

Sunwing Airlines

# Accessibility Plan

2023-2026

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# General

## Statement

Sunwing Airlines' goal is to provide a safe and dignified service for passengers with disabilities, ensuring inclusion and equal participation for all. Sunwing Airlines has a committed focus on identifying, removing, and preventing accessibility-related barriers in key areas of our services, communication, and environment. We are also committed to fostering an inclusive and barrier-free workplace by meeting the requirements of the Accessible Canada Act (ACA) along with adhering to our company policies that address customers and employees' human rights and privacy. The Accessibility Plan is our commitment to support the initiative to make Canada barrier-free by 2040.

The Company is guided by our purpose of passionate people making vacation dreams come true, along with our core values: entrepreneurial, passionate, innovative, and customer centric. Preventing and removing barriers for both our customers and employees is an integral part of our company culture. Sunwing Airlines' leadership team continues to lead with innovation and is always seeking new ideas to support accessibility, diversity, equity and inclusion, further ensuring customers and employees are free from discrimination based on protected grounds.

In preparation of this Accessibility Plan and identification of accessibility barriers, Sunwing Airlines has consulted with numerous employees from areas of the company along with community members with experience and expertise on accessibility-related transportation matters.

## Corporate Overview

Sunwing Airlines Inc. ("Sunwing" or the "Company") is an operating division of the largest vertically integrated tour operator in North America. The Company has grown to operate an airline with a modern fleet of 40 aircrafts along with three major North American tour operators and two renowned travel retailers. The Company's impressive fleet of Boeing 737- 800 and 737-8 MAX are not only fuel-efficient, but they also contribute to a reduced carbon footprint and have one of the industry's lowest cost bases. Sunwing's growth

strategy has included bringing service to the doorsteps of Canadians in smaller markets as well as providing more frequent flights to those in larger cities. The Company currently has year-round crew bases in Vancouver, Toronto, and Montreal, and seasonal bases in Calgary, Winnipeg, Ottawa, Quebec City, and Halifax.

## Feedback Process

Sunwing Airlines welcomes all feedback relating to accessibility. Our goal is to empower our teams with knowledge that we will use to work toward a more accessible future. The Manager of Airport Regulatory Compliance and their team is designated to receive the feedback on behalf of the Company. They will inform and involve other departments as required based on the content of the feedback. The feedback will also be monitored and reviewed by the Company's Accessibility Committee. Any feedback relating to accessibility is stored in our internal database and kept for 7 years. We will acknowledge all feedback unless it is submitted anonymously.

The Accessibility Plan and Feedback Process are available in the following formats: An electronic version that is compatible with assistive technology is available on our website, large print can be available within 15 days, braille and audio can be available within 45 days. Feedback along with requests for any of these formats may be made through the contact information below.

Web Form: [Sunwing Cares](#)

Email: [accessibility@flysunwing.com](mailto:accessibility@flysunwing.com)

Phone: 1-877-786-9464

TTY: 1-800-855-0511

Mailing Address:

27 Fasken Drive

Toronto, Ontario M9W 1K6 Canada

# Areas Described under Section 5 of the ACA

## Information and Communication Technologies (ICT)

### *Background*

Sunwing is committed to ensuring that the communication available to the public through technology is accessible and compatible with adaptive technologies. Our website, mobile app, and email communications have been designed in a way that considers accessibility. We are committed to enhancing and improving the way we communicate through our website and always maintaining Level AA compliance of the Web Content Accessibility Guidelines (WCAG). We will continue to identify and address barriers in our technology through consultations with persons with disabilities. These consultations began in May 2023, and will continue as necessary.

Additionally, we recognize the importance of making all our forms and documents accessible on our website. We are committed to housing our forms and documents in one place on the website in accessible PDFs along with providing instructions on how to request alternate formats. We anticipate completion by fall of 2023.

Sunwing has been working toward improving the accessibility of self-service airport kiosks over the past year. Our goal has been to meet and exceed the standards set out by the National Standards of Canada. We have partnered with the Canadian National Institute for the Blind (CNIB Foundation) to create a seamless and accessible kiosk experience for our passengers. Under the Accessible Transportation for Persons with Disabilities Regulations (ATPDR), we are required to have this implemented in 2024, but we anticipate completion by late summer 2023.

