

Vista Radio Limited - Accessibility Plan 2023-2025

Introduction and Executive Summary

Vista Radio Limited ("**Vista**" or the "**Company**") is committed to accessibility for persons with disabilities. We are committed to meeting our obligations under the *Accessible Canada Act* (the "**ACA**") and its Regulations.

The Company is committed to treat all individuals in a manner that allows them to maintain their dignity and independence. This commitment involves identifying and removing barriers to accessibility for our employees, customers, and within our local communities. At Vista, we recognize that accessibility extends beyond mere compliance with legal obligations; it is a fundamental aspect of promoting diversity, equity, and inclusion within our organization. We strive to create an environment where both internal and external individuals with disabilities are valued, respected, and provided with the necessary support to thrive. By embracing accessibility as a core value, we are committed to creating a barrier-free environment that promotes equal opportunities, independence, and dignity for all individuals.

In developing this Accessibility Plan and in making decisions regarding persons with disabilities, we have considered 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.
- 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 policies, programs, services and structures.
- 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.

General

Vista has designated Gary Russell, Vice President as the individual that will be responsible for receiving feedback on any barriers to accessibility, as well as this Accessibility Plan. Accessibility feedback can be submitted in the following ways:

a)	Mailing Address:	101-910 Fitzgerald Avenue Courtenay, BC, V9N 2R5
b)	Telephone:	+1-250-338-1133
c)	Email:	webmaster@vistaradio.ca
d)	Online:	Completing the online Accessibility Feedback form on the Company website: <u>https://www.vistaradio.ca/accessibility/</u>

Feedback can be provided anonymously by any of the methods outlined above.

All feedback that is not provided anonymously will be acknowledged by Vista. Vista will ensure that the personal information of a person who provides feedback will remain confidential.

This Accessibility Plan will be posted on our website at https://www.vistaradio.ca/accessibility/

Consultation

When preparing this accessibility plan, the Company recognized the importance of conducting consultations with persons with disabilities to ensure their unique perspectives, experiences, insights, and needs are adequately addressed for the purpose of this plan. The Company consulted with internal employees with disabilities to get a better understanding of barriers to accessibility as it relates to the Company's culture and practices. At Vista, we respect the confidentiality and privacy of all employees and as such, the identities of those who participated in the consultation session remains confidential for the purpose of this accessibility plan.

The Company lead the consultation process by facilitating scheduled individual virtual meetings to ensure inclusivity for all participants with disabilities. By utilizing virtual meetings, we made the consultation process accessible and eliminated potential barriers, such as physical limitations, transportation challenges and scheduling conflicts that may hinder in-person participation. Facilitating virtual meetings ensured the consultations were accessible and allowed participants to join from their preferred locations, utilize assistive technologies if required, and engage comfortably in a familiar setting. Individual virtual meetings also provided a focused and personalized setting, encouraging open and meaningful discussions.

At the time of the consultations occurred, the accessibility plan was nearing completion. The Company had made significant progress in developing the plan by identifying barriers, and formulating strategies to enhance accessibility. The purpose of scheduling the consultations in May 2023 was to align the identified barriers in the plan with the feedback received through the consultation process. This approach served as a final opportunity to gather insights and validate the proposed strategies before finalizing the accessibility plan.

During the consultation meetings, discussions were primarily focused on the prescribed areas of the accessibility outlined in the Accessible Canada Act. The Company sought input and feedback from participants on the following key areas:

- Employment
- Built Environment
- Information and Communication Technologies (ICT)
- Communication
- Design and Delivery of Programs and Services
- Transportation.

The responses obtained from the feedback sessions played a crucial role in developing and informing the accessibility plan. The responses provided in the consultation meetings influenced the plan in several different ways, including but not limited to:

- Identifying specific barriers and challenges experienced by persons with disabilities in various areas of accessibility.
- Providing a comprehensive understanding of the obstacles that needs to be addressed in the plan.
- Giving insight into the most pressing accessibility issues, which guided the prioritization of actions within the plan.
- Developing effective strategies and solutions to enhance accessibility. Participant insights and suggestions were taken into consideration when formulating action plans and implementing accessibility initiatives.
- Validating and refining the initial draft of the accessibility plan. By aligning the plan with the feedback, the organization ensured that the final version accurately addressed the concerns and recommendations raised during the consultation process.

