
TATA COMMUNICATIONS ACCESSIBILITY PLAN

VERSION 1.0 | *EFFECTIVE MAY 29, 2026*

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1. GENERAL

- **Accessibility Statement**

Tata Communications (Canada) Ltd. (“Company / Tata Communications”) is committed to identifying and meeting the accessibility needs of persons with disabilities in an affective, appropriate, and timely manner through compliance with the Accessible Canada Act including the Accessible Canada Regulations (“ACA”).

Our Company is committed to fostering an inclusive, barrier-free environment guided by the principles of the ACA, including dignity, independence, integration (except where alternate measures are necessary to meet the needs of persons with disabilities), and equal opportunity. The purpose of this Accessibility Plan (“Plan”) is to outline the principles that guide the Company’s path toward accessibility for persons with disabilities through compliance with the ACA.

- **Feedback**

We are committed to providing accessible services and digital experiences for everyone, including persons with disabilities. Your feedback helps us identify barriers and improve accessibility for persons with disabilities in Canada. Feedback regarding accessibility issues may be directed towards Madison Roberts or Astrid Dixon who can be contacted as follows:

- By Mail: Attn: 1441 Carrie Derick St, Montreal, Quebec H3C 6W2
- By Phone: 1-438-270-5065
- By Email: Astrid.Dixon@tatacommunications.com, Madison.Roberts2@tatacommunications.com

The Company will continue to ensure that our processes for receiving and responding to feedback are accessible to people with disabilities by providing or arranging the Company’s accessibility plan or description of the Company’s feedback process in the following alternate format upon request:

- Print
- Large print
- Braille
- Audio format
- Any electronic format that is compatible with adaptive technology.

Stakeholder(s) can call or e-mail the representative directly. Feedback can be provided anonymously. The persons designated to receive feedback are Madison Roberts and Astrid Dixon, who will acknowledge receipt, unless it is provided anonymously.

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2. GLOSSARY

Where used in this Plan, certain terms are defined as follows, pursuant to the ACA:

- **Accessibility:** the design of services, products, devices, technologies, environment, policies, and rules in a way that allows everyone, including people with disabilities, to effectively access them.
- **Barrier:** 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:** 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.

3. AREAS DESCRIBED UNDER SECTION 5 OF THE ACA

(i) Employment

This category covers recruitment and retention to ensure an inclusive and accessible work environment that is free from employment-related barriers, discrimination, and harassment.

Barriers:

- Lack of awareness about accommodation availability during recruitment.
- Limited integration of accessibility considerations in performance management and career development processes.

Action Plan

Actions and Goals:

- In our recruitment process, we will inform employees and the public about the availability of accommodations for applicants with disabilities. When candidates are selected for further assessment or participation in the selection process, they will be notified that accommodations are available upon request. The Company will work with applicants in relation to the materials or processes to be used and will work with the applicant to address any requests for accommodation up to the point of undue hardships.
- Our employees will be informed about the Company's processes for supporting individuals with disabilities, including providing job accommodations that consider accessibility needs. This information will be provided to new hires as soon as practicable after they commence employment.
- When an employee requests a disability-related accommodation, the Company will collaborate with that employee (and, where appropriate, their treating physicians or other practitioners) to assess, develop,

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and implement a documented individual accommodation plan. The plan will also include information about accessible formats, communication supports, and individualized workplace emergency response information where applicable.

- The Company will also consider accessibility needs and individual accommodation plans of employee with disability when conducting performance management, providing career development and advancement opportunities, or redeploying employees.
- In alignment with the Accessible Canada Act and the Company's Global Dignity at Workplace Policy, we are committed to fostering an inclusive environment by providing reasonable accommodations for individuals with a disability, those with a record of a disability, or those regarded as disabled. Employees or applicants requiring adjustments to perform essential job functions should contact Human Resources or the Legal Department to initiate an interactive process. The Company may request documentation or arrange a health care evaluation to substantiate the need for accommodation and will provide accommodations accordingly.

Long-Term Plans:

- Continue reviewing and enhancing employment practices to ensure they remain inclusive and accessible.
- Adapt to evolving accessibility standards and adapt to changing employee needs over time.

(ii) Built Environment

This category ensures barrier-free physical access at Company-owned sites, focusing on administrative and office spaces so individuals with disabilities can navigate safely and comfortably.

Barriers:

- Physical spaces may not fully comply with current accessibility standards.

