

# Accessibility Plan

2026-2029



1 800 839 2256



## **SECTION 1.0 EXECUTIVE SUMMARY**

Calm Air International LP (Calm Air) is committed to creating a barrier-free travel experience for all passengers, customers and employees. As a vital connector between northern and southern communities, we recognize our responsibility to ensure that everyone, regardless of ability, can access safe, reliable, and dignified Air Transportation and workspace.

## **SECTION 2.0 GENERAL**

### **SECTION 2.1 PURPOSE**

Since 1962, Calm Air has provided scheduled passenger service, Charter operations, Cargo transport, and essential medical travel. This new Accessibility Plan will set the direction over the next three years for accessibility enhancements, focusing on building a transportation service and workplace that is equitable, inclusive and barrier-free.

### **SECTION 2.2 STATEMENT OF COMMITMENT**

Being a diverse, inclusive and accessible employer is a priority at Calm Air. We are committed to creating a barrier-free workplace that shows the full and equitable participation of employees who identify as Persons with a Disability in our workforce.

Calm Air commits to continuous review of our policies, programs, and services to ensure they are inclusive and accessible. Calm Air aims to:

- Build strong and diverse teams
- Promote fairness, justice and equity
- Advocate for the full participation of employees with disabilities in the workforce
- Establish barrier-free Canada
- Continue meaningful consultation with Persons with Disabilities within the communities to further guide decision-making and service improvements

The 2026-2029 Accessibility Plan represents a proactive and inclusive approach to accessibility which emphasizes transparency, collaboration, and accountability. This positions Calm Air International LP as a leader in fostering a workplace culture where accessibility is a core organizational value, not just a compliance requirement.

### **SECTION 2.3 FEEDBACK PROCESS & ALTERNATE FORMATS OF PLAN**

Calm Air encourages ongoing feedback to continue identifying, removing and preventing barriers to accessibility.

To provide your accessibility feedback (anonymous feedback is welcome in any method), feedback on our Accessibility Plan, Feedback Process and Progress Reports or request an alternate format of our Accessibility Plan, Progress Reports, or description of our feedback process through one of the following methods:

**Feedback Form (via website):** <https://www.calmair.com/site-top/accessibility>

**Phone:** 1-800-839-2256 (select option #1 for Reservations)

**TTY Relay Service** (for D/deaf, deafened, or hard-of-hearing):

1. Dial 711
2. After the operator gives you the go ahead, type in 1-800-839-2256
3. The operator will dial the number for you and act as a translator with Calm Air.

**Fax:** 1-204-956-6217

**Email:** [accessibility@calmair.com](mailto:accessibility@calmair.com)

**Mail:**

Calm Air Passenger Solutions Manager  
958 Ferry Road  
Winnipeg, Manitoba  
R3H 0Y8

Calm Air will acknowledge receipt of feedback, other than anonymous feedback, in the same method it was received.

## **SECTION 3.0 OUR UNDERSTANDING OF BARRIERS TO ACCESSIBLE TRANSPORTATION**

Calm Air recognizes the five (5) main categories of barriers as outlined in the *Accessible Transportation for Persons with Disabilities Regulations (ATPDR)* and *Accessible Canada Act (ACA)*:

1. Attitudinal barriers
  - This results when people think or act based on false assumptions.
2. Systemic barriers
  - These include policies, procedures, or work instructions that result in some people being excluded from activities, employment, or other services.
3. Technological barriers
  - These occur when technology, such as a smartphone application, cannot be accessed by people with disabilities.
4. Information and communication barriers
  - These are created when information is offered in a format that suits some of the population, but not all people.
5. Physical / architectural barriers
  - These are physical obstacles that prevent access to a facility, room, or other location.

## **SECTION 4.0 CONSULTATIONS**

Consultations remain a critical component of Calm Air's accessibility strategy. Calm Air continues to engage with the following stakeholders through our Accessibility Committee at Calm Air:

- Manitoba Possible
- Winnipeg Airport Authority (WAA)
- Calm Air Employees throughout various departments, including those that identify as Persons with Disabilities

During discussions about consultations and feedback in Calm Air Accessibility Committee meetings, members from Manitoba Possible suggested that Calm Air solicit more in-person feedback throughout the passenger experience. As a result, Calm Air will be creating a more robust feedback process to allow customer service teams to solicit feedback through a variety of touch points throughout the passenger journey (this may include at time of booking the reservation, at check-in, upon arrival at destination, post travel, etc.). This project is planned to launch by the end of Q3 in 2026.

