



# 2023 – 2026 Accessibility Plan

June 1, 2024

## IceNet Wireless

### 1. Statement of Commitment

As part of providing customer-focused service, IceNet Wireless is committed to improving the accessibility of our products and services. We strive to provide our services and treat our employees in a way that respects the dignity and independence of all people. This plan outlines the steps we plan to take to achieve these goals.

### 2. General

#### 2.1. Providing Feedback

We welcome questions, concerns or other feedback on any issues involving accessibility from our customers or other interested people. This can include any feedback you feel is related to accessibility, including comments on this Accessibility Plan, or relating to any barriers you have identified in dealing with IceNet Wireless or accessing our products or services.

You may provide feedback on accessibility through your usual way of contacting us, including the following channels:

**Phone: Accessibility feedback link - 1-844-423-6384**

**Email: [accessibilityfeedback@icenetwireless.com](mailto:accessibilityfeedback@icenetwireless.com)**

**Accessibility Feedback Form - <https://icenetwireless.com/en/accessibility>**

#### **By mail:**

Manager for Accessibility  
IceNet Wireless  
Suite 304, 150 Katimavik Rd,  
Ottawa, ON K2L 2N2.

If you would like to be contacted in response to your concern, please let us know your preferred method of communication. Otherwise, we will respond to you through the same method that you used to contact us.

You also have the option of providing feedback anonymously. If you do, we will take note of your feedback through our usual internal process but will not respond to you directly.



Our Manager for Accessibility is the designated employee responsible for receiving feedback on accessibility. Any feedback on this plan or accessibility can be addressed directly to our Manager for Accessibility by mail at IceNet Wireless, Suite 304, 150 Katimavik Rd, Ottawa, ON K2L 2N2. or electronically at [accessibilityfeedback@icenetwireless.com](mailto:accessibilityfeedback@icenetwireless.com).

Unless you elect to provide feedback anonymously, we will contact you in response to confirm receipt and to work with you on how we can best address the issue.

In addition to addressing accessibility issues on a case-by-case basis directly with you, our agents are trained to forward all feedback to our accessibility representative who is responsible for receiving feedback on accessibility. Feedback will be tracked and assessed as part of the process for updating our Accessibility Plan and policies.

Any personal information you disclose to us while providing feedback on accessibility will be kept confidential. As with all personal information you provide to us, your personal information will be treated in accordance with our Privacy Policy available in URL <https://icenetwireless.com/en/privacy-policy>.

## **2.2. Requesting Alternative Formats of this Plan**

If you would like to request an alternative format of this plan, free of charge, upon request, please contact us in one of the ways listed above.

An electronic version in large print of this plan can be downloaded immediately from our website:

IceNet Wireless can provide this plan in any of the formats below:

- Printed physical copy;
- Audio recording;
- Braille;

If you have another format in mind, we are also happy to work with you to find an alternative format that will work best for you.



### 2.3. Definitions

The following key terms are used throughout this plan. We use these key terms as they are defined in the [Accessible Canada Act](#):

- **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.
- **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.
- **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.

## 3. Key Areas

### 3.1. Employment

#### Where we want to be:

IceNet Wireless is committed to fair and accessible employment practices to promote an inclusive and accessible work environment that is affirming and safe for our employees.

#### How we will get there:

<b>Identified Barrier</b>	Job searchers and applicants may face barriers in applying for jobs with IceNet Wireless
<b>Policies and Action(s)</b>	<p>As part of our job postings, we advise potential applicants about the availability of accommodation for applicants with disabilities in our recruitment processes.</p> <p>We notify job applicants when they are selected to participate further in the assessment/selection process that accommodation is available upon request.</p> <p>If an applicant requests accommodation, we further consult with the individual and plan for the provision</p>

	<p>of suitable accommodation to the extent possible that take into account the applicant's needs.</p> <p>Next steps:</p> <ol style="list-style-type: none"> <li>1. Ongoing review of our hiring practices based on feedback relating to accessibility.</li> </ol>
<b>Timeline</b>	<ol style="list-style-type: none"> <li>1. Ongoing</li> </ol>

