

Accessibility Consultancy Process

Abstract

This document outlines Colt's process for consulting with stakeholders with accessibility needs on the accessibility of our products, services, communications and employee and customer experience.

Document Version	1.3
Release Date	31/05/2022
Department	Environment Social Governance team (ESG)
Key Stakeholders	Brand & Digital team, Disability Accessibility Network (DAN), Regulatory team
Dependants	Brand & Digital team
Distribution	ESG Team, Brand & Digital team, DAN, Regulatory team, external stakeholders

Copyright ©

No part of this document may be reproduced or adapted in any form, including photocopying or storing it by electronic means, except as is necessary for the purpose of the recipient's dealings with Colt, without the written permission of Colt. Any copies made of any part of this document shall include the notice: © 2021 Colt Technology Services. The Colt name and logos are trademarks. All rights reserved.

No information contained in this document shall be disclosed to any third party without the written permission of Colt.

Background

Colt's Inclusion & Diversity strategy is to build an inclusive culture where everyone can thrive. Our aim is to improve the diversity of our workforce and ensure all individuals to experience a fair chance to join Colt, develop and progress.

One of our key areas is Enablement, which focuses on supporting and enabling those with disabilities or long term conditions, whether visible or invisible and encompassing our employees, customers, partners, suppliers and other stakeholders. Ensuring we are an accessible organisation is a key part of this agenda, which is why we are currently working on building our long term Accessibility Roadmap, planned for launch in late 2022.

In developing this roadmap, we believe it's important to seek the views of those most impacted by a lack of accessibility, especially those with a disability or long term condition. This is why we have developed a feedback mechanism for both our intranet to gain input from internal stakeholders in particular employees, as well as our external website, to gain input from external stakeholders and customers and implementing Colt's accessibility plan, the "Project".

Building our roadmap

As a company that values inclusion and employee wellbeing, accessibility is important to us. Colt engaged an external third-party provider to undertake an accessibility maturity modelling assessment of Colt in February 2022. The objective is to gain a clear picture of Colt's accessibility maturity currently so that we are able to build a realistic long term roadmap for the business.

What was the process?

We held a series of workshops with stakeholders from across the business, including our Disability Accessibility employee Network (DAN) and senior leaders, during April and May 2022. You can find out more about our DAN network on our website in the [Inclusion & Diversity area](#). In this guided discussion led by Accessibility experts, we were able to gain a clearer view of our current state across key areas such as Built environment, Technology, People Processes, Communications, customer journey, procurement and strategic intent.

What are the next steps?

Following these workshops and some individual stakeholder interviews, our provider will be putting forward recommendations in July 2022. In the meantime, we continue to gather feedback from stakeholders both internally and externally via the process outlined below.

This feedback will be essential for Colt in developing and implementing its accessibility plan. In addition, any feedback collected by Colt will be used to identify any barriers encountered by persons that deal with Colt and develop the appropriate measures to remove such barriers.

Feedback process

Internal stakeholders

On our intranet, known as "Connect", employees can select our accessibility button and initiate our accessibility toolbar, Recite Me. Recite Me is a web based accessibility toolbar that supports those with dyslexia, visual impairments and literacy issues. The user can activate the toolbar at the push of a button and can use it to customise the toolbar to improve accessibility. It enables changes of colour, screen magnification, text to voice and language support.

They are invited to email accessibility@Colt.net with any feedback about the accessibility of our intranet and other communications channels.

We will use employee feedback gathered this way, along with feedback from our Disability Accessibility employee Network (DAN), to make improvements where possible and any longer term improvements needed will feed into our Accessibility Roadmap.

External stakeholders

On our external website, www.colt.net, users can select our accessibility button and initiate our accessibility toolbar, Recite Me.

We have also created a form on our site which can be accessed at www.colt.net/accessibility where visitors to our site can send feedback on the accessibility of our site or the Colt products and services.

Users can also email accessibility@Colt.net with any feedback.