Consultation with Persons with Disabilities will continue throughout the life of this plan as Calm Air aims to continue progress on identifying, removing, and preventing barriers for customers and staff.

## SECTION 5.0 INFORMATION AND COMMUNICATION TECHNOLOGIES (ICT)

Information and communication technologies are critical to providing services related to transportation. In particular, Calm Air depends on its website as one means to communicate information with customers and provide booking travel options. This includes information related to flight schedules, routes, available services, and travel purchases. A significant effort has been made to improve our Calm Air website, including an annual comprehensive accessibility review conducted by our website developer (Visual Lizard) to ensure Calm Air’s website complies with Web Content Accessibility Guidelines (WCAG 2.1).

Visual Lizard’s review combines automated testing tools with manual expert analysis to identify technical and content-related accessibility issues. Their approach focuses on how actual users, particularly those using assistive technology such as screen readers, keyboard navigation, and other adaptive tools, interact with Calm Air’s website.

The observations listed below highlight areas where accessibility can be improved across navigation, content structure, forms, media usage, and overall site organization. While many of the issues identified were relatively minor and can be addressed through content and front-end adjustments, resolving them will significantly improve usability, accessibility compliance, and overall user experience.

OVERALL	DESCRIPTION OF RECOMMENDED ACTION	TARGET COMPLETION
Multiple navigation links in the footer that go to the same location.	<ul style="list-style-type: none"> <li>To modify the copy of one link to be more generic so that the second link isn’t necessary.</li> </ul>	Q2 2026 – Q2 2027
<b>Internal Pages</b> – There are a number of locations in the website where the heading level rules are not being followed.	<ul style="list-style-type: none"> <li>Update all heading levels on the Website to follow heading level rules.</li> </ul>	Q2 2026 – Q2 2027
<b>Forms using ReCAPTCHA</b> – Suggestion is to implement an associated label for the ReCAPTCHA response. Google does not provide one.	<ul style="list-style-type: none"> <li>Have Visual Lizard implement an associated label that will only be available for screen-readers that will bring this element into compliance.</li> </ul>	Q2 2026 – Q2 2027

<p><b>Link Redundancy</b> – In various areas, there are numerous links within a few paragraphs that bring a user to the same page. Redundant links of this type both confuse the user when using a screen and can cause a hit to a Company’s SEO ranking for the associated content.</p>	<ul style="list-style-type: none"> <li>Review all links within the website and simplify single link points by rewriting the language so that only one link is required to bring a user to a different spot.</li> </ul>	<p>Q2 2026 – Q2 2027</p>
<p><b>Misuse of underlines</b> – It was noted that in numerous occasions within the website, underlines were being used to draw the user’s attention to emphasis of a word or clause.</p>	<ul style="list-style-type: none"> <li>Update all words that were found to have underlines where not required and restrict use of underlines within the website to links only. Use Bold or Italics as a way to bring attention to elements that are deemed important.</li> </ul>	<p>Q2 2026 – Q2 2027</p>
<p><b>Suspicious link text</b> – Throughout the website it was noted that in some cases “click here”, “here” and “more” did not provide the user with any context as to what they should expect.</p>	<ul style="list-style-type: none"> <li>Correct all links to the words that provide the user with actual context for where they will be taken, applying the link to the contextual copy tells the user using assistive technologies what the user should expect.</li> </ul>	<p>Q2 2026 – Q2 2027</p>
<p><b>Images embedded in Content</b> – It was noted that in most cases there was no given proper “Alternative Text” for an image.</p> <p>Proper descriptive filenames and proper alt text play a role in how SEO interprets the content.</p>	<ul style="list-style-type: none"> <li>Review all images on the website, give all images proper Alt Text for the image. In addition to proper alternative text, image filenames should also be given descriptive text that will tell a user using assistive technologies relevant information on the image.</li> </ul>	<p>Q2 2026 – Q2 2027</p>
<p><b>Home Page</b> – Continued use of images with rendered copy are inaccessible. The banner continues to change, and a user is unable to make it stop in order to read or access the elements.</p>	<ul style="list-style-type: none"> <li>Recommendation is to is for Calm Air to find an alternative way to promote the elements in that carousel that do not require banner images with rendered text.</li> </ul>	<p>Q2 2026 – Q2 2027</p>
<p><b>Home Page</b> – Background video loop isn’t something a user is able to stop or interact with. This motion is considered distracting to some individuals on the Autism spectrum. This current motion can also be a trigger for seizures for those with Neurological disorders such as Epilepsy.</p>	<ul style="list-style-type: none"> <li>Recommendation is for video of any kind to be user triggered as opposed to automatic.</li> </ul>	<p>Q2 2026 – Q2 2027</p>
<p><b>Widgets</b> – The “Book a Flight” widget does not follow semantic structural rules for accessibility. Portions of the form are triggering error in terms of structure and contrast.</p>	<ul style="list-style-type: none"> <li>This is a third-party system, Calm Air, to review and bring to the attention of the third party.</li> </ul>	<p>Q2 2026 – Q2 2027</p>
<p><b>Site Structure</b> – Minor issues regarding the overall structure of the Website. There are several pages on the website that have very little content on them but have sub-pages that have full content.</p>	<ul style="list-style-type: none"> <li>Review all pages on the website, in cases where it is found that a page has very little content and sub-pages with full content, consideration to consolidate the pages for a full content page.</li> </ul>	<p>Q2 2026 – Q2 2027</p>

