AODA Policy Handbook

Multi-Year Accessibility Plan (Public Facing)

Company Name: *Barracuda Networks*
Effective Period: 2026–2031
Applies To: All Ontario operations

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1. Purpose

This Multi-Year Accessibility Plan outlines the steps the Company will take to comply with the **Accessibility for Ontarians with Disabilities Act, 2005 (AODA)**, the **Integrated Accessibility Standards Regulation (IASR)**, and the **Ontario Human Rights Code**.
The plan is designed to identify, remove, and prevent accessibility barriers over a five-year period.

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2. Statement of Commitment

The Company is committed to:

- Providing accessible customer service, information, communications, and workplaces.
- Removing barriers for employees, applicants, customers, and visitors.
- Meeting or exceeding all legislative requirements under AODA.

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3. Accessibility Strategy Overview

The Company will address accessibility under the following IASR pillars:

1. Customer Service
2. Information & Communications
3. Employment
4. Training

These categories align to the list of required AODA documents and policies outlined by counsel.

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4. Multi-Year Commitments & Actions (2026–2031)

4.1 Customer Service Standard

Current Status

Accessible Customer Service Policies are established and maintained; assistive device, service animal, and support person processes are in place.

Actions (2026–2031)

- Conduct annual reviews of Customer Service Standards Policy.
- Ensure temporary disruption procedures remain posted and accessible.
- Maintain a documented feedback process and review submissions quarterly.
- Provide accessible formats for customer-related communications upon request.

4.2 Information & Communications Standard

Current Status

The Employee Handbooks list required policies and indicate the presence of a feedback process and accessible information commitments.

Actions

Website & Digital Accessibility

- Bring all new web content into compliance with **WCAG 2.0 Level AA** each year.
- Audit existing content by end of 2026 and update by 2027.

Communication Supports & Formats

- Respond to accessibility format requests within 5 business days.
- Enhance internal guidance for managers on providing accessible documents by 2027.

4.3 Employment Standard

Current Status

Employee accommodation processes exist and are referenced across internal handbooks.

Actions

Recruitment:

- Continue informing applicants of availability of accommodation during recruitment and assessment.
- Update job posting templates annually to maintain accessibility requirements.

Employee Accommodation:

- Maintain and improve:
    - Individualized Accommodation Plans
    - Return-to-Work Program
    - Individualized Emergency Response Plans

Performance Management, Career Development & Redeployment:

- Ensure systems and documentation consider accessibility needs.
- Document accessibility considerations in annual performance cycle guidance (starting 2026).

4.4 Training

Current Status

Mandatory training exists for employees.

Actions

- Provide onboarding AODA & Human Rights Code training within first week of employment.
- Track training completion through HRIS quarterly.
- Provide refresher training every 3 years or whenever policies change.

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5. Barrier Identification & Prevention

Ongoing Activities

- Annual workplace barrier assessments in collaboration with HR and Health & Safety.
- Include accessibility lens in ergonomics assessments, emergency planning, and workspace design.
- Collect input from employees through surveys, feedback channels, and accommodation discussions.

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6. Monitoring & Reporting

6.1 Compliance Reports

- Prepare and file AODA compliance reports as legally required (every 3 years).
- Ensure reports are accurate and publicly posted.

6.2 Annual Review

- HR and Legal teams will jointly review this plan annually.
- Changes will be approved by Senior Leadership and published on the company website.

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7. Publication & Availability

- This plan will be posted publicly on the Company's website.
- It will be provided in accessible formats upon request.

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8. Contact Information

Accessibility Inquiries & Feedback:

HR Department: HR_Amer@barracuda.com

Section 1: Customer Service Standards Policy (Public Facing)

Effective as of July 1, 2026

Owner: Human Resources

1. Purpose/Policy Statement

Barracuda Networks is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence.

We believe in integration and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the Accessibility for Ontarians with Disabilities Act and Ontario's accessibility laws.

Barracuda is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination.

Barracuda understands that obligations under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and its accessibility standards do not substitute or limit its obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law.

Barracuda is committed to excellence in serving and providing goods, services or facilities to all customers including people with disabilities.

Our accessible customer service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

2. Policy Details/Implementation

Customer service training

We are committed to training all staff in accessible customer service, other Ontario's accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities.

In addition, we will train:

a) all persons who participate in developing the organization's policies; and
b) all other persons who provide goods, services or facilities on behalf of the organization.

