Accessibility and Digital Accessibility Policy

Revised 2026 | Replaces the 2023 Policy-Driven Adoption for Accessibility (PDAA) Policy

Effective Date	August 25, 2026
Review Date	August 25, 2026
Policy Owner	Compliance / Human Resources
Approved By	Mary Grace Foster - Director of Compliance

1. Purpose

Internal Data Resources, Inc. ("IDR" or the "Company") is committed to providing equal access to employment opportunities, workplace resources, services, facilities, communications, and technology for individuals with disabilities. This policy establishes IDR's approach to identifying, preventing, and addressing accessibility barriers affecting applicants, employees, clients, and other users of IDR resources.

2. Policy Statement

2.1 Compliance with Applicable Requirements

IDR will comply with applicable federal, state, and local disability and accessibility laws, including the Americans with Disabilities Act (ADA) and, where applicable, provisions of the Rehabilitation Act and other accessibility requirements. IDR uses the Web Content Accessibility Guidelines (WCAG) 2.2 Level AA as a technical accessibility target for its digital properties. This technical target supports IDR's accessibility efforts and does not replace or expand the requirements of applicable law.

2.2 Equal Opportunity and Non-Discrimination

IDR provides equal employment opportunities to qualified individuals with disabilities and prohibits discrimination or retaliation based on disability or a good-faith request for an accommodation or report of an accessibility concern.

2.3 Digital Accessibility

IDR works to design, maintain, and improve its digital properties so that they are accessible to individuals with disabilities. Digital accessibility efforts may include IDR websites, job boards, online applications, forms, documents, candidate portals, mobile experiences, chatbots, virtual screening tools, AI-enabled recruiting tools, and other digital services that IDR provides or makes available.

IDR will periodically evaluate relevant digital properties against its accessibility target and prioritize remediation based on the severity of the barrier, the impact on users, technical feasibility, and business needs. Evaluation may include automated testing, manual testing, and user-reported concerns.

2.4 Applicant and Recruiting Accommodations

IDR will provide reasonable accommodations to qualified applicants with disabilities during the application, screening, assessment, interview, and hiring process, unless doing so would create an undue hardship as defined by applicable law. When a digital recruiting or screening tool creates an accessibility barrier, IDR will provide a reasonable alternative method when required and appropriate, such as direct recruiter screening, an accessible written format, or another accessible process.

A request for an accommodation or an applicant's inability to use an inaccessible recruiting tool will not, by itself, negatively affect the applicant's consideration for employment. Applicants are not required to disclose more medical information than is reasonably necessary to evaluate and provide an accommodation consistent with applicable law.

2.5 Employee Accommodations

IDR will engage in the reasonable accommodation process with employees with disabilities as required by applicable law. Accommodations may include modifications to workplace practices, schedules, equipment, technology, communication methods, or other reasonable measures that enable an employee to perform the essential functions of the position or access the benefits and privileges of employment.

2.6 Third-Party Digital Products and Services

IDR considers accessibility when selecting, implementing, and managing third-party digital products and services that materially affect applicants, employees, or other users. Where appropriate, IDR may request accessibility documentation, evaluate known accessibility limitations, include accessibility expectations in vendor discussions or agreements, and work with vendors to remediate identified barriers.

Because third-party technology may be developed or controlled outside of IDR, IDR does not guarantee that every third-party product will be free of accessibility barriers at all times. When a barrier is identified and cannot be immediately resolved, IDR will work to provide reasonable alternative access when required and appropriate.

2.7 Accessible Communications and Documents

IDR will make information available in an accessible format upon reasonable request and will work to improve the accessibility of frequently used digital documents, forms, and communications. Content owners are expected to consider accessibility when creating or publishing materials intended for broad employee, applicant, client, or public use.

2.8 Training and Awareness

IDR will provide role-appropriate training and awareness regarding disability inclusion, reasonable accommodations, digital accessibility, accessible communications, and reporting of accessibility concerns. Employees who manage recruiting, digital content, technology, procurement, or third-party platforms may receive additional training appropriate to their responsibilities.

2.9 Client Services

IDR will work in good faith with clients to support accessible staffing and employment processes within IDR's control. Where a client-controlled process, site, or technology affects an IDR applicant or employee, IDR will coordinate with the client as appropriate to address accommodation needs and accessibility barriers.

3. Roles and Responsibilities

Company-wide: All employees and representatives of IDR share responsibility for supporting accessibility, identifying potential barriers, participating in required training, and promptly escalating accessibility concerns.

Compliance / Human Resources: Maintain this policy and related procedures; support accommodation processes; coordinate responses to significant accessibility concerns; and monitor applicable legal and policy developments.

Technology / Digital Platform Owners: Consider accessibility in the design, configuration, testing, maintenance, and remediation of IDR-controlled websites, applications, and digital tools.

Recruiting: Provide an accessible path through the recruiting process, recognize and escalate accommodation requests, and arrange reasonable alternative screening methods when appropriate.

Vendor / Procurement Owners: Consider accessibility during selection and management of third-party tools that materially affect applicants, employees, or other users, and coordinate remediation or alternatives when barriers are identified.

Employees: Follow this policy, complete required training, use available accessible practices and tools, and report barriers or accommodation needs through the appropriate channels.

4. Reporting Accessibility Concerns and Requesting Accommodation

Applicants, employees, clients, and other users are encouraged to report accessibility barriers or request an accessible format or accommodation through Human Resources, Recruiting, Compliance, or another designated IDR contact. Reports should include enough information to identify the barrier or requested assistance. IDR will address concerns promptly and will handle disability-related information as confidentially as practicable and as required by law.

IDR prohibits retaliation against any individual for making a good-faith accessibility report, requesting an accommodation, or participating in an accommodation or accessibility review process.

5. Monitoring and Remediation

IDR will maintain an accessibility improvement process that may include periodic reviews of digital properties, tracking and prioritizing reported barriers, coordinating remediation with internal teams and vendors, and providing interim alternative access where appropriate. Accessibility is an ongoing responsibility and will be considered when material changes are made to digital platforms or candidate- and employee-facing processes.

6. Policy Review and Revision

This policy will be reviewed at least annually and additionally when there are material changes to applicable law, accessibility standards, IDR digital platforms, or business processes, or when significant accessibility concerns identify a need for revision. Updated versions will be made available through the Company's designated accessibility resources. An accessible format of this policy will be provided upon request.

7. Reference Standards

- Americans with Disabilities Act (ADA), as applicable.
- Rehabilitation Act, where applicable to IDR's activities or contractual obligations.
- Web Content Accessibility Guidelines (WCAG) 2.2, Level AA, as IDR's current technical accessibility target.
- Applicable state and local disability, employment, and accessibility requirements.

8. Conclusion

IDR is committed to maintaining an inclusive and accessible environment in which individuals with disabilities have equal opportunity to participate in employment and access IDR resources. Accessibility requires ongoing evaluation and improvement, and IDR will continue to identify and address barriers within its control and provide reasonable alternatives when appropriate.