



Turkish Airlines Accessibility Plan Progress Report

In accordance with Canada's Accessible Canada Act, Accessible Transportation Planning and Reporting Regulations and Accessible Canada Regulations

Executive Summary

Türk Hava Yollari Anonim Ortakligi ("Turkish Airlines," "we" or "us") has developed an Accessibility Plan to ensure compliance with the *Accessible Canada Act* (ACA) and the *Accessible Transportation Planning and Reporting Regulations* (ATPRR). The Accessibility Plan aims to enhance accessibility at airports and on flights and provide excellent customer service for all passengers.

In accordance with the provisions of the *Accessible Canada Act*, this progress report outlines actions that we have already taken under our Accessibility Plan to address some of the barriers identified through our consultations and through feedback form.

Turkish Airlines is dedicated to improving accessibility for our passengers and employees and creating a positive and inclusive environment for all passengers and employees and welcomes any comments and feedback about its Accessibility Plan. Turkish Airlines will continue to receive feedback and incorporate them in the Accessibility Plan.

In 2023, Turkish Airlines engaged Çizgi Advertising, Research and Consultancy Company to conduct, in cooperation with certain disability organizations, mystery shopper research to assess the quality of services being provided to passengers with disabilities. The research program involved 16 different flights and 7 airports, and passengers with visual, auditory, mobility and mental disabilities. The research also incorporated feedback from citizens with disabilities in Türkiye. The research program identified certain areas for improvement, which were reviewed at a meeting of Turkish Airlines' Customer Experience Executive Board. The meeting was also attended by members of senior management, and based on the findings, we have we developed a roadmap to correct the identified deficiencies and implement a process for systemic improvements in the services and support offered to disabled passengers in all aspects of travel with Turkish Airlines.

Turkish Airlines is actively focusing on these findings and is committed to ongoing improvements to enhance the passenger experience, starting with flights to and from our hub in Istanbul, and eventually across our entire network.

General

To improve accessibility for persons with disabilities, while ensuring compliance with the *Accessible Canada Act* (ACA), the *Accessible Transportation Planning and Reporting Regulations* (ATPRR) and *Accessible Canada Regulations* (ACR), Turkish Airlines has conducted consultations and developed this Accessibility Plan.

Its aim is to identify and remove potential barriers and prevent new barriers in the future. Any comments about the Turkish Airlines' Accessibility Plan can be shared via the contact information provided below.

Feedback process:

If anyone would like to contact Turkish Airlines to discuss Turkish Airlines Accessibility Plan and/or any barriers that could have been encountered by passengers with disabilities, then please contact us via:

i. Name: Sales Operations Manager

ii. Phone: +1-416-260-4880

iii. Mailing Address: Turkish Airlines, 170 University Avenue, Toronto, M5H3B3 ON, Canada

iv. Email: CANADACUSTOMER@thy.com

Feedback can be provided anonymously using any of the channels above.

Alternative format for the Accessibility plan and/of feedback process:

To request a copy of Turkish Airlines' Accessibility Plan and Feedback Process or the Accessibility Plan Progress Report in an alternate format, please contact Turkish Airlines using any of the channels above. On request, we may provide a copy of the Accessibility Plan and Feedback Process or the Accessibility Plan Progress Report 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.

We will acknowledge any feedback (other than anonymous feedback) provided to us, in the same format as it was submitted.

Information and Communication Technologies (ICT)

As outlined in the Accessibility Plan, Turkish Airlines strives to provide accessible digital information, services, and products.

Turkish Airlines has already developed its website using HTML (Hyper Text Markup Language), CSS (Cascading Style Sheets) to Web Content and Accessibility Guidelines (WCAG) 2.0 Level 2 (Double-A compliance) in accordance with World Wide Web Consortium (W3C) standards. To provide content, there are also JavaScript and jQuery functions found on Turkish Airlines' HTML and CSS linked website.

Further, all webpages were developed and tested with the following types of software in mind:

- Screen reading software
- Voice activation software
- Screen magnification software
- Alternative methods of input, such as switches, etc.
- Documents in various formats such as Adobe Acrobat (.pdf) and Microsoft Word (.doc) can be downloaded from the Turkish Airlines website.