In 2025, Calm Air also had Visual Lizard conduct an accessibility audit of our internal employee facing site (SharePoint / Compass).

The objective of the audit / review was to ensure that the Calm Air employee site meets accessibility guidelines and standards, enabling a positive employee user experience for Persons with Disabilities. Visual Lizard employed a combination of automated accessibility testing and manual testing methods to evaluate compliance with the Web Content Accessibility Guidelines (WCAG) 2.1.

### **Testing Approach:**

To comprehensively assess accessibility, Visual Lizard implemented a multi-faced testing approach. Firstly, they employed two different automated accessibility testers to identify potential accessibility issues. These automated tools systematically scanned the digital content and provided valuable insights into areas requiring further examination. Secondly, they conducted a manual testing process for two of the main internal site pages, following a detailed WCAG 2.1 Checklist. Their team of testers manually verified the accessibility of various components and interactions on the platform to ensure compliance with the defined guidelines.

### **Automated Accessibility Testing:**

The use of automated accessibility testing tools allowed Visual Lizard to efficiently scan a wide range of digital elements. By leveraging these tools, they were able to identify and address several accessibility issues, such as missing alt tags, inadequate color contrast, and improper heading structures.

### **Manual Accessibility Testing:**

Visual Lizards manual testing process focused on evaluating the platform's compliance with the WCAG 2.1 guidelines. The WCAG 2.1 Checklist was used as a reference to assess various accessibility aspects, including keyboard navigation, form elements, and multimedia content. Through this manual examination, they were able to identify and address additional accessibility concerns that were not captured by the automated tools.

### **Assistive Technology Testing:**

Screen reader technology tests were performed during this phase of testing as well. The testers found that it was very difficult to navigate the intranet site using a screen reader.

The following are accessibility notes from Visual Lizard on the WebAIM WAVE accessibility evaluation tool and the AXE DevTools accessibility evaluation tool.

1. There are currently seven (7) functional Accessibility errors:
  - a. Six (6) of which are images that are missing their Alternative Text attributes. The six primary links are using images containing rendered text without alt attributes to describe the links that they are associated with.

#### **Suggested Recommendation of Action to Correct:**

To make these links using live copy rather than rendered text. If an image is also required as part of these elements, an appropriate alt text description should be added in order to provide link context.

- b. The search field in the head is missing its associated label.

#### **Suggested Recommendation of Action to Correct:**

To always provide an associate label for any form field. The label may be visually hidden using styles, however screen-reading software needs to be able to read

the label in order to provide audience members with Visual impairments context for the associated fields.

