ACCESSIBILITY PLAN 2023-2026

JANUARY 2024



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ACCESSIBILITY PLAN

1. GENERAL

1.1 Description of TAP Air Portugal's Activities

Since 1945, TAP has been a pioneer in connecting Portugal to the world and the continents to each other. Born in a country of explorers, TAP grew, changed and followed the innovations in aviation.

Its activities presently include carriage of passengers, cargo, maintenance and engineering, TAP being a major actor in the world of aviation, a leader in transportation safety and an innovator with respect to comfort on board.

TAP welcomes all passengers with disabilities on board its aircrafts, subject to certain exceptional situations where transportation may be contrary to medical recommendations or applicable safety standards.

Passengers with disabilities require adapted care and assistance, regulated by a complex set of rules that establish different standards of treatment, as implemented through Canadian, European and Portuguese legislations.

1.2 Special Services for Clients with Disability:

TAP provides free of charge the following special services for clients with disabilities:

- i) Assistance to the customer free of charge:
 - a. assistance for passenger with a visual disability;
 - b. assistance for passengers with a hearing disability;
 - c. assistance to passengers with intellectual or developmental disability;
 - d. wheelchair to seat assistance (WCHC);
 - e. wheelchair to/from aircraft door assistance (WCHR);
 - f. wheelchair up/down stairs assistance (WCHS);
- ii) transportation of certified service dogs on board (SVAN) free of charge;
- iii) transportation of special equipment free of charge:
 - a. electrical and manual wheelchairs and other mobility aids (WCBD/WCLB/WCBW/WCMP);
 - b. medical equipment (MEQT);
 - c. Portable Oxygen Concentrator (POC);
 - d. Continuous Positive Airway Pressure equipment (CPAP);
 - e. kidney dialysis portable equipment (CAPD/APD).

1.3 Feedback Process

Any person wishing to provide feedback to TAP Air Portugal in relation to a service offered by the latter (such as, without limitation: a service provided when purchasing a ticket, at check-in, baggage drop off, boarding, on board, or at the arrival of the flight), or in relation to a medium through which TAP Air Portugal interacts with the public (such as its website) may provide said feedback through one of the means described below addressed to:

TAP Air Portugal

Care of: Customer Engagement Coordinator

i) By Email – via the following link on TAP's website: https://www.flytap.com/en-us/support/talk-to-us/suggestion-or-praise

ii) By Mail: **TAP Air Portugal**

C/O: Customer Engagement Coordinator Edifício 25 do Aeroporto de Lisboa

1700-008 Lisbon

Portugal

iii) By Phone: 1-800-903-7914

iv) On our website, whose address is listed below, in the "Accessibility Information" section:

https://www.flytap.com/en-ca/accessibility-information

1.4 Alternate Format

By using the means and contact information hereinabove, a person may request that TAP Air Portugal make the present accessibility plan as well as TAP Air Portugal's feedback process available to them in print, large print, braille or audio format, or in an electronic format that is compatible with adaptive technology that is intended to assist persons with disabilities.

TAP Air Portugal will take the necessary steps to ensure the accessibility plan is provided in the requested format within the applicable processing times, namely:

- (a) in the case of a request for a description in braille or an audio format, on the 45th day after the day on which the request is received; and
- (b) in the case of a request for a description in any other format, on the 15th day after the day on which the request is received.

2. Information and Communication Technologies (ICT)

TAP Air Portugal endeavours to make its website and mobile application accessible to most people with disabilities and special needs.

In this respect, TAP Air Portugal took steps in order to comply with requirements of Level AA conformance, provided under the *World Content Accessibility Guidelines*, published by the World Wide Web Consortium, as amended from time to time.

These rules will allow TAP Air Portugal to offer digital content accessible on its website and mobile application to most people, with or without disabilities.

2.1 Website

https://www.flytap.com/en_ca/flights-from-canada

Accessible in both official languages of Canada, as well as in Portuguese, our website offers to people with disability the possibility of booking a trip and signaling the type of special assistance they required.

For clients who require a personalized assistance, they may contact us by using at the following phone number: <u>1-800-903-7914</u>

Clients with a hearing disability can access the live chat through the following link: https://www.flytap.com/en-us/special-needs/deaf-passengers

2.2 Mobile Application

TAP Air Portugal's mobile application allows travelers with disabilities to book autonomously their travel to all destinations serviced by our company. Travelers with disabilities are able to reach out to our designated department in order to signal the type of assistance required.

