



## **EH!tel Networks LP**

### **Accessibility Plan**

**2026-2029**

**June 1, 2026**

## **1. General**

### **1.1 Introduction**

This Accessibility Plan (the "Accessibility Plan") is published by EH!tel Networks LP (the "Company") in compliance with the Accessible Canada Regulations, SOR/2021-241, under the Accessible Canada Act (the "ACA").

EH!tel Networks LP is committed to fostering an accessible and inclusive environment for employees, customers, applicants, suppliers, visitors, and members of the public. This Accessibility Plan builds on feedback received from employees and customers and outlines the actions the Company will take between 2026 and 2029 to identify, remove, and prevent barriers to accessibility.

The Accessibility Plan will be made publicly available, including in accessible formats upon request. The Company will publish a progress report each year in which a new accessibility plan is not required and will review and update this Accessibility Plan at least once every three years.

### **1.2 Application**

The following entities fall under the Company:

- EH!tel Networks Inc.
- Grey Bruce Telecom Inc. ("GBTEL")

This Accessibility Plan applies to all employees of the Company, as defined in the Accessible Canada Regulations, and to all customers of the Company and the entities listed above, throughout Canada.

### **1.3 Our Commitment**

EH!tel Networks LP is committed to creating an accessible, inclusive, and barrier-free environment. The Company strives to treat all individuals in a manner that allows them to maintain their dignity, independence, and equal opportunity.

Accessibility is an ongoing journey. The Company will continue to identify, remove, and prevent barriers through continuous improvement, education, consultation, and thoughtful design of workplaces, services, technologies, communications, and employment practices.

This Accessibility Plan sets out the Company's approach to accessibility across the areas identified under section 5 of the ACA:

- Employment
- The Built Environment
- Information and Communication Technologies (ICT)
- Communication, Other than ICT
- The Procurement of Goods, Services and Facilities

- The Design and Delivery of Programs and Services
- Transportation (not applicable - see Section 3.7)

## 1.4 Feedback

The Company has appointed a Designated Accessibility Representative who is responsible for receiving feedback relating to accessibility, supporting action planning to address feedback, and updating this Accessibility Plan.

The Company's Designated Accessibility Representative is:

Maria Carelli - Manager, Customer Service

Feedback may be provided, and accessible versions of this Accessibility Plan and any related progress reports may be requested, in any of the following ways:

- Email: [accessible@corp.ehtel.ca](mailto:accessible@corp.ehtel.ca)
- Telephone: 1-519-594-0946
- Online form: <https://ehtel.ca/accessibility-feedback/>
- Mail: Accessibility, EH!tel Networks LP, 5000 Yonge Street, Suite 1403, Toronto ON, M2N 7E9

Feedback may be provided anonymously by telephone or mail. Anonymous feedback will not be acknowledged with a receipt. Non-anonymous feedback will be acknowledged by email or mail. All personal information is kept confidential unless the person providing the feedback consents to disclosure.

## 2. Consultation

As part of developing this Accessibility Plan, the Company engaged employees and considered accessibility feedback gathered through previous planning activities, customer interactions, and existing accessibility feedback channels. The insights received helped identify priorities and opportunities to further enhance accessibility for employees, customers, and members of the public.

### 2.1 How We Consulted

Consultation activities included:

- An anonymous employee accessibility survey conducted across the EH!tel Networks LP workforce in April and May 2026, with participation from employees representing customer-facing, technical and field, office and administrative, supervisory, and senior leadership roles.
- Review of feedback and insights gathered through previous accessibility planning activities, employee discussions, and customer interactions.
- Consideration of ongoing feedback received through existing accessibility feedback channels.

The survey included participation from employees who self-identified as persons with disabilities, including non-visible or invisible disabilities, as well as employees who preferred not to disclose disability status.

### 2.2 What We Heard

Employees identified several key areas where continued focus will help strengthen accessibility across the organization:

- Increasing awareness of accessibility-related policies, resources, and supports.
- Expanding accessibility training and education for employees and people leaders.
- Improving awareness of accessibility feedback processes.
- Continuing to enhance the accessibility of physical work environments, including access routes, workspaces, signage, and emergency procedures.
- Strengthening accessibility in internal communications, technology, customer service, and recruitment practices.