Action Plan

Actions and Goals:

- Our sites were originally designed in accordance with National Building Code, 1990 standards and therefore our administrative spaces largely comply with accessibility requirements. However, to meet current standards, we will conduct internal facility accessibility audits where required to assess compliance with the ACA guidelines. The audits will focus on improved signage and how individuals with disabilities can move freely around our administrative and office areas, including exterior paths of travel, ramps, cafeteria, accessible parking, bathrooms and waiting areas and help identify any shortcomings and evaluate the need for enhancements. These actions aim to maintain compliance and improve physical access wherever feasible.
- The scope of compliance especially to move freely around our built environments will be limited to administrative/office areas of our sites. Technical areas, including data centre white spaces, will remain outside the Accessibility Act requirements due to operational constraints and equipment configurations that do not allow unrestricted movement. This is based on the nature of our field operations activities

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within these technical data centre spaces where our server devices, racks and other environmental controlling equipment configuration and layout does not allow for the ability to move freely around this internal space. These areas are also restricted for individuals with pacemakers because of electromagnetic interference risks and therefore are deemed inaccessible for safety reasons.

Long-Term Plans:

- Creating an inclusive and accessible workplace by ensuring barrier-free entrances and emergency exits, installing tactile and clear signage, and improving workstations to support diverse needs.
- While current efforts focus on administrative spaces, future plans will include extending accessibility measures to additional areas if Tata Communications (Canada) Ltd. undertakes development or maintenance of public spaces.

(iii) Information and Communication Technologies

Information and Communication Technologies (ICT) refer to technology tools and systems used to create, store, share, and manage information. This includes websites, digital platforms, communication tools, and assistive technologies that enable effective interaction and information exchange.

Barriers:

- Lack of accessible formats for persons with disabilities in communication processes.
- Limited awareness among employees about the availability of accessible communication supports.
- Potential challenges in ensuring web accessibility compliance (WCAG standards).

Action Plan

Actions and Goals:

- The Company is committed to supporting digital inclusion and strives to enhance the accessibility and usability of its digital experiences and online communications. To guide these efforts, the Company aims to conformance with Level AA of the World Wide Web Consortium (W3C) Web Content Accessibility Guidelines (WCAG) 2.2, except where meeting these requirements is not practicable.

Long-Term Plans:

- Continue monitoring and enhancing accessibility in communication technologies and web content of the Company in line with the applicable WCAG standards.

(iv) Communication (Other than Information and Communication Technologies)

This includes all non-digital communication methods and ensures that persons with disabilities can access and understand information in formats that meet their needs.

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Barriers:

- Non-digital communication materials may not be available in accessible formats by default.
- Employees and the public may not be aware of the availability of accessible communication supports.

Action Plan:

Actions and Goals:

- Upon request, the Company will provide or arrange for accessible formats, and communication supports that meet individual accessibility needs. We will consult with the person making the request to determine the most suitable format or support. Additionally, the Company will advise the public about the availability of accessible formats and communication supports for feedback processes through a notification on our company website.

Long-Term Plans:

- Continue to review and enhance accessibility resources to ensure all communications and materials remain inclusive and accessible.
- Provide ongoing employee awareness and training to ensure timely and effective responses to accessibility requests.

(v) Procurement of Goods, Services, and Facilities

This category addresses how accessibility requirements are integrated into the procurement of goods, services, and facilities. It ensures that vendors and partners align with accessibility standards and inclusive practices.

Barriers:

- Accessibility requirements may not be consistently integrated into procurement processes.
- Vendors may not always demonstrate strong accessibility practices or inclusion of persons with disabilities.

Action Plan:

Actions and Goals:

- Where applicable, the Company will ensure compliance with general obligations and specific requirements of applicable accessibility legislation in relation to the Company's procurement of goods, services and facilities.
- During partner selection, the Company applies a positive discrimination policy favouring vendors who demonstrate strong technical capability, accessibility practices and inclusion of persons with disabilities and help align procurement approach with the Accessible Canada Act.

Long-Term Plans:

- Continue integrating accessibility requirements into procurement processes.

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(vi) Design and Delivery of Programs and Services

This ensures that programs and services offered by the Company are designed and delivered in a way that is accessible and inclusive for persons with disabilities, meeting legislative requirements and best practices.

Barriers:

- Accessibility considerations may not always be integrated during the initial design phase of programs and services.
- Limited awareness of evolving accessibility standards among teams responsible for program delivery.

Action Plan:

Actions and Goals:

- The Company will adhere to the general obligations and specific requirements of accessibility legislation in relation to the design and delivery of programs and services, if and where applicable.