Print documents such as boarding passes can be downloaded as a pdf as well as accessible HTML alternatives.

Turkish Airlines is currently engaged in the process of updating all information available on our website, include certain legal documents, to ensure that it is available in an accessible format. We are also engaged in a web re-design project in order to identify and remediate technologies and features that may cause accessibility issues. Turkish Airlines is currently working to identify and address accessibility issues related to downloadable documents in various formats, media players and other documents. We have started an awareness campaign to better familiarize our passengers and employees with services offered in alternative formats.

During our consultation with disability groups, we received feedback that the website and mobile application are not compatible with screen reader programs that are used by people with visual impairment and that the online channels are not accessible to people with hearing impairment.

In our ongoing commitment to enhance accessibility for our visually impaired passengers, Turkish Airlines has incorporated features that are compatible with screen reader programs as part of our end-to-end renewal project of the website and mobile application. This includes the introduction of accessible online channels specifically designed for visually impaired users. Furthermore, we are currently assessing the potential integration of Blindlook, a screen reader program, to further improve our services for visually impaired passengers.

In an effort to enhance the accessibility of our online channels for passengers with hearing impairments, Turkish Airlines has initiated a project to refine the terminology used across our platforms. This initiative is part of our commitment to ensure an accessible and inclusive experience for our passengers.

Communication, Other Than ICT

Turkish Airlines continues to provide our employees assistance and behavioral and communications training, so that we can create an inclusive and accommodating environment for our passengers and employees.

We have enhanced the availability of our Video Call Centre service so that hearing impaired passengers can easily buy their tickets and communicate with the call centre staff via video. We have also been actively seeking inputs from passengers and employees with visual and hearing disabilities in relation to accessing information on our services and procuring assistance.

We have also been working on improving the availability and awareness of Turkish Airlines' Sunflower Lanyard service, and providing training to our staff to work with passengers that avail this service. We are also in the process of ensuring that every shift at our special service counters is staffed with personnel proficient in sign language. This initiative is aimed at enhancing our service delivery to passengers with disabilities at these counters.

In 2023, Turkish Airlines engaged Çizgi Advertising, Research and Consultancy Company to conduct, in cooperation with certain disability organizations, mystery shopper research to assess the quality of services being provided to passengers with disabilities. We received feedback that highlighted several challenges faced by individuals with disabilities. These included difficulties in communicating with the video call centre, limited number of employees who are able to communicate in sign language, gaps in awareness about the Sunflower badge from the Sunflower Lanyard System and limited number of employees with training to assist passengers with autism.

In response to these concerns, Turkish Airlines has initiated a comprehensive plan to enhance the user experience for our passengers with disabilities. This includes:

- improvements to the video call centre interface;
- reducing the advance notice period required for accessibility requests;
- providing extensive training to our call centre staff about the range of ground services we offer to passengers with disabilities;
- having personnel who are proficient at sign language at special service counters during all shift in order to provide better service for passengers with hearing impairments;
- providing a digital menu card for passengers with hearing impairments;
- initiating communication efforts to increase awareness of the Sunflower Badge service and implementing a specific code in the reservation system for passengers with autism and Down syndrome;
- providing destination-independent gluten-free catering service to passengers with autism;
- educating staff about the importance of offering passengers with autism the option to select a window seat at no additional cost; and
- providing information and guidance to staff at stations about services to passengers with disabilities.

We are also working on making the Sunflower Lanyard service available to passengers at Canadian airports that we operate from and familiarizing local staff with the program.

Procurement of Goods, Services and Facilities

As we work towards our goal of including accessibility requirements in equipment, facilities, and services, we have been working on reviewing and updating our procurement processes, policies, and standard documents to identify barriers to accessibility, and ensure that accessibility requirements are addressed. We have also been working with our ground service providers to ensure that suitable equipment and processes are in place to meet the accessibility needs of our passengers and employees.