Training of our employees on accessibility relates to their specific roles. Training includes:

- purpose of the *Accessibility for Ontarians with Disabilities Act, 2005* and the requirements of the Customer Service Standards
- our policies related to the Customer Service Standards
- how to interact and communicate with people with various types of disabilities
- how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- how to use the equipment or devices available on-site or otherwise that may help with providing goods, services or facilities to people with disabilities.
- what to do if a person with a disability is having difficulty in accessing our organization's goods, services or facilities.

We train every person as soon as practicable after being hired and provide training in respect of any changes to the policies.

We maintain records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided

Information and Communication

We communicate with people with disabilities in ways that take into account their disability. We will work with the person with disabilities to determine what method of communication works for them.

Accessible websites and web content

Barracuda websites, applications and web content, controlled either directly by Barracuda or through certain types of contractual relationships, will meet or exceed the digital accessibility requirements set out in the *Integrated Accessibility Standards (Ontario Regulation 191/11)*.

Feedback process

Barracuda welcomes feedback on how we provide accessible customer service. Customer feedback will help us identify barriers and respond to concerns.

Feedback may be provided:

- in person
- in writing
- by email or
- by other communication technology as required.

All feedback, including complaints, will be handled in the following manner:

- Customers can expect to hear back in 3 business days.

Barracuda ensures our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request.

Service disruption

If there is a problem with facilities, equipment or services that people with disabilities rely on to facilitate access, we will provide notice to the public.

The way we provide the notice will be determined by the nature of the problem. We will always try to make alternative arrangements to provide service where possible.

Assistive devices

People with disabilities may use their own personal assistive devices. Where assistive devices are available in our buildings, our staff have been trained on how to use them.

Service animals

People with disabilities may use their service animal in all parts of our premises that are open to the public, unless the animal is excluded by law.

When we cannot easily identify that an animal is a service animal, our staff may ask for documentation (template, letter, or form) from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.

A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

A regulated health professional is defined as a member of one of the following colleges:

- College of Audiologists and Speech-Language Pathologists of Ontario
- College of Chiropractors of Ontario
- College of Nurses of Ontario
- College of Occupational Therapists of Ontario
- College of Optometrists of Ontario
- College of Physicians and Surgeons of Ontario
- College of Physiotherapists of Ontario
- College of Psychologists of Ontario
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

In cases where service animals are not allowed, we will ensure that other measures are available to ensure that the person can access the service.

Support persons

A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises.

In certain cases, this organization might require a person with a disability to be accompanied by a support person for the health or safety reasons of:

- the person with a disability
- others on the premises

Before making a decision, Barracuda will:

- consult with the person with a disability to understand their needs
- consider health or safety reasons based on available evidence
- determine if there is no other reasonable way to protect the health or safety of the person or others on the premises

Section 2: General Integrated Accessibility Standards Policy (Public Facing)

Effective as of July 1, 2026

Owner: Human Resources

1. Purpose/Policy Statement

This policy outlines how the organization will meet its obligations under the **Accessibility for Ontarians with Disabilities Act, 2005 (AODA)** and the **Integrated Accessibility Standards Regulation (IASR)**. It establishes the rules the organization will follow to ensure accessibility across operations, including information & communications, employment, customer service, and public spaces.

The organization is committed to ensuring equal access and participation for people with disabilities. Consistent with sample policy language provided by the Ontario Ministry for Seniors and Accessibility, the organization will:

- Treat people with disabilities in a manner that maintains dignity and independence
- Strive for integration and equal opportunity
- Prevent and remove barriers to accessibility
- Comply with all applicable AODA and Human Rights Code obligations

2. Scope

This policy applies to all employees, contractors, and any individual involved in delivering goods, services, information, or employment practices on behalf of the organization. This aligns with the definition of "accessibility policies" under IASR Section 3.

3. Policy Details/Implementation

General Requirements (IASR Part I)

Accessibility Policies

The organization will develop, maintain, and publicly post written accessibility policies that outline how it achieves accessibility and meets AODA requirements. Policies will be reviewed and updated regularly.

Multi-Year Accessibility Plan

The organization will:

- Maintain a publicly available multi-year accessibility plan
- Update it at least once every five years
- Provide it in accessible formats upon request

Training

The organization will provide training on:

- IASR requirements
- Human Rights Code as it relates to disability
  Training will be provided to employees, volunteers, contractors, and anyone involved in policy development.

Procuring Goods, Services & Facilities

The organization will incorporate accessibility criteria and features when procuring goods, services, or facilities, unless it is not practicable to do so. This reflects IASR Section 5 guidance.