Qualitative data was collected during the consultation process and was then analyzed to identify common themes, specific issues, and potential solutions, while formulating action plans to address and further prevent identified barriers. The data will be used to implement targeted initiatives, design educational programs, and continuously improve accessibility practices.

Areas of Accessibility under section 5 of the Accessible Canada Act

1. Employment

Accomplishments to Date

At Vista, we are committed to promoting accessibility and inclusivity in employment for individuals with disabilities. To achieve this, we have implemented various policies and practices to prevent new barriers from taking place and improve accessibility to our workplace. This includes:

- The Company's *Business Code of Conduct and Ethics Policy* and *Violence and Harassment Prevention Policy*. These are in place to enforce a work environment that is completely free from any form of discrimination and harassment, specifically target individuals with disabilities. These policies create the expectation for all employees to deliver on a culture of respect for all, and therefore further creating a culture of accessibility.
- Reiterate and highlighting our commitment to equality in each of our job descriptions with the following statement: "As an equal opportunity employer, we encourage applications from all qualified individuals."

Barriers

In preparation for this plan, through analysis of the insights provided from our consultations, the Company has identified the following area of opportunity towards our goal of removing barriers for accessibility with respect to employment:

- Building awareness of disability in the workplace.
 - We learned that it would be advantageous to provide additional education to our managers and staff regarding disabilities and the accommodation process to challenge and eliminate misconceptions and attitudes that act as barriers.

Next Steps to Address Barriers

The Company will develop and implement disability awareness training programs for employees at all levels. These training sessions will aim to enhance understanding, challenge biases, and promote a culture of inclusion. The training will cover topics such as disability etiquette, communication strategies, reasonable accommodations, and the benefits of a diverse and inclusive workforce.

2. The Built Environment

Accomplishments to Date

As of 2022, the Company has 49 locations across three provinces and one territory within Canada. The level of accessibility in our diverse range of built environments varies across regions and the local communities in which they are located. Vista is actively taking steps to make the built environment more accessible for individuals with disabilities. We recognize the importance of creating an inclusive and barrier-free physical space that allows everyone to navigate and engage with ease.

• Recognizing the diverse needs of individuals with disabilities, the organization provides various means of accommodation when requested. This includes evaluating options for alternative arrangements, and/or providing adaptive equipment and assistive technology if it is determined to be needed to ensure an accessible environment.

Barriers

In preparation for this plan, through analysis of the insights provided from our consultations, the Company has identified the following area of opportunity towards our goal of removing barriers for accessibility with respect to the built environment:

- Accessibility assessments to physical spaces.
 - Considering that Vista manages various unique locations across Canada, it would be advantageous to implement accessibility assessments to evaluate the physical space for each of our locations.

Through an assessment of such physical spaces, Vista can be proactive in identifying any potential barriers for each of the Company's locations and be proactive in finding solutions to address any identified physical barriers within our locations.

Next Steps to Address Barriers

The Company will conduct regular accessibility audits, which will be scheduled to take place every two to three years to coincide with completion of future accessibility plans. The Company will develop and find solutions towards making our locations accessible if it is determined from the finds of these audits that there is a need for further review.

3. Information and Communication Technologies

Accomplishments to Date

Vista is actively working to make information and communication technologies (ICT) more accessible to individuals with disabilities. To achieve this, we are currently:

• Adhering to communication accessibility standards, such as WCAG (Web Content Accessibility Guidelines) for our various websites.

Barriers

In preparation for this plan, through analysis of the insights provided from our consultations, the Company has identified the following area of opportunity towards our goal of removing barriers for accessibility with respect to the information and communication technologies:

- Ensuring closed captioning in our digital presence.
 - We learned that it would be advantageous to enable closed captioning in all Company video and multimedia posts to ensure that we are eliminating any barriers related to auditory limitations. We have also learned that there may be an opportunity to provide training to ensure all team members are enabling closed captioning within their media posts.

