

ONX ENTERPRISE SOLUTIONS LTD.

Accessible Canada Act

Multi-Year Accessibility Plan

June 1, 2026 to May 31, 2029

Contents

Background	3
Guiding principles	3
Goals	3
Feedback Mechanism	4
Executive Summary.....	5
Accessibility Statement.....	5
Multi-Year Accessibility Plan.....	5
1. Employment.....	5
2. Built Environment.....	6
3. Information and Communication Technologies (ICT).....	7
4. Communications other than ICT	7
5. The Procurement of Goods, Services, and Facilities.....	8
6. The Design and Delivery of Programs and Services.....	8
7. Transportation	8
OnX Action Plan at a Glance	9
A. Consultations	9
Methodology.....	9
Key Staff Members.....	9
Review by OnX Staff Members with Disabilities and Caregivers.....	10
B. Implementation, Monitoring and Reporting	10
C. Glossary.....	10

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ACCESSIBILITY PLAN 2026

Accessible Canada Act

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

General

OnX partners with businesses to provide IT solutions that solve their biggest challenges whilst achieving outstanding business results. OnX resells IT enterprise-grade IT equipment and provides a variety of IT services to businesses across Canada. 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.

If you have any questions, feedback, or suggestions, you can communicate with us by mail at:

OnX Enterprise Solutions Ltd.
Attn: OnX Legal
20 Toronto Street, Suite 800
Toronto, ON M5C 2B8
Telephone: 888-783-2506
Email: OnXLegal@onx.com

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

Executive Summary

OnX's current plan was developed by reviewing the progress against OnX's 2023 Plan, reviewing the changes OnX underwent, and the rapidly changing pace of technology and its enhanced ability to increase accessibility.

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

- OnX underwent several changes over the previous three years, including a change in ownership, leadership, and customer strategy.
- Due to several changes across OnX, employees need more consistent education regarding OnX's accommodation process and how to access the accommodation process.
- Ensure continuous improvement and compliance with Web Content Accessibility Guidelines for both internal and external sites.
- Compile information from OnX's original equipment manufacturers regarding accessibility.
- Redevelop an individual or group/committee to be champions for accessibility.
- Expectation of accessible design rather than fixing problems as they are identified.
- Use of generative artificial intelligence ("Generative AI") to implement accessibility goals that were previously unobtainable.

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.

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.

Multi-Year Accessibility Plan

1. Employment

OnX is developing accessibility knowledge and information among employees, both in how work is completed and regarding personal accommodations. OnX has a robust accommodation

process in place where employees can reach out to the health services team directly or to their direct manager to begin the process. There is also an option for employees to request an accommodation through Connect (Intranet). For onsite operations, emergency protocols do include consideration for employees with disabilities and OnX regularly reviews these protocols.

OnX engages in a hybrid work model, with more than half of OnX working substantially from their residence or other preferred space outside of the office.

Barriers:

- Employees have limited familiarity with accessibility resources and information.
- No go-to person/champion for Canadian operations for accessible resources including equipment and software.

Actions

- Revise the accessibility policy and remind all employees on how to access the accommodation process (i.e. who to contact, what to expect of the process, etc.) to improve confidence.
- Designate an accessibility champion for the Company.
- provide general training on accessibility awareness and sensitivity to employees as well as additional training for specific employees on specific topics as identified by their role e.g., training on WCAG (Web Content Accessibility Guidelines), training on creating accessible documents for communications employees, and training on accessible recruitment for Human Resources employees.

2. Built Environment

OnX recognizes the importance of an accessible built environment. As such, OnX will continue to work with employees and building owners, to achieve the highest level of accessibility within the current offices and facilities. The built environment is complex given multiple locations in leased spaces across the country. OnX has office locations in Toronto, Edmonton, Calgary, Ottawa, Halifax, and St. Johns, and its office spaces are leased. The offices range in size and vary in use and function.

Barriers:

- OnX lacks a pre-signing accessibility review process for new facilities and leases.

Actions:

- establish a process to review accessibility issues before leasing or purchasing a new location.
- Ensure that leases impose obligations on the building owners to ensure accessibility where possible.

3. Information and Communication Technologies (ICT)

Documents for the OnX webpages go through an approval process before being uploaded. The website has been designed with WCAG in mind.