Long-Term Plans:

- We will continue to review and adapt our practices to ensure that all programs and services are designed and delivered with accessibility at their core. This includes embedding inclusive principles from the planning stage, leveraging assistive technologies, and continuously improving delivery methods to meet evolving accessibility standards and diverse user needs.

(vii) Transportation

This requirement is not applicable to Tata Communications (Canada) Ltd.

(viii) Training

This ensures that employees and managers receive training and information about accessibility requirements, accommodation processes, and inclusive practices. Training promotes awareness and equips staff to fulfil their roles in supporting accessibility.

Barriers:

- Employees may lack awareness of accessibility legislation and accommodation processes.
- Need for continuous reinforcement of accessibility and inclusion principles.

Action Plan:

Actions and Goals:

The training programs currently include:

- Annual training for all Canadian employees, including links to our Company's policy.

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- Review of the accommodation process during package handler orientation for new employees.
- Annual management training on the interactive accommodation process.
- Encouragement for managers to provide flexible schedules and ergonomic tools for remote work.
- Launch of DEI initiatives focusing on disability awareness and inclusion.
- Code of conduct training emphasizing equal opportunities and non-discrimination on any factors including disability.
- Global dignity at workplace training, specifying reasonable accommodations for individuals with disabilities.

Long-Term Plans:

- Continue reviewing and enhancing training programs to maintain compliance with accessibility legislation.
- Provide or recommend accessible technology training to employees, focusing on tools relevant to their roles.
- Foster an inclusive workplace culture that supports accessibility and accommodation.
- Integrate evolving best practices and legislative updates into training content regularly.

4. CONSULTATIONS

The consultation focused on major areas of the Accessible Canada Act, including:

- Employment
- Built Environment
- Communication
- Information and Communication Technologies

A survey was conducted during the preparation of this accessibility plan. For this we distributed a confidential survey to 104 Canadian-based employees which included people with any type of disability to gather input. These consultations were conducted remotely through an online survey to ensure confidentiality and accessibility. The survey included people from different roles, tenure and work setup.

After compiling responses, several patterns emerged:

- **Employment:**
Employees expressed positive remarks about remote work reducing commuting challenges. Some concerns were raised by those without remote/hybrid options. Employees suggested providing signage and physical communication tools in braille. In response, the Company has encouraged managers to offer flexible schedules and ergonomic tools for remote work and launched DEI initiatives focusing on disability awareness and inclusion.
- **Built Environment:**
Suggestions were made to include ramps, accessible bathrooms, improve signage, and ergonomic

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workstation options (e.g., cubicle walls for hearing issues in open-plan offices). Following the survey, we are currently:

- conducting a facility accessibility audit to assess compliance with ACA standards.
- prioritizing high-impact changes, such as ensuring accessible entrances and paths of travel.
- installing tactile signage and ensuring emergency exits are accessible.
- reviewing event and activity spaces to ensure inclusiveness.

- **Information and Communication Technologies:**

Employees requested website improvements, better assistive technologies, consistent office Wi-Fi, VPN connectivity, and modernized equipment (monitors with HDMI ports, docking stations, keyboards, noise-cancelling headphones). Some employees also requested improved training on new digital tools. Others noted no digital barriers, indicating mixed experiences. In response, the Company will:

- provide or recommend accessible technology training to employees, focusing on tools relevant to their roles.

- **Communication:**

Employees expressed fear of stigma when communicating issues concerns included HR responsiveness and knowledge of Canadian law, and fear of judgment from managers. Following the survey, the Company is:

- encouraging managers to provide flexible schedules and ergonomic tools for remote work.
- mechanism for providing feedback anonymously.
- preparing to launch DEI initiatives focusing on disability awareness and inclusion.

5. CONCLUSION

The Company is committed to fostering inclusion for people with disabilities across all areas of our organization and move closer to the goals established by the lawmakers and regulators to remove barriers and help make Canada fully accessible by the year 2040. As part of our ongoing efforts, we are working towards the accessibility of our online communications in line with Level AA of the Web Content Accessibility Guidelines (WCAG) 2.2. We are dedicated to making continuous progress that reflects our commitment to enhancing accessibility, addressing both current and future barriers, and ensuring that our services are accessible to everyone. We value and welcome feedback, as it plays a critical role in shaping our future accessibility goals. Recognizing that accessibility is an ongoing journey, we remain committed to advancing these efforts through active consultation and collaboration with people with disabilities.

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