

Xplore Accessibility Plan 2023-2027 Second Progress Report, 2025

Version 1.0. Last Modified May 2025

Introduction

Founded in small-town Canada, Xplore is dedicated to bringing fast, reliable Internet to Canadians in rural communities. With our world-class fibre, wireless, and next-generation satellite infrastructure, combined with a network of local dealers and around-the-clock Canadian-based tech support, we strive to provide our customers with the Internet connection they need and the peace of mind knowing they are supported.

One of Xplore's core values is customer focus. We are driven to provide the best possible service for our customers in rural and remote communities including our customers with accessibility needs. Within our own workplace, Xplore recognizes that diversity and inclusion are a source of strength and innovation; embracing our team's diverse perspectives fosters an environment where innovation thrives and our collective potential knows no bounds.

Xplore continues to work towards fulfilling the actions and goals that we set in our 2023 Accessibility Plan. Our progress for since the publication of our 2024 Progress Report is outlined in this Report. This Accessibility Plan Progress Report has been prepared in accordance with the requirements of the *Accessible Canada Act* ("ACA", S.C. 2019, c. 10) and its regulations. Please note that this Report applies equally to the operations of Xplore Inc. and Xplore Fibre L.P.

Accessibility Center

At Xplore, we are committed to ensuring our services are accessible to all of our customers. For customers requiring accessible methods of contact, to request documentation in alternate formats, or for information on our Accessibility Policy, please use one of the following options:

Email: accessible@xplore.ca

Telephone: 1-866-841-6001

Mailing Address: Manager, Human Resources

625 Cochrane Drive - Suite 1000

Markham, ON L3R 9R9

Web to Case

Using MyXplore, please <u>access our "Web to Case" feature located under the "Cases" tab</u>. If you don't have your MyXplore login information, please contact us by email or phone relay service for assistance.

The following alternative formats are available upon request:

- Print
- Large Print
- Braille
- Other electronic formats that are compatible with adaptive technologies

Consultations

Our consultation approach focused on identifying accessibility barriers experienced by persons living with many different types of disabilities and listening to solutions proposed by those affected by those barriers.

CTA Wireless Consultations. Working with the Canadian Telecommunications Association (the "CTA"), we engaged directly with persons with disabilities and organizations working withing the disability community in Canada. Representatives from Xplore participated in two virtual consultation sessions that occurred on October 29 and 31, 2024. Ten¹ (10) registered for the October 29 session, and 12² registered for the October 31 session. The October 29th session was provided in English and French with simultaneous translation, and the October 31st session was provided in English, ASL and included English CART services. Meeting delivery was determined by feedback provided by accessibility group participants during the registration process. Xplore participated in an additional meeting in November with two groups that had participated in the 2024 consultations for the first time in order to allow them to provide supplemental information that impacted the respective disability communities that they represented.

The consultations focused on wireless accessibility and the points discussed were relevant to broadband offerings and services. Key topics areas discussed included:

 Wireless accessibility offerings, promotion, and customer service, including assessing whether wireless accessibility offerings are offered and promoted in a way that meets

² Accessibility group participants included: Autism Canada, Canada Deaf Grassroots Movement, Canadian Association of the Deaf, Canadian Cultural Society of the Deaf, Canadian Hard of Hearing Association (National), Canadian Hard of Hearing Association (Manitoba chapter) CNIB (Deafblind Community Services), Deaf Wireless Canada Committee, Deaf-Blind Planning Committee, Newfoundland Association of the Deaf, and Ontario Association of the Deaf. While registered, the following group was unable to participate in the October 31st session: Wavefront Centre.



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¹ Accessibility group participants included: Alliance for Equality of Blind Canadians, Brain Injury Canada, Canadian Council of the Blind, CNIB, Confédération des organismes de personnes handicapées du Québec, Disability Empowerment Equality Network (DEEN), and Regroupement des aveugles et amblyopes du Quebéc. While registered, the following groups were unable to participate in the October 29th session: Autism Canada, Connected Canadians, Réseau québécois pour l'inclusion sociale des personnes sourdes et malentendantes.

the needs of Canadians with various disabilities and reviewing promotion of wireless accessibility offerings and customer service.

- "Unfettered" access or use of specific services, including unfettered access to VRS and other services or applications.
- Discussion and identification of how to verify eligibility for wireless accessibility offerings, including the possible introduction of an accessibility passport.

To support the participation of accessibility groups, the CTA continued to provide an honorarium to eligible participants for their involvement at the consultation sessions. In addition, the honorarium was expanded it to include additional pre-consultation time for review activities (including reviewing documents or visiting WSP websites).

CRTC Virtual Roundtable Sessions. Representatives from Xplore also participated in the Canadian Radio-Television and Telecommunications Commission's ("CRTC") Virtual Roundtable sessions, aimed at improving the experience of senior citizens when dealing with communications service providers. The sessions gave communications service providers and CRTC staff a better understanding about the lived experiences of seniors when dealing with their providers and the challenges they face and facilitated discussions to explore potential solutions to address those challenges. These sessions took place on February 26th and 28th, 2025, and focused on two core topics: sales practices and consumer rights, and customer and technical support services. The CRTC's findings arising from these sessions have not yet been released.

Diversity and Inclusion Committee. Xplore established an active Diversity and Inclusion Committee in 2023. We reviewed internal feedback provided to our Diversity and Inclusion Committee over the course of the year and have taken this feedback into account as we implement our Accessibility Plan.

Progress in Priority Areas

Since the release of our 2024 Progress Report, Xplore has taken meaningful steps to fulfilling many of the actions outlined in our Accessibility Plan.