Barriers

- While WCAG errors were identified on the website and corrected, OnX aims for continuous improvement.
- WCAG continues to evolve, and OnX does not have a process to incorporate changes as new versions of WCAG are published.
- OnX does not have the ability to dictate ICT of its customers or vendors.

Actions:

- Develop an in-house solution to automatically create accessible Word (.docx) documents and accessible PDFs.
- Evaluate the accessibility of documents currently posted to the external and internal websites.
- ensure all content posted to the website is compliant to WCAG requirements.
- continue to correct WCAG errors identified and continue audit processes as necessary.

4. Communications other than ICT

OnX is dedicated to ensuring that all its communications, whether that be internal or external, are accessible. This includes ensuring that our communications are written in plain language.

Barriers:

- Despite having a process to accommodate, OnX has yet to receive a request for alternative formats, so it has no existing knowledge of what alternative formats are typically required by users or employees.
- OnX's customer base are directors of information technology and chief information technology officers, which does not always allow for plain language communication in its advertising.
- Due to OnX's hybrid work model and business model, most work is performed and communicated via ICT.

Actions

- identify what alternative formats and communication supports are typically required by our stakeholders and design such documents before they are asked.
- Create standards for public-facing communications to be made accessible and where possible, in plain language.

5. The Procurement of Goods, Services, and Facilities

Procurement is a key partner in achieving accessibility at OnX. Additionally, many business customers already require products purchased through OnX to have accessibility in mind. As such, OnX will implement procurement principles, rules, and practices with the goal to advance accessibility objectives. Accessibility will be considered in new and existing purchasing agreements. Goods and services purchased will be accessible to the greatest extent possible.

Barriers:

- OnX does not have leverage to dictate design or accessibility requirements in its procurement contracts due to the quantities involved and the nature of the products.
- OnX's procurement is on a shared services level with its US affiliate.

Actions:

- Establish a process to evaluate accessibility before purchasing a product for the enterprise that will be deployed for OnX.
- Implement contractual requirements for subcontractors to provide deliverables in an accessible manner where practicable.

6. The Design and Delivery of Programs and Services

OnX considers accessibility in the delivery of programs and services. A fundamental aspect in achieving this will be implementing meaningful accessibility improvements including OnX designing programs, services and products using an accessibility lens for its customers.

Barriers:

- The customer has already chosen the solution from the original equipment manufacturer to be purchased before engaging OnX.

Actions:

- Develop materials and side-by-side comparison of accessibility options between similar offerings
- Provide employees tools for creating documentation for customers in an accessible manner.

7. Transportation

This priority area under the Act is not applicable to OnX.

OnX Action Plan at a Glance

Action	Timeline
Revise Accessibility Policy	2026
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.	2027
Continue to review and determine specific training needs with respect to accessibility for all employees and new hires	2026-2029
Redevelop in house champion(s) with overall knowledge of accessibility and available resources	2027-2029
Establish a process to review accessibility issues before procuring facilities	2027
Establish minimum accessibility requirements in office space leases	2028
Develop in-house documentation to create accessible documents	2027
Regularly evaluate the accessibility of documents currently posted to external and internal websites	2027-2029
Develop a standardized process for alternative formats and communication supports that are needed for persons engaging with OnX.	2028
Establish a process to evaluate accessibility during procurement.	2028
Implement contractual requirements for subcontractors to provide deliverables in an accessible manner where possible	2029
Develop side-by-side comparison of accessibility options between similar offerings	2028

A. Consultations

One of the guiding principles of this strategy is the statement "*Nothing without us*" which affirms that persons with disabilities must be involved in the design and implementation of this plan at every stage.

Methodology

OnX consulted with persons with disabilities on the current state of accessibility at the OnX and with employees who provide services. The consultation was conducted in two parts:

Key Staff Members

Key employees at OnX were consulted in facilitated focus groups. Internal stakeholders with knowledge of employment practices, procurement, facilities, digital resources,

communications, and the design and delivery of good and services were consulted. Questions regarding accessibility barriers, current accommodation practices, and priorities for remediation were discussed and responses have been used to inform this plan.

Review by OnX Staff Members with Disabilities and Caregivers

The plan was also reviewed by Neuro, the employee resource group variety of lived experience with disabilities, and knowledge of a range of accessibility issues. Their feedback was incorporated into this Plan.

B. 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 first progress report will be published one (1) year after the publication of our first plan. 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 next revised plan will be published on June 1, 2029.

C. 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.