

ACCESSIBILITY PLAN

Progress Report 2024

Effective 1 June 2024

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1. Plain language summary of the plan

This is the plain language version of the Canadian Transportation Agency (CTA) Accessibility Plan. You can read the full version of the Accessibility Plan here.

The Accessible Canada Act (ACA) is a law to make Canada accessible. Under the ACA, Scandinavian Airlines (SAS) needs to make a plan to be more accessible. SAS is a commercial airline which operates commercial flights mainly to and from Scandinavia. The airline has three hubs located in Oslo, Copenhagen, and Stockholm. From Copenhagen the airline operates a route to Toronto, Canada.

SAS' goal forward is to make sure that air travel is accessible. This plan is one step toward being more accessible. We created our plan by:

- Sending a survey to disability organizations.
- Talking to employees that have disabilities
- Talking to representatives in various disability organizations
- Holding an internal workshop to list known barriers
- Making plans to reduce and/or remove known barriers.

We plan to make SAS more accessible by doing the following:

- Setting up a clear process on how to receive and collect feedback about our accessibility plan
- Talking to disability organizations about potential barriers
- Having a dedicated Accessibility Officer
- Creating an organizational awareness of disability
- Training staff on accessibility
- Updating diversity, equity, and inclusion training to include disability

We welcome feedback on this plan. If you would like this plan in a different version (e.g., braille or audio), the instructions are linked here: <u>Feedback</u>.

2. Full version of the Accessibility Plan

2.1. Description of Scandinavian Airlines - SAS

SAS is a Scandinavian airline which mainly operates commercial flights to and from Scandinavia. It is one of the largest airlines in Scandinavia and a founding member of the largest airline alliance, Star Alliance. SAS aims to reflect the diversity of society. The basis for all recruitment, skills development, promotion, and other cooperation is that all people are equal. All employees and applicants must be treated according to formal and objective criteria. SAS recruits based on competence. No one who works at SAS should be subject to discrimination or favoritism because of age, sex, ethnicity, nationality, religion, sexual orientation, disability, political beliefs, or social status. Neither do we accept physical, psychological, verbal, or sexual harassment.

2.2. Statement of Commitment

SAS is committed to advancing accessibility and making it a priority in the delivery of our services. We will engage with persons with disabilities to better understand their experiences and meet their need when interacting with SAS.

All individuals have a right to benefit from our services equally. This accessibility plan represents our commitment to identifying barriers that our passengers may experience, and to taking meaningful action to reduce and/or remove them completely.

2.3. General

We have appointed a "SAS Accessibility Officer" (SAO) who is mandated to receive and act on general feedback on identified barriers on behalf of SAS. You can contact SAS and the SAO by sending a letter, sending an e-mail, making a phone call or submitting feedback through our simple feedback form.

General feedback on our plan or barriers may be sent to:

Postal address;

Scandinavian Airlines System Att: SAS Accessibility Officer (STOKZ) 195 87 Stockholm Sweden

Email:

accessibility-officer@sas.se

Phone:

+1 8555936279 and +1 6474176390

Feedback form on our webpage:

"Link to feedback form"

We will acknowledge all accessibility feedback we receive with contact information. Note that you are also entitled to submit anonymous feedback.

SAS will upon request provide the following alternative formats of this plan in:

- Print
- Large print (increased font size)
- Braille (a system of raised dots that people who are blind or who have low vision can read with their fingers)
- Audio (a recording of someone reading the text out loud)
- Electronic formats that are compatible with adaptive technology

You can request alternative formats of this plan, and a description of our feedback process by contacting us at accessibility-officer@sas.se.

2.4. Definitions

The following are important terms in the ACA. They are used throughout this plan. They are defined here in plainer language. For the full ACA definitions, visit: <u>Summary of the Accessible Canada Act - Canada.ca</u>.

Disability: Any impairment, or difference in physical, mental, intellectual, cognitive, learning, or communication ability. Disabilities can be permanent, temporary, or can change over time.

Barrier: Anything that might hinder people with disabilities' full and equal participation. Barriers can be architectural, technological, attitudinal, based on information or communications, or can be the result of a policy or procedure.

Accessibility: The design of products, devices, services, environments, technologies, policies, and rules in a way that allows all people, including people with a variety of disabilities, to access them.