Based on feedback from the Mystery Shopper Research Project, we are studying the possibility of reconfiguring washrooms on our narrow-body fleet to increase accessibility, and ensuring the availability of in-flight chairs, which can be used to access the toilet on narrow-body aircraft. Our goal is to ensure a comfortable and accessible travel experience for all our passengers.

Design and Delivery of Programs and Services

Turkish Airlines continues to strive to ensure that our programs and services are designed and delivered in a way that is accessible for everyone. We remain committed to ensure that everyone who engages with us is satisfied with the accessibility of our programs and services. To equip our employees with the necessary tools to design and deliver accessible programs and services, we have been actively seeking feedback from our employees, disability communities and other external groups with a view to improving the design and delivery of our programs and services.

Transportation

Turkish Airlines continually reviews its network to ensure that we remain compliant with our obligations under the ATPDR and other applicable laws, both in Canada and other jurisdictions. As part of this process, we are reviewing measures implemented to ensure that passengers with visual or auditory disabilities are able to understand the pre-flight safety briefing and pertinent flight information and can communicate with our cabin crew. We have also been working to expand the availability of accessibility aids (such as closed captioning) in our in-flight entertainment system.

We have also been working with our ground service providers to review the status and improve the availability of wheelchairs and other mobility assistance equipment available at our stations, and our ability to provide the type of assistance requested by passengers.

The Built Environment

Turkish Airlines is undertaking a review of our in-terminal facilities across all of our stations to identify and address any barriers to accessibility and areas for improvement, including placement of our check-in and assistance counters, and availability of accessible seating and facilities in our airport lounges.

While all of our aircraft meet all of the technical requirements under the ATPDR, we continually review our fleet to understand how we can improve the inflight experience for our passengers with disabilities, and we endeavour to incorporate such improvements in the cabin design for new aircraft being inducted into our fleet.

From the Mystery Shopper Research Project, we received feedback from the participants that the food stands in our lounges and the grab bars in the lounge washrooms are positioned at a height that may be too high for some passengers with disabilities. In response to this feedback, we are developing plans to offer personalized services in our lounges for passengers with disabilities and special health.

Further, we are committed to positioning the grab bars in our lounge washrooms in accordance with Time-of-Flight Diffraction (“TOFD”) standards.

Employment

As part of its commitment to promote a diverse and inclusive workplace, Turkish Airlines has set up a team that supports accommodation requests from our employees as well as employment applicants, across its offices in different locations. We have been working to ensure that our offices and other facilities provide barrier free access to the extent possible, and that employees are provided the tools and resources necessary to meet their accessibility requirements. We have been working to develop workplace accommodation training for all staff and aim to implement such training in the near future.

Provisions of CTA Accessibility-Related Regulations

Turkish Airlines, as a major carrier operating under the regulations of the Canadian Transportation Agency, is required to comply with all the relevant provisions of the *Accessible Transportation for Persons with Disabilities Regulations* (SOR/2019-244) in parts 1, 2, 3, and 7 that are applicable to Turkish Airlines.

Turkish Airlines aims to implement its accessibility plan regarding the applicable provisions.

Feedback Information

We continually monitor all our communication channels for feedback or inputs provided by our customers and members of the public. Based on such feedback, we review our operating standards and procedures to ensure that any barriers to accessibility identified pursuant to such feedback are swiftly addressed.

As an example, Turkish Airlines received an email from a passenger with restricted mobility, who experienced some difficulties and deficiencies in service during a long-haul flight. The passenger noted that due to their disability, they require a seat with extra legroom and in close proximity to the exit and the lavatories, and they usually have to pay extra for such seats. The passenger suggested that disabled passengers should be able to access such seats at no extra cost. They also noted that on certain flights, they did not receive satisfactory assistance for moving about the cabin. Based on this passenger input and other feedback received as part of our consultations (discussed below), we implemented new procedures whereby disabled passengers are entitled to free seat selection, so that they can select a seat in the applicable cabin of service that best meets their requirements. In order to improve our standards for cabin service for disabled passengers, we have also introduced Cabin Service Standards Instruction for Special Categories of Passengers for our cabin crew, that sets out detailed service standards for disabled passengers and other passengers requiring special assistance while on-board, which include providing a personalized introduction, providing an individualized pre-

flight briefing, regular check-ins with the passengers throughout the duration of the flight and providing support during in-flight service and with the entertainment system.

