to its Policy on Accessibility.
Ensure alternative arrangements are made available to anyone needing	Completed	OnX has developed an Accessibility Standards Policy that allows for any individual to pre-

accessibility accommodations prior to attending the office		arrange any accommodations they may need in order to access the office.
Consider a review of all offices to include the identification of barriers and a plan to remove them over time	As each lease comes up for renewal	OnX plans to review all offices for accessibility when deciding to renew a lease. However, OnX works primarily under a work-from-home model, meaning that only individuals generally do not need to work from any office unless their work requires them to do so.
Develop a protocol for what needs to be done when an individual with a disability needs to enter an area that is not accessible	Completed	OnX has developed an Accessibility Standards Policy that allows for any individual to pre-arrange any accommodations they may need in order to access the office.
Provide training and support on creating accessible documents	2025	Training and Support for creating accessible documents is scheduled to occur during 2025.
Develop a process and information on providing alternative formats and communication supports	2025	This activity is scheduled to occur during 2025.
Create standards for public facing communications to be in plain language and accessible	Spring 2025	OnX plans to review and develop this process in 2025 in regards to accessibility of its website to conform to WCAG.  In terms of plain language, the requirement is not always applicable to OnX. OnX sells its services to companies, and it specifically targets its marketing at IT experts. Therefore, OnX cannot always use the plain language to describe a complicated product.
Establish a process to evaluate accessibility in all phases of procurement.	Spring 2025	OnX is completely redesigning its website. During this redesign, the above action should be accomplished.
Ensure all purchased goods and services are as accessible as possible	2025	This activity is scheduled to occur during 2025.
Include the requirement for external contractors to indicate accessibility training has been completed on tenders and requests for proposals	2026	This activity is scheduled to occur during 2026.
Develop a plan to ensure accessibility is considered when new policies and practices are put in place or reviewed	2025	OnX hopes to take this action in 2025. OnX is currently rewriting many of its policies due to the separation from its ultimate parent company.

Establish how accessibility will be addressed when designing programs and services for clients.	2025	<p>OnX plans to review and develop this process in 2025. However, OnX sells its services to companies, and it specifically targets its marketing at IT exports. Therefore, OnX cannot always use the most simple language to describe a complicated product.</p> <p>Customer also direct OnX to configure the products it sells. While many of these products have accessibility alternatives built into the product and OnX can provide details on the features, it is up to the customer to actually use and educate its end users of these features.</p>
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### Implementation, Monitoring and Reporting

To ensure that accessibility remains a constant priority, the *Accessible Canada Act* dictates that regulated entities prepare and publish annual progress reports on the implementation of their plans. Similar to our plan, progress reports must be prepared in consultation with persons with disabilities. The progress reports must also present the feedback received (if any) and how that feedback was taken into consideration. OnX’s next progress report will be published one (1) year after the publication of this update. This progress report will include updates on the actions OnX has taken. As specified in the regulations, organizations must publish a revised plan every three (3) years. OnX’s first revised plan will be published on June 1, 2026.

### Glossary

**Barrier**

“Means anything—including anything physical, architectural, technological or attitudinal, anything that is based on information or communications or anything that is the result of a policy or a practice—that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation.”

**Disability**

“Means 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.”

**ICT (Information and Communication Technology)**

“An extensional term for information technology (IT) that stresses the role of unified communications and the integration of telecommunications (telephone lines and wireless signals) and computers, as well as necessary enterprise software, middleware, storage and audiovisual, that enable users to access, store, transmit, understand and manipulate information.”

### **Web Content Accessibility Guideline (WCAG)**

“The WCAG documents explain how to make web content more accessible to people with disabilities. Web “content” generally refers to the information in a web page or web application, including:

- natural information such as text, images, and sounds
- code or markup that defines structure, presentation, etc.