

FIRSTLIGHT

Accessibility Progress Report

Accessible Canada Act

ORGANIZATION	FirstLight Fiber, Inc.
DOCUMENT STATUS	Final
DATE	September 2026

Purpose This report summarizes FirstLight’s accessibility progress, outstanding commitments, and anticipated next steps following review of the 2025 Accessibility Plan.

1. Introduction

FirstLight Fiber, Inc. (“FirstLight”) is committed to identifying, preventing, and removing barriers to accessibility and to improving accessibility across its policies, programs, practices, services, and workplace.

FirstLight published its Accessibility Plan in 2025. The Plan identified accessibility priorities across seven areas: Employment; the Built Environment; Information and Communication Technologies (“ICT”); Communication other than ICT; Procurement of Goods, Services and Facilities; Design and Delivery of Programs and Services; and Transportation.

This Progress Report provides an update on FirstLight's activities and progress since publication of the Accessibility Plan. It identifies measures currently in place, work completed or partially completed, commitments that remain outstanding, and actions FirstLight intends to continue as part of its accessibility program.

Not all actions contemplated in the Accessibility Plan were completed during this period. This report identifies those items together with current or anticipated next steps.

2. Feedback

FirstLight maintains channels through which individuals may provide accessibility-related feedback or request accessibility information.

During the period covered by this report, FirstLight is not aware of having received accessibility-related feedback through its designated channels. FirstLight also did not receive a request for its Accessibility Plan or related accessibility information in an alternative format.

Because no accessibility-related feedback was received during this period, there was no specific feedback requiring incorporation into changes to FirstLight's policies, programs, practices, or services.

FirstLight will continue to monitor its accessibility feedback channels and consider accessibility feedback received in its ongoing accessibility planning.

3. Consultation with Persons with Disabilities

FirstLight's 2025 Accessibility Plan contemplated consultation with persons with disabilities as part of its efforts to identify, prevent, and remove accessibility barriers.

Formal consultation with persons with disabilities was not completed during the period covered by this report. FirstLight has also not yet completed consultation with an external accessibility advocate or accessibility organization.

FirstLight is currently developing an accessibility survey/questionnaire as the first stage of a more structured consultation process. The survey is anticipated to be distributed by the end of October 2026, with results expected to be reviewed during November 2026.

FirstLight intends to use the survey results to help identify and categorize the accessibility issues and barriers most relevant to the organization. Following review and categorization of the survey results, FirstLight will evaluate the identified accessibility barriers and determine the most appropriate method and available resources for obtaining recommendations regarding potential remedies and barrier-removal measures.

The resulting recommendations will be evaluated by FirstLight to identify additional barriers, opportunities for improvement, and appropriate actions for consideration in future updates to FirstLight's Accessibility Plan and subsequent progress reporting.

4. Progress in Priority Areas

Employment

FirstLight has a number of existing workplace practices that support employees who require accommodations. These include a process through which accommodation needs can be submitted to Human Resources and management for review, accommodation information during onboarding, accessible workplace considerations, flexible scheduling where appropriate, and nondiscrimination practices.

FirstLight also considers accessibility when planning workplace activities and events. Current practices may include accessible venues, remote participation options, consideration of dietary restrictions, and mobility assistance where necessary.

Human Resources reviews its policies and procedures annually. FirstLight intends to supplement these existing practices by considering recommendations arising from its planned accessibility consultation and incorporating appropriate recommendations into future materials and practices.

Dedicated accessibility and disability-awareness training contemplated by the Accessibility Plan has not yet been implemented. FirstLight currently plans to incorporate accessibility, disability-awareness, equal employment opportunity, and inclusive workplace training into its annual training program beginning in 2027, consistent with applicable employment and anti-discrimination laws.

FirstLight also intends to use its accessibility consultation process to review recruitment and retention practices to identify and address accessibility barriers and support equal access to employment opportunities for qualified applicants and employees with disabilities, consistent with applicable employment and anti-discrimination laws. Recommendations from the consultation will be evaluated to identify appropriate improvements.

Accessibility of staffing and performance-management technologies continues to be evaluated. When an individual experiences an accessibility issue with an existing tool, Human Resources can provide alternative formats, human assistance, or tailored workflows to support participation.

Built Environment

FirstLight's U.S. office facilities are accessible, with accessible entrances, elevators or ground-floor access and accessible meeting spaces available where needed.

Facilities conducts an annual review of FirstLight properties. In addition, property management provides and maintains professional level office space.

FirstLight is confirming whether any accessibility-related facility complaints or requests have been received since publication of the Accessibility Plan and whether specific accessibility-related facility improvements have been completed since 2025.

FirstLight does not own buildings or equipment in Canada. Facilities and equipment used in connection with FirstLight's Canadian operations are rented or leased. Any physical work required at Canadian data center locations is performed by local third-party contractors on behalf of FirstLight though not Firstlight employees. FirstLight employees supporting services provided to Canadian customers are based in the United States.

Information and Communication Technologies (ICT)

FirstLight's public website has been reviewed for accessibility and was modernized in 2025 as part of broader website improvements. FirstLight is currently confirming the extent to which the website has been evaluated against applicable Web Content Accessibility Guidelines ("WCAG") and whether accessibility-specific improvements can be identified as part of the 2025 modernization.

FirstLight has not yet confirmed that a comprehensive accessibility assessment of its software and information technology systems has been completed. Similarly, FirstLight has not identified systems that were replaced or modified specifically because of accessibility concerns during this reporting period.