<b>Identified Barrier</b>	<p>Employees may face barriers in performing their work that require accommodation.</p>
<b>Policies and Action(s)</b>	<p>We have a disability management and wellness plan to explain our practices for supporting employees with disabilities, including our policies regarding the provision of job accommodation. We maintain written documentation of individual accommodation plans for employees with disabilities, which can be accessed by the employees themselves. In the event employees return to office, these plans will also include individualized workplace emergency response information.</p> <p>We notify our employees of our program and any further updates to the policies.</p> <p>Next steps:</p> <ol style="list-style-type: none"> <li>1. Update staff onboarding training to improve employee awareness of our programs relating to disability management and wellness.</li> <li>2. Ongoing review of our disability management and wellness program based on feedback.</li> </ol>
<b>Timeline</b>	<ol style="list-style-type: none"> <li>1. Ongoing</li> </ol>

<b>Identified Barrier</b>	<p>Employees may face barriers in returning to work following or during a period of absence related to disability.</p>
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<b>Policies and Action(s)</b>	<p>Together with an external human resources partner, PomeGran Inc. will develop a graduated return-to-work program for employees when it is recommended for their individual needs.</p> <p>The current process for developing graduated return- to-work programs includes working with the individual employee and our external human resources firm, who assists the employee with obtaining documentation from their medical practitioner. Our external human resources partner then drafts an accommodation letter outlining the employees' needs, based on this medical documentation.</p> <p>Next steps:</p> <ol style="list-style-type: none"> <li>1. Ongoing review of our graduated return-to-work program based on any feedback received.</li> </ol>
<b>Timeline</b>	<ol style="list-style-type: none"> <li>1. Ongoing</li> </ol>

### 3.2. The Built Environment

#### Where we want to be:

IceNet Wireless is committed to ensuring that the public has barrier-free access to the parts of its premises open to the public, and its employees have barrier-free access to its offices whether working remotely or in office:

Our policy encourages most employees to always work in office with some exceptions.

#### How we will get there:

<b>Identified Barrier</b>	<p>Our employees may face physical discomfort or mobility issues in working at their remote workstations.</p>
<b>Policies and Action(s)</b>	<p>As with other employee accommodation, requested accommodations to workstations are addressed on a case-by-case basis by our human resources department.</p> <p>Next steps:</p> <ol style="list-style-type: none"> <li>1. We will review our disability management and wellness program and policies on an ongoing basis based on feedback.</li> </ol>
<b>Timeline</b>	<ol style="list-style-type: none"> <li>1. Ongoing review</li> </ol>

<b>Identified Barrier</b>	Our employees may face barriers in physically accessing our office buildings. These may include for example barriers posed by exterior and interior paths of travel, building entrances, ramps, stairs, doorways, washrooms, signage, illumination levels, parking, and flooring.
<b>Policies and Action(s)</b>	<p>Employees who require building access can receive accommodation through our usual accommodation process, described above.</p> <p>Next steps:</p> <ol style="list-style-type: none"> <li>1. Review the physical accessibility of our offices to identify remaining barriers to accessing our premises.</li> </ol>
<b>Timeline</b>	Ongoing

<b>Identified Barrier</b>	Employees may face barriers in being aware of or participating in emergency responses in the workplace.
<b>Policies and Action(s)</b>	<p>We will provide individualized workplace emergency response information to employees with disabilities where the employee's location and disability is such that individualized information is necessary and IceNet Wireless is aware of the need for accommodation. IceNet Wireless will provide workplace emergency response information as soon as practicable after learning of the need for accommodation due to an employee's disability.</p> <p>If an employee would likely require assistance in the event of a workplace emergency response, IceNet Wireless will designate a person(s) to help and, with the employee's</p>



	<p>consent we will provide the workplace emergency response information to the designated person(s).</p> <p>Individualized workplace emergency response information will be reviewed at minimum each time (i) the employee moves to a different location within IceNet Wireless; (ii) the employee’s overall accommodation needs or plans are reviewed, or (iii) there is a change in the physical environment.</p> <p>Next steps:</p> <ol style="list-style-type: none"> <li>1. Ongoing review of our individualized workplace emergency response program based on requests from employees and feedback.</li> </ol>
<b>Timeline</b>	Ongoing

### 3.3. Information and Communication Technologies and Design and Delivery of Programs and Services

#### Where we want to be:

IceNet Wireless’ goal is to provide barrier-free access to its Information and Communications Technologies (ICT), and to ensure the design and delivery of its services takes accessibility into account. IceNet Wireless is committed to ensuring its clients are satisfied with the design and delivery of our services.