Since Turkish Airlines published its feedback form, we have not yet received any submissions regarding our Accessibility Plan or accessibility barriers outside of customers' immediate travel requirements and concerns. The lack of feedback appears to relate to low level of awareness of the provisions of *Accessible Canada Act* and the regulations made thereunder, and the availability of our Accessibility Plan and Feedback Process, and the relatively smaller scope of our operations in Canada. In order to encourage our customers to engage with us on accessibility issues and increase awareness of our Accessibility Plan and initiatives to identify and remove accessibility barriers, we propose to actively inform passengers about our Accessibility Plan and Feedback Process, including during interactions with our contact centre and airport personnel, and when customers request disability assistance.

Consultations

Turkish Airlines engaged the Physically Disabled Solidarity Association and the Turkish Spinal Code Paralyzed Association to review our service offering and better understand how persons with disabilities experience our services. In addition, we also engaged with the Esenler Orthopedically Handicapped Association, the Istanbul Autism Association and the Tukiye Autism Confederation, and sought inputs from different disability groups (orthopedic, hearing, vision, autism) under the coordination of Çizgi Advertising, Research and Consultancy Company.

Physically Disabled Solidarity Association; Esenler Orthopedically Handicapped Association

We approached Physically Disabled Solidarity Association (“**PDSA**”) and Esenler Orthopedically Handicapped Association (“**EOHA**”) to review our operations and advise on barriers to mobility faced by persons with reduced mobility and other physical disabilities. The consultation process was led by M. Çam and C. Koç on behalf of EOHA and K. Demirel on behalf of PDSA. PDSA and EOHA sought inputs from a group of seven persons with various physical disabilities, and the consultations took place between January 23, 2024 and January 28, 2024. Representatives of Turkish Airlines, PDSA and EOHA held in-person meetings with the group, which included members of the two organizations and disabled passengers, during which the group was asked the following questions regarding their experiences while travelling with Turkish Airlines:

- What problems did they experience with Turkish Airlines airport services?
- Did they experience any difficulty in finding and accessing their seats and during the boarding and de boarding process?
- Did they experience any problems with accessibility and personal needs in the cabin during the flight?

The feedback received from the group indicated that there were some coordination issues in respect of providing wheelchair services at Istanbul Airport, the main hub of Turkish Airlines, and some passengers with a short connection time had a long wait for wheelchair assistance. The passengers did not experience any mobility issues on board our wide-body aircraft, but the lack

of an on-board wheelchair on narrow-body aircraft created difficulties for passengers in accessing the lavatories. Disabled passengers were given priority during the boarding process, but the group noted that disabled passengers should be seated at the front of the cabin as accessing the rear rows in a wheel chair makes the process difficult for passengers.

Based on the input provided by the PDSA and EOHA, Turkish Airlines has initiated a Web Application and Android-based Mobile/Tablet Application development project to systematically monitor the PRM (Passenger with Reduced Mobility) Service provided by for passengers with reduced mobility, automatically assign personnel and passengers, and to ensure effective management by Turkish Ground Services. We have also started the process of inducting narrow body aircraft wheelchairs in our single aisle aircraft for in-flight use, and have introduced free seat selection for disabled passengers.

Istanbul Autism Association; Tukiye Autism Confederation

We recognize that disabilities may not always be visible, and there may be situations here passengers with disabilities may need additional assistance in order to effectively communicate their requirements. We engaged Istanbul Autism Association (“**IUA**”), represented by S. Dinç & A. Dinç, and Tukiye Autism Confederation (“**TAC**”), represented by E. Güngör, to understand the unique challenges faced by persons with autism and other mental health disabilities when travelling with Turkish Airlines. The consultation process occurred over a period of one year, during which members of both associations travelled with Turkish Airlines and provided feedback on their experiences, both during the course of travel at airports and during in-person meetings. The consultation process focused on the following key questions:

- Did the passengers experience any difficulties in preparation for travel?
- As individuals with autism, which problem did the passenger experience the most at the airport?
- Did Turkish Airlines’ Sunflower Lanyard Service facilitate their travel?

