



Accessibility Plan
2025-2027

August 9, 2025
Revision 1

Accessibility Plan

Action Plan - Accessible Canada Act – Diversity and Inclusion of Persons with Disabilities

Revision History		
Rev.	Date	Change
1	August 9,2025	Initial Release

Accessibility Plan

Action Plan - Accessible Canada Act – Diversity and Inclusion of Persons with Disabilities

Table of Contents

- I. Executive Summary
- II. Summary of the key barriers and actions to be taken Accomplishments and highlights
- III. General
 - a. Background About Firstlight
 - b. Diversity and Inclusion Policy and Contact Information
- IV. Barriers and actions
 - a. Employment
 - b. The built environment
 - c. Information and communication technology
 - d. Communication (other than information communication technology)
 - e. The procurement of goods, services and facilities
 - f. The design and delivery of programs and services
 - g. Transportation
- V. Consultations
 - a. Consultation process
- VI. Glossary

Accessibility Plan

Action Plan - Accessible Canada Act – Diversity and Inclusion of Persons with Disabilities

I. Executive Summary

The Accessible Canada Act aims to realize a barrier-free Canada by 2040. Firstlight has developed this work-in-progress Accessibility Plan to meet its responsibilities under the Accessible Canada Act and to persons with disabilities.

This plan outlines the barriers that may currently exist, and over the next three years (2025–2027) we will identify the steps that we will take to remove them.

A key principle of the Act is “Nothing Without Us,” which means that persons with disabilities should be consulted when developing rules, regulations, policies, practices, services, and programs. People with disabilities are in the best position to tell us about the barriers they face. As such, the contribution of Firstlight employees with disabilities will be instrumental in the development of this action plan.

FirstLight used the guidelines of the Accessible Canada Act, and intends to consult with partners in accessibility, such as Diversity and Inclusion Committees, and other working committees and advisory groups on the development of this plan.

All employees of Firstlight will be provided with an opportunity to identify barriers to accessibility through a survey and to contribute to the plan.

II. Summary of the key barriers and actions to be taken

FirstLight is implementing solutions to address barriers to accessibility. FirstLight’s actions will contribute to a society that is more accessible and a workforce that reflects the diversity of Canadians.

Key Perceived Barriers identified

Barriers exist in a range of communications methods with the public and employees, particularly relating to digital communications.

Accessibility standards are not fully met with respect to:

- Information available on the public website.
- Public and internal events.
- Software and equipment used by employees.
- Some employee office workspaces utilized by Firstlight are not fully accessible.
- Awareness training for employees to support awareness and accessibility are currently limited.

Actions to be taken by FirstLight

- Soliciting feedback and conducting consultation and engagement activities with persons with disabilities (2026).
- Improving public and internal communications during meetings and events and ensuring that digital communications are fully accessible.

Accessibility Plan

Action Plan - Accessible Canada Act – Diversity and Inclusion of Persons with Disabilities

- Ensure office space and meeting facilities are available at ground levels to facilitate access to restricted mobility persons.
- Embed diversity and inclusion into company standards of business conduct (2026).
- Implementing training on accessibility and disability awareness, diversity and inclusion for employees, managers and executives (2026).
- Implementing best practices aimed at embedding a culture of diversity and inclusion in the workplace to attract and retain employees, regardless of ability, age, gender and other identity factors.

Accessibility Plan

Action Plan - Accessible Canada Act – Diversity and Inclusion of Persons with Disabilities

I. General

The Accessibility Plan FirstLight aligns with the Accessible Canada Act (ACA) and the Accessible Canada Regulations.

Words used in this document that are related to accessibility are defined in the Glossary.

Background

The Accessible Canada Act aims to realize a barrier-free Canada by 2040. It is a federal law that involves identifying, removing and preventing new barriers to accessibility. Firstlight is subject to the Act and, as such, we must:

- Publish an accessibility plan.
- Set up a process for receiving feedback about the plan and barriers to accessibility.
- Consult with persons with disabilities.
- Prepare progress reports on the implementation of the plan.
- Provide a description of the feedback process.
- Report to the Accessibility Commissioner every year.
- Carry out FirstLight's responsibilities by applying the principles identified in the Act.
- Update the accessibility plan every three years.