## Summary of Action Items

Action Item	Anticipated Completion
Improving the accessibility of Self-Service Airport Kiosks	Summer 2023
Consultations with people who have disabilities to help identify and remove barriers on our website and other technologies	Ongoing
Housing all documents in an accessible PDF format on our website	Fall 2023
Enhancing website accessibility based on results from accessibility consultations	June 2024

## Communication, other than ICT

### Background

Sunwing is committed to ensuring our staff communicate in language that is informed, respectful, and accessible to persons with disabilities. We are focused on providing our teams with the proper tools and knowledge through regular accessibility-related training. More details regarding training can be found in the *“Design and Delivery of Programs and Services”* section. This also ties in with how we obtain contracted services. We ensure that our contracts specify training with respect to proper education on different kinds of disabilities and assistive devices, as well as different methods of communication.

When our passenger-facing staff are interacting with any persons with disabilities, we consider their individual needs and ask questions when we are unsure how to best assist. The information we convey on our website along with airport and in-flight announcements are all in plain language. We also provide individualized announcements during in-flight for information such as the location of the call button at the passenger’s seat.

Our airports and aircraft are equipped with large print and braille formats of the Air Passenger Protection Regulation (APPR) pamphlets which can be provided upon request. All our aircraft are also equipped with English and French braille passenger safety feature cards. We are focused on improving our visual and verbal communication at the airport and in-flight level. This includes evaluating the content and ensuring consistency. This evaluation will help us determine whether any physical signage or announcements need change or improvement.

### *Summary of Action Items*

<b>Action Item</b>	<b>Anticipated Completion</b>
Evaluate content of verbal and visual communication at an airport and in-flight level	Ongoing
Implement any changes to airport and in-flight communication based on evaluation	June 2024

## **Procurement of Goods, Services, and Facilities**

### *Background*

Sunwing has contracts with third parties across our network that are intended to fulfill our passenger service needs. These contracts are standard across our network and include expectations for appropriate staffing levels along with the appropriate equipment to properly handle mobility aids and assistive devices. We are currently developing a process that takes accessibility into higher consideration when we acquire contracts for passenger services and the handling of mobility aids and assistive devices. The first step of that process is to evaluate all current contracts, and conduct audits to confirm compliance. Following that, we will ensure any future contracts include specific items that directly pertain to removing and preventing accessibility barriers. Moving forward, our contracts will include relevant accessibility-related regulations which are applicable under the Accessible Canada Act (ACA) as well as enhanced training requirements for our service providers.

### *Summary of Action Items*

<b>Action Item</b>	<b>Anticipated Completion</b>
Reassess current contracts to evaluate if there are appropriate accessibility-related standards	Summer 2023
Standardize contracts to make sure that there are appropriate accessibility-related standards	Ongoing

## Design and Delivery of Programs and Services

### *Background*

At Sunwing, we make sure all our passenger-facing staff receive training about accessibility and how to provide customer service to people with disabilities. In collaboration with Changing Paces in 2020-2021, we developed a thorough accessibility training. The courses included are *Accessible Air*, *Special Customer Handling*, and *Best Practices for Assisting Passengers with Disabilities*. The objective of these courses is to empower our staff to provide a predictable and consistent level of customer service for all. Further to these courses, our *Ramp Services Training* has a detailed section dedicated to the handling of mobility aids and assistive devices. We plan to re-launch our accessibility-related training courses next year.

Additionally, Changing Paces conducted a detailed accessibility audit of our *Ramp Services Training* and *Passenger Service & Product Training*. The focus of the audit was on content, wording, and required scope. Furthermore, Changing Paces provided a consultation with persons with disabilities required under the Accessible Transportation for Persons with Disabilities Regulations (ATPDR). The content was examined to ensure compliance with sections 17-19 and 23 of the ATPDR. This was completed in January 2021.

Sunwing has a Special Services department that is solely dedicated to assisting passengers with accessibility-related inquiries and bookings. We are currently working on developing a passenger feedback process for those who connect with our Special Services team. The goal is to use this data for future improvements on our services.

Our priority is to focus on ensuring that our design and delivery is consistent across all areas of the Company. Meaning, verifying that our sales agents, airport staff, cabin crew, and customer relations team are all aligned. We plan to assess each department's training needs and adjust as necessary. Following this, our Customer Experience and Training Department will lead a re-launch of Sunwing Airline's accessibility-related training as mentioned above. A project plan is currently being created, and implementation will start early summer 2023.