#### How we will get there:

As most of our products and services are either ICT themselves, or facilitate the use of ICT, we have considered ICT together with the design and delivery of our programs and services.

<b>Identified Barrier</b>	<b>Branding colours:</b> Some Brand colours may not be ideal for ensuring readability for all individuals, including individuals with colour blindness or vision impairment.
<b>Policies and Action(s)</b>	IceNet Wireless plans to ensure any future branding reviews will improve the accessibility of its brand colours.

	<p>Next steps:</p> <ol style="list-style-type: none"> <li>1. Incorporate accessibility lens into future branding reviews.</li> </ol>
<b>Timeline</b>	<ol style="list-style-type: none"> <li>1. Ongoing</li> </ol>

<b>Identified Barrier</b>	<p><b>Website accessibility:</b> The primary source of information about our ICT products and services is our website. The information on our website may not be accessible for all potential customers. For example, issues such as drop-down menus, hyperlinks and online selection forms may not be functional for all screen-reader tools.</p>
<b>Policies and Action(s)</b>	<p>IceNet Wireless currently employs a tool to ensure its website is compliant with Web Content Accessibility Guidelines (WCAG). Our existing website content, and any new website content, is assessed for compliance with this tool. We will continue to ensure that our website is accessible through ongoing testing with our WCAG compliance tool and identify any new sources of non-conformance. We will also continue to update our website based on any feedback we receive related to accessibility issues.</p> <p>Next steps:</p> <ol style="list-style-type: none"> <li>1. Ongoing review of accessibility of our website.</li> </ol>
<b>Timeline</b>	<ol style="list-style-type: none"> <li>1. Ongoing</li> </ol>

<b>Identified Barrier</b>	<p><b>Social Media and Advertising Accessibility:</b> IceNet Wireless's' social media and advertising posts may not be accessible to all users.</p>
<b>Policies and Action(s)</b>	<p>IceNet Wireless does not currently have in place a specific policy for ensuring the accessibility of its social media and advertising posts. This means that IceNet Wireless employees posting on its social media accounts may not be familiar with best practices for ensuring accessibility of its posts, such as providing alternative text for images and closed captioning for any videos.</p> <p>Next steps:</p>

	<ol style="list-style-type: none"> <li>1. Include accessibility guidelines in our standard advertising review checklist to promote better internal awareness.</li> <li>2. Develop social media policy identifying barriers to accessibility on social media and establishing best practices for posts.</li> </ol>
<b>Timeline</b>	<ol style="list-style-type: none"> <li>1. Ongoing</li> </ol>

<b>Identified Barrier</b>	<p><b>Remote installations and troubleshooting:</b> we have identified that our customers may experience barriers to receiving customer support remotely, including when setting up internet or other services for the first time, or when they require technical support. For instance, when a customer is experiencing certain issues, such as connectivity, IceNet Wireless agents will assist the customer remotely and guide the customer through different troubleshooting tasks. This may include, for example guiding the customer through accessing a web portal or reading a light pattern on hardware.</p> <p>Remote troubleshooting of this type can pose a barrier to accessing services in several ways. For example, people may have difficulty reading visual cues on hardware, or have difficulty with using technology. People may have physical mobility restrictions that may not allow them to easily access their hardware.</p> <p>IceNet Wireless will always have agents available to personally assist customers with any form of disability.</p>
<b>Policies and Action(s)</b>	<p>Currently IceNet Wireless' agents will work with customers to find support for various accommodations on a case-by-case basis. For example, customers may choose to ask a family member or friend, or personal support worker, to join them for a call. Customers are also able to provide a limited form of account access to allow a specific individual to take care of all troubleshooting.</p> <p>Agents may not be familiar with all available accommodations or may have difficulty identifying that a customer requires accommodation. We will work with our employees to receive training on accessibility when they are onboarded and deliver similar training on an ongoing basis.</p>

	<p>Next Steps:</p> <ol style="list-style-type: none"> <li>1. We will develop a specific “quick reference” checklist for our agents to advise on:             <ol style="list-style-type: none"> <li>a. how to identify barriers to accessibility in troubleshooting.</li> <li>b. common types of accommodations for addressing specific barriers.</li> </ol> </li> <li>2. We will provide ongoing refresher training to agents to ensure they understand best practices for accommodating customers during troubleshooting.</li> </ol>
<b>Timeline</b>	<ol style="list-style-type: none"> <li>1. Ongoing</li> </ol>