Next Steps to Address Barriers

To overcome this barrier, the Company will provide training for all team members who post media on the company website to enable closed captioning. In turn, this will set the expectation that all videos posted online will be closed-captioned enabled to ensure that our internal and external stakeholders with auditory limitations can enjoy our content.

4. Communication (Other than Information and Communication Technologies)

Accomplishments to Date

To ensure accessibility in internal and external our communications, the Company encourages open dialogue and collaboration towards providing a supportive environment where employees feel comfortable discussing their specific communication requirements and finding suitable accommodations as necessary and when needed.

Barriers

In preparation for this plan, through analysis of the insights provided from our consultations, the Company has identified the following area of opportunity towards our goal of removing barriers for accessibility with respect to communication:

- <u>Availability of alternative options, forms and methods of communications are not consistently</u> <u>available in marketing materials.</u>
 - We learned that the marketing materials that distributed to external stakeholders may not necessarily be available in alternative methods of communication, such as offering accessibility to braille or larger text formats.

Next Steps to Address Barriers

To overcome this barrier, the Company will develop accessibility guidelines for creating marketing materials for internal and external stakeholders. This includes ensuring that accessibility needs are considered when developing marketing materials and finding reasonable solutions to ensure that we have alternative materials available when requested.

5. The Procurement of Goods, Services and Facilities

Accomplishments to Date

The Company is committed to ensuring the procurement of goods, services and facilities is accessible to all employees, including those with disabilities. When collaborating with new and existing suppliers, the Company communicates our accessibility expectations and requirements. Furthermore, Vista promotes a culture of inclusion and encourages employees to provide continuous feedback on the accessibility of procured goods and services for us to further improve our procurement processes.

Barriers

The Company is currently unaware of any barriers around the procurement of goods, services and facilities.

Next Steps to Address Barriers

The Company will continue to monitor this area to determine if any barriers arise.

6. The Design and Delivery of Programs and Services

Accomplishments to Date

The Company is dedicated to ensuring that the design and delivery of programs and services are accessible to all individuals, including those with disabilities. Vista achieves this by following and adhering the legislation and industry requirements and practices of the radio broadcasting industry. From an internal standpoint, we achieve this by encouraging team members to discuss their specific concerns or requirements directly to management so then company can seek reasonable solutions and/or adjustments to the design and delivery of programs and services that would meet their individualistic needs if needed.

Barriers

The Company is currently unaware of any barriers in the area of the design and delivery of programs and services.

Next Steps to Address Barriers

The Company will continue to monitor this area to determine if any barriers arise.

7. Transportation

Accomplishments to Date

Transportation is currently not applicable to Vista's operations.

Barriers

The Company is currently unaware of any barriers in the area of the design and delivery of programs and services.

Next Steps to Address Barriers

The Company will continue to monitor this area to determine if any barriers arise.

Licensing

As required under the Broadcasting Act, the conditions of Vista's license issued are set out below:

Vista shall adhere to the conditions of license set out in the *Revised conditions of license for commercial AM and FM radio stations*, Broadcasting Regulatory Policy CRTC 2022-334, 7 December 2022, as well as to the conditions set out in the broadcasting license for the undertaking.

Vista is committed to creating a barrier-free environment. Should it be determined that any of the conditions of the license compromises or impacts this commitment, the Company shall take immediate, proactive measure to mitigate those conditions as required.

Glossary

"**Barrier**" means 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.

Alternative Formats

This Accessibility Plan is available in alternative formats, upon request. A request for an alternative format can be made in the following ways:

a)	Mailing Address:	101-910 Fitzgerald Avenue Courtenay, BC, V9N 2R5
b)	Telephone:	+1-250-338-1133
c)	Email:	webmaster@vistaradio.ca
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In responding to a request for an alternative format, Vista will comply with the timelines established by *Canadian Radio-television and Telecommunications Commission Accessibility Reporting Regulations*, SOR/2021-160.