These insights have informed the goals and actions outlined in Section 3.

### **3. Areas Described Under Section 5 of the ACA**

The following sets out how the Company is identifying, removing, and preventing barriers in each of the priority areas under section 5 of the ACA. Unless otherwise specified, the actions identified in this Accessibility Plan are intended to be implemented during the 2026-2029 planning cycle. Progress will be reviewed annually and reported through the Company's Accessibility Progress Reports.

#### **3.1 Employment**

The Company is committed to fair and accessible employment practices throughout the employment lifecycle and to creating a workplace where employees and applicants with disabilities can participate fully and succeed.

##### **Current Level of Accessibility in the Area of Employment**

The Company has established accessibility practices that support inclusive recruitment, accommodation, and workplace participation. EH!tel Networks LP will continue to strengthen these practices and promote awareness of available supports and resources.

##### **Barriers in Employment as Identified by Consultation Participants**

Consultation participants identified several opportunities to further strengthen accessibility in employment practices:

- Increase awareness of accessibility, accommodation, and return-to-work supports.
- Expand accessibility training and education for employees and people leaders.
- Improve understanding of accommodation processes and available resources.
- Continue strengthening accessibility within recruitment, hiring, onboarding, performance management, and career development practices.

##### **Accessibility Goals in the Area of Employment**

- Provide accessibility training to employees and people leaders, with role-appropriate content.
- Increase awareness and accessibility of accommodation, return-to-work, and related workplace policies.
- Maintain accessible recruitment, selection, onboarding, performance management, and career development processes.
- Maintain a documented individual accommodation plan process that meets the requirements of the Accessible Canada Regulations.

##### **Planned Action to Achieve Accessibility Goals**

###### **a) Recruitment**

The Company will continue to promote accessible and inclusive recruitment practices by:

- Reviewing recruitment policies, procedures, and processes to support accessibility and consistency across the organization.
- Communicating on the Company's website and on job postings that accommodation is available for applicants with disabilities throughout the recruitment process.
- Notifying applicants individually selected for assessment or interview that accommodations are available upon request.
- Consulting with applicants who request accommodation to arrange suitable accommodation that takes into account their accessibility needs.
- Including information about accommodation supports in offers of employment and onboarding materials.

- Providing training to employees involved in hiring on inclusive and accessible hiring practices, with refreshers as needed.

#### **b) Informing Employees of Supports and Provision of Accessible Formats**

The Company will inform current and new employees of the policies and supports available to employees with disabilities, including job accommodation supports. The Company will:

- Communicate accessibility and accommodation resources through onboarding and employee communication channels.
- Provide information about accessibility and accommodation policies as soon as practicable after a new employee begins employment.
- Keep employees informed of changes to accessibility and accommodation-related policies.
- On request from an employee with a disability, provide or arrange accessible formats and communication supports for information needed to perform the employee's job and information generally available in the workplace.
- Consult with employees requesting accessible formats or communication supports to determine the suitability of the format or support.

#### **c) Documented Individual Accommodation Plans and Return-to-Work Process**

The Company will maintain accommodation and return-to-work processes that meet the requirements of the Accessible Canada Regulations. The Company will ensure that its documented individual accommodation plan process includes:

- How the employee requesting accommodation can participate in the development of the plan.
- How the employee will be assessed on an individual basis.
- How the Company may request an evaluation by an outside medical or other expert, at the Company's expense, to assist in determining if and how accommodation can be achieved.
- How the employee may request the participation of a representative from their bargaining agent, where represented, or another workplace representative, where not represented.
- Steps to protect the privacy of the employee's personal information.
- How often individual accommodation plans will be reviewed and updated, and how that review will occur.
- Reasons for a denial if an individual accommodation plan is denied.
- How the individual accommodation plan will be provided in a format that takes into account the employee's accessibility needs.
- Any accessible formats, communication supports, or other accommodations to be provided to the employee.

The Company will ensure that the return-to-work process outlines the steps it will take to facilitate an employee's return to work after a disability-related absence, including the development of an individualized return-to-work plan and the use of individual accommodation plans where appropriate.

