Iristel and Ice Wireless

Accessibility Plan

Progress report _ 2025

2024-2027

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General

1. Iristel and Ice Wireless overview 3
2. Iristel's commitment to accessibility 3
3. Definitions 4
4. Feedback process 5
5. Alternative formats 5
1. Employment: 6
2. The built environment: 8
3. Information and communication technologies: 9
4. Communication, other than information and communication technologies: 9
5. Procurement of goods, services and facilities: 10
6. The design and delivery of programs and services: 10
7. Transportation: 11

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General

1. Iristel and Ice Wireless overview

Iristel is a leading telecommunications company based in Canada, serving customers across the country and around the world. Founded in 1999 by Samer Bishay, the company has grown to become one of the largest independent providers of voice, data, and IP services in Canada. Iristel's critical infrastructure is built on a foundation of state-of-the-art technologies, including advanced network and cloud services, high-speed data connectivity, and cutting-edge voice and data services.

As a Competitive Local Exchange Carrier (CLEC) in Canada, Iristel is committed to providing affordable, reliable, and innovative telecommunications services to businesses and consumers across the country. With its cutting-edge technology and advanced network infrastructure, Iristel is extremely well positioned to meet the changing needs of its customers, offering them the speed, reliability, security and cost-effectiveness they need to succeed in today's fast-paced and ever-changing world.

Ice Wireless (“Ice”), a facilities-based regional mobile network operator (MNO) delivering LTE Advanced and 3G/4G HSPA+/UMTS technology to rural and remote areas of Northern Canada, was first launched in Inuvik, Northwest Territories in 2005 and is operating now as an affiliate of Iristel.

Iristel therefore files this joint accessibility plan on its behalf and Ice Wireless.

2. Iristel’s commitment to accessibility

Iristel benefits from a small staff resource, which is yet very dedicated to excellence and customer oriented. Therefore, taking into utmost account the principles set out in section 6 of the Accessible Canada Act (ACA), we have formed an internal committee comprised of Regulatory Affairs representatives, HR, and key decision making personnel in Sales, Marketing, Operations and Product Management in order to create measures to identify, remove and prevent accessibility barriers.

The principles set out in section 6 of the (ACA) are the following:

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

b. 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;
c. all persons must have barrier-free access to full and equal participation in society, regardless of their disabilities;
d. all persons must have meaningful options and be free to make their own choices, with support if they desire, regardless of their disabilities;
e. 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;
f. persons with disabilities must be involved in the development and design of laws, policies, programs, services and structures; and
g. 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.

3. Definitions

accessibility means the design of products, devices, services, environments, technologies, policies and rules in a manner that allows all people, including people who experience disabilities, to access them.

barrier means anything — including anything physical, architectural, technological or attitudinal, anything that is based on information or communications or anything that is the result of a policy or a practice — that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation. (*obstacle*)

disability means any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment — or a functional limitation — whether permanent, temporary or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person's full and equal participation in society. (*handicap*)

4. Feedback process

We value your feedback about any accessibility barriers you have encountered during your experience with our organization or our products. You may send that by email at accessibility@iristel.com or you may call us at 1 (833) 474-7835. We will acknowledge receipt of your feedback.
You may provide your feedback anonymously; however, in that case, we will not be able to follow up with you.
Our Customer Care Manager will process your feedback with utmost attention.
We assure you that your personal information remains confidential unless you consent to its disclosure.

5. Alternative formats

Iristel is fully committed to working towards creating a barrier-free world for people with disabilities. If you need this plan, or the feedback process only, provided in an alternative format, please request that by email at accessibility@iristel.com or by phone at 1 (833) 474-7835 and we will provide it to you within the following timeframes:

• Braille – within 45 days of request

• Audio (voice reading text out loud) – within 45 days of request

• Any other format – within 20 days of request

Key areas

Iristel has formed an internal committee ("The Committee") comprised of Regulatory Affairs representatives, HR, and decision-making key personnel in Sales, Marketing, Operations and Product Management to create measures to identify, remove and prevent accessibility barriers in all the relevant key areas, taking into outmost account the feedback received from the relevant non-profit organizations.

Progress report for each of the key areas is described below

1. **Employment:**

The committee has identified the following opportunities for improvement:

- Regarding our hiring practices we have identified that recruitment processes lack accessibility to all applicants. This includes providing different types of accommodation for people with disabilities in job postings, application forms, and interview processes.

- Regarding our policies and practices we realized that current policies and practices do inadvertently exclude individuals with disabilities.

