

FIRSTLIGHT

Accessibility Plan 2026–2029

Accessible Canada Act

ORGANIZATION	FirstLight Fiber, Inc.
DOCUMENT STATUS	Final
PLAN PERIOD	2026–2029

1. Executive Summary

The Accessible Canada Act (ACA) establishes a framework for identifying, removing and preventing barriers to accessibility. FirstLight Fiber, Inc. (“FirstLight”) is committed to advancing accessibility across its policies, programs, practices, services and workplace.

This 2026–2029 Accessibility Plan updates FirstLight’s prior accessibility planning based on its review of the 2025 Accessibility Plan, existing accessibility practices, areas where implementation remains incomplete, and actions identified for continued improvement.

FirstLight recognizes that accessibility is an ongoing process. Some practices described in this Plan are already in place, while other actions remain under development. FirstLight intends to use feedback and consultation, including planned consultation with persons with disabilities and other appropriate accessibility resources, to refine future actions and identify additional barriers.

2. General

Background

FirstLight’s accessibility planning is intended to support the ACA’s objective of identifying, removing and preventing barriers to accessibility. This Plan addresses the seven priority areas reflected in FirstLight’s prior Accessibility Plan: Employment; the Built Environment; Information and Communication Technologies; Communication other than ICT; Procurement of Goods, Services and Facilities; Design and Delivery of Programs and Services; and Transportation.

About FirstLight

FirstLight provides telecommunications services, including private line, high-speed Internet access, data center, cloud, managed and voice services. FirstLight’s network provides connectivity throughout its service territory.

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 and not by FirstLight employees. FirstLight employees supporting services provided to Canadian customers are based in the United States

Accessibility Commitment

FirstLight seeks to provide an environment in which employees, customers and members of the public can participate with dignity and have access to reasonable accessibility support. Existing practices include workplace accommodations, accessible workplace and meeting considerations, alternative formats upon request, customer accommodation options and accessibility features available through certain technologies.

3. Accessibility Priorities and Planned Actions

Employment

FirstLight is committed to maintaining an accessible and inclusive workplace in which employment opportunities and employment decisions are administered in accordance with applicable employment and anti-discrimination laws. Accessibility initiatives under this Plan are intended to identify and remove barriers, support reasonable accommodations, and promote equal access and opportunity. They are not intended to

establish preferences or differential treatment in hiring, promotion, compensation, training, or other employment decisions based on protected characteristics.

During the 2026–2029 plan period, FirstLight intends to:

- Add accessibility and disability-awareness training to the annual training, with implementation currently planned for 2027.
- Provide accessibility, equal employment opportunity, and inclusive workplace awareness training through the annual training program, consistent with applicable employment and anti-discrimination laws.
- 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.
- Review Human Resources programs and practices against accessibility objectives and incorporate appropriate recommendations into future materials.
- Continue annual review of Human Resources policies and procedures and consider recommendations resulting from consultation.
- Continue evaluating accessibility of staffing and performance-management technologies and provide alternative formats, human assistance or tailored workflows when needed.
- Confirm and, where appropriate, strengthen communication to job applicants regarding how to request accommodations during the recruitment process.

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 office space and addresses facility-related accessibility needs as they arise.

FirstLight will continue annual property reviews and will consider accessibility-related requests, complaints and identified barriers as part of its facilities management process. Where accessibility barriers are identified, FirstLight will evaluate appropriate corrective measures.

Information and Communication Technologies (ICT)

FirstLight’s public website has been reviewed for accessibility and was modernized in 2025 as part of broader improvements. FirstLight also provides accommodation support when an employee experiences difficulty accessing or using a technology or system.

During the plan period, FirstLight intends to:

- Confirm the extent of accessibility and WCAG evaluation performed for the public website and identify any remaining remediation needs.
- Determine whether a broader accessibility assessment of FirstLight software and information technology systems has been completed and, where appropriate, establish a structured assessment process.
- Identify systems presenting accessibility barriers and evaluate modification, replacement or alternative workflows as appropriate.
- Consider accessibility requirements when selecting or procuring relevant technology and software.
- Continue providing individualized support or alternative workflows when accessibility issues arise.

Communication Other Than ICT

FirstLight has plain-language guidance, provides accessible or alternative formats upon request, and considers accessibility when planning meetings and events. Virtual meeting technology supports features such as transcription and recorded replays. FirstLight has also partially reviewed or updated its internal intranet for accessibility.

FirstLight intends to:

- Develop practical employee guidance for creating accessible documents, presentations, PDFs, images and similar communications.
- Complete additional review of intranet accessibility and identify appropriate remediation.
- Continue making information available in accessible or alternative formats upon request.
- Continue considering accessibility in internal and public meetings and events.
- Use consultation and feedback to identify additional communication barriers.