2.3 Social Networks

TAP Air Portugal also has a social media presence, namely on Facebook, X (formerly Twitter), and Instagram and designated teams in place to answer all questions or inquiries made by its clients.

2.4 Ongoing Policies, Programs, Practices or Services, to Improve Accessibility and Removal of Barriers

TAP's ongoing policies, programs, practices or services used to improve accessibility and remove barriers are discussed throughout this plan. TAP takes advantage of every opportunity to better its service and ensure compliance with all rules, policies and regulations.

3. COMMUNICATION, OTHER THAN INFORMATION AND COMMUNICATION TECHNOLOGIES

TAP Air Portugal's personnel are sensitive to the needs and care required by people with disabilities, and adapt their conduct, speech, and language accordingly. In this respect, TAP offers its personnel training programs and manuals, containing specific sections dedicated to the services that should be offered to passengers with disabilities, in order to improve accessibility.

4. PROCUREMENT OF GOODS, SERVICES AND FACILITIES

4.1 At the Airport

Air carriers rely on airport operators regarding access to the facilities, and the provision of information regarding accessibility.

Nevertheless, TAP Air Portugal works closely with airport operators in order to facilitate and constantly improve the access, the use and the passage of people with disabilities through airport facilities, as well as their overall travel experience.

In Canada, airport operators have specific obligations governing accessibility by people with disabilities, as provided by the *Accessible Transportation for Persons with Disabilities Regulations*, SOR/2019-244.

People with disabilities can easily check in at the automated self-service kiosks.

Passengers with disabilities are prioritized during check-in (being provided a dedicated counter at the Humberto Delgado Airport (Lisbon)), during the security checks, being provided a dedicated queue by the security personnel of the Portuguese airports, during immigration and border control, as well as during boarding operations, or in case of operational irregularities (delays, cancelations, etc.)

4.2 Communication and of Provision of Information to the Client

TAP Air Portugal selects and offers several products and services which facilitate and improve accessibility for people with disabilities.

In collaboration with specialized accessibility communication agencies, TAP Air Portugal develops communication programs and campaigns in compliance with accessibility standards.

TAP Air Portugal's website meets the Level AA accessibility requirement, as set out in the *Web Content Accessibility Guidelines* (WCAG), in compliance with applicable Canadian accessibility requirements. The website is accessible through tools that web browsers widely and commonly offered, as well as through screen reading software used by people with partial or total visual disability, such as JAWS, NVDA, Lighthouse, or WAVE.

TAP Air Portugal's mobile apps made available on iOS and Android operating systems, offer the following accessibility features:

- i) Voice Over Support (Android/iOS);
- ii) Dynamic Font Type (Android);
- iii) Zoom (Android/iOS);
- iv) Color Contrast (Android/iOS)
- v) Feedback colors with text/icons (Android/iOS)
- vi) Focus Indication (Android/iOS)
- vii) Avoid Critical Gestures (Android/iOS)
- viii) Keyboard navigation (Android/iOS)
- ix) Speech-to-Text (Android/iOS)
- x) Text-to-Speech (Android)
- xi) Progress indicator (Android/iOS)
- xii) Error handling (Android/iOS)

In addition to the foregoing, TAP Air Portugal adopted certain operational practices that facilitate accessibility:

- Short and descriptive email subject lines, which helps users with screen readers to determine whether the email communication should be opened;
- Email content is organized in a logical way, which facilitates reading;
- Alt Text is used for images, in order to provide to passengers with visual impairment using a screen reader a brief description of the image's content or of the text overlaying the image;
- We underline hyperlinks, which makes it easier to identify clickable text.

4.3 Aircraft Cabin

Applicable safety standards impose upon carriers an obligation to seat passengers with disabilities in locations that do not limit passage in case of emergency evacuation.

The design of certain cabins allows us to offer passengers with disabilities designated seats, offering more comfort, in particular in business class.

Furthermore, the Airbus A330neo and the Airbus A330ceo aircrafts have adapted lavatories, and all other aircraft are equipped with support handles inside the lavatories, as well as liftable armrests (save and except for the A321 aircraft and the A330 aircraft's business class section).

Passengers with visual and hearing disabilities may be escorted by their Certified Service Dog through the airplane cabin and arrangements may be made for passengers with immobilized lower limbs to travel in a more comfortable manner.

