



Xplore Accessibility Plan 2023–2027

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General

Introduction

Xplore is Canada’s Fibre, 5G, and satellite broadband solution for rural living. Founded in Woodstock, New Brunswick, the Xplore group of companies (including Xplore Inc. and Xplore Fibre L.P., together “Xplore”) has become one of the country’s largest facilities-based telecommunications providers for residential and business customers. Xplore is committed to the relentless pursuit of an improved broadband experience for Canadians in rural and remote communities.

At Xplore, we are a customer-first organization. We continually strive to improve the customer experience for all Canadians. To ensure all of our customers enjoy the same quality of service, Xplore seeks to fulfill the individual needs of people living with disabilities.

We further recognize that diversity in the workplace is essential to the success of connecting Canadians to what matters most. This has been woven into our values and core belief that integrity, trust, diversity, and inclusion are essential to our success. We are committed to promoting a workplace where a person from any walk of life can bring their full self to the workplace and succeed.

This Accessibility Plan has been prepared in accordance with the requirements of the *Accessible Canada Act* (“ACA”, S.C. 2019, c. 10) and its regulations. The contents of this Plan apply 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 access our “Web to Case” feature located under the “Cases” tab . 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

Xplore has a process for receiving and responding to feedback, including feedback on how services are delivered to persons with disabilities. For more information about the feedback process for accessibility at Xplore, please visit our [Accessibility Center Webpage](#).

Executive Summary

Xplore is a customer-first organization, built on care, collaboration, and a pursuit to provide an exceptional online experience for all Canadians. We are committed to providing an inclusive and equal experience for all of our customers and employees, including those who identify as persons with disabilities.

The Government of Canada has set a goal for Canada to be barrier-free by 2040. Developing our Accessibility Plan is how we start taking steps toward that goal as an organization. The plan covers the steps we plan to take by the end of 2025. It outlines barriers we identified, the actions we will take to address them, and how we plan to prevent new potential barriers. It also includes some of the accessibility initiatives we have already been working on.

To help create this plan, we consulted with persons with disabilities and disability advocate groups to understand the accessibility concerns with the telecommunications industry prevailing today. We have listened to these concerns and have taken their proposed solutions into account. We will continue to engage with persons with disabilities on an ongoing basis as we continue to implement and refine our plan.

We will review our plan annually, publish yearly progress reports, and build on our progress in future plans.

This Accessibility Plan is current to the date this plan was published; it may change in accordance with ACA and other applicable laws, in order to reflect the evolving accessibility needs of our employees and customers as well to reflect our evolving business.

Accessibility Commitment and Principles

Accessibility Statement

Xplore is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to

meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements.

Principles of the Accessible Canada Act

In 2019, the Government of Canada adopted the *Accessible Canada Act*, recognizing that barriers to accessibility can impact all persons in Canada, in particular those with disabilities and their families, and can prevent persons with disabilities from achieving their full and equal participation in society. In working towards creating a barrier-free environment for all Canada, the legislation recognizes seven key principles:

- All persons must be treated with dignity;
- All persons must have equal opportunity to lead the lives that they are able and wish to have;
- All persons must be able to participate fully and equally in society;
- 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
- Developing and revising accessibility standards and regulations must be done with the goal of achieving the highest level of accessibility for persons with disabilities.

In preparing this Accessibility Plan, Xplore has carefully considered each of these principles.

Consultations

Our consultation approach focused on identifying accessibility barriers experienced by persons living with many different types of disabilities. We actively sought out external resource documents made available by disability advocate and accessibility groups to inform the development of our plan.

Working with the Canadian Telecommunications Association (CTA, formerly CWTA), we also engaged directly with persons with disabilities and organizations working within the disability community in Canada.

- Disability experts and persons living with disabilities provided to us, in writing, their views on barriers that exist in the telecommunications sector and what we can do as a service provider to ensure an equal service experience for all. We have reviewed these submissions and taken them into account when developing our plan.