2.5. The Progress Report 2024

The Progress Report 2024 will naturally be based on the Accessibility Plan from 2023 and will adhere to the same structure. If there are any updates on progress, they will be included in a separate paragraph under each bullet point.

3. Identification of barriers and actions

3.1. Information and communication technologies (ICT)

Actions to remove and prevent new barriers:

- Continuing in 2024, investigate the possibility of introducing a Safety Briefing Video to the A321LR used for Toronto. There has been some development in this area, specifically by raising awareness on the matter and have the responsible department investigate possibilities and solutions.
- By the end of 2024, investigate the possibility of improving the procedure for receiving information about PWD's and assistance when a passenger books through a third party.
 - → **Progress:** SAS has followed up on so-called agent bookings and made the agents aware that they need to collect information and make bookings 48 hours before departure. This is to ensure that all PWD's receive the best possible service and assistance throughout their journey.
- By the end of 2024, investigate the possibility of creating and establishing a procedure that enables the airport to conduct their assistance in the best manner by sharing information about the passengers' needs.
 - → **Progress:** SAS has joined a national workforce at Oslo Airport (OSL) where representatives from airlines operating on OSL and Avinor (the State-owned operator) are cooperating to find and resolve accessibility issues at the airport.
- By the end of 2024, investigate the possibility to develop a solution in the mobile app that enables PWD's to request assistance.
 - → **Progress:** The solution is still being developed. In the meantime, SAS has developed a solution to remind passengers who have previously booked assistance to make a request for assistance for their current bookings, if they require assistance.

3.2. Communication, other than ICT

Actions to remove and prevent new barriers:

- Starting in 2023, investigate the possibility of introducing printed information and placards in Braille, such as Safety on Board Card and in-flight menu card.
 - → **Progress:** The investigation has begun and SAS is looking at various options and suppliers.
- Starting in 2024, investigate if we can have all information and placards readable for passengers with impaired or no vision.
 - → **Progress:** The investigation has begun.

3.3. Procurement of goods, services and facilities

Actions to remove and prevent new barriers:

- By the end of 2024, SAS' Suppliers Code of Conduct shall contain accessibility requirements in detail.
- Starting in 2024, add and include requirement on accessibility training and awareness in all vendor agreements.
- Starting in 2023, enhance the current procedures regarding the follow up on suppliers and vendors in their accessibility training and work.

3.4. Design and delivery of programs and services

Actions to remove and prevent new barriers:

- By the end of 2024, set up a company policy that there are at least two alternative ways of requesting and purchasing all services and products on all markets.
- By the end of 2024, develop and create an accessibility checklist to the product cycle.
- Starting in 2023, initiate internal accessibility awareness campaigns to raise awareness throughout the company.
 - → **Progress:** The project has been initiated and the idea is to start with an awareness campaign about monitors at and around offices and operational bases.

3.5. Transportation

Actions to remove and prevent new barriers:

 By the end of 2023, update the internal policy for how to handle PWD's when a flight diversion occurs in regards of alternative means of transportation and accommodation etc.

→ Progress: Done.

- By the end of 2024, update the procedures for ground personnel and flight crew to clarify accessible In-Flight Entertainment System (IFE).
- Starting in 2024, SAS will review the process of pre-seating arrangement to ensure that body paralyzed passengers get the proper seat assigned.
- Starting in late 2023, ensure that employees who have direct contact with PWD's have undergone sufficient training in understanding and handling various disabilities.

3.6. Built environment

Actions to remove and prevent new barriers and accessibility goals:

 By the end of 2024, add to the cabin manual a specific instruction on how to ensure that the PWD's privacy is preserved when using the forward lavatory on the A321LR.

3.7. The built environment related to passenger terminals

Actions to remove and prevent new barriers:

 Starting in 2023, participate in a task force/working group directed by Avinor (the state-owned company that operates most the commercial airports in Norway) whose focus is accessibility and accessible travel.

→ Progress: Done.

4. Provisions of Canadian Transportation Agency Accessibility-Related Regulations

The Canadian Transportation Agency has a mandate to decide in cases where an applicant has identified an accessibility barrier. If the applicant can demonstrate that they have a disability and that their mobility has been limited due to an accessibility barrier, it is up to the airline to either remove or reduce the barrier in general (by updating policies, terms, and conditions etc.) or take an individual measure that removes the barrier in the individual case. This applies unless it would be an undue hardship for the carrier to reduce or remove the barrier.