TAP Air Portugal's objective is to improve certain existing constraints pertaining to pitch space between seats and aisles, as well as tactile and verbal indications.

5. DESIGN AND DELIVERY OF PROGRAMS AND SERVICES

TAP Air Portugal observes applicable accessibility standards for people with disabilities as part of its calls for tender in relation to the acquisition or deployment of physical, as well as virtual, inventory, products and services.

In this respect, a dedicated TAP Air Portugal department, *Manager de Comunicacao com o Cliente* (Manager of Communication with the Client) responsible for interaction with people with disabilities, takes part in its operations and ensures compliance with accessibility standards.

The *Manager de Comunicacao com o Cliente* (Manager of Communication with the Client) oversees ongoing programs targeting the improvement of products and services offered to both clients and personnel, while concurrently ensuring compliance with new accessibility rules under applicable legislation.

5.1 At the Airport

At airports in Portugal, the airport operator provides assistance to people with disabilities by through the *MyWay Assistance Service*.

In Canada, the obligations in relation to accessibility to airport facilities fall within the purview of Airport operators.

Except for special circumstances, in order to ensure the provision by the carrier of special services or assistance for people with disabilities under applicable Canadian rules, the passenger is invited make a request in this respect at least 48 hours prior to the scheduled departure time of the flight in question.

The requests made less than 48 hours prior to the scheduled departure time will be processed, to the extent possible, by following an order of priorities dependent upon the type of service or

assistance required. TAP Air Portugal will do its utmost to ensure the processing of all requests of special services or assistance submitted by people with disabilities.

In this regard, the Canadian Transportation Agency published for the benefit of people of disabilities a guide in relation to travel, accessible at the link provided below:

https://otc-cta.gc.ca/eng/publication/take-charge-your-travel-a-guide-travellers-disabilities

Information regarding baggage, dangerous goods and forbidden items can be made available to the passenger, upon request, in braille (Portuguese and English).

In Europe, passengers with reduced mobility are carried in accordance with EU Regulation No. 1107/2006 of 5 July 2006 on the rights of disabled passengers and passengers with reduced mobility. Any passengers travelling to/from the USA are carried in accordance with the U.S. DOT provisions, Title 14, Code of Federal Regulations, Part 382, effective as of 13 May 2009.

5.2 During Flight

On board the aircraft, flight attendants work ensure the safety and comfort of all passengers, including passengers with disabilities.

In this capacity, flight attendants ensure the welcoming on board of passengers with disabilities and provide them with the services necessary for their travel, including safety instructions and onboard mobility aids.

TAP Air Portugal also makes available to people with disabilities on-board facilities adapted to their needs, such as an on-board entertainment system, or adapted washrooms, the whole within the limits of applicable health and safety standards.

TAP Air Portugal provides assistance to passengers with disabilities, through a variety of services, covering, among other things, embarkation and disembarkation, assistance with mobility aids, assistance to people with visual impairments, access to washrooms, individualized safety briefings and demonstrations adapted to passengers with disabilities, including visual impairments.

TAP Air Portugal's objective is to improve certain existing constraints pertaining to pitch space between seats and aisles, as well as tactile and verbal indications.

5.3 After Flight

TAP Air Portugal conducts an annual review of accessibility services offered to people with disabilities in order to improve said services and ensure they are up to date with the needs of people with disabilities, which includes the implementation into its operations of all feedback received, including the feedback of the passengers with disabilities.

5.4 Employee Services

For more than 23 years, TAP Air Portugal has been committed to hiring and welcoming people with disabilities into its enterprise.

TAP Air Portugal's personnel and representatives include 98 people with disabilities.

5.5 Training

TAP Air Portugal provides training to its personnel regarding the accessibility needs of people with disabilities, processing of service requests received from passengers with all types of disabilities, handling of feedback related to services/matters, provision of services on board, at the airport, as well as in all interactions with passengers. TAP Air Portugal's training programs comprise, among other things:

- 1. Cabin Crew Training: comprising Initial Training, Recurrent Training, and Purser Training, covering, among other things, awareness towards special cases, adaptive conduct, and interactions with passengers with disabilities, individual safety briefings (hearing impaired, visually impaired, reduced mobility, service animals), awareness to seat allocation and special evacuation procedure;
- 2. *Ground staff training*: Initial and recurrent training for TAP operational staff includes guidelines regarding the assistance of passengers with disabilities, including passengers with reduced mobility, and hidden disabilities;
- 3. Customer Engagement Training, re: passengers with disabilities and accessibility.