2. There are several “very low contrast” errors:

- a. This specifically has to do with the branding color choices. The navigation for all the SharePoint sites has gold copy links on white background. This does not provide enough contrasts for audience members who have difficulty with distinguishing low contrasting colors. The minimum requirement for contrast, specifically for smaller sized copy is ration 4.5:1. The current contrast is 3.58:1.

**Suggested Recommendation of Action to Correct:**

While the color values being used are for branding purposes, it’s suggested that color selections should be modified to accommodate accessibility needs. By changing the gold color to a HEX hue of #947127, this will still provide a close to brand coloring while also meeting the contrast ratio minimum. It is also suggested that all links appearing in the content of these pages that are using the gold coloring be updated as well.

3. Accessibility Alerts:

- a. Skipped heading level. The underlying content structure should reflect semantic structure. In the case of the Compass’ homepage, the heading below the first six (6) navigation items is set as an h3.

**Suggested Recommendation of Action to Correct:**

Update the heading to a h2. By skipping heading levels, screen reading software doesn’t provide the listener with correct context, allowing the listener to be confused expecting a secondary heading rather than a tertiary heading. Semantically correct structure ensures that an audience member using a screen reading software is receiving the content in the correct order.

- b. There are several direct links to PDF documents. The WAVE software being used for accessibility assessment of these web pages cannot determine the accessibility accuracy of PDF documents.

**Suggested Recommendation of Action to Correct:**

Any PDF documents should be assessed using the Adobe Acrobat PDF creation tool or some other PDF assessment tool to be sure that documents are meeting the PDG accessibility guidelines.

- c. SharePoint’s search functionality seems to be using Acceskey attribute.

**Suggested Recommendation of Action to Correct:**

The use of Acceskey in webpages are not recommended since they tend to conflict with Operating System keyboard shortcuts.

- d. Redundant title text. On the Calm Air logo in the header is the same as the copy found within that link.

**Suggested Recommendation of Action to Correct:**

It is not recommended that the title attribute of a link be the same as the copy of the link. A title attribute is meant to provide additional context for the link as opposed to repeating the link's content.

4. Other items to note:

- a. There are 2 QR code graphics with rendered copy as part of the graphics. In addition to this, these two QR code graphics are on a webpage, which should result in a link out to the resulting URLs.

**Suggested Recommendation of Action to Correct:**

These graphics should have alt attribute provided to explain what these graphics are to those with Visual impairments. QR codes are not necessary on a webpage as browsers are fully capable of taking the visitor to the correct location by simply using the link. UR codes are meant to fuse in an offline environment as a way for people to access a page or site without having to type in a URL code.

- b. The underlying page coding does not contain any structural "landmarks". The entire rendered content area for the webpage is all in a series of nested DIV tags.

**Suggested Recommendation of Action to Correct:**

Without any structural landmarks, assistive technologies have difficulty in prioritizing the content elements that are found on the page. As a result, there is also an over-reliance on ARIA attributes. With proper structural landmarks added, fewer ARIA attributes are required.

5. Outside of the Items assessed above:

- a. SharePoint relies on scripts to push content into page structure. It was noticed that several of the JavaScript libraries being used are throwing errors.

**Suggested Recommendation of Action to Correct:**

This requires a review of any updates that the SharePoint system may need for security purposes.

- b. On the Archived Memos & Bulletins page there are additional items listed in the Alerts. The majority of these have to do with redundant title attributes. Title attributes on links are meant to provide additional context for the link, such as explaining to the audience that a link may open in a new tab or window, or if the link is going to a PDF document. Title attributes should not reiterate the copy that the tag surrounds.

**Suggested Recommendation of Action to Correct:**

The title attributes on linked images should have the correct alt attributes assigned rather than title attributes being applied to the links.

- c. Also of note, the banner image contains a series of attributes that do not belong to the associated image tag (specifically the title attribute).

### Suggested Recommendation of Action to Correct:

The title attributes on linked images should have the correct alt attributes assigned rather than title attributes being applied to the links.

Once the compliance report was received from Visual Lizard, Calm Air took immediate action to ensure all observations and recommendations were implemented. A new soft launch of Calm Air’s internal employee site (SharePoint / Compass) was completed in March of 2026.