Information & Communications Standard

Accessible Formats & Communication Supports

Upon request, the organization will provide or arrange accessible formats for public information in a timely manner and at no additional cost to the requester.

Feedback Processes

Feedback mechanisms will be accessible by providing or arranging communication supports upon request, in compliance with IASR Section 11.

Accessible Websites

Websites and web content will conform to WCAG 2.0 Level AA, consistent with IASR Section 14 and the AODA.ca IASR Guide.

Emergency & Public Safety Information

Emergency information made available to the public will be provided in an accessible format upon request, aligned with IASR Section 13.

Employment Standard

Recruitment

The organization will:

- Notify applicants of the availability of accommodations
- Provide accommodations during assessments and interviews
- Inform successful candidates of workplace accommodation policies

Workplace Accessibility Supports

The organization will:

- Consult with employees requesting accommodation
- Provide accessible formats and communication supports

- Maintain a documented process for individual accommodation plans
- Create individualized emergency response plans

Performance Management, Career Development & Redeployment

The organization will consider accessibility needs and accommodation plans during performance reviews, career development, and redeployment decisions.

Customer Service Standard (IASR + O. Reg. 429/07)

Although governed by a separate regulation, the Integrated Standards require organizations to maintain:

- Accessible customer service policies
- Use of assistive devices, support persons, and service animals
- Accessible temporary disruption notices
- Customer service training [mh.on.ca]

Monitoring & Compliance

The organization will:

- Track progress on all accessibility initiatives
- Conduct annual reviews of policies and practices
- File AODA compliance reports as required
  The Accessibility Standards Checklist can be used as a self-assessment tool.

Availability of Documents

All accessibility documents—including this policy, the statement of commitment, and the multi-year accessibility plan—will be provided in accessible formats upon request.

4. **Contact Information**

For questions about this policy, please contact hr_amer@barracuda.com

Section 3: Employment Standards Policy

Effective as of July 1, 2026

Owner: Human Resources

1. Purpose/Policy Statement

Provide a clear and succinct statement describing the policy's intended purpose, goals, and what outcome the policy seeks to achieve.

2. Policy Details/Implementation

Employment

We notify employees, job applicants and the public that accommodations can be made during recruitment and hiring. We notify job applicants when they are individually selected to participate in an assessment or selection process that accommodations are available upon request. We consult with the applicants and provide or arrange for suitable accommodation.

We notify successful applicants of policies for accommodating employees with disabilities when making offers of employment.

We notify staff that supports are available for those with disabilities as soon as practicable after they begin their employment. We provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that take into account an employee's accessibility needs due to a disability.

We will consult with employees when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to disability. We will consult with the person making the request in determining the suitability of an accessible format or communication supports specifically for:

a. information that is needed in order to perform the employee's job; and
b. information that is generally available to employees in the workplace.

Where needed, we will also provide customized emergency information to help an employee with a disability during an emergency. With the employee's consent, we will provide workplace emergency information to a designated person who is providing assistance to that employee during an emergency.

We will provide the information as soon as practicable after we become aware of the need for accommodation due to the employee's disability.

We will review the individualized workplace emergency response information:

c. when the employee moves to a different location in the organization;
b. when the employee's overall accommodations needs or plans are reviewed; and
c. when the employer reviews its general emergency response policies.

We have a written process to develop individual accommodation plans for employees.

We have a written process for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work.

Our performance management, career development and redeployment processes take into account the accessibility needs of all employees.

Changes to Existing Policies

Any policies of this organization that do not respect and promote the principles of dignity, independence, integration and equal opportunity for people with disabilities will be modified or removed.

This document is publicly available. Accessible formats are available upon request.

Section 4: Workplace Accommodations

Effective as of July 1, 2026

Owner: Human Resources

1. Purpose/Policy Statement

The Company is committed to providing equal treatment with respect to employment without discrimination because of race, ethnic origin, creed (religion), sex (including pregnancy and breastfeeding), sexual orientation, same-sex partnership status, gender identity/expression, age, civil status, family or marital status, or disability or any other ground established in the Ontario Human Rights Code (the "Code").

Furthermore, the Company will work to achieve a workplace free of barriers by providing accommodation for the needs of those individuals covered by the Code, up to the point of undue hardship for the Company.

Upon implementing accommodation, the Company expects the accommodated employee to perform their job duties to the Company's reasonable satisfaction.

If you have specific ergonomic needs or require other accommodation because of a disability or a medical need, please contact Human Resources to initiate the accommodation process.

2. Scope

This policy applies to all employees and job applicants who require accommodation, particularly on the grounds of disability.

