WiMacTel, Inc. and Subsidiaries

(collectively, the "Company")

CRTC Initial Accessibility Plan 2024-2026

Version 1.0

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Revision History

Date	Description	Version	Author
5/1/2024	**Initial document**	**1.0**	Michael O'Hara

General Application

This Accessibility Plan has been prepared in accordance with the requirements of the Accessible Canada Act (S.C. 2019, c. 10) and its regulations (ACA). This Accessibility Plan applies to WiMacTel Inc., as defined in the footnotes below.

WiMacTel Inc. has a process for receiving and responding to feedback, including feedback on how services are delivered to persons with disabilities.

Our Accessibility Plan and a description of our accessibility feedback process are available in the following alternate formats: print, large print, braille, audio format, electronic format, or other agreed-upon formats.

WiMacTel Inc., along with the words "we", "us", "our" refer to the WiMacTel Inc. group of companies and brands as they exist over time, as well as any successor companies as a result of corporate reorganizations or restructurings, to the extent that those companies and brands are subject to and not exempt from the requirements of the ACA (the entities referred together as "WiMacTel Inc.").

Principles of the ACA

WiMacTel Inc.'s Accessibility Plan has been written in accordance with principles set out in the ACA.

WiMacTel Inc. Overview

Founded in 2004, WiMacTel Canada Inc. (the "Company") is an integrated technology company that designs cloud-based network communications solutions focused on emergency services, customer care and legacy voice-to-cloud solutions. The organization is based in Calgary, Alberta Canada with a call center in Anniston, Alabama USA, and another call center expected to open in San Antonio, Texas USA in 2024.

The cloud-based, mesh network seamlessly integrates and transports all forms of data from any device to improve and customize the end-user experience. The platform boasts complete redundancy and fault tolerance, enabling the development of durable, tailor-made contact center and SaaS solutions for clients, surpassing industry standards and regulatory requirements. This system maintains the agility to scale and adjust as technology evolves and clients' needs change. The network is integrated with every major Tier 1 carrier in North America, and processes more than 40 million calls per year.

The Company's blue-chip customer list includes Verizon, T-Mobile, Spectrum, Comcast, Frontier, Lumen, AT&T, Telus and Viiz Canada, among many others.

Having recently launched the "Get Help" feature in Verizon's IoT Care Smart application, the Company is ideally positioned

to capitalize on the Personal Emergency Response Systems ("PERS") market.

With the current customer channel and integrated network, WiMacTel Canada Inc. is also positioned to further increase its revenue curve with respect to the emerging emergency services macro trend through organic growth and targeted acquisitions.

WiMacTel Canada Inc. is the parent company and has subsidiary WiMacTel Inc. for retail services and Viiz Communications for wholesale services. All subsidiaries follow the policies and procedures of WiMacTel Canada Inc.

Description of Services Provided

WiMacTel Canada Inc.'s current product portfolio includes emergency, customer care, voice, and clearinghouse services.

The Company's proprietary call center platform software enables unlimited customization and optimization to maximize quality and efficiency:

- Smart Dialer: The dialer predicts when the agents will be available and optimizes automatically to have them ready.
- Intelligent Routing: Routing calls to the right agent is paramount to maintain quality service and call center occupancy rates. Routing is based on IVR selections, customer history, agent availability and other criteria.
- Omnichannel Communications: Operators' omnichannel communications via voice, e-mail and SMS/text provide a seamless, unified experience for call center agents to interact with customers on the preferred channel of the customer.
- Robust Service Delivery Network: Self-managed network: Highly controlled and regulated environment.
- Computing power: 4 computing clouds

Product Services Include:
- Legacy: Directory Assistance ("DA") and Operator Service ("OS")
- Emergency ("EMG"): Emergency call center for unprovisioned 911 phone calls and IoT personal monitoring.
- Care: Combination of inbound customer service calls, Message Relay Services ("MRS") to support the deaf and hard of hearing (mandated by the CRTC) and N11 routing for U.S. local exchange carriers ("LECs").
- SaaS: Call center platform licensed to carriers.

Accessibility Statement

WiMacTel aims to meet the highest standard of accessibility. We follow the Government of Canada's [Standard on Web Accessibility](#). This standard follows the World Wide Web Consortium (W3C) [Web Content Accessibility Guidelines](#) (WCAG) 2.0.

This site will work to meet the guidelines from [Web Content Accessibility Guidelines 2.1 AA](#). This sets a higher standard.