1. Employment

- Xplore established project teams that will work towards implementing Xplore's accessibility goals. In 2024, these teams continued to meet regularly to provide updates on the steps that have been taken toward meeting the actions outlined in our Accessibility Plan.
- Xplore's employee-led Diversity and Inclusion Committee continues to meet regularly. The
 Committee is focused on creating a workplace where every individual feels valued,
 respected, and empowered to bring their authentic selves to work,



- Xplore established a Pay Equity Committee in compliance with the Pay Equity Act. Xplore
 developed and executed a pay equity plan, adjusting the salary ranges of many female
 predominant job classes.
- Xplore has developed initial accessibility training that will be mandatory for all customerfacing employees. The training introduces core concepts of accessible service delivery and familiarizes employees with accessibility accommodations available for employees and customers. This training will be delivered in summer 2025.
- Xplore initiated a review of our recruitment process to identify any accessibility barriers in the process and develop an action plan to address these barriers for existing and potential employees.

2. The Built Environment

• In 2024, Xplore retained Accessible NB to conduct an accessibility audit of our Fredericton, New Brunswick, office and building. Accessible NB is a non-profit organization that provides a formal review of a business, identifying gaps with and offering recommendations for compliance with accessibility regulations and accessible design standards. Accessible NB issued its recommendation report to Xplore in February 2025. Xplore is reviewing Accessible NB's findings to determine how best to incorporate its recommendations at our Fredericton office and at other locations.

3. Information and Communication Technologies (ICT)

- Xplore continues to ensure our web sites conform to WCAG 2.0 AA Standard and WCAG 2.1 Standard.
- In February 2025, Xplore conducted third-party accessibility audits on our main website, our business website, support pages, the customer portal, the dealer portal, and the business website. Xplore is reviewing the results of these audits in order to develop company-wide accessible design policies respecting on our online offerings.
- Based on the results of our accessibility audits, Xplore is also developing a policy for incorporating inclusive design principles into all websites, portals, and social media content.
- Xplore introduced a policy ensuring that descriptive alternative text is included on all posted images to Xplore social media accounts.
- Xplore continues monitoring WCAG for the release of new standards, up to and including WCAG 2.1 AA standards.



 Xplore continued to increase awareness of our online chat function, which permits customers to interact with real customer service representatives on our support page without having to interact with AI agents at the outset.

4. The Procurement of Goods, Services and Facilities

- Xplore has introduced new ways that customers can access equipment installation and operating instructions. Customer equipment now includes QR code that, when scanned, provides a link to these accessible instructions.
- Xplore's Supplier Code of Conduct, introduced in 2024, strongly encourages suppliers to incorporate accessible design principles. All Xplore employees who are involved in procuring goods are aware of these Supplier Code of Conduct requirements.

5. The Design and Delivery of Programs and Services

- Xplore continues internal discussions regarding the adequacy of accessibility features available in our online and software offerings for customers, dealers, vendors, and employees.
- Accessibility training has been developed for front-line customers service agents, which, once introduced in 2025, will be mandatory for all customer-facing employees upon hiring and on a yearly basis.
- Xplore has improved our project development life cycle to ensure that accessibility considerations are being taken into account on all new internal projects, products, services and new technologies to be implemented.

6. Communication, Other Than ICT

- Xplore has identified accessibility gaps in materials in the company's branding materials. Xplore is developing solutions to address those accessibility gaps.
- The company continues to develop simplified branding materials that meets accessibility standards.
- Xplore is in the process of developing best practices for accessibility standards in written communications, including training materials for key employees who product written communications.

Feedback Process

Xplore has a process for receiving and responding to feedback, including feedback on how services are delivered to persons with disabilities. Xplore's feedback mechanisms are available through the following methods:



- Email;
- Phone;
- Web to Case;
- Online Chat; and,
- Online Support Forum.

Since the publication of our 2024 Progress Report, Xplore has not received any actionable feedback regarding the accessibility of our services.

Regulatory Conditions

As required by section 51(1) of the ACA and section 29 of the Canadian Radio-television and Telecommunications Commission Accessibility Reporting Regulations, below are the CRTC Decisions and Orders that relate to the removal and prevention of accessibility barriers and that Xplore is subject to:

Order/Decision No.	Title	Relevant Passages
TO CRTC 1998-626	Alternative format billing and paper billing on request and at no charge	Full Order
TD CRTC 2002-13	Extending the availability of alternative formats to consumers who are blind	Full Decision
Order CRTC 2001-690	Alternative formats for a person who is blind	Full Order
TBC CRTC 2022-28	When and how communications service providers must provide paper bills	Full Decision
CTRP CRTC 2009-430	Accessibility of telecommunications and broadcasting services	Full Policy Direction
TRP CRTC 2017-200	Review of the Wireless Code	Subsections B.1, C.1, G.4, A.1, and paras 382-383
TRP CRTC 2019-269	The Internet Code	Subsections A.1, B.4, C.1, G.2, 2, and paras 463 – 469; Appendix 1 at B.4(i), C.1(iii)(d)(2), C.1(v), E.2(i), G.2(ii)
TRP CRTC 2016-496	Modern telecommunications services – The path forward for Canada's digital economy	Para 217
TRP CRTC 2014-187	Video Relay Service	Full Decision



TRP CRTC 2017-11	Applying regulatory obligations directly to non-carriers	Para 29
TRP CRTC 2022-234	Introducing 9-8-8 as the three-digit abbreviated dialing code for mental health crisis and suicide prevention services	Para 142
TRP CRTC 2018-466	Review of the regulatory framework for text-based message relay services	Para 151