About FirstLight

FirstLight provides a full complement of cost-effective, high-quality, scalable telecommunications services, including private line, high speed Internet access, data center, cloud, managed and voice services to retail and wholesale customers throughout the Northeast and mid-Atlantic.

FirstLight has been building and operating its own fiber network, including fiber to the premises systems, for over 20 years with roots going back a century. The network has approximately 25,000 route miles, more than 15,000 on-net locations with access to more than 125,000 locations in six states, with connectivity to Montreal. In our key markets, we have significant fiber density to ensure that we can offer a comprehensive solution that addresses all locations. FirstLight's core data and switching platforms are designed for maximum availability to ensure that our services meet or exceed our stated Service Level Agreements (SLAs).

Accessibility Plan

Action Plan - Accessible Canada Act – Diversity and Inclusion of Persons with Disabilities

Diversity and Inclusion Policy

FirstLight is committed to fostering, cultivating and preserving a culture of diversity, and inclusion. We embrace and encourage our employees' differences in age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, disability, race, religion, sexual orientation, socio-economic status, veteran status, and other characteristics that make our employees unique. We believe these differences offer the opportunity to experience varying perspectives, which provide valuable insights and problem-solving skills in the workplace.

FirstLight encourages and enforces:

- Respectful communication and cooperation between all employees,
- Teamwork and employee participation, permitting the representation of all groups and employee perspectives.
- Work/life balance through flexible work schedules to accommodate employees' varying needs.
- Employer and employee contributions to the communities we serve to promote a greater understanding and respect for inclusion.
- All employees of FirstLight have a responsibility to always treat others with dignity and respect. All employees are expected to exhibit conduct that reflects inclusion during work, at work functions on or off the work site, and at all other company-sponsored and participative events.

Any employee found to have exhibited any inappropriate conduct or behavior against others may be subject to disciplinary action up to and including termination of employment.

Employees who believe they have been subjected to any kind of discrimination that conflicts with FirstLight's diversity policy and initiatives should seek assistance from a supervisor or Human Resources.

The 2017 Canadian Survey on Disability found that over 6.2 million people in Canada met criteria for having a disability. This includes over 6 million people with long-term health problems or conditions that fit into one or more of the ten categories of disability.

We are committed to ensuring our goals and actions are aligned with Government of Canada action plan of ensuring inclusiveness and the richness of Canada's diversity are reflected in our workforce and workplaces, and in the development of our products and services.

FirstLight is committed to working towards the goals of the Accessible Canada Act by:

- Striving for a barrier-free by 2040.
- Identifying, removing and preventing barriers to accessibility in its programs, policies, services and workplaces.
- Working with and consulting persons with disabilities, organizations who advocate on their behalf and internal committees, to better understand the full range of diversity of the communities Firstlight serves and to identify and address barriers to accessibility.
- Increasing its representation of persons with disabilities.
- Creating a work environment where everyone is treated with dignity, fairness and respect and where everyone can fully participate and contribute to the objectives of Firstlight.

Accessibility Plan

Action Plan - Accessible Canada Act – Diversity and Inclusion of Persons with Disabilities

Contact information

You may communicate with us about accessibility in the following ways:

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

Accessibility Plan

Action Plan - Accessible Canada Act – Diversity and Inclusion of Persons with Disabilities

II. Barriers and actions

The barriers and plans to remove and prevent them are grouped into seven priority areas.

1. Employment
2. The built environment
3. Information and communication technologies (ICT)
4. Communication other than ICT
5. The procurement of goods, services and facilities
6. The design and delivery of programs and services
7. Transportation

1. Employment

Firstlight strives to be an employer of choice, for all people. We want to give people with disabilities equal access to employment and advancement opportunities. We also want to offer them access to accommodation they need so they can contribute to their full potential as employees.