## Summary of Action Items

Action Item	Anticipated Completion
Assess the need for improvement of accessibility training among different areas of the airline	Summer/ Fall 2023
Implement passenger feedback process for Special Services team	Winter 2023/ 2024
The relaunch of improved accessibility training for different areas of the Company	Summer 2024

## Transportation

### Background

Sunwing has had an increased focus on the safe and equitable transportation of passengers and their mobility devices over the last few years. We want our passengers to experience a predictable and consistent level of accessibility accommodations across a barrier-free transportation system. We plan to accomplish this through an increased coordination regarding accessibility between us and our partners in the transportation network.

At all points of our passengers' journey, Sunwing staff are available for assistance. Depending on the type of service, we may need advance notice to ensure that we can appropriately fulfill the requests. However, we always make every effort to provide services even when advance notice isn't provided.

We strive to remove and prevent accessibility barriers in the transportation of our passengers by the inclusion of the following services:

- Transportation of Support Persons/ Attendants
- Transportation of Service Dogs and Emotional Support Dogs
- Transportation of Passengers Requiring an Additional Seat
- Transportation of Mobility Aids and Assistive Devices

An important priority for Sunwing is assessing and improving the process of providing physical assistance to passengers with disabilities. Over the next three years we will be implementing a quality assurance process to properly evaluate the programs that our ground handling partners have in place. We plan to consult with

subject matter experts to identify any areas of improvement and determine how that will affect our training moving forward.

### *Summary of Action Items*

Action Item	Anticipated Completion
Implement quality assurance process for staff who provide physical assistance to passengers with disabilities	June 2026

## **The Built Environment**

### *Background*

Sunwing operates a core fleet of eleven 737-800 NG and nine 737-8 MAX aircraft. In addition, each year we acquire approximately twenty 737-800 NG or 737-8 MAX aircraft from our European partners to lease for our peak winter season. At the time of the implementation of the Accessible Transportation for Persons with Disabilities Regulations (ATPDR), we worked to ensure each non-exempt technical requirement was met. By 2021, we completed our aircraft assessments and made the necessary enhancements. All our core and seasonal aircraft have an on-board wheelchair, English and French braille passenger safety feature cards, and more than 80% of our seats have moveable armrests. We have tactile row markers for applicable aircraft, and meet the applicable washroom, floor, and signage requirements.

Additionally, our engineering department conducted an assessment on our aircraft that determined the necessary floor space for passengers that travel with a service or emotional support dog. This assessment established the appropriate seats that ensure that the passenger and their service or emotional support dog can travel safely and with reasonable comfort. These seats are prioritized for those passengers and their service or emotional support dog.

Our current focus is assessing the exempt aircraft and equipping them with the attainable outstanding specifications to ensure our core fleet is consistent and equally accessible.

## Summary of Action Items

Action Item	Anticipated Completion
Improved accessibility consistency in our core fleet	June 2026

## Employment

### *Background*

Sunwing Airlines employs approximately 1,700 individuals at peak season, with approximately 1,000 full-time employees who work year-round. We strive to ensure that all people have equitable and barrier-free access to the Company premises as well as fair employment opportunities. The Company is fully committed to ensuring its hiring and employment practices are designed to meet the accessibility needs of its Employees and job applicants with disabilities. Many of our employees are unionized and up to 75% of our employees work in jobs that are safety sensitive. This means that their jobs are related to keeping air travel safe. Many of these roles have some restrictions on who can do them, for examples some roles have requirements for vision and physical lifting abilities. However, there are minimal restrictions for office-based roles. We strive to make sure there are no undo barriers to employment for people with disabilities at Sunwing Airlines.

Based on our Employment Equity Report for 2022, Sunwing has identified persons with disabilities as an under-represented group. As a result, the Company is committed to supporting initiatives through our Global Diversity, Equity and Inclusion Committee to address this variance. We strive to foster diversity and inclusion in our workforce, helping us make positive contributions to social inclusion and workforce participation.