When an employee experiences an accessibility barrier involving a technology or system, FirstLight's Human Resources accommodation process is available to provide assistance, alternative formats, human support, or an alternative workflow as appropriate.

Further assessment of technology accessibility remains an area for continued review. FirstLight also intends to establish an annual accessibility review of its public website to identify potential accessibility barriers and opportunities for improvement.

Communication Other Than ICT

FirstLight has developed plain-language guidance and makes documents or information available in accessible or alternative formats upon request.

Accessibility is also considered in meetings and events. Available measures include accessible venues, remote participation and other accommodations where appropriate. Virtual meeting technology provides features such as transcription and recorded replays.

FirstLight has partially reviewed or updated its internal intranet for accessibility. Additional work remains to complete that review.

Formal employee guidance specifically addressing the creation of accessible documents, presentations, PDFs, images, and similar communications has not yet been implemented. FirstLight has identified this as an area for continued improvement and intends to develop internal guidance for creating accessible documents and electronic communications, including the use of available accessibility-checking tools.

No accessibility-related complaints or feedback concerning FirstLight communications were identified during this reporting period.

Procurement of Goods, Services and Facilities

FirstLight has not yet completed the formal review of its Procurement Policy contemplated by the Accessibility Plan. The current policy does not specifically reference the Accessible Canada Act or formally establish accessibility criteria throughout FirstLight's purchasing process.

Accessibility is nevertheless considered to some extent in existing purchasing practices. Certain technology and telecommunications products used by FirstLight include accessibility functionality or compatibility with accessibility equipment. Vendors may also be asked whether they comply with applicable accessibility laws.

FirstLight has not yet formally incorporated accessibility requirements into its contracts, requests for proposals, vendor questionnaires, or purchasing procedures.

FirstLight intends to review its procurement practices to determine how accessibility considerations can be more formally incorporated. Areas anticipated for review include accessibility criteria for relevant goods, services, facilities and technology; requesting accessibility information from vendors where appropriate; and providing guidance to employees involved in purchasing decisions.

Design and Delivery of Programs and Services

Accessibility is considered to some extent in FirstLight's products and services. Certain third-party technology solutions used by FirstLight contain accessibility functionality, and telecommunications products may be compatible with accessibility equipment.

Customers may request accommodations or alternative methods of receiving information or service when needed because of a disability. Accessibility is also considered when FirstLight plans customer-facing or public meetings and events.

FirstLight has not yet established a formal process for obtaining accessibility input when developing or materially changing programs and services. No specific customer-facing accessibility improvements resulting from such consultation were identified during this reporting period.

The consultation process currently being developed will provide an opportunity for FirstLight to obtain accessibility input and identify potential improvements to the design and delivery of programs and services.

Transportation

FirstLight maintains a fleet of company vehicles used as operational work and service vehicles. FirstLight does not use this fleet to provide transportation services to employees, customers, or members of the public.

No employee accessibility requests or accessibility issues involving company vehicles were identified during the reporting period, and FirstLight has not conducted a separate accessibility-specific review or modification of its vehicle fleet.

FirstLight will review the scope of this priority area as part of its continuing accessibility planning to determine what measures, if any, are appropriate given the operational purpose of its fleet.

5. Challenges and Outstanding Actions

FirstLight's review identified several areas in which the objectives of the 2025 Accessibility Plan have not yet been fully implemented. In particular, formal consultation with persons with disabilities was not completed during this reporting period. Several accessibility-specific reviews also remain incomplete or require additional verification, including aspects of technology accessibility, WCAG compliance, procurement practices, accessible-document guidance, and the accessibility of certain internal systems.

FirstLight's review also identified that some existing practices already provide accessibility support even though those practices were not necessarily developed specifically in response to the Accessible Canada Act. FirstLight intends to evaluate these existing practices alongside the results of its planned consultation to determine where additional formalization or improvement is appropriate.

6. Next Steps

FirstLight's immediate accessibility work will focus on completing the consultation process currently under development. The accessibility survey is anticipated for rollout by the end of October 2026, with results reviewed and categorized during November-December 2026. Following review and categorization of the survey results, FirstLight will evaluate the identified accessibility barriers and determine the most appropriate method and available resources for obtaining recommendations regarding potential remedies and barrier-removal measures.

FirstLight will evaluate the consultation results and recommendations to identify barriers and appropriate corrective or improvement measures. Relevant actions will be incorporated into FirstLight's ongoing accessibility planning and future reporting.

Other areas for continued work include accessibility training, technology accessibility assessment, an annual public-website accessibility review, completion of the intranet accessibility review, development of accessible-document guidance, formal incorporation of accessibility into procurement practices, and further review of recruitment, retention, and employment practices.

TIMEFRAME	ACTIVITY	PURPOSE
End of Oct. 2026	Accessibility survey rollout	Gather structured accessibility input
Nov.-Dec. 2026	Review and categorize survey results	Identify accessibility barriers and priority areas
Following survey review	Evaluate appropriate methods and available accessibility resources	Obtain recommendations regarding potential remedies and barrier-removal measures
Following consultation/review	Evaluate recommendations	Incorporate appropriate actions into planning and reporting

7. Contact Information

Feedback regarding accessibility and FirstLight's Accessibility Plan may be submitted to:

FirstLight Fiber, Inc. Attention: Regulatory Compliance 12 Metro Park Road Albany, NY 12205 Telephone: (518) 545-0213 Email: alievanos@firstlight.net

Information may also be requested in an alternative accessible format.