3. Roles and Responsibilities

The Company shall strive to provide accommodation as is appropriate, using a consultative approach that involves the Company, the individual, and as appropriate, healthcare professionals, and other third parties that are required to assist in the accommodation process.

Accommodation may be temporary, or permanent, based on the requirements of the individual.

Employee Responsibilities:

The employee requiring accommodation will:

- Make the request to their Manager;
- Identify the type of accommodation required, if possible;
- Participate and co-operate to facilitate the accommodation;
- Provide supporting documentation or consents to medical disclosure, if requested; and
- Cooperate in an Individual Medical Evaluation (IME) at Company's expense, where permitted by law.

An employee requesting an accommodation is expected to be reasonable and flexible in responding to proposals put forward by the Company and, where applicable, the union.

Upon accommodation, the employee is required to perform the essential duties of the position and to meet the reasonable performance expectations of the Company.

Manager Responsibilities:

On receiving a request for accommodation, the Manager will:

- Review the request and identify accommodation options appropriate for the employee;
- determine whether additional information is required to properly assess or implement the accommodation process;
- Work in close co-operation with the employee and/or their representative;
- Participate and co-operate to facilitate the accommodation;
- Record the accommodation in writing and in Ontario, if required, draft a formal Individual Accommodation Plan;
- Review the accommodation and/or Individual Accommodation Plan as required, not less than once a year;
- Initiate a discussion regarding accommodation, where a Manager has good reason to believe that an employee requires accommodation on the basis of a Code-protected ground; and
- Assist in the accommodation process.

Approach to Accommodation

The approach taken by the Company in the provision of accommodation shall include:

- Personalized plans designed to meet the needs of individuals that are protected by the Code;
- Collaborative practices in the creation and implementation of accommodation plans through consultation of all relevant stakeholders, the person to be accommodated and medical professionals; and
- An approach that ensures confidentiality and dignity to the extent possible. The employee's personal information will be protected, unless disclosure is necessary to assess, develop or implement an accommodation request or plan.

Accommodation Process

Typically, the process to determine an appropriate accommodation will be as follows, but it may be modified in accordance with the simplicity or complexity of the request:

Step 1. Recognize the Need for Accommodation

The need for accommodation can be:

- Requested by the employee through their manager or through senior management; or
- Identified by the employee's Manager.

Step 2. Gather Relevant Information and Assess Needs

The employee is an active participant in this step, and will need to assist the Company as follows:

- Where accommodation is due to disability, the Company does not require details on the nature of the employee's disability to provide an accommodation; it needs to know only about the employee's functional abilities or limitations in sufficient detail to assess the validity of the request and the possible types of accommodation that are appropriate;
- The Manager may ask for a functional capacity assessment at the Company's expense;
- The employee and their manager will evaluate potential options to find the most appropriate measure;
- An external expert may be involved, at the Company's expense; and
- Where permitted by law, the Company may obtain an Independent Medical Evaluation (IME) at its expense.

Step 3. Record the accommodation provided

Once the most appropriate accommodation has been identified and agreed upon, the accommodation should be recorded in writing and a copy put in the employee's personnel file.

Where the accommodation is due to disability and involves an employee in Ontario, the employee will be asked to complete an Individual Accommodation Plan to fully describe the accommodation details. The Individual Accommodation Plan should also include the following:

- Accessible formats and communication supports, if requested;
- Workplace emergency response information, if required; and
- Any other accommodation that is to be provided.

The accommodation plan should be provided to the employee in a format that takes into account their accessibility needs due to their disability.

Step 4. Implement, Monitor, and Review the Accommodation Plan

The employee and their manager should monitor the accommodation to ensure that the following criteria are met:

- Formal reviews are conducted at a predetermined frequency;
- The accommodation plan is reviewed if the employee's work location or position changes; and
- The accommodation is reviewed if the nature of the employee's Code-protected needs and/or disability changes.

If the accommodation is no longer appropriate, the employee and the Manager should work together to gather relevant information and reassess the employee's needs in order for the Company to find the best accommodation measure (Step 2)

If the accommodation is no longer required, the employee is expected to advise the Company.

Upon accommodation, the employee is required to perform the job duties, as accommodated, to the reasonable satisfaction of the Company.

Accommodation Options

The Company's goal is to accommodate an employee in their existing position.

Where that is not a realistic option, the Company will consider the possibility of accommodating the employee into any open position for which the employee is suitable, given the employee's experience, education, skill set, and accommodation needs.

If the accommodation requires a substantial change in the position, involving duties or hours, the employee's compensation and benefits may be impacted

When is Accommodation Not Feasible?