Upon hire, each employee is advised of our Employment Equity reporting requirements and is asked to fill out their Employment Equity Self Identification Questionnaire as a part of our Employment Equity Program. The form outlines that Sunwing promotes employment equity in the workplace to ensure that women, Aboriginal peoples, persons with disabilities, and members of visible minorities are fully represented at all levels of our organization and thus ensures that our hiring and promotional practices are based on qualifications and ability.

The Company strives to reach equality in the workplace when recruiting new employees. As a part of this, all job advertisements include a statement affirming our commitment to the principles of equitable employment for all and strongly encourage applications from persons with disabilities, and other identified groups. Our job postings state:

*“At Sunwing, diversity is important to us, follow this link to learn about how Diversity and Inclusion has always been, and continues to be, a top priority for us. We are proud that our workforce is made up of passionate people from all experiences and backgrounds. We are also committed to employment equity and to fostering an inclusive, accessible environment. We welcome applications from everyone. We will accommodate all applicants throughout the hiring process. If you are an individual who requires accommodation to apply to this position, please email (insert Talent Acquisition Manager’s email)”.*

When these requests are received, Sunwing follows its Accommodation Policy which is available to all employees. The policy outlines accommodation for job applicants, employees, and the Company’s responsibility. The goal of this process is to create and maintain a barrier-free environment and to ensure full participation for employees and external candidates.

#### *The Built Environment for Employees*

The goal of the Built Environment area under the Accessible Canada Act is to ensure all people can move freely around company facilities. Sunwing buildings and facilities are a combination of owned and leased spaces, which include office space, warehouse space, airports, and maintenance hangers. Barriers in many of these areas are largely related to older infrastructure which was constructed prior to the existence of current accessibility standards. As facilities are upgraded or replaced, accessibility requirements will be considered as required. Our offices do offer employees accessible parking and an elevator in our newer establishment.

## Summary of Action Items

Action Item	Anticipated Completion
Review training and development programs to ensure persons with disabilities have an equal opportunity for learning and career advancement along with a focus on long term employment retention	June 2024
Review new processes that include a recruitment strategy to target persons with disabilities	August 2024
Provide training and guidance for all employees on hiring persons with disabilities	Ongoing
Review interview process to ensure it does not deter applicants with disabilities	December 2023
Promote flexible work arrangements across the organization	Ongoing
Promote the use of our newly implemented anonymous reporting for persons with disabilities to report on barriers and suggest solutions to improve them	Ongoing
In collaboration with The Health and Safety Committee, assess company-owned establishments and enhance as needed to meet accessibility standards	Annual
Implement alternate training formats to accommodate different learning needs	December 2024
Webinar highlighting Sunwing's work around removing accessibility barriers during National AccessAbility Week	May 28-June 3, 2023
Annual activities surrounding accessibility during AccessAbility Week	Annual

## Provisions of CTA Accessibility-Related Regulations

### Summary

As a federally regulated air carrier, Sunwing is subject to the Accessible Transportation for Persons with Disabilities Regulations (ATPDR) under the Canadian Transportation Agency, which has the goal to remove barriers for persons with disabilities.

Sections of the ATPDR applicable to Sunwing are: 1-25, 31-41, 43-44, 48-85, 243. Information pertaining to these sections of the ATPDR have been detailed in preceding sections of this accessibility plan.

An Accessibility Committee has been created to discuss the progression of Sunwing's Accessibility Plan. The committee will discuss action items within the Accessibility Plan, review feedback provided by the public, and provide ideas for future accessibility within each member's respective area. The Accessibility Committee has overlapping members with our Global Diversity, Equity and Inclusion Committee to ensure that our initiatives are properly aligned.

## Consultations

### Summary

Sunwing consulted with Left Turn, Right Turn Ltd in the preparation of this plan. We met with two of their accessibility consultants throughout April and May 2023 who assisted with the scope, verbiage, and direction of our plan.

We also consulted with people who have disabilities in the preparation of this plan. To do this, Left Turn, Right Turn Ltd assembled a focus group of Canadians with a variety of disabilities and who have experiences with air travel. The group was asked to look at our website, try to book a flight, and try to contact us. We also asked them about their general experiences with air travel. Finally, we asked them to review and provide feedback on this plan. The information they shared with us will be taken into consideration throughout the implementation of our multi-year goals.

Sunwing is committed to conducting regular consultation with people who have disabilities as we implement this accessibility plan. In the future, we hope to conduct larger consultations directly with our customer base and employees.