Procurement of Goods, Services and Facilities

Accessibility is considered to some extent in current purchasing practices. Certain technology and telecommunications products used by FirstLight include accessibility functionality or compatibility with accessibility equipment, and vendors may be asked whether they comply with applicable accessibility laws. Accessibility has not yet been formally embedded throughout FirstLight's Procurement Policy and related procedures.

FirstLight intends to:

- Review the Procurement Policy and related procedures for accessibility considerations.
- Evaluate inclusion of accessibility criteria when purchasing relevant goods, services, facilities, technology and software.
- Request information from vendors regarding accessibility capabilities where applicable.
- Evaluate appropriate accessibility language for procurement guidelines, vendor questionnaires, requests for proposals or contractual processes.
- Provide guidance to employees involved in purchasing decisions regarding applicable accessibility considerations.

Design and Delivery of Programs and Services

Customers may request accommodations or alternative methods of receiving information or service. Accessibility is also considered when FirstLight plans customer-facing or public meetings and events. Certain third-party technologies and telecommunications products used or offered by FirstLight contain accessibility functionality or compatibility with accessibility equipment.

FirstLight intends to:

- Use planned consultation to identify accessibility barriers affecting the design or delivery of programs and services.
- Develop a more structured approach for considering accessibility when materially developing or changing customer-facing programs, services and processes.
- Consider accessibility consultation when developing initiatives where accessibility impacts may arise.
- Continue providing accommodations or alternative methods of receiving information or service where appropriate.
- Evaluate recommendations from persons with disabilities and accessibility specialists for incorporation into future programs and services.

Transportation

FirstLight maintains a fleet of operational work and service vehicles used by employees to perform job duties and support operations and emergency response. FirstLight does not operate the fleet as a transportation service for employees, customers or members of the public.

No employee accessibility issues involving company vehicles have been identified through the current review. During the plan period, FirstLight will continue to address individual accommodation needs if they arise and will reassess whether additional accessibility measures are appropriate for its operational fleet.

4. Consultation

FirstLight recognizes that consultation with persons with disabilities is an important part of identifying barriers and developing meaningful accessibility actions.

Formal consultation contemplated by the prior Accessibility Plan was not completed. FirstLight is developing an accessibility survey/questionnaire, with rollout currently anticipated by the end of October 2026 and review of results anticipated during November-December 2026.

The survey results are expected to help identify and categorize the accessibility issues and barriers most relevant to FirstLight. 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 resulting recommendations and determine appropriate actions for incorporation into its accessibility program, future updates to this Plan, and subsequent progress reporting. Consultation will be treated as an ongoing process rather than a one-time activity.

5. Feedback Process

FirstLight welcomes feedback regarding accessibility barriers, this Accessibility Plan, and the manner in which FirstLight implements its accessibility commitments.

Feedback may be provided anonymously. Feedback received will be reviewed and considered in FirstLight's accessibility planning and future updates.

During FirstLight's current review, no accessibility feedback was identified as having been received through its established channels since publication of the prior Accessibility Plan.

6. Contact Information

Accessibility feedback, questions, requests for alternative formats, or other accessibility-related communications may be submitted using the following contact information:

FirstLight Fiber, Inc.

Attention: Human Resources

12 Metro Park Road, Suite 104

Albany, NY 12205

Telephone: (518) 545-0213

Email: HR@firstlight.net

This Accessibility Plan is available in alternative formats upon request, including large print, audio and accessible electronic formats. Requests may be made using the contact information above.

7. Monitoring and Updates

FirstLight will monitor implementation of the actions identified in this Plan, consider accessibility feedback received, and evaluate the results of consultation with persons with disabilities and other appropriate accessibility resources.

Progress will be documented through FirstLight's applicable accessibility reporting process. Where consultation, feedback, operational changes or accessibility reviews identify new barriers or priorities, FirstLight will evaluate whether additional actions should be incorporated into its accessibility planning.

8. Glossary

Accommodation: A change or adjustment intended to enable a person with a disability or functional limitation to participate more fully in employment, services or other activities. Depending on the circumstances, accommodations may include adjustments to a workspace, equipment or tools, scheduling, work location, duties, formats or methods of communication.

Barrier: Anything physical, architectural, technological, attitudinal, information- or communications-based, or resulting from a policy or practice that hinders full and equal participation in society by persons with an impairment or functional limitation.

Disability: An impairment or functional limitation, whether permanent, temporary or episodic, evident or not, that in interaction with a barrier may hinder a person's full and equal participation in society.

Accessibility: The design and provision of environments, information, technology, programs, services and practices in ways that seek to reduce or remove barriers to participation.