The feedback provided by the passengers indicated that passengers with autism faced a barrier to travel because they were asked to produce a doctor’s certificate confirming that they were allowed to travel by aircraft. The process of obtaining such a certificate was financially and morally challenging for passengers with autism. The passengers also reported that since autism is an invisible disability, airport security personnel and airline employees do not always understand that the passengers are disabled, and as a result, the passengers are not able to receive priority service at airports. The availability of the Sunflower Lanyard Service made travel easier, but the service was only available at the airport in Istanbul.

Based on the inputs provided by IUA and TAC, we have initiated an awareness campaign among our airport staff about invisible disabilities, which includes rolling out informative screensaver designs and providing e-learning resources about autism for airport personnel. We also initiated a review of the document requirements for passengers with disabilities and our health and passenger services departments are working on ways to reduce documentary requirements. We have also removed the requirement for passengers with autism to produce a doctor’s report

before the flight. We are also expanding our Sunflower Lanyard Service to other airports served by Turkish Airlines, including Toronto, Vancouver and Montreal in Canada. Passengers requiring special assistance can request the Sunflower Lanyard Service, which helps airport personnel and cabin crew to identify and better support those passengers may need more assistance or more time in some processes.

Çizgi Advertising, Research and Consultancy Company

We engaged Çizgi Advertising, Research and Consultancy Company (“**Cizgi**”) to audit our operations from the perspective of disabled passengers and gather feedback on their experiences. Cizgi collaborated with the Association of Orthopedically Disabled People, the School of Visually Impaired, a volunteer that supports individuals with autism, the President of the Ankara Anatolian Deaf Sports Club, the President of the Turkish Deaf National Federation, a board member of the Turkish Disabled Confederation and a visually impaired academician to conduct the research. The program included nine participants and was conducted during multiple phases in January 2023, March 2023, June 2023 and September 2023.

The program was conducted as a “mystery shopper program”, pursuant to which participants travelled on various Turkish Airlines flights without prior intimation to staff. We met with the participants after their flights both virtually and in-person to discuss their observations and comments. Upon completion of the program, the data was collated and reviewed.

Participants were asked to evaluate various aspects of Turkish Airlines’ service, including:

- the process of purchasing a ticket from Turkish Airlines’ website;
- the service provided by check-in and ground staff;
- service provided by cabin crew and flight experience; and
- wheelchair and other assistance services.

The participants reported that the ticket purchase experience could be enhanced for visually impaired passengers by ensuring that it worked with a voiceover program. Passengers also noted that airport staff need to specialize in interacting with and providing services to different disability groups, including passengers with invisible disabilities, and passengers with disabilities should be given priority during the check-in process. While on board and aircraft, suggested enhancements included provisioning a wheelchair for lavatory access and providing disabled passengers with information about accessible content on the in-flight entertainment system. Participants also suggested that cabin crew should be informed of the needs and expectations of disabled passengers, including passengers with invisible disabilities, and adopt special procedures for interacting with passengers with autism. With respect to mobility assistance services, it was noted that equipment used to access aircraft in open parking positions needed better maintenance, and wheelchair attendants needed to be trained to improve communication skills with passengers.

Based on the feedback gathered from the mystery shopper program conducted by Cizgi, we have also introduced specific measures to improve the experience of disabled passengers, such as introduction of on-board wheelchairs on narrow body aircraft, the introduction of dedicated

personnel for serving the disabled passengers at special service check-in counters, improved maintenance on our mobility assistance equipment and enhanced instruction for cabin crew in relation to interactions with disabled passengers. We have also developed the concept of *Accessible Turkish Airlines* to measure the service quality of Turkish Airlines for passengers with disabilities.