



ACCESSIBILITY PLAN

2023-2026



TABLE OF CONTENTS

1. General information	3
1.1 Introduction	3
1.2 Interdepartmental team	4
1.3 Feedback process	5
2. Inclusion of principles of the Accessible Canada Act	6
3. Consultations with individuals and organizations	7
3.1 Feedback received through CTA meetings	7
4. Freedom Mobile obligations	10
5. Freedom Mobile policies, programs, practices, and services	11
5.1 Employment	11
5.2 The built environment and the acquisition of goods, services, and facilities	12
5.3 Information and communication technology (ICT)	13
5.4 Communications beyond ICT	14
5.5 Communication with customers	15
5.6 The design and performance of programs and services	15
5.7 Transportation	17
6. Conclusion	18

1. GENERAL INFORMATION

1.1 Introduction

Freedom Mobile Inc., a wholly owned subsidiary of Videotron Ltd, is a Canadian wireless telecommunications provider striving to bring affordability, innovation and customer satisfaction to Canadians in Ontario, Alberta and British Columbia. Together, Freedom Mobile and Videotron hold more than 3.5 million customers for mobile services and form the fourth strongest and competitive wireless service provider in Canada.

To ensure all customers enjoy the same quality of service, Freedom Mobile aims to fulfill the specific needs of people living with disabilities.

Freedom Mobile is proud to present its three-year Accessibility Plan. This publication describes the initiatives that aim to eliminate obstacles faced by its customers and employees.

For consumers, Freedom Mobile is committed to:

- Facilitating access to its phone, live chat and in-store services.
- Offering an optimal experience to its customers for the duration of their subscription, while limiting any barriers they may face.
- Remaining up to date on best practices in accessibility and inclusivity.
- Considering accessibility issues when making decisions so as to continuously improve its customers' experience and satisfaction, particularly for those living with disabilities.

Regarding its employees, Freedom Mobile is taking the necessary measures to provide a workplace that promotes equality, diversity, and inclusion. To this end, it will encourage the hiring of those living with disabilities. Freedom Mobile believes that it is important to guarantee them the same opportunities so that they may achieve their goals and feel supported in the workplace.

Freedom Mobile was purchased by Vidéotron Ltd. in April 2023. Vidéotron held various meetings with community organizations. These learnings were shared with Freedom Mobile, which helped in establishing these initiatives and best practices.

The three-year plan includes all activities initiated so far that address the elimination of accessibility obstacles. The company's approach can be modified and enhanced based on the context of its activities.

Note that this document respects the accessibility standards outlined in the Web Content Accessibility Guidelines (WCAG) validated in Adobe Acrobat 2023.

It is also possible to use PDF reader features to change the display of documents and render them easier to read.

1.2 Interdepartmental team

Governance for the Freedom Mobile Accessibility Plan was provided by the following people:

Senior Executive, Accessibility Plan

Mark Elson

Vice President, Enablement & Operations

Senior Executive, Human Resources

Roxanne Doucet

General Manager, People and culture

1.3 Feedback process

People living with disabilities as well as the groups and organizations representing them can share their comments on the barriers they face through the “Accessibility” page of the Freedom Mobile website. Walker Peters, VP, Customer Care, Freedom Contact Centres, receives and manages this feedback. People who would like to submit their comments can use the following communication channels:

Email

- Address: accessibility.feedback@freedommobile.ca
- An acknowledgement of receipt will be sent by email to the sender.

Telephone

- 1-844-203-7171

The personal information of those submitting feedback, along with the content of said feedback, will remain confidential. It will only be used by the interdepartmental team for the purpose of enhancing and evolving the Accessibility Plan.