Barriers: Employment

- Knowledge and awareness about accessibility is limited. Employees may not have enough knowledge or awareness to apply accessibility lenses fully and effectively in their work.
 - Planned Actions: Employment
 - Implement accessibility and disability awareness and training requirements for employees, including managers, Human Resources advisors, executives and specialists.
 - Implement training and awareness sessions on diversity and inclusion, and unconscious bias for all employees.
 - Develop plans to improve the recruitment and retention of employees with disabilities.
- Workplace activities may not fully consider and support the needs of employees with disabilities.
 - Planned Actions: Employment
 - Continue to look for ways to improve workplace culture through human resources programs and services.
 - Continue to promote inclusiveness in the workplace.
 - Identify ways to make sure that employees with disabilities are considered and included in the development of workplace activities and special events.
- There is no official procedure for communicating the availability of accommodations for candidates in staffing processes.

Accessibility Plan

Action Plan - Accessible Canada Act – Diversity and Inclusion of Persons with Disabilities

This could lead to:

- Candidates missing opportunities to request and receive accommodations.
- Managers and Human Resources Advisors not knowing how to provide accommodations to candidates who have disabilities.
 - **Planned Actions: Employment**
 - Improve communications to applicants on how to request accommodations.
 - Improve communications to managers on how to provide accommodations to candidates during staffing processes.
 - Add information about the accommodations process into the onboarding process.
- Some human resources policies, procedures and employment systems use outdated language, approaches or practices that could contribute to systemic barriers to accessibility.
 - Some human resources policies, procedures and employment systems use outdated language, approaches or practices that could contribute to systemic barriers to accessibility.
 - **Planned Actions: Employment**
 - Periodically review the policies, procedures, programs technology systems, etc. and make recommendations on how to improve them.
 - Based on the recommendations, develop a plan to modernize Human Resources policies, programs and services to remove and prevent systemic barriers and to build trust with persons with disabilities.
 - Include and consult committees and persons with disabilities in the redevelopment of Human Resources programs and policies.
- Information technology used for staffing and performance management may not be fully accessible.
 - **Planned Actions: Employment**
 - Develop plans to remove and prevent barriers in systems used for staffing.

2. The current facilities

Firstlight is a top provider of telecommunications solutions. Our facilities are accessible to individuals with disabilities, designed with environmental sensitivity, sustainability, and industry best practices in mind. We are committed to fostering a professional and safe workplace.

Accessibility Plan

Action Plan - Accessible Canada Act – Diversity and Inclusion of Persons with Disabilities

3. Information and communication technology

Firstlight provides corporate-wide information and communication technologies tools and services, and information management, designed to ensure efficient and effective operations.

In the procurement process for information and communication technology, software and equipment,

Firstlight will make it a priority to select solutions that adhere to the Web Content Accessibility Guidelines 2.0 Level AA (Web Accessibility Standard). These guidelines offer technical specifications designed to enhance the accessibility of web content, websites, and web applications across all devices for individuals with various disabilities, including those related to hearing, cognition, neurological conditions, mobility, vision, and speech.

Barriers: Information and communication technology	Planned actions: Information and communication technology
Certain software solutions are non-compliant or partially compliant with the Treasury Board Secretariat, Web Accessibility Standard.	• Assess all software systems for compliance with the Web Accessibility Standard. • Develop a strategy to resolve and migrate away from partial and non-compliance with the Web Accessibility Standard. • Transition, replace or modify information technology solutions to meet or exceed the Web Accessibility Standard.

4. Communication (other than information communication technology)

Firstlight engages with the public through various channels, including website content, blog posts, media advisories, news releases, media clippings, and digital ads on online platforms and social media. Additionally, Firstlight produces visual communication materials like photos, videos, infographics, maps, brochures, posters, and signs. FirstLight connects with the public through industry events, recruitment fairs, and workshops.

Barriers: Communication	Planned actions: Communication
The language used in communications and consultations can be at a high-literacy level and not all communications use plain language	• Draft guidelines for employee on using plain language.

Accessibility Plan

Action Plan - Accessible Canada Act – Diversity and Inclusion of Persons with Disabilities

Not all communications use inclusive language or are available in various accessible formats. Examples: • Audio-only materials such as meetings or speeches. • Visual-only materials such as images, maps, presentations.	• Draft guidelines for employees on: ○ Creating accessible communications products, including web content, documents and visual materials. ○ Providing accessible services. ○ Hosting accessible meetings and events.
Digital communications, including documents available on Firstlight website and intranet, may not currently meet the Web Accessibility Standard	• Migrate and update the content of Firstlight website and intranet to ensure compliance with the Web Accessibility Standard.

