NUSO Accessibility Compliance and Recordkeeping Plan

2026-2028

Contents

1. INTRODUCTION

NUSO offers a diversified portfolio of business-focused SaaS communications and collaboration solutions. The company serves expanding business markets through enterprise-grade, as-a-service offerings delivered via a robust network of channel partners and service provider customers. NUSO provides these services through its CPaaS enablement platform, supported by a fully redundant network infrastructure across North America and Europe.

NUSO has developed this Accessibility Plan in accordance with the requirements of the Accessible Canada Act (ACA) and applicable accessibility obligations for telecommunications service providers. The plan outlines NUSO's processes for identifying and addressing accessibility barriers and for collecting feedback from employees, customers, partners, and other stakeholders.

As part of this process, NUSO has engaged in consultations with employees, external stakeholders, and third-party resources to identify potential accessibility barriers and opportunities for improvement in product design, documentation formats, and online services. These consultations help inform best-practice approaches to improving accessibility across NUSO's products, services, and communications.

NUSO is committed to supporting accessibility requirements under both the Accessible Canada Act (ACA) and applicable U.S. accessibility regulations, including the Twenty-First Century Communications and Video Accessibility Act (CVAA)

2. CONSULTATIONS AND CONTACT

NUSO has established multiple means of communications options. All options will be sent to our Accessibility Committee to review and create an appropriate response and/or solutions for the questions or inquiries. This team is constructed of Human Resources, Regulatory and Staff Management to enable quick resolution and responses.

NUSO also consults with third-party accessibility providers, including Sorenson Communications, to identify best practices and improve accessibility across its communications services.

NUSO welcomes feedback from its Employees, Users and Partners on any Accessibility barriers you may have in communications or access to information or products. To that end, NUSO is committed to ensuring equal access and participation for people with disabilities.

3. ANONYMOUS FEEDBACK

Individuals can leave feedback with their contact or anonymously. Providing feedback via Live Chat or through NUSO's online form are best ways to provide anonymous feedback.

4. ACKNOWLEDGEMENT OF FEEDBACK

Feedback received from Online form or email will be notified and acknowledged of receipt. Those providing feedback through TTY and Live Chat will interface directly with an Employee who will acknowledge receipt. For any feedback received by Postal Carrier, if contact is provided, an acknowledgement letter will be mailed to the address provided.

5. EMPLOYEE FEEDBACK

NUSO regularly requests feedback from its employees, including anyone with disabilities, to provide direct feedback to the NUSO Human Resources team. The survey's purpose is to collect feedback on all areas of NUSO including Accessibility, Employee recruitment, onboarding, and training as examples. NUSO is also implementing a biannual survey for Employees. This survey will include topics about Fair Employment as well as any hindrances that a person with disabilities might encounter in interfacing with NUSO. That feedback will be sent to the Accessibility team to investigate and remediate.

6. PARTNER AND EXTERNAL FEEDBACK

NUSO also monitors feedback given during online Webinars, Trade Shows, Social Media, etc. NUSO employees are instructed to provide any feedback received to a NUSO Accessibility team member or emailing to Accessibility@nuso.cloud.

Feedback and Communication options

7. ACCESSIBILITY COMMITTEE MEMBERS

Kevin Moss
VP of Compliance and Regulatory
Kevin.moss@nuso.cloud

Chastity Ritrovato
VP of People Operations
Chastity.Ritrovato@nuso.cloud

Kris Boulware
Technical Chief of Staff
Kris.Boulware@nuso.cloud

8. POSTAL MAIL

Kevin Moss
VP of Compliance and Regulatory

7777 Bonhomme Ave
Ste 1100
Clayton, MO 63105

9. ACCESSIBILITY SITE

https://nuso.cloud/accessibility/

10. TELEPHONE

NUSO Feedback Customer Service
1-844-438-6876 Option 4

11. EMAIL

Accessibility@nuso.cloud

12. WEB SITE-LIVE CHAT

https://nuso.cloud/
Access to Live Agent Monday through Friday 8:00 am- 5:00 pm CST

13. TTY

Support for Teletypewriter access is available via 711 from NUSO's network in Canada and US.

14. IP RELAY SERVICES

NUSO's network is cable of carrying IP Relay services and media now. NUSO sees potential to work with third parties to offer newer applications and Video type applications that might benefit our User base and those with disabilities.

<u>Barriers:</u>

NUSO is continuing to look for means to enhance the service and capability by partnering with third parties.

<u>Action Steps:</u>

NUSO is actively looking for an IP Service provider to partner with in order to provide more technically capable communication products that would benefit our User base. Researching providers that offer IP Relay services and what may be possible for NUSO to provide.

15. 911 SERVICE LIMITATIONS

NUSO is prepared to provide information on limitations on VoIP 911/E911 service in accessible formats and to explain information to those with disabilities upon request.

NUSO network architecture supports Next Generation 911 (NG911) Location-Based Routing (LBR), utilizing IP-based routing mechanisms to direct emergency communications to the appropriate Public Safety Answering Point (PSAP) based on the caller's best available location information.