This statement highlights our efforts to improve accessibility for our partners, employees, and consumers. We know it is

important to have inclusive and accessible systems, policies, and procedures in place for everyone.

Consultations

To help create this Accessibility Plan, WiMacTel Inc. consulted with persons with disabilities -- including customers, employees, and external organizations that specialize in   accessibility. These consultations allowed us to outline opportunities to identify, remove and prevent barriers in:

- employment practices,
- built environment,
- information communication and technology (ICT),
- communication, other than ICT,
- procurement of goods, services and facilities,
- the design and delivery of programs and services.

Our consultation approach focused on identifying accessibility barriers experienced by persons living with many different types of disabilities. We provided varied methods for engagement to meet the needs of a diverse group of participants across Canada including language of choice (English and French) and preferred format for engagement. The information we gathered enriched our learning experience and helped prioritize the

actions that are central to our Accessibility Plan. As part of our consultation approach, we:

- Established an Employee Resource Group with team members who identify as persons with disabilities and have experience with accessibility barriers, team members experienced in the field of accessibility, and allies involved in supporting diversity, equity, inclusion and belonging.
- Established an Advisory Panel made up of internal and external stakeholders. This includes organizations and individuals who identify as persons with disabilities or who are experienced in the field of accessibility in Canada, representing varied geographies and stakeholders with different accessibility needs.
- Conducted a series of virtual consultation sessions and one-on-one interviews with team members and members of the public who identified as persons with disabilities. A leading vendor in the field of accessibility facilitated the sessions.

Key Areas

WiMacTel Inc.'s Accessibility Plan reflects barriers we identified as part of our consultation   approach and details the actions we will take to identify, prevent and remove various barriers experienced by persons with disabilities. Our actions can be divided into three timeframes:

- short-term actions,
- medium-term actions,
- long-term actions.

There are also ongoing actions we must take to ensure we continue to make progress. Our initial actions will focus on the areas outlined in the sections below. We will provide updates on our progress annually and adapt our plans as we

identify new barriers and learn from our progress.

Employment

Resolving employment-related barriers helps ensure everyone has the same employment opportunities at WiMacTel Inc.. We are committed to a safe and supportive workplace and promoting a culture that values diversity, equity, inclusion and belonging.

Identified Barriers:

- There is a need for greater engagement, promotion, and communications to support accessibility, encourage self-disclosure and enhance a supportive workplace culture and community.
- Team members who self-identify as persons with disabilities or who see themselves as an ally would like a centralized, coordinated way to collaborate.
- Team members could have better awareness of the available accommodations – or the barriers experienced – by persons with disabilities.
- The process to accommodate for disabilities is considered cumbersome; there is a lack of awareness of the support available for employees and their managers during the accommodation process.
- There is a lack of clarity among job applicants, recruiters and hiring managers on the types of accommodations available for persons with disabilities who are applying, interviewing, and qualifying for jobs.

Actions and Timelines

Short-Term:

- Begin rollout of enhanced accessibility training.
- Encourage participation through our Employee Resource Groups, such as Diversability at Viiz.
- Promote forums for collaboration, information sharing, and discussion. • Increase awareness of WiMacTel Inc.'s accommodation process for applicants, team members, and leaders.

Medium-Term:

- Continue rollout of enhanced accessibility training.
- Review and evaluate the effectiveness of training
- Review and evaluate the effectiveness and team member experience of our Employee Resource Group.
- Review and adjust current processes to support an improved candidate experience. Processes must provide more information and guidance to recruiters, hiring managers, and candidates to support accessibility and accommodation requirements.

Long-Term:

- Further elevate leaders' familiarity with accommodation processes and practical ways to increase inclusion and accessibility in the workplace.
- Create a consolidated inventory of resources used to support accommodation.
- Use internal feedback and consultations and collaborate with persons with disabilities to ensure that accessibility standards are integrated across our   business – including workplace policies, employment standards, programs, and work environments.

Ongoing:

- Continue to create awareness of accessibility to foster a more inclusive workplace.
- Continue to support hiring managers and recruitment teams to broaden their perception and provide them with

the information and resources they need to support a more inclusive and accessible workplace.
- Continue to enhance our accommodation processes.
- Continue to evaluate how well our processes for workplace accommodation are performing.
- Continue to improve how we engage and collaborate with persons with disabilities.