6. TRANSPORTATION

TAP Air Portugal deploys all reasonable measures to ensure the access of passengers to its transportation network, to remove all barriers to such accessibility and to accommodate all passengers depending on their particular needs.

As explained under subsections 1.2, 4.3, and 5.2 hereinabove, TAP Air Portugal provides free of charge several services for clients with disabilities in preparation of their transportation, and during their transportation on its aircrafts.

While complying with flight safety requirements, TAP Air Portugal seeks to implement the best conditions transportation conditions to ensure the comfort of people with disabilities and accommodation of special needs in its aircraft.

During flight, TAP Air Portugal's flight crew is committed to providing assistance to the passengers with disabilities in order to fully answer to their needs.

At the end of travel, passengers with disabilities can provide feedback on their experience on board TAP Air Portugal's aircraft, as per the provisions of subsections 1.3 hereinabove.

7. BUILT ENVIRONMENT

In Canada, airport operators have specific obligations in relation accessibility by people with disabilities, as provided by the *Accessible Transportation for Persons with Disabilities Regulations*, SOR/2019-244.

TAP Air Portugal collaborates closely with Canadian airport operators in order to improve accessibility by people with disabilities to the services and facilities offered and made available therein.

8. Provisions of CTA Accessibility-related regulations

TAP Air Portugal is subject to and complies with Portuguese and European legislation applicable to the carriage by air of people with disabilities and is compliant with legislation applicable to foreign carriers of the states to which its flights are operated.

TAP Air Portugal complies with the Canadian legislation applicable to the carriage of people with disabilities and to the removal of barriers in their transport, including the provisions of Part 2 – Service Requirements Applicable to Carriers, of the Accessible Transportation for Persons with Disabilities Regulations, SOR/2019-244, such as the provisions pertaining to:

- Assistance for persons with disabilities, including priority boarding;
- Transportation of mobility aids and other assistive devices;
- Transportation of support persons;
- Transportation of service dogs;
- Additional passenger seats; or
- Allergy buffer zones.

9. CONSULTATIONS

8.1 Internal

TAP Air Portugal's personnel, including personnel with disabilities, actively participates in the improvement of accessibility conditions, and actively engages in the provision of services to people with disabilities.

The annual review of TAP Air Portugal's accessibility services offered to people with disabilities involves all departments of its enterprise, which are required to report on relevant experiences of the preceding year, and to propose a plan of improvements for the year that follows.

This annual review covers all of TAP Air Portugal's network and consists of affirmative actions by all departments involved in the accessibility of passengers with disabilities at all destinations to which TAP Air Portugal operates its flights.

8.2 External

TAP Air Portugal solicits the input of several leading partners in the field of accessibility, as well as community associations in relation to the development and deployment of accessibility plans and projects.

Working groups established jointly with said partners and community associations facilitate the understanding of the needs of people with disabilities, and allow the development of new ways in which TAP Air Portugal is able to adequately address such needs and improve its overall experience.

Specifically, TAP Air Portugal is actively consulting with Deloitte, its current technological partner, in relation to its website and mobile app, in preparation of TAP Air Portugal's accessibility plan and to ensure the accessibility needs are met.

During the month of October 2022, TAP Air Portugal consulted Deloitte on *Web Content Accessibility Guidelines* (WCAG), online tools that make sites accessible such as screen reading software, tools that make mobile apps accessible, as well as operational practices that would facilitate accessibility such as how TAP's emails are formatted and generated.

During the month of September 2023, TAP Air Portugal consulted Deloitte to ensure that the accessibility level is up to date and meets current accessibility levels, in particular on its website.

In order to identify existing obstacles to accessibility in the carriage of people with disabilities, and to establish plans to remove said obstacles, TAP Air Portugal relies, among other things, on the input and feedback of its passengers, its personnel, as well as leading partners in the field of accessibility, collected through different means, such as:

- On its website;
- Client satisfaction surveys
- At the airport;
- During flights.

As a result of this input and feedback system, existing obstacles that may have affected personnel or passengers during their travels are identified and understood, which in turn facilitates their removal, and the overall improvement of the travel experience, based on both qualitative and quantitative criteria.

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