The service supports the provision and delivery of dispatchable location, where available, or alternative location data (including geodetic coordinates), consistent with FCC rules governing wireless and interconnected VoIP emergency services.

Additionally, our platform is designed to comply with the accessibility obligations of the Twenty-First Century Communications and Video Accessibility Act (CVAA), ensuring that Advanced Communications Services (ACS) provide accessible and reliable access to 911 and NG911 emergency services for users with disabilities.

The availability, accuracy, and functionality of NG911 and location-based services may be dependent on factors outside of NUSO's control, including end-user device capabilities, configuration by partners or customers, network connectivity, and third-party service providers. Location information may not always be precise and can vary based on available data sources and environmental conditions. Additionally, NG911 capabilities, including Location-Based Routing, are dependent on the infrastructure of the receiving Public Safety Answering Point (PSAP) and may not be available in all geographic areas. While NUSO supports accessibility in accordance with applicable requirements, certain accessibility features may rely on external technologies or user-specific configurations.

16. WEB CONTENT ACCESSIBILITY GUIDELINES

NUSO's goal is to offer clear communications and various means to support Customers potential needs. NUSO's marketing team is fully aware of the WCAG guidelines and works diligently to include and fully implement wherever possible. NUSO's development team is also aware of guidelines as they continue to build NUSO's portals, online tools, and systems.

17. DESIGN AND DELIVERY OF PRODUCTS AND SERVICES

NUSO's goal is to offer clear instruction, documentation and support options to all Customers and potential Customers. NUSO wants to ensure that people of all abilities have access to information and support available across all products and services.

Barriers:

Products, Technologies, and Communication channels change rapidly. New product and technologies require many documentation releases and NUSO needs to ensure Accessibility requirements are met.

Action Steps:

- NUSO will strive to continuously create and improve all communications and formats to enable clear and accessible instructions and support across those of all abilities.

- NUSO will continue to monitor our feedback channels to identify any area that needs improvement.
- Implement and train team members on any new process or communications to support NUSO's Accessibility program.
- Collaborate with accessibility partners, including Sorenson Communications, to incorporate relay and video-based accessibility capabilities into NUSO's communications services where feasible.

18. CVAA ACCESSIBILITY COMPLIANCE AND RECORDKEEPING

NUSO provides communications services and related software platforms that may constitute Advanced Communications Services (ACS) under the Twenty-First Century Communications and Video Accessibility Act (CVAA) and applicable FCC regulations.

These services may include interconnected VoIP communications, messaging capabilities, and collaboration tools delivered through NUSO's CPaaS platform and related customer interfaces.

NUSO evaluates accessibility considerations during the design, development, and deployment of these services in order to ensure accessibility for individuals with disabilities where such accessibility is technically and economically achievable.

Compatibility with Assistive Technologies

NUSO endeavors to ensure that its communications services and associated user interfaces are compatible with assistive technologies commonly used by individuals with disabilities.

Where achievable, NUSO systems and interfaces are designed to support compatibility with technologies that may include:

- screen reader software

- speech recognition tools

- refreshable braille displays

- alternative input devices

Compatibility considerations are evaluated during development and operational review processes for NUSO's communications platforms and related user interfaces.

Third-Party Accessibility Partnerships

NUSO engages with third-party accessibility service providers, including **Sorenson Communications**, to support compliance with CVAA requirements related to accessible communications services.

Through this partnership, NUSO leverages Sorenson's expertise and services, including Video Relay Service (VRS) and IP Relay, to enhance accessibility for users with disabilities.

NUSO evaluates the compatibility and integration of such third-party services as part of its accessibility design and operational processes and maintains records of these evaluations in accordance with CVAA recordkeeping requirements.

Achievability Determinations

When accessibility features cannot be implemented because they are not technically or economically achievable, NUSO evaluates the circumstances and documents the basis for that determination.

Such evaluations may consider:

- the technical feasibility of implementing accessibility features

- the impact on the functionality of the service

- available resources and operational considerations

These determinations are maintained as part of NUSO's accessibility compliance records.

Accessibility Recordkeeping

In accordance with 47 CFR §14.31, NUSO maintains records documenting its efforts to comply with accessibility requirements under the CVAA.

These records may include:

- documentation of accessibility features implemented within NUSO services

- information regarding compatibility with assistive technologies

- records of consultations and feedback related to accessibility barriers

- documentation supporting determinations where accessibility was not achievable

Accessibility compliance records are maintained in accordance with NUSO's record retention policies and are retained for at least two years after a product or service ceases to be offered, consistent with FCC requirements.

Accessibility Complaint Resolution

NUSO designates responsible personnel to address accessibility inquiries and complaints related to its communications services.

Contact information for these personnel is maintained and submitted to the FCC Accessibility Recordkeeping Compliance Certification and Contact Registry and is updated when changes occur to ensure accessibility concerns can be addressed promptly.