WCAG 2.1 – Level A	Description of Finding:	Completion Actions:
1.1.1 Non-text Content	Linked images are missing alternative text. Images that are being used to link to another page or location must have alt text supplied in order for accessibility tools to provide context for the audience. Specific case: The six navigational buttons on the home page, while they have rendered copy that is large enough to read, people using screen-reader technology do not have any context regarding what these links do.	Updated homepage navigational buttons with dark background and meaningful alternative text to ensure screen reader parity.
1.3.1 Info and Relationships	Skipped heading levels. The semantic underlying structure for the page helps screen reading and other assistive technologies provide content structure to the audience. Skipping headings and subheadings simply for visual purposes can cause issues for those with disabilities needing to know the logical structure and context of the content being presented to them.	Reviewed affected pages and standardized heading structures (H2 for main sections, H3 for sub-sections) to improve screen reader and keyboard navigation.
1.3.2 Meaningful Sequence	Structurally this is almost there. As noted above, the skipped headings cause issues with meaningful order. Also, the underlying structure does not use landmark structural tags to group elements into meaningful context.	Simplified page layouts using standard SharePoint sections and web parts to improve logical structure and navigation flow.
2.1.4 Character Key Shortcuts	The search is using AccessKey functionality. This is not recommended as the AccessKey may conflict with the user’s operating system short cuts. Best practice is using Tab key navigation to move the focus.	Verified that built-in SharePoint Search supports keyboard-only navigation via standard Tab / Shift + Tab behavior. Confirmed that Microsoft-managed AccessKey behavior remains the standard accessibility interface for this feature.
2.2.2 Pause, Stop, Hide	Sliders on the home page can be paused, however at the moment the images for the slider appear to be broken.	Increased the slider transition duration to allow users more time to read content before the slide changes.
2.4.1 Bypass Blocks	The structure of the page does not contain any Landmarks in the underlying code. Screen-readers and other assistive technologies will have difficulty with providing the audience	Simplified page layouts by using standard SharePoint sections and web parts to improve logical structure. While landmark tags are primarily platform-managed by SharePoint

	with a proper structure and context for the content being provided.	Online, these structural adjustments optimize navigation for screen readers.
2.4.2 Page Titled	The title in the Head is not overly descriptive but still indicates location within the website.	Updated page titles to be more descriptive and meaningful (e.g., "Intranet Home Page") to provide better orientation for all users.
2.4.4 Link Purpose (In Context)	The links applied to images do not have relevant context provided. This can be addressed by providing alt text to the associated image.	Updated linked images with meaningful alternative text to ensure screen reader parity.
2.5.3 Label in Name	The search form field does not contain a name attribute.	Confirmed this is a native SharePoint Online search control. While specific HTML attributes like the "name" attribute are managed at the platform level, verified that the search bar remains fully accessible via standard keyboard navigation (Tab / Shift + Tab).
<b>WCAG 2.1 Level AA</b>	<b>Description of Finding:</b>	<b>Action Items Completed:</b>
1.4.3 Contrast (Minimum)	The brand colors for Calm Air do not meet the contrast compliance required. Specifically, the navigation at the top of each page has gold/mustard yellow text on a white background. The contrast ratio there is around 3.5:1. While applying brand colors to the design is important, proper contrast ratios should be prioritized in order to keep the page compliant for accessibility.	Removed the brand "gold" color to meet WCAG contrast requirements. Implemented a <b>Dark Blue theme with Black text</b> for the navigation and UI elements to ensure maximum readability and accessibility across the site.
1.4.5 Images of Text	There are several instances on the few pages we have access to where graphics of text have been applied. Best example are the six navigation quick links on the home page. Rendered copy in a graphic is not legible by screen reading technology. In cases where graphics contain rendered text, alternative text must be applied to the graphic in order to supply context.	Implemented a dark brand-aligned color palette to ensure optimal contrast ratios and applied descriptive <b>Alternative (Alt) Text</b> to all navigation links.
2.4.6 Headings and Labels		Updated all <b>page headings and section labels</b> to be descriptive and consistent. This ensures a logical hierarchical outline for screen reader users and facilitates efficient scanning for all visitors.