#### **d) Performance Management, Career Development and Redeployment**

The Company will consider accessibility needs and individual accommodation plans when supporting employee performance, development, advancement, and workforce transitions. The Company will:

- Review and, as necessary, update policies, procedures, and practices to support compliance with the ACA and the Accessible Canada Regulations.
- Take accessibility needs and accommodation plans into account when assessing performance.
- Consider accessibility needs when supporting career development and advancement, including notifying employees of accommodation availability on internal postings.
- Consider accessibility needs and accommodation plans when redeployment or transfer is required.

## **3.2 The Built Environment**

The Company is committed to removing barriers in its physical workspaces in a manner that upholds the dignity, independence, and safety of persons with disabilities.

### **Current Level of Accessibility in the Area of the Built Environment**

The Company operates from several locations that differ in age, design, ownership structure, and physical layout. While accessibility features vary across locations, the Company is committed to evaluating opportunities for improvement and incorporating accessibility considerations into future workplace enhancements. The Company does not operate retail locations open to the general public.

### **Barriers in the Built Environment as Identified by Consultation Participants**

Consultation participants identified opportunities to further improve accessibility within Company workspaces, including parking and loading areas, access routes, entrances, paths of travel, workstations, signage, wayfinding, and emergency procedures. These insights will help guide future accessibility assessments and workplace improvements.

### **Accessibility Goals in the Area of the Built Environment**

- Improve accessibility of entrances, paths of travel, parking, and common spaces across the Company's workspaces, as resources allow.
- Improve accessibility signage and wayfinding.
- Incorporate accessibility considerations into any new workspaces or significant renovations.
- Maintain safe and accessible emergency and evacuation procedures for employees and visitors.

### **Planned Action to Achieve Accessibility Goals**

- Conduct accessibility assessments of Company workspaces during the term of this Plan, prioritizing improvements based on impact, feasibility, operational needs, and available resources.
- Maintain boardrooms, common spaces, and access routes in a manner that keeps them clear of physical barriers.
- Incorporate accessibility considerations into any new construction, significant renovation, or major workplace reconfiguration.
- Put procedures in place to address service disruption to accessible parts of public spaces and, in the event of a disruption, notify the public of the disruption and any alternatives available.
- Consider individualized emergency response and evacuation arrangements for employees with disabilities upon request.

## **3.3 Information and Communication Technologies (ICT)**

The Company is committed to making its information and communications technologies accessible to persons with disabilities.

### **Current Level of Accessibility in the Area of ICT**

The Company communicates with customers and the public through its website, online chat, email, electronic documents, telephone, including an IVR system, and text. The Company provides alternative formats upon request and continues to work toward accessible digital communications and customer-facing systems.

### **Barriers in ICT as Identified by Consultation Participants**

Consultation participants identified opportunities to enhance the accessibility and usability of internal systems, digital tools, and customer-facing technologies. Continued improvements to online services, website navigation, customer communications, billing, and telephone systems were identified as priorities.

### **Accessibility Goals in the Area of ICT**

- Work toward conformance with WCAG 2.0 Level AA on the Company's Canadian-based public website and web content.
- Improve the accessibility and usability of customer-facing systems, including telephone, billing, and online service channels.
- Support accessible internal technology and communication tools for employees.
- Ensure that accessible formats and communication supports are available upon request in a timely manner.

### **Planned Action to Achieve Accessibility Goals**

#### **a) Feedback, Accessible Formats and Communication Supports**

The Company will ensure that processes for receiving and responding to feedback are accessible. Where accessible formats and communication supports are requested, the Company will:

- Provide or arrange for accessible formats and communication supports.
- Consult with the person making the request to determine the suitability of the accessible format or communication support.
- Provide accessible formats and communication supports in a timely manner that takes into account the person's accessibility needs.
- Provide accessible formats and communication supports at no greater cost than the regular cost charged to other persons.
- Notify the public about the availability of accessible formats and communication supports.

#### **b) Accessible Websites and Web Content**

The Company will work toward making its Canadian-based websites and web content conform with WCAG 2.0 Level AA. The Company will take reasonable steps to ensure that new Canadian-based websites and web content controlled by the Company conform with WCAG 2.0 Level AA, except where meeting the requirement is not practicable. The Company will maintain a clearly linked accessibility services page on its public website.