Identified Barriers

Websites and mobile apps may not always be easy to navigate because of the large volume of information; also, the language used may be too complex and difficult to understand.
- Websites and mobile apps may not offer alternate methods of communication for transactions.
- Chat tools, drop-down menus, selection of options, and online forms are not consistently accessible.
- There are opportunities to expand the availability of video content with consistent and accurate Described Video (DV) and Closed Captions (CC).
- Our products and services can be enhanced to provide more accessibility features - such as varied activation methods, audio prompts, visual prompts, and tactile markers.
- The amount of information required during an online transaction can sometimes be challenging. More time to complete a transaction may be required.

Actions and Timelines

Short-Term:
- Adopt accessibility guidelines for information and communication technology.
- Make accessibility central in developing and buying devices and equipment.
- Standardize digital accessibility guidelines, policies and practices.
- Adopt universal design principles and best practices in digital accessibility.

Ongoing:
- Continue to improve websites and applications to enhance accessibility.
- Develop an audit program to monitor the accessibility of information and communication technology.
- Work with content providers, partners, manufacturers and vendors to improve accessibility features and ensure they are maintained.
- Continue to simplify our processes and use language that is concise and easy to understand.
- Continue to evaluate the accessibility of the information and communications technologies we use when addressing both internal and external audiences.
- Continuously improve training, tools, and support materials for team members to meet information and technology accessibility guidelines.

Communication, other than ICT

By addressing communication-related barriers, we will improve the accessibility of the documents that we create at Viiz. Our brand guidelines will provide direction on how to create documents and advertising that promote our products and

services in a way that meets accessibility requirements.

Identified Barriers:

- Customers may not be aware that they can request certain types of documents (such as bills and other documents that contain critical information) in alternate formats to meet their accessibility needs.
- Document templates and communication guidelines may not always be accessible.
- Alternate options and methods of communication are not consistently mentioned in marketing materials or advertisements.

Actions and Timelines:

Short-Term:
- Develop accessibility guidelines for creating documents.
- Improve customer awareness of the services provided by our Accessibility Service Centre.

Ongoing:
- Promotion of accessibility products, services, and alternate options and methods of communications to increase awareness and usage.
- Continuous refinement of communication guidelines to create content that is simple, concise, and easy to understand.
- Ensure accessibility needs receive consideration in the development of marketing and advertising materials.

The Procurement of Goods, Services and Facilities

We endeavor to ensure our procurement practices address accessibility procurement barriers, and encourage the use of suppliers who are part of our supplier diversity program. When interacting with new and existing suppliers, we communicate our accessibility expectations and requirements.

Identified Barriers:
- Existing procurement practices may not consistently meet accessibility requirements.

Actions and Timelines:

Ongoing:
- Continue to evaluate current procurement policies, processes and tools to improve accessibility.

The Design and Delivery of Programs and Services

By addressing the design and delivery of programs and service-related barriers, we aim to ensure persons with disabilities have meaningful options. We want to ensure they are free to make their own choices, with support if they desire, regardless of their disabilities. This includes improving the accessibility of our systems and networks, and

improving our efforts to provide great customer experiences.

Identified Barriers:
- Team members have different levels of knowledge and awareness when it comes to the barriers experienced by customers with disabilities, such as how to respond to inquiries and requests for accommodations.
- Accessible products and services are not broadly promoted to customers.
- Large service windows (the timeframe when a technician will visit a customer), limited hours of operation, or long waits in line at retail stores can make it   challenging for persons with disabilities to access support when it is needed.
- Situations such as arranging for an interpreter or a support person, and planning times for a pick-up or a return of equipment by courier or at stores, all need consideration.
- Alternate options and methods of communications are not consistently made available to persons with disabilities when they try to complete certain transactions, or when requesting support.

Actions and Timelines:

Medium-Term:
- Explore expansion of virtual on-demand sign language interpreter program. • Optimize virtual assistants to support products and services related to accessibility.

Long-Term:
- Identify ways to improve systems and processes for common transactions such as booking a technician appointment for installations and repairs.

Ongoing:
- Continue to monitor customer surveys and feedback to identify areas for improvement.
- Continue to coach and train team members on best practices in customer service, for example: knowledge on how to send replacement equipment to customers with accessibility challenges.
- Explore ways to further increase customer awareness of Viiz's accessibility products and services and of our Accessibility Services Centre.

Regulatory Conditions

- Conditions under section 24 or 24.1 of the Telecommunications Act
- Conditions that relate to the identification and removal of barriers and the prevention of new barriers are set out in Appendix C.
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- Provisions of any Regulations made under the Telecommunications Act
- Provisions of any regulations that relate to the identification and removal of barriers and the prevention of new barriers are set out in Appendix C.