Accommodation is not feasible if the employee is unable to perform the essential duties of their position (or accommodated position) to the reasonable performance expectations of the Company.

Accommodation is also not feasible if implementing such accommodation would cause the Company to incur excessive costs or where the accommodation would create a health and safety hazard.

Workplace Information

The Company will provide workplace information in an accessible format if an employee asks for it. This includes:

- Any information employees need to perform their jobs (e.g. job descriptions and manuals); and
- General information that is available to all employees at work (e.g. Company newsletters, bulletins about Company policies and health and safety information)

We will also provide accessible emergency information to staff when we are made aware an employee may need accommodation in an emergency.

Talent and Performance Management

As part of the Company performance management and career development processes, we will consider the needs of an employee with disabilities when we:

- Hold formal or informal performance reviews; or
- Promote or move them to a new job

Examples include:

- Making documents available in accessible formats (e.g., large print for people with low vision);
- Providing feedback and coaching in a way that is accessible to them (e.g., allowing someone with a learning disability to record the conversation); and
- Providing the accommodations an employee may need to successfully learn new skills or take on more responsibilities.

Return to Work Process

We will develop and write a process to support employees who have been absent from work due to a disability, illness or injury and require a related accommodation to return to work.

Version Control

Version	Date	Description of Changes	Approved By
1.0	July 1, 2026	N/A	Matthew Allen

Individualized Workplace Accommodation Plan Request Form

Personal Information

Name: _____

Employee ID: _____

Department: _____

Contact Information: _____

Please feel free to attach additional pages if the space below is not adequate.

Accommodation Details

Type of Accommodation Requested:

Describe the specific accommodation you are requesting. For example, "Ergonomic chair for back support."

Reason for Accommodation:

Explain why this accommodation is necessary. Include any relevant medical information or documentation. Do not include diagnostic information.

Duration of Accommodation:

Specify the expected duration for which the accommodation is needed. For example, "Temporary (3 months)" or "Permanent."

Medical Information (if applicable)

Medical Documentation: Attach any relevant medical documentation that supports your request for accommodation.

Additional Information

Comments or Additional Requests: Provide any additional information or requests that may help in processing your accommodation plan.

Sign and date the form to confirm the accuracy of the information provided.

Signature: _____

Date: _____

Contact Information for Assistance: If you need help filling out this form or have any questions, please contact HR_Amer@barracuda.com

Individualized Employee Emergency Response Plan

Personal Information

Name: _____
Employee ID: _____
Department: _____
Contact Information: _____
Cubicle number: _____
Regular days in the office: _____

Please feel free to attach additional pages if the space below is not adequate.

Accommodation Details

Type of Accommodation Requested:
Describe the specific support you are requesting. For example, "Assistance navigating the stairs during an emergency evacuation."

Reason for Accommodation:
Explain why this accommodation is necessary. Include any relevant medical information or documentation. Do not include diagnostic information.

Duration of Accommodation:
Specify the expected duration for which the accommodation is needed. For example, "Temporary (3 months)" or "Permanent."

Additional Information
Comments or Additional Requests: Provide any additional information or requests that may help in processing your accommodation plan.

Sign and date the form to confirm the accuracy of the information provided. By signing below, you consent to sharing this information with designated helpers such as the office fire marshals.

Signature: _____

Date: _____

Contact Information for Assistance: If you need help filling out this form or have any questions, please contact HR_Amer@barracuda.com

Identification of Potential Barriers During an Emergency

Potential Barrier	Solution
Mobility Challenges: Stairwells are often the only exit route in emergencies, especially when elevators are disabled. This poses a major barrier for individuals with mobility impairments.	Assigned "Barracuda Monitors" act as buddies to assist mobility-impaired individuals to safe locations like stairwell exits.
Communication Barriers: Individuals with hearing or cognitive disabilities may not hear alarms or understand evacuation instructions.	Fire marshals to provide clear, loud verbal communication and visual cues which are essential.
Lack of Personal Evacuation Plans	Stress the importance of pre-planning and personalized evacuation strategies. Employees are encouraged to identify their needs and communicate them to facility managers in advance. Employees who require an individualized employee emergency response plan should complete the "**Individualized Employee Emergency Response Plan"** form.
Untrained Helpers: Attempting to assist someone without proper training can be dangerous	Rescue efforts should only be made by trained personnel unless the individual is in immediate danger.
Visibility and Awareness: Emergency responders may not know where individuals with disabilities are located.	Plans must include mechanisms to inform responders of their presence and location