We will accept requests to provide the feedback process document in the following alternative formats: print, large print, braille, audio format, electronic format that is compatible with adaptive technology that is intended to assist persons with disabilities. We will make the description of our feedback process available in the requested format within 45 days of the request in the case of a request for a description in braille or an audio format. For a request in any other format, we will provide the information within 15 days.

Use of feedback

Colt will acknowledge the receipt of non-anonymous feedback.

Feedback will be sent to Colt's Head of Inclusion & Diversity, who will share with the relevant stakeholders in the Brand & Digital, Customer, Communications, IT and Product teams to implement the Project.

Those giving feedback will have the option to request that their feedback is anonymous and any data will be stored in accordance with data protection guidelines.

Colt will use any feedback received to make improvements where possible and any longer term improvements needed will feed into our Accessibility Roadmap. We will also consult with our Disability Accessibility employee Network (DAN) on the creation of our roadmap and plan to partner with a disability organisation to gather feedback.

Disclaimer

Participation in this feedback process is voluntary and no confidential relationship is intended or created between the participant and Colt through the submission of the participant's feedback/suggestions, except to the extent mandated by data protection laws.

The usage, non-usage and manner of usage of feedback received shall be at Colt's sole discretion.

By participating in this feedback process, the participant acknowledges that to the best of their knowledge, any and all feedback submitted by them does not infringe the rights of third parties, in particular any intellectual property, confidentiality or privacy rights. Participants shall not be entitled to any compensation irrespective of Colt's decision to implement any suggestions received through the feedback process. Any intellectual property created or other rights arising as a result of Colt's use of such feedback shall vest solely with Colt.

Confidentiality

Colt will take a proactive approach to ensuring that confidentiality is maintained. Any feedback collected by Colt will be used to identify any barriers encountered by persons that deal with Colt and develop the appropriate measures to remove such barriers.

Please note that the notification of adjustment will necessitate the sharing of relevant information with experts in order to facilitate appropriate improvements. The information shared is only to understand and achieve the implementation of an adjustment.

Privacy

The information and personal data provided by you, Personal Data, will only be processed by Colt to implement its accessibility plan and for no different purposes. For this purposes, Colt will process your Personal Data, only for the necessary period to comply with all the legal obligations, and will be securely deleted afterwards. Your Personal Data will be treated in line with applicable data protection laws, including without limitation the General Data Protection Regulation. If you wish to exercise your privacy rights, please send an email to Accessibility@colt.net together with a document that can identify you, attaching the form related to the right you wish to exercise available at www.colt.net/gdpr/.

Should you have any questions, please contact the sustainability team at Accessibility@Colt.net.

Categories of personal data process, legal basis and purposes

Colt is handling the following the personal data (i.e. data which can be used to identify you) for the purposes described underneath:

What data?	Why?
<u>Contact Details:</u> name, surname, email, company name	To be able to be contacted by Colt with your consent for feedback gathered to make improvements and feed into our Accessibility Roadmap.

The legal basis to process your personal data is:

- (a) Your consent.
- (b) To comply with our legal obligations regarding Accessibility.

Colt may share your personal data with third parties in limited situations, as detailed below:

- **Colt group companies:** We may share your personal data with other companies that fall within the Colt group, for example for recruitment purposes, human resource management and internal reporting.
- **Service providers and business partners:** We may share your personal data with our service providers and business partners to identify any barriers encountered by persons that deal with Colt and develop the appropriate measures to remove such barriers.

Your information/personal data will be hosted in WordPress for one day only. WordPress servers store personal data both in the US and in the EU. After this, the information will be automatically erased. Your information will be sent directly to Accessibility@Colt.net, at Colt Technology Services and located within the EEA and UK Servers . Colt may transfer personal data or makes personal data accessible to its subsidiaries (<https://www.colt.net/legal/>), subcontractors or otherwise located within or outside of the EEA or UK to develop the appropriate measures to remove accessibility barriers for the provision of the services. Colt transfers the Personal Data in compliance with Data Protection Laws and with EDPB Recommendations 01/2020 on measures that supplement transfer tools to ensure compliance with the EU level of protection of personal data. The transfers within Colt Group are carried out by means of its Binding Corporate Rules (BCRs).