2. INCLUSION OF PRINCIPLES OF THE ACCESSIBLE CANADA ACT

In 2019, the Canadian government adopted the Accessible Canada Act. Its goal is to turn Canada into a country without barriers for people with disabilities. This legislation includes seven key concepts:

- Every person has a right to be treated respectfully.
- Every person has a right to an equal opportunity for fulfillment.
- Every person has a right to barrier-free access and full and equal participation in society.
- Every person has a right to make independent decisions, with or without assistance.
- The participation of those living with disabilities in the design and creation of policies, programs, services, and organizations.
- The consideration of disabilities and multiple and intersectional forms of discrimination and marginalization when designing policies, programs, services, and organizations.
- The attainment of the highest level of accessibility possible for people with disabilities through the design and correction of accessibility standards.

Freedom Mobile has taken into consideration the above mentioned principles when preparing its Accessibility Plan, as outlined in this document.

3. CONSULTATIONS WITH INDIVIDUALS AND ORGANIZATIONS

Freedom Mobile took into consideration the feedback received during Canadian Telecommunication Association (CTA) meetings to draft its Accessibility Plan. The company will also encourage the participation of those living with disabilities in order to identify and prioritize future initiatives.

3.1 Feedback received through CTA meetings

Meetings organized by the CTA, of which we are a member, were held in August 2022. The list included:

- **August 3, 2022:** Blind and vision-impaired community.
- **August 5, 2022:** Speech language, communication and cognition impaired and intellectual disability community.
- **August 9, 2022:** Deaf, hearing-impaired, and deaf-blind community.

These meetings allowed us to share the results of consultations conducted by the CTA. The association surveyed various groups, communities, and organizations working with, or for, those living with disabilities. These consultations led to the identification of several concerns affecting the entire telecommunications industry. The feedback provided, which addresses the main barriers to accessibility for people living with a disability, is listed below:

Staff: sales and after-sale service

- Knowledge of the service offering and procedures related to accessibility are insufficient.
- Customer relations and communication skills are lacking.
- People with disabilities have issues communicating efficiently with the various agents.
- Adapted technologies (IP bridging, interpretation services, video relay service, etc.) are absent.

1. Devices

- Devices are not always adapted. For example, they lack sound or touch indicators or a voice description. The characters and buttons displayed on devices are also too small.
- Device usage is complex. Usage guides for accessibility options are not available, and knowledge of these options is limited.

2. Stores

- The layout of stores is not optimal.
- It is difficult to communicate with the staff, whether trying to be understood verbally or with the help of a speech-generating device. No process is in place to provide interpreters or other facilitators when necessary.

3. Websites

- Websites are not 100% compliant with WCAG standards.
- There are no specialized sections and there is little to no information about adapted services.
- Page design has not been adapted. There is too much text, the content is complex, site navigation is difficult, videos do not have subtitles, etc.
- Sites are not all compatible with specialized software, particularly ones used for speech synthesis.

4. Technicians

- Technical staff are not sufficiently familiar with features relating to accessibility for equipment and how to activate them.
- Information to identify customers with functional limitations as well as certain equipment is missing from work orders.
- Certain providers give preference to self-installation. A fee is charged for installation by technical staff.
- Customer relations and communication skills are inadequate.
- The time slots for visits by personnel are too long and do not support the presence of an interpreter.

5. Rates, packages, and services

- Service rates and equipment costs are high.
- Discounts offered to people with disabilities are for a limited time period.
- At the moment, no provider is offering a fully accessible range of services.

Freedom Mobile took into consideration the barriers that were mentioned during meetings and the recommendations that were made when designing its Accessibility Plan and initiatives.

4. FREEDOM MOBILE OBLIGATIONS

As a company operating in the field of telecommunications, Freedom Mobile is mainly under the jurisdiction of the Telecommunications Act, as well as the regulations of the Canadian Radio-television and Telecommunications Commission (CRTC). With some exceptions, Freedom Mobile's services are subject to detailed licencing requirements. Many conditions involve establishing technology and practices that guarantee the accessibility of Freedom Mobile services to disabled people. In this regard, Freedom Mobile is subject to monitoring and regular reviews by the CRTC.

A number of codes of conduct created by this regulator apply to Freedom Mobile, including the Wireless Code, and the Internet Code. This notably includes obligations regarding trial periods