- We engaged directly with these individuals and groups through several virtual meetings in 2022, where they could share their experiences directly with service providers and let us know how we can do better to ensure a barrier-free experience.

We will continue to work with these groups through the CTA to improve our Accessibility Plan and hear how we can do better. We will also conduct internal consultations with Xplore employees who identify as persons with disabilities to understand their experiences and how we can improve.

Priority Areas

1. Employment

Xplore is committed to a fair and accessible employment environment that embraces diversity, equity, and inclusion. Removing employment barriers ensures that all current and prospective employees have the same employment opportunities.

Identified Barriers:

- Employees could have better awareness of the barriers experienced by persons with disabilities as well as the accommodations that are available.
- The process for providing accommodation for persons with disabilities is informal and may take more time than preferred.
- The accommodations available to prospective employees in the recruitment process could be better communicated.

Actions and Timelines:

Short-Term: Develop and launch accessibility training for all employees.

Short-Term: Review our recruitment process to identify and develop an action plan to address any accessibility barriers.

Short-Term: Establish a project team to manage, monitor, and implement Xplore's progress in implementing its accessibility goals.

Short-Term: Establish an internal committee responsible for developing policies related to and promoting diversity and inclusion in our workplace.

Medium-Term: Evaluate effectiveness of training organization-wide training and modify as needed.

Medium-Term: Develop a dedicated section on our internal website so employees can access all information relating to accessibility training, tools, and technologies in one place.

Medium-Term: Develop and provide training for our recruitment leaders respecting recruitment, hiring, and onboarding of persons with disabilities.

Ongoing: Consult with employees who present accommodation requests and medical professionals respecting accommodation best practices.

Ongoing: Communicate regularly with employees about initiatives to promote a diverse and inclusive workplace.

2. The Built Environment

Xplore is dedicated to creating an accessible environment for all in our corporate offices. Xplore works with a dealership network who sell Xplore's services at retail locations across the country.

Barriers:

- Signage could be more accessible in some buildings.
- Some washrooms are not accessible in corporate offices.
- The entrances of some buildings could have more accessibility features or better signage to accessible entryways.

Actions and Timelines:

Medium-Term: Work with property managers at corporate office locations to introduce additional accessibility signage and accessibility buttons for doors.

Long-Term: Develop policies and procedures for incorporating accessibility considerations into future purchasing or rental decisions.

Long-Term: Incorporate policies and procedures relating to accessibility into decisions to engage dealers who operate retail locations.

Ongoing: Engage with employees at each office location to identify accessibility barriers and solutions at the workplace.

3. Information and Communication Technologies (ICT)

Xplore recognizes the importance of digital accessibility for our employees and customers. Xplore's website is designed with the Web Content Accessibility Guidelines ("WCAG") 2.0 in mind.

Identified Barriers:

- Drop-down menus, and online forms are not consistently accessible.
- Internal websites and resources are not consistently accessible.
- Support 'frequently asked questions' pages are only available in written format.
- Social media posts are not consistently accessible.

Actions and Timelines:

Short-term: Promote the use of the video relay service.

Short-term: Highlight availability of chat function with real customer service representatives on our support page.

Short-term: Introduce alternative text for photos posted on social media.

Medium-term: Update website to meet the latest WCAG Standards.

Medium-term: Develop customer support resources in additional accessible formats (e.g. video).

Medium-term: Review internal websites and communications for accessibility barriers and develop strategies for removing these barriers.

Medium-term: Develop a policy for incorporating inclusive design principles into all social media content.

Ongoing: Monitor for the development and introduction of improved industry standards and guidelines.

Ongoing: Monitor for continuing compliance with WCAG Standards as website is updated.

4. The Procurement of Goods, Services and Facilities

Xplore acknowledges that accessibility is critical in all aspects of its business, including in the procurement of goods and services. Xplore will undertake to promote accessibility with all our suppliers.

Identified Barriers:

- Current procurement practices may not consistently meet accessibility requirements.

