

Web Accessibility Policy

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Northland Power is committed to providing accessible web content for customers, stakeholders and employees. Our Web Accessibility Policy outlines our commitments to accessibility on the public website and provides staff with clear responsibilities as it relates to web accessibility.

1. Definitions

Review the following definitions for technical terms found within the policy.

Public website

Website developed or procured to support or inform Northland Power customers and members of the public.

Web content

Includes electronic documents, websites, services, and applications delivered via the web.

Web Content Accessibility Guidelines (WCAG)

Accessibility requirements for web content, including text, images, audio-visual materials, and the code used for structure, style and interactions.

2. Statement of Policy

- All new and redesigned web content published after the effective date of this
 policy by Northland Power, will conform to WCAG 2.0 Level AA success criteria.
- All existing web content published prior to the effective date of this policy will either be archived or modified to conform to WCAG 2.0 Level AA success criteria.
- This policy does not stipulate any particular technology or design approach. The aim is to maximize access to and use of Northland Power's website by people with disabilities.

3. Reason for Policy

- Provide information that is accessible to all Northland Power clients, stakeholders and customers regardless of ability.
- Accessibility of the web is of critical importance to people with disabilities around the world, including people with auditory, cognitive, physical, neurological, and visual disabilities, and is likewise important to those with accessibility needs due to aging.
- Providing accessible web content can also benefit people who do not have disabilities but who are experiencing situational barriers. For instance, when



accessing the web from devices with small screens or in low bandwidth situations, or when experiencing barriers due to language or literacy levels, accessibility solutions can also support improved access.

- Northland Power is committed to ensuring equal access for people with disabilities. As
 potential customers and employees, they are important contributors to the business
 success of Northland Power and should not be excluded.
- This policy meets the legislative requirement to align with the <u>Accessibility for Ontarians</u> with <u>Disabilities Act</u>.



4. Responsibilities

The following staff roles have been identified to ensure that our public website meets the accessibility standards outlined in this policy. The Director of Communications will oversee the accessibility of all website content.

Accessibility coordinator

- 1. Consolidate annual status reports and present internally.
- 2. Prepare and provide accessibility training and guidance.
- 3. Promote web accessibility awareness internally.
- 4. Respond to user enquiries related to web accessibility.
- 5. Organize on-going assessment of the accessibility of websites, content, services, and applications identified as in scope.

Web project manager

- 1. Ensure compliance with this policy.
- 2. Prepare project accessibility report at key project stages; analysis, design, development and QA.
- 3. Ensure user feedback mechanisms are included as part of project deliverables.
- 4. Ensure all staff receive appropriate and regular accessibility training.

IT department

- 1. Choose and implement tools that conform to this policy.
- 2. Provide tools to support in automated accessibility checking.
- 3. Remedy identified accessibility barriers.

Web content management team

- 1. Ensure all staff receive appropriate and regular accessibility training.
- 2. Ensure submitted content is compliant with this policy.
- 3. Fix identified accessibility issues in authored web content.

5. Exclusions

• This policy does not include archived web content that was created before January 1, 2012.



- Any archived content that is requested will be provided in an accessible format.
- Materials that are not published on the website are excluded from this policy.

6. Third Party/Contracted Content

- This policy applies to all web content developed by or for Northland Power.
- This policy should be referenced within any contract of services or statements of work for web content, websites, services or applications. Any contract must include a statement of conformance stating that the work meets the required standard. This should form part of the deliverables approval process.
- Elements of Northland Power's websites might include web content syndicated from other providers. For example, a social media stream or embedded video. When considering a syndication service for inclusion in Northland Power's website, any service review should include an evaluation of the accessibility of the service. Such evaluations must form a part of the service selection criteria.
- Where a service is selected with known accessibility issues, Northland Power will develop or procure a solution that ensures the content delivered via our websites meets the policy standards.

7. Policy Maintenance

- The Director of Communications is responsible for the maintenance of the Web Accessibility Policy.
- Each department with responsibility for web content, websites, services or applications must submit an annual status report to the Accessibility Coordinator. The status report will summarize the efforts and progress towards the aims defined by this policy.
- This policy shall be reviewed at least once a year by the Director of Communications. The Director of Communications will reach out to any other departments that may need to review the policy based on necessary updates.

8. Policy Revisions

Northland reserves the right to modify, discontinue or terminate this Policy any time at its discretion.

9. Questions about this Policy

If you have any questions, contact the Director of Communications.



Confirmed by the Director of Communications on December 15, 2020.