5. The procurement of goods, services and facilities

Firstlight sources a diverse array of goods and services and therefore plans to incorporate accessibility requirements into its procurement policies and guidelines.

Barriers: Procurement	Planned actions: Procurement
Firstlight's Procurement Policy and the processes for procuring goods and services may not currently consider accessibility requirements or refer to the Accessible Canada Act, which may have an impact on procuring accessible goods and services.	• Review and update the Procurement Policy and related procedures to: ○ Include accessibility criteria and requirements for the procurement process for goods and services. ○ Include reference to the Accessible Canada Act.

Accessibility Plan

Action Plan - Accessible Canada Act – Diversity and Inclusion of Persons with Disabilities

6. The design and delivery of programs and services

Firstlight is a leading telecommunications services provider. We strive to collaborate with stakeholders to use and develop our solutions and services with universal accessibility.

Barriers: Design and delivery of programs and services	Planned actions: Design and delivery of programs and services
Lack of design guidance on universal accessibility.	• Develop a new approach to address universal accessibility within the offered solutions and services.
Persons with disabilities are not always consulted in the design of services and solutions, policies and procedures.	• Implement a procedure for FirstLight planning initiatives to provide for consultations and to identify who will be consulted before consultations.
Public events organized by Firstlight may not fully consider accessibility requirements in their design and delivery.	• Develop and apply an accessibility checklist for public events.

7. Transportation

FirstLight maintains a fleet of vehicles. These vehicles are used by staff for the ongoing daily operations of FirstLight's daily processes and emergency response. The fleet is made up of a variety of different types of vehicles, including standard and specialized vehicles.

Barriers: Transportation	Planned actions: Transportation
Firstlight currently has enough vehicles in its fleet, vehicles may not fully meet accessibility guidelines.	• Continue to consult employees who use vehicles in the current fleet to identify accessibility issues and make modifications, as required.

Accessibility Plan

Action Plan - Accessible Canada Act – Diversity and Inclusion of Persons with Disabilities

III. Consultations

The Human Resources and Facilities Management shall coordinate the consultation efforts on behalf of Firstlight, to contribute to the identification of barriers, the development of actions to resolve the barriers and the development of FirstLight's Accessibility Plan.

We intend to consult persons with disabilities in the preparation and improvement of our accessibility plan.

Firstlight is committed to consultation with members of the public and employees who have disabilities and the organizations that support persons with disabilities, on their perspectives and experiences with Firstlight. The consultation process will be ongoing.

Accessibility Plan

Action Plan - Accessible Canada Act – Diversity and Inclusion of Persons with Disabilities

Glossary

Accommodation refers to any change in the working environment that allows people with a disability or functional limitation to do their job. Changes can include:

- Adjustments to the physical workspace.
- Adaptations to equipment or tools.
- Flexible work hours or job-sharing.
- Relocation of the person's workspace.
- The ability to work from home.
- Reallocation or exchange of some non-essential tasks for others.
- Time off for medical appointments.

Accommodation can be temporary, periodic or long-term, depending on the employee's situation or changes in the workplace.

Attitudinal barriers are behaviors, perceptions and assumptions that discriminate against persons with disabilities. These barriers often emerge from lack of understanding, which can lead people to ignore, to judge, or have misconceptions about persons with disability.

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 physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation.

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.

Types of disabilities in the 2017 Canadian Survey on Disability

- Seeing
- Hearing
- Mobility
- Flexibility
- Dexterity
- Pain-related
- Learning
- Developmental
- Mental health-related
- Memory

Inclusion is the act of including someone or something as part of a group. An inclusive workplace is fair, equitable, supportive, welcoming and respectful. Inclusion recognizes, values and leverages differences in identities, abilities, backgrounds, cultures, skills, experiences and perspectives that support and reinforce Canada's evolving human rights framework.