Actions and Timelines:

Short-Term: When contracting with new and existing suppliers, Xplore will include accessibility requirements.

Ongoing: Review and modify internal policies to ensure accessibility considerations are incorporated into procurement decisions.

5. The Design and Delivery of Programs and Services

Xplore endeavours to ensure the design and delivery of our programs and services are accessible to all Xplore customers and give them meaningful ways to engage with our customer service and care teams

Identified Barriers:

- Frontline employees may be unaware of accessibility plans, features, and services that we offer to customers with disabilities. As a result, the customer may need to call in to a service representative, resulting in a lengthy service experience.
- Technicians installing or servicing equipment may not be aware of the accessibility features available on equipment, and therefore they cannot show the customer how to use these features.
- Long estimated windows for service of equipment create difficulties for persons with disabilities who may need to arrange for interpretation or other accessibility services.
- Some equipment, including modems, could have additional accessibility features.

Actions and Timelines:

Medium-term: Provide training to frontline customer service representatives on Xplore's accessibility plans, features, and services.

Medium-term: Provide training to technicians on how to use the accessibility features and how to educate customers on availability of features and use of equipment.

Medium-term: Evaluate our field service protocols, and develop solutions to provide service to persons with accessibility needs in a narrower time band.

Long-term: Develop, evaluate, and implement accessibility solutions for equipment provided to customers.

Ongoing: Promote awareness of accessible product offerings.

6. Communication, Other Than ICT

Xplore is a customer-first organization, and communication with our customers and the public is a key part of our success. Communication (other than ICT) includes how we interact with customers in our retail stores as well as how we communicate through our customer care and support teams.

Identified Barriers:

- Employees may not be aware of the challenges faced by people with disabilities, affecting their ability to effectively and empathetically communicate with customers with accessibility needs.
- Employees may not be trained to use accessible communication tools such as video relay services.
- Employees may not be trained on how to create accessible documents.
- Certain materials developed as a result of Xplore's 2023 rebrand may not meet accessibility best practices.

Actions and Timelines:

Short-Term: Develop and implement best practices to improve customer service for persons with disabilities.

Short-Term: Review and identify accessibility gaps in materials developed as a result of Xplornet's rebrand to Xplore.

Medium-term: Address accessibility gaps in Xplore branding materials.

Medium-Term: Develop and provide training to customer-facing employees (including customer service representatives, neighbourhood marketing specialists, and field technicians) on how best to communicate with persons with disabilities, including the availability and use of accessibility tools such as video relay services.

Medium-Term: Engage with dealer network to provide training to customer-facing employees at storefronts.

Ongoing: Encourage internal awareness of accessibility tools and services, including availability of alternative methods of communication.

Ongoing: Ensure that written communications are prepared in accordance with accessibility guidelines.

Appendices

Glossary

Accessibility

Accessibility refers to how services, technology, locations, devices, environments, and products are designed with persons with disabilities in mind. Accessibility means giving people of all abilities equal opportunities to take part in life activities. The term implies conscious planning and effort to make sure something is barrier-free for persons with disabilities. Accessibility benefits everyone.

Barrier

According to the ACA, a barrier is “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.”

Disability

According to the ACA, disability is “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.”

Regulatory Conditions

As required by section 51(1) of the ACA, 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
CRTC 1998-626	Alternative format billing and paper billing on request and at no charge	Full Order
CRTC 2002-13	Extending the availability of alternative formats to consumers who are blind	Full Decision
CRTC 2001-690	Alternative formats for a person who is blind	Full Order
CRTC 2022-28	When and how communications service providers must provide paper bills	Full Decision
CRTC 2009-430	Accessibility of telecommunications and broadcasting services	Full Policy Direction
CRTC 2017-200	Review of the Wireless Code	Subsections B.1, C.1, G.4, A.1, and paras 382-383
CRTC 2019-269	The Internet Code	Subsections A.1, B.4, C.1, G.2, 2, and para 468
CRTC 2016-496	Modern telecommunications services – The path forward for Canada’s digital economy	Para 217