Consumers and users may contact NUSO through the accessibility communication channels described in this Accessibility Plan.

19. ALTERNATIVE PRINT FORMATS

A Partnership with Brailleworks.com has been established to provide all alternative feedback formats when requested of NUSO. NUSO's Accessibility team is in the process of printing a sample invoice, sample marketing material as well as this Accessibility plan as part of our hard copy and retention process. These formats include Braille, Large print and others as requested and will be provided by the agreed timeline set or sooner, if possible.

20. ALTERNATIVE FORMAT REQUESTS

A request can be made for NUSO's feedback process as well as other documents in print, large print, Braille, audio or other supported media by sending request to Accessibility@nuso.cloud or by online form at https://nuso.cloud/accessibility/.

21. PROCUREMENT OF GOODS, SERVICE AND FACILITIES

NUSO has multiple Data Center Facility locations throughout the world. NUSO can attest that all locations are in fact ADA compliant. NUSO has also moved into a new Head Quarter location which is requiring several construction projects to comply.

A new reception area is being constructed to allow for wheelchair access and other ADA requirements. NUSO is also in the process of construction to allow for additional and more compliant ADA restrooms.

These construction and updates are expected to be completed within 90 days.

22. RETENTION

NUSO maintains records in accordance with 47 CFR §14.31 documenting accessibility features, compatibility, consultations, and achievability determinations. Records are retained for at least two (2) years after the service is no longer offered and are available for review upon request.

23. BUILT ENVIRONMENT

NUSO does not have physical offices in Canada currently.

24. TRANSPORTATION

NUSO does not offer any type of transportation services.

25. EMPLOYMENT

NUSO does not employ any Team members in Canada currently.

26. CONCLUSION

NUSO is committed to continuing our enhance and continued development of our Accessibility plan. We commit to being diligent in accepting all feedback and responding promptly with action or resolution.

NUSO is including in the appendix the summarized Act requirements that we are following as requested of Telecommunications Providers.

APPENDIX

Principles of ACA

In preparing this plan, NUSO considered the following Principles, which are set out in Section 6 of the ACA

- all persons must be treated with dignity regardless of their disabilities.

- all persons must have the same opportunity to make for themselves the lives that they are able and wish to have regardless of their disabilities.

- all persons must have barrier-free access to full and equal participation in society, regardless of their disabilities.

- all persons must have meaningful options and be free to make their own choices, with support if they desire, regardless of their disabilities.

- laws, policies, programs, services and structures must take into account the disabilities of persons, the different ways that persons interact with their environments and the multiple and intersecting forms of marginalization and discrimination faced by persons.

- persons with disabilities must be involved in the development and design of laws, policies, programs, services and structures; and

- the development and revision of accessibility standards and the making of regulations must be done with the objective of achieving the highest level of accessibility for persons with disabilities.

Telecommunications Act Requirements

- VoIP providers must provide Teletypewriter Relay (TTY Relay) Service and Internet Protocol Relay Service (IP Relay) Service 24 hours a day, 7 days a week. Telecom Regulatory Policy CRTC 201711.

- VoIP providers must have an easy-to-find home page link to the accessibility section of the website and to promote, in an accessible manner, information on all their disability-specific services and products. Telecom Regulatory Policy CRTC 201711.

- VoIP providers are to make the information on telecommunications services and products and any customer service functions on their websites available in an accessible manner. Telecom Regulatory Policy CRTC 201711.

- VoIP providers are to make their general call centres accessible by (a) training customer service representatives in handling enquiries from persons with disabilities and familiarizing them with the service providers' products and services for persons with disabilities, and (b) making Interactive Voice Response systems accessible, which could be by transferring the call to a call centre. Telecom Regulatory Policy CRTC 201711.

- VoIP providers must provide information on limitations on VoIP 911/E911 service in accessible formats and to explain information to those with disabilities upon request. Telecom Regulatory Policy CRTC 201711.

- VoIP providers must make available to subscribers who are blind billing statements, billing inserts, dialing plan changes, and information setting out rates, terms, and conditions of service in accessible formats. Telecom Decision Telecom Regulatory Policy CRTC 201711.

- VoIP providers must provide paper bills upon request and at no charge to customers with disabilities. Telecom and Broadcasting Decision CRTC 202228.

- VoIP providers must provide communications regarding 988 and the transition to 10-digit dialing in ASL and LSQ. Telecom Regulatory Policy CRTC 222234.

- Accessibility plans, progress reports, and descriptions of feedback processes published under the ACA must be made available, upon request, in print, large print, braille, audio format, electronic format that is compatible with adaptive technology that is intended to assist persons with disabilities, or any other format that the person and the regulated entity agree upon and for which there is proof of the agreement. CRTC Accessibility Reporting Regulations, SOR/20211160.

- Accessibility plans, progress reports, and descriptions of feedback processes published under the ACA must be published in a way that meets WCAG guidelines. CRTC Accessibility Reporting Regulations