<b>Identified Barrier</b>	<p><b>Communication with customers:</b> customers may face barriers in seeking to communicate with our sales and support agents in general. This includes for example customers with visual, auditory, or cognitive impairments, and customers with difficulties accessing technology typically used for communicating with our agents.</p>
<b>Policies and Action(s)</b>	<p>IceNet Wireless currently allows customers to contact us through a variety of methods, including by phone, email, and social media chats. Our agents are trained in communicating clearly and on accessibility considerations, including tools for accommodating customer needs, when they are onboarded. Our agents are also trained on when to escalate complaints where they cannot find a way to assist.</p> <p>Next steps:</p> <ol style="list-style-type: none"> <li>1. We will create additional refresher training materials for our agents to ensure they are aware of the best communication practices, including those for reducing barriers.</li> </ol>

	<ol style="list-style-type: none"> <li>2. Review internal policies and training to ensure all front-line staff and future hires are knowledgeable about best communication practices.</li> <li>3. Publish all accessibility training resources to be available to all employees on our internal resource site.</li> </ol>
<b>Timeline</b>	Ongoing

<b>Identified Barrier</b>	<b>Accessibility of our customer policies:</b> communication may pose a barrier to understanding our existing policies, such as our customer terms and privacy policies. For example, policies may not be written in plain language, or alternative formats are not readily available.
<b>Policies and Action(s)</b>	<p>Our existing policies are made available publicly on our website. We also provide copies upon request in alternative formats.</p> <p>Next steps:</p> <ol style="list-style-type: none"> <li>1. As existing policies are updated and new policies are created, ensure plain language is used throughout, targeting at a grade 6-8 reading comprehension level.</li> <li>2. Provide alternative formats for policies available for download on our website.</li> </ol>
<b>Timeline</b>	1. Ongoing

### 3.4. Procurement of goods, services and facilities

#### Where we want to be:

IceNet Wireless' goal is to ensure its employees involved in procurement consider accessibility from the start of a procurement process, such that all new goods, services and facilities IceNet Wireless procured will be accessible by default. IceNet Wireless is committed to incorporating accessibility awareness into its procurement practices so that they are accessible to all vendors.

#### How we will get there:

<b>Identified Barrier</b>	<p>Not all employees who may engage in procurement are aware of the importance of accessibility in the procurement process.</p> <p>Moreover, IceNet Wireless typically engages in informal procurement processes, which means that accessibility considerations of a product or service may not be identified at the outset of the process.</p>
<b>Policies and Action(s)</b>	<p>Next steps:</p> <ol style="list-style-type: none"> <li>1. Develop an accessibility policy for procurement that:             <ol style="list-style-type: none"> <li>a. Identifies potential barriers to persons with disabilities looking to participate in procurement processes; and</li> <li>b. Explains how accessibility considerations of a product or service should be identified at the procurement stage.</li> </ol> </li> </ol>
<b>Timeline</b>	<ol style="list-style-type: none"> <li>1. Ongoing</li> </ol>

### 3.5. Transportation

#### Where we want to be:

IceNet Wireless does not itself provide any transportation services and this key area does not therefore directly apply to IceNet Wireless’s operations. That said, IceNet Wireless is committed to ensuring that its employees will have barrier-free access to transportation as needed in order to accomplish their work.

#### How we will get there:

<b>Identified Barrier</b>	<p>Employees may face barriers in accessing transportation needed to accomplish their work, such as where off-site work requires the use of a vehicle.</p>
<b>Policies and Action(s)</b>	<p>As with most accommodations relating to employment, IceNet Wireless currently addresses accommodation requests relating to transportation on a case-by-case basis. As these</p>

	<p>requests are rare, more consideration of possible barriers faced by employees to transportation is required.</p> <p>Next steps:</p> <ol style="list-style-type: none"> <li>1. Develop transportation guidelines to plan for alternative transportation to worksites to ensure employees with disabilities can perform off-site work as needed.</li> </ol>
<b>Timeline</b>	Ongoing

### 3.6. Communication, other than ICT

We are required to identify areas where communication (other than information and communication technologies) can pose a barrier to the subject areas described above. For ease, we have integrated this discussion into the specific areas where we have identified communication as posing a potential barrier.