## **SECTION 6.0 COMMUNICATION, OTHER THAN ICT**

Some communities in northern and remote regions do not always have reliable access to digital information or websites. This creates additional barriers for Air Transportation Providers. As a result, we continue to focus on communicating information in formats that are accessible to people who encounter barriers.

All published documents are available in hard copy, regular or large print, braille, audio and email on request.

Alternate formats are available as follows:

- Hard copy (print) within 15 days
- Large print within 15 days
- Braille within 45 days
- Audio format within 45 days
- Electronic format compatible with adaptive technology within 15 days

## **SECTION 7.0 PROCUREMENT OF GOODS, SERVICES AND FACILITIES**

To ensure that goods, services, and facilities are barrier-free, Calm Air updated the Procurement Policy that was adopted into our amended Accessibility Policy in March of 2026. This revised Policy is designed to prevent barriers from being introduced. We continue to look at our goods and services through the lens of universal design principles. Procurement is key to ensuring accessibility is considered from the start of any project, initiative, or event.

## **SECTION 8.0 DESIGN AND DELIVERY OF PROGRAMS AND SERVICES**

Calm Air prides itself on delivering effective customer service to all passengers. Our training materials, standard operating procedures, and employee policy and procedure manuals provide guidance on how to best assist passengers with disabilities during each phase of their travel experience, including guidance on the transportation of mobility aids, and the transportation of service dogs.

We guide team members by stressing the importance of speaking with our customers and asking them directly, “Please tell me how I can best assist you?”.

Calm Air conducts annual accessibility engagement surveys internally to connect with all employees. Through our most recent survey results, Calm Air heard an employee desire for more opportunities to learn about disabilities and the adaptive technologies used to assist people in their daily lives. Employees also expressed interest in participating actively on Calm Air’s Accessibility Committee, looking for opportunities to enhance their accessibility workspaces.

## **SECTION 9.0 TRANSPORTATION**

Calm Air recognizes that there may be barriers to equal access in areas that are outside the control of Calm Air. For example, this may include ground transportation providers or airport and terminal operators. For this reason, Calm Air engages closely with our local Airport Authorities, regional representatives, and other stakeholders to ensure that barriers can be identified and removed in a timely manner.

Calm Air recently launched an “Uber for Business” program for employee on duty travel. Key accessibility features and solutions that Uber for Business offers are:

- **Uber WAV:** Connects riders with certified drivers operating vehicles equipped with ramps or lifts.
- **Uber Assist:** Provides door-to-door service from specially trained drivers for riders needing extra assistance.
- **Centralized Control:** Organizations can manage ride policies, spending, and on-demand, specialized rides for employees or guests.
- **Accessibility Features in App:** Features like screen reader support (Voice Over, Talk Back) for visually impaired users and visual alerts for deaf or hard-of-hearing users are available.
- **Service Animal Policy:** Drivers on the Uber platform are required to transport riders with service animals.

These transportation enhancements are currently in their introductory and testing phases with Calm Air duty travel employee programs, with the goal of extending these enhancements to customers when ground transportation services are being provided by the carrier.

## SECTION 10.0 BUILT ENVIRONMENT

As a Transportation Service Provider (TSP), Calm Air understands that passenger aircraft may present barriers for some individuals. We are committed to working with Persons with Disabilities to ensure that their travel experience is seamless and as comfortable as possible. Our frontline employees are trained to ask questions about possible barriers that may affect a Person with Disabilities' travel experience. Team members are also trained to inquire about mobility aids, allergies, and any special assistance a passenger may require throughout their travel.

## SECTION 11.0 PROVISION OF THE CTA ACCESSIBILITY-RELATED REGULATIONS

Calm Air is subject to *Air Transportation Regulations, Part VII* and *Personnel Training for the Assistance of Persons with Disabilities Regulations*. Calm Air's compliance with the ATR's, Part VII is captured in our Domestic Tariff, which is updated from time to time, and includes provisions related to the service and transportation of passengers with disabilities across our network.

While we continue to grow our employee training program based on the requirements set out in the *Accessible Transportation for Persons with Disabilities Regulations (ATPDR)*. Calm Air recently revised its Accessibility Policy, launched brand new Accessibility Training for all our employees across our Organization, updated our Privacy Policy and our Workplace Harassment and Violence Prevention Training, to meet regulations.