- Leave policies do not accommodate medical appointments or disability-related needs.

- Current career development and advancement lack of clarity on how to request and receive accommodations

<u>Action items and timelines</u>:

Short-Term:

• Provide trainings for HR personnel, managers, and employees on disability awareness, unconscious bias, and inclusive hiring practices at Iristel

• Ensure job advertisements are available in accessible formats and include a statement encouraging candidates with disabilities to apply.

Medium-Term:

- Review and evaluate the effectiveness of disability awareness training.

- Evaluate and modify existing procedures to enhance the candidate experience. The process should offer clearer information and guidance to recruiters, hiring managers, and candidates, ensuring better support for accessibility and accommodation needs.

- Offer career development programs and support tailored to the needs of employees with disabilities.

Long-Term:

- Develop and implement policies for handling accommodation requests that are clear and accessible.

Creating Comprehensive Leave Policies: Ensure that leave policies are inclusive and provide adequate support for medical needs and disability-related appointments.

Implement Inclusive Career Development: Ensure that career development and advancement opportunities are accessible and that employees with disabilities have equal access to training and promotional processes.

On-going:

- Keep promoting awareness of accessibility to build a more inclusive workplace environment.

- Keep assisting hiring managers and recruitment teams in expanding their understanding and equip them with the necessary information and resources to foster a more inclusive and accessible workplace.

- Keep updating policies and procedures to ensure that do not inadvertently exclude individuals with disabilities.

2. **The built environment:**

Regarding the physical workspace and facilities, the committee has identified that the current workstations are not designed to accommodate individuals with mobility impairments or other physical disabilities.

Action items and timelines:

Short-Term:

- Examine current workstations to identify the issues of current design that obstruct people with disabilities

- Interview employees and leaders about the accommodation process if physical barriers are identified in the workplace.

Medium-Term:

- Purchase or customize workstations that are designed for people with disabilities.

Long-Term:

- Accessibility Improvements: Create a plan for ongoing accessibility improvements in the physical workspace. This plan should include regular reviews and updates based on employee feedback and accessibility audits.

On-going:

- Scheduled Maintenance: Ensure that accessibility features are always maintained and functional.

3. **Information and communication technologies:**

The committee ensured that the accessibility menu is maintained and actively available across the site. Also, testing was completed on the main pages for compatibility with assistive technologies (e.g., screen readers, keyboard navigation).

Action items and timelines:

By the end of the second quarter of 2025, the committee will ensure to have reviewed top-level web content for plain language and to add alt text to remaining legacy images/files.

By the end of the third quarter of 2025, the committee will have conducted a simplified internal audit of 3 core pages for WCAG 2.1 Level AA compliance and will have posted contact options (phone, email, TTY) clearly on Contact page.

4. **Communication, other than information and communication technologies:**

The committee found that current communication methods and the working environment are not accessible to employees with hearing, visual, or cognitive impairments (e.g., not providing materials in alternative formats or not offering sign language interpreters).

Action items and timelines:

Short-Term:

- Create guidelines for ensuring accessibility when producing documents.
- Providing alternative formats to meet different accessibility needs.

Long-Term:

- Developing Accessibility Standards: Implement standards for accessible communication that comply with ACA requirements. This includes ensuring that all communications are accessible to people with various disabilities.

- Providing an accessible digital technology-enabled work environment, such as the internal employee-facing web pages, would give employees with disabilities a greater sense of control over their work environment, reducing their levels of stress and ultimately lead to reduced rates of employee turnover.

On-going:

- Maintain Feedback Mechanism: Establish a system for receiving feedback from employees and clients regarding communication accessibility and make necessary adjustments.

5. **Procurement of goods, services and facilities:**

   Iristel does not have a standardized process for procurement of goods, services and facilities. The committee has this as an action item for the next progress report.

6. **The design and delivery of programs and services:**

   Existing onboarding and customer support channels include phone, email, and online support. The committee realized that there might be customers with visual or cognitive impairments which may prevent exclusive use of web or email channels.

   The committee has already actioned to ensuring to maintain phone-based customer support to ensure accessibility for visually impaired customers and to simplify the support documentation for greater clarity.

Action items and timelines:

By the end of the second quarter of 2025, the committee will confirm continued availability of voice-based customer service.

By the end of the third quarter of 2025, the committee will review and simplify digital onboarding instructions and will explore adding short video tutorials with voiceovers & captions

7. **Transportation:**

Iristel does not have anything to report under this heading, as we do not offer transportation services.