## 4. Accessible Canada Act and the Telecommunications Act

As a federally regulated telecommunications provider, we are subject to the Accessible Canada Act (the “ACA”) and its regulations: the Accessible Canada Regulations and the Canadian Radio-television and Telecommunications Commission Accessibility Reporting Regulations. At a high-level, the ACA and these regulations require us to:

- Prepare and publish this Accessibility Plan designed to identify barriers in different areas of our business, as well as outline our policies, plans, and practices to remove these barriers.
- Publish an updated version of our Accessibility Plan every three years.
- Prepare annual progress reports in years we do not publish an Accessibility Plan.
- Link to the accessibility section of our website directly on our home page.
- Accept feedback related to this plan or accessibility and describe our process for accepting feedback. Our process for providing feedback is discussed in section [2.1](#) above.
- Ensure our materials described above, such as this Accessibility Plan, progress reports and our feedback process description, are published in a manner that conforms to most recent WCAG guidelines.

IceNet Wireless is also subject to some requirements relating to accessibility as part of decisions made by the Canadian Radio-television and Telecommunications Commission (CRTC) under the *Telecommunications Act*. We have summarized the requirements relevant to IceNet Wireless in this section. We note that as a smaller provider of



telecommunications services, IceNet Wireless is not subject to all CRTC decisions relating to accessibility, and therefore only those that apply to IceNet Wireless are listed below.

#### **4.1. Making Information About our Telecom Services Accessible**

As part of Telecom Regulatory Policy 2017-11, service providers like IceNet Wireless are required to make information about all our telecommunications services and products on our websites accessible to the point of providing reasonable accommodation for persons with disabilities.

#### **4.2. Alternative Channels of Customer Service**

As part of Telecom Regulatory Policy 2017-11, where customer service functions on our websites are not accessible, persons with disabilities must not incur a charge or otherwise be disadvantaged if they use an alternate channel of customer service to access those functions. We are also required to ensure the accessibility of any customer service functions that are available solely over the service providers' websites.

IceNet Wireless does not charge any fees for using alternative channels of customer service outside of our website. We look forward to serving you by phone, email or through our social media account.

#### **4.3. Call Centre Accessibility**

As part of Telecom Regulatory Policy 2017-11, service providers like IceNet Wireless are required to make their general call centres accessible to the point of providing a reasonable accommodation to persons with disabilities. This includes by (a) training customer service representatives in handling enquiries from persons with disabilities, (b) familiarizing them with the service providers' products and services for persons with disabilities, and (c) making Interactive Voice Response systems accessible. A service provider with a disability call centre can meet this requirement by developing and implementing protocols for the appropriate transfer of calls to the call centre.



## 5. Consultations

This Accessibility Plan was prepared by first discussing common barriers to accessibility with representatives from groups across PomeGran Inc, including employees involved in human resources, health and safety, customer service (including customer complaints and escalations), website design and specific products and services. In preparing the plan, employees considered their knowledge of existing barriers and challenges to overcoming those barriers, as well as where current policies and practices may fall short.

Once an initial draft plan was prepared, employees across different teams in the organization were invited to consult on the plan in different ways. Initially, this was done by identifying select representatives across teams within the business with experience in various areas. In consideration of employees' privacy, employees that participated in the consultation were not asked to identify if they lived with a disability or not. Based on this consultation process, revisions to the draft plan were made.

This process led to the preparation of a finalized draft version of the plan ready for more formal consultation. At that stage, IceNet Wireless does not currently have a formal network of stakeholders in the accessibility space.

The plan was reviewed with the focus to identify improvements to the Plan, including ways to improve readability of the plan for screen-assisted devices, an additional barrier to accessibility that IceNet Wireless employees had not initially identified, and other steps that could be taken to address identified barriers. Comments and recommendations received in this process were integrated into the final plan.

## 6. Section 6 of the ACA

The *Accessible Canada Act* sets out seven key principles. The Act should be carried out in recognition of, and in accordance with, these principles. IceNet Wireless has taken account of these principles in preparing its Accessibility Plan:

- 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.

IceNet Wireless reviewed these principles prior to engaging in its review of barriers described above and kept these goals at the forefront in assessing what its goals should be in each element of its business described above. IceNet Wireless reviewed each of its “next steps” action plans against these principles and adjusted our next steps where they did not fully reflect these principles.

In consulting internally on its draft of this Accessibility Plan, IceNet Wireless ensured these specific principles were brought to employees’ attention to ensure their feedback could be the most meaningful.