## SECTION 12.0 EMPLOYMENT

Calm Air values an inclusive, diverse, equitable, and accessible work environment, and we are committed to meeting the needs of Persons with Disabilities during the recruitment process. We recognize that every individual has unique abilities and challenges, and we are dedicated to removing barriers and creating a culture of accessibility. By proactively considering accessibility, we strive to provide equal opportunities for all employees to thrive in our organization.

Our Accessibility Policy was recently updated to adjust the framework and guidelines that ensure equal access and opportunities for all employees regardless of their abilities or disabilities. Calm Air reviews and updates as necessary its policies, practices, and procedures to reflect any changes that have been made within the applicable regulations.

We take the following steps in our day-to-day business activities:

- Identification of barriers
- Removal of identified barriers
- Prevention of barriers
- Increase awareness of accessibility initiations at all levels of the organization
- Prevention of compliance policies and procedures with respect to accessibility to all employees, passengers, and customers.

## SECTION 13.0 ACCESSIBILITY ACTION PLAN

Over the next three (3) years, Calm Air is committed to developing and enhancing accessibility within our Organization. The following Action Plan will help achieve our vision of improving access to and from the communities we serve. Achieving the Action Plan creates a solid foundation on which to build in the future.

Each action is accompanied by the anticipated barrier that the action will address, as well as the target completion date.

### ACTIONS:

ACCESSIBILITY ACTION	BARRIER TYPE TO ADDRESS	DESCRIPTION OF ACTION	TARGET COMPLETION
Update Policy and Process Enhancements	Systemic	<ul style="list-style-type: none"> <li>• Refresh policy to include new regulatory requirements and consultation mechanisms, including Service Standards and Accommodation processes.</li> </ul>	Ongoing
Communication, Customer and Employee Experience Enhancement	Attitudinal, Information and Communication, Systemic, Built/Physical	<ul style="list-style-type: none"> <li>• Calm Air Accessibility Committee to continue conducting bi-annual meetings. Committee members will include a variety of Calm Air departmental / employee representatives, persons with lived experience, and members of the disability community.</li> <li>• Expand feedback processes to include direct customer engagement and accessibility travel experience surveys.</li> <li>• Continue engagement surveys with Calm Air employees.</li> </ul>	Ongoing Q3 2026 Q1 2027
Conduct Accessibility Audit	Built/Architectural, Information and Communication, Technological, Systemic, and Attitudinal	<ul style="list-style-type: none"> <li>• Update Calm Air signage at all Stations (e.g. Check-In, Boarding Gate, Onboard, Baggage Claims).</li> </ul>	Q4 2027
Training and Cultural Enhancements	Attitudinal	<ul style="list-style-type: none"> <li>• Further training on clear verbal communication with customers and how to enhance their travel experience.</li> <li>• Source out Adaptive Technology Training for Flight Crew, CSA's and Management.</li> <li>• Train Employees on "How to make Digital Documents Accessible"</li> <li>• Train employees on Digital Accessibility</li> </ul>	Q2 2026-Q4 2027

Web Accessibility Enhancements	Information and Communication, Technological, Systemic	<ul style="list-style-type: none"> <li>• Conduct annual website audit to ensure compliance is met with WCAG 2.1 AA Standards with remediation plans.</li> <li>• Implement accessible online forms</li> <li>• Add alt text, proper headings, captions, transcripts, and screen reader compatibility on company internal employee site.</li> </ul>	Q2 2026-Q4 2028
Improve Employee Knowledge and Awareness of Accessibility	Systemic	<ul style="list-style-type: none"> <li>• Develop new accessibility annual and recurrent training for all Calm Air employees to increase awareness and promote a more inclusive and accepting work environment.</li> <li>• Explore opportunities for additional specialized training such as Digital Accessibility Training.</li> </ul>	Q2 2026-Q4 2028
Make Digital Content more Accessible		<ul style="list-style-type: none"> <li>• Continue to review and improve accessibility on our Company website,</li> <li>• Internal Intranet and web-based services.</li> </ul>	Ongoing