Conclusion

We are committed to offering accessible and inclusive services to our clients, employees and consumers. We will

continue to work with partners, employees, and consumers to identify, remove and prevent barriers to access. We will continue to create or modify our programs, systems and policies. We thank our clients, employees and consumers for their sound advice and help thus far, and look forward to continuing to learn and change. We will regularly monitor and report on progress, and will update our plan every three years as per the requirements of the Accessibility Act.

Appendices

Appendix A – ACA Section 6, Principles

In preparing this Accessibility Plan, we have taken into account the principles 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.

Appendix B – Broadcasting Act Requirements

As required by section 42(1) of the ACA, this Appendix sets out:
- 42(1)(b) - the conditions imposed by license, issued under Part II of the Broadcasting Act, to which some or all WiMacTel Inc. broadcasting undertakings are subject
- that relate to the identification and removal of barriers and the prevention of new barriers;
- 42(1)(c) - the provisions of any order made under subsection 9(4) of the Broadcasting Act that relate to the identification and removal of barriers and the prevention of new barriers and that apply to some or all WiMacTel Inc. broadcasting undertakings; and
- 42(1)(d) - the provisions of any regulations made under subsection 10(1) of the Broadcasting Act that relate to the identification and removal of barriers and the prevention of new barriers and that apply to some or all WiMacTel Inc. broadcasting undertakings.

This Appendix does not include requirements that have not been in force for at least   three months before the day on which the Accessibility Plan must be published2 or expectations/encouragements, which do not rise to the level of imposed conditions.

Equipment that Supports Accessibility
- WiMacTel Inc. must provide equipment, software or other technology for customers with visual or fine motor skills disabilities to identify and have access to programming services.
- WiMacTel Inc. Canadian Radio-television and Telecommunications Commission (CRTC) Annual Returns must include information on the following: availability of accessible set top boxes (STBs), remotes and accessibility features, penetration of accessible STBs and remotes, and number of accessibility-related queries received/resolved.
- WiMacTel Inc. must provide at least one simple means of accessing described programming (open or embedded)

requiring little or no visual acuity.

Customer Service Related

Promotion and Customer Service:
● WiMacTel Inc. shall promote disability-specific services/products in an accessible manner.
● WiMacTel Inc. shall make their general call centers accessible to the point of providing a reasonable accommodation to persons with disabilities by training customer service representatives to handle calls from persons with disabilities and familiarizing them with products and services for persons with disabilities, and by making their Interactive Voice Response systems accessible.

Website Accessibility
● WiMacTel Inc. must have an easy-to-find home page link to a section of their websites "dealing with the needs of persons with disabilities".
● WiMacTel Inc. must make information on their websites accessible to the point of providing a reasonable accommodation for persons with disabilities.
● Where customer service functions on their websites are not accessible, WiMacTel Inc. must ensure that persons with disabilities will not incur a charge or otherwise be disadvantaged if they use an alternate avenue of customer service.
● WiMacTel Inc. shall make accessible any customer service functions that are available solely over their websites.
● Accessibility plans, progress reports, and descriptions of feedback processes published under the ACA must be published in a way that meets W3C Web Content Accessibility Guidelines (WCAG) guidelines.

Alternative Formats and Website Accessibility
● 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 broadcasting entity agree upon and for which there is proof of the agreement.
● Accessibility plans, progress reports, and descriptions of feedback processes published under the ACA must be published in a way that meets WCAG guidelines.
● Appendix C – Telecommunications Act Requirements As required by section 51(1) of the ACA, this Appendix sets out:
    ○ 51(1)(b) - the conditions imposed under section 24 or 24.1 of the Telecommunications Act to which some or all of WiMacTel Inc. is subject that relate to the identification and removal of barriers and the prevention of new barriers; and
    ○ 51(1)(c) - the provisions of any regulations made under the Telecommunications Act that relate to the identification and removal of barriers and the prevention of new barriers and that apply to some or all of WiMacTel Inc..
    ○ This Appendix does not include requirements that have not been in force for at least three months before the day on which the Accessibility Plan must be published55 or expectations/encouragements, which do not rise to the level of imposed conditions.
    ○ Telecommunications Service Providers (TSPs) must make general call centers accessible to the point of providing reasonable accommodation by training customer service representatives to handle questions from persons with disabilities.