SAS continuously works to reduce barriers. As part of this job, we will do the following:

- To guarantee that the passenger journey is entirely accessible, all functions and areas within SAS must have accessibility as an integrated part of their work. All staff will be trained in accessibility issues to meet this requirement by the end of 2025.
- We will have a dedicated Accessibility Officer appointed that will have a mandate to receive feedback on this accessibility plan.

As a large foreign carrier SAS is subject to the following provisions:

- Part 2 of the Accessible Transportation for Persons with Disabilities Regulations.
- Accessible Canada Act
- Canada Transportation Act
- Accessible Transportation Planning and Reporting Regulations
- Air Passenger Protection Regulations
- Air Transportation Regulations

5. Feedback Information

SAS has established a feedback process in accordance with the requirements set out in the Accessibility Transportation Planning and Reporting Regulations. As at 10 May 2024, SAS had not yet received feedback from passengers, employees or any PWD organizations. For this reason, there is nothing to report in this section.

6. Consultations

In work on this Progress Report, SAS reached out to PWD organizations and the employees we consulted last year when we devised the first plan.

6.1. Results of consultation with employees

For this year's report ,we sent out an email together with the plan to ask employees if they had experienced any progress or major changes in the way they travel on SAS.

One person mentioned that the app had been approved, but the challenges regarding the airport and seating remain. We will therefore retain the bullet points from last year's plan and strive to make these improvements.

- There is a lack of knowledge about how to handle PWD's from the assistance staff at the airport, in particular, how to deal with different kinds of disabilities as well as the service in general. On several occasions, the staff were late when meeting the PWD's before boarding and consequently, they had little or no time to do any planned shopping, buy food or even use the washrooms. They also noted that on several occasions, the assistance staff did not meet them at the arrival airport.
- The queue-system at the airport with going "back and forth" in narrow "gates".
- The "aisle chair" at some airports does not actually fit in the aisle.
- Not being able to use their own wheelchair all the way to the gate.
- → **Progress:** New procedures are in place to better understand and facilitate these needs. From the dialogue with NAD (see below), SAS learned that things are running more smoothly now, even though there is room for improvement.
- Not being able to put the armrest up on some seat rows.
- The so-called throne in business class seat cannot be used, as they don't get into the seat due to the big armrests on both sides.

6.2. Results of consultation with The Norwegian Association of Disabled (NAD)

We held a dialogue with the head of the Norwegian Association of Disabled (NAD) who talked openly about challenges and areas for improvement and also answered specific questions on how the journey from booking and going through the airport to arrival when traveling with SAS actually is in practice. Some of the points from last year's plan remain as challenges, which is why they have been included in Progress Report.

- There are difficulties in navigating and understanding the specific rules and terms and conditions for PWD's on SAS' website. In general, this was not SAS-specific.
- Difficulties in navigating and booking the same travel extras, seats and other services as non-PWD passengers. There was also a lack of information about which seats were unavailable for PWD's.
- → **Progress:** SAS has updated the information on its website and has now indicated which seats PWD's cannot choose or sit in. There is also a list of all rows and seats that have moveable armrests on all configurations and aircraft.
- There is a lack of information about the airport (i.e. parking, distance to the terminal etc.) in the booking flow.
- → **Progress:** As mentioned earlier, SAS has joined a taskforce at OSL to ensure effective cooperation with the airport in providing service for PWD's. SAS has also created a new email that will be sent to all passengers with bookings with a WCHS/R/C code. The email provides tips on what PWD's should think about when traveling.
- Lack of understanding and education at the airport from assistance staff, especially regarding using their own chair. Some of the chairs are custom made for the PWD and using "generic" chairs can cause discomfort.
- → **Progress:** The head of the NAD suggested that SAS contact an organization called Ekskurs that has developed courses and training modules for companies that would like to learn about PWD's and the challenges they face in daily life. By late 2024 or early 2025, SAS will investigate the possibility of offering such courses to employees and leaders.
- Lack of routines, focus and attention given to PWD's at the gate during preboarding.
- Lack of understanding of the purpose of booking a seat on one side of the aisle (i.e. if the passenger is paralyzed on one side.).
- Challenges when the passenger has a connecting flight or if the flight is diverted.