#### **c) Customer-Facing Systems**

- Review and improve the customer IVR telephone system to better support customers with intellectual, communication, or cognitive disabilities.
- Continue to review customer-facing systems and billing communications to identify opportunities to improve accessibility.
- Provide paper bills at no charge to customers who self-identify as a person with a disability for whom e-billing is a barrier.

### **3.4 Communication, Other than ICT**

The Company is committed to making its communications accessible to deaf persons in Canada and to other persons whose communication needs are not fully met by ICT alone. Communication other than ICT includes the use of American Sign Language, Quebec Sign Language, Indigenous sign languages, and one-on-one interactions in customer support, field operations, and workplace settings.

#### **Current Level of Accessibility in the Area of Communication, Other than ICT**

The Company uses plain language in customer communications, including terms of service, correspondence, and service agreements. Customer-facing employees and field technicians interact directly with customers as part of installation, repair, and support activities.

### **Barriers in Communication, Other than ICT as Identified by Consultation Participants**

Employees identified opportunities for additional training, tools, and resources to support accessible communication practices when interacting with customers, colleagues, and members of the public with diverse accessibility needs, including situations where a customer uses an interpreter, intervenor, or support person.

### **Accessibility Goals in the Area of Communication, Other than ICT**

- Equip frontline agents, field operations employees, and other employees with accessible communication training appropriate to their roles.
- Support employees with standard practices, tools, and templates that promote accessible communication.
- Continue improving accessibility in external communications, including marketing, advertising, and customer service materials.
- Ensure feedback processes are accessible to deaf persons in Canada and to others who require communication supports.

### **Planned Action to Achieve Accessibility Goals**

- Develop and roll out accessible communication training materials, with specialized content for frontline agents and field operations and general awareness training for other employees.
- Create or update supporting templates and standard practices to help employees communicate in accessible ways.
- Continue to improve accessibility in external communications, including marketing and advertising materials.
- Ensure existing and new processes for receiving and responding to feedback are accessible to deaf persons in Canada, including by providing or arranging accessible formats and communication supports in a timely manner upon request.
- Consult with the person making a request to determine the suitability of any accessible format or communication support and provide it at no greater cost than the regular cost charged to other persons.

## **3.5 The Procurement of Goods, Services and Facilities**

The Company is committed to considering accessibility in the procurement of goods, services, technology, and facilities in a manner that respects the dignity and independence of persons with disabilities.

### **Current Level of Accessibility in the Area of Procurement**

The Company procures a wide range of internal technology and software, as well as devices and equipment used to deliver telecommunications services to customers. Accessibility considerations are addressed in a variety of procurement decisions, and the Company will continue strengthening the integration of accessibility considerations into purchasing practices, supplier engagement, and technology selection.

### **Barriers in Procurement as Identified by Consultation Participants**

Consultation and internal review identified opportunities to further embed accessibility considerations into procurement processes, supplier selection activities, scoping discussions, and contract templates.

### **Accessibility Goals in the Area of Procurement**

- Embed accessibility considerations into the Company's procurement processes.
- Raise accessibility awareness among new and existing suppliers.
- Support procurement decisions that improve accessibility for employees, customers, and members of the public.
- Consider accessibility when purchasing or updating technology, software, equipment, services, and facilities.

### **Planned Action to Achieve Accessibility Goals**

- Review procurement processes during the term of this Plan to identify where accessibility considerations should be incorporated.

- Update procurement templates, scoping documents, or contract language where appropriate to include accessibility considerations.
- When interacting with new and existing suppliers, include accessibility awareness in scoping conversations and contracts where relevant.
- Consider supplier accessibility capabilities when evaluating goods, services, technology, and facilities that may affect employees, customers, or the public.

### **3.6 The Design and Delivery of Programs and Services**

The Company is committed to removing barriers in the design and delivery of programs and services and to giving people with disabilities the same opportunity to engage with and benefit from its programs and services as other customers.

#### **Current Level of Accessibility in the Area of the Design and Delivery of Programs and Services**

The Company's programs and services include the delivery of internet, telephone, and data services, including in-home and on-site installation and repair. As required under the Telecommunications Act and CRTC accessibility regulations, the Company makes available Message Relay Service, including TTY and IP Relay Services, for telephone customers. The Company communicates with customers in plain language and, upon request, provides customers with disabilities with a free copy of their monthly consumer agreement and related documents.

#### **Barriers in the Design and Delivery of Programs and Services as Identified by Consultation Participants**

Employees identified opportunities to further strengthen awareness, training, and resources that support accessible customer experiences during service interactions, installations, repairs, and emergency situations.

#### **Accessibility Goals in the Area of the Design and Delivery of Programs and Services**

- Equip customer-facing employees with the training and tools they need to support customers with disabilities.
- Ensure that routine customer communications and service-disruption notices are designed with accessibility in mind.
- Support the use of assistive devices, service animals, and support persons in accordance with legal requirements.
- Ensure that emergency and evacuation procedures consider accessibility needs.

#### **Planned Action to Achieve Accessibility Goals**

##### **a) Communication**

When communicating with people with disabilities, employees will do so in ways that take into account the person's disability. The Company will train employees who deliver programs and services on how to interact and communicate with people with various types of disabilities, building on the training developed under Section 3.4.

##### **b) Assistive Devices**

People with disabilities are welcome to use their own personal assistive devices, such as white canes, wheelchairs, hearing aids, and visual aids, to access or use the Company's programs and services. The Company will familiarize employees with assistive devices customers may use and will ensure that employees know how to use assistive devices that the Company makes available on its premises.

##### **c) Service Animals and Support Persons**

People with disabilities who are accompanied by a service animal are welcome on all parts of the Company's facilities open to the public and may participate in Company programs. Customers may keep the service animal with them unless excluded by law, in which case the Company will consider alternative measures to support

access to its services. Employees dealing with the public on the Company's behalf will be familiar with how to interact with people accompanied by a service animal.

Any person with a disability who is accompanied by a support person will be allowed to enter the Company's facilities with their support person and will not be prevented from having access to their support person while on Company premises or when participating in a Company program.

#### **d) Notice of Temporary Disruption**

In the event of a planned or unexpected disruption in facilities or services usually used by people with disabilities, the Company will post a notice about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available. The notice will be placed at or near the affected facility or service and/or through other appropriate means, such as the Company's website.

#### **e) Emergency Procedures**

The Company will consider accessibility in its emergency and evacuation procedures, including making individualized arrangements available to employees with disabilities upon request. The Company will continue to review emergency and evacuation practices to identify opportunities to better support employees, customers, and visitors with disabilities.

### **3.7 Transportation**

The area of Transportation is not applicable to the Company. EH!tel Networks LP is not involved in the transport of persons with disabilities and does not offer transportation services.

## **4. Accessible Formats**

This Accessibility Plan is available in accessible formats upon request. Requests can be made to the Designated Accessibility Representative using any of the contact methods set out in Section 1.4. The Company will provide the requested format in a timely manner that takes into account the person's accessibility needs:

- Regular print: within 15 days of receiving the request.
- Large print: within 15 days of receiving the request.
- Braille: within 45 days of receiving the request.
- Audio: within 45 days of receiving the request.
- Other accessible formats or communication supports: in consultation with the requester, in a timely manner.

## **5. Commitment to Continuous Improvement**

EH!tel Networks LP recognizes that accessibility is an ongoing process. The Company is committed to regularly reviewing its policies, practices, programs, services, technologies, and facilities to identify opportunities for improvement.

Feedback from employees, customers, applicants, suppliers, visitors, and members of the public will continue to play an important role in shaping the Company's accessibility priorities and actions. Through this Accessibility Plan, EH!tel Networks LP reaffirms its commitment to fostering an inclusive and accessible environment where all individuals are treated with dignity, respect, and equal opportunity.

## **6. Definitions**

The following definitions apply throughout this Accessibility Plan:

**Disability:** Any impairment, including a physical, mental, intellectual, cognitive, learning, communication, or sensory impairment, or a functional limitation, whether permanent, temporary, or episodic in nature, evident or not, that, in interaction with a barrier, hinders a person's full and equal participation in society.

**Barrier:** 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.

**Accessibility:** The design of products, devices, services, environments, technologies, policies, and rules in a way that allows all people, including people with a variety of disabilities, to access them.

## **Appendix A - Accessibility Principles**

This Accessibility Plan is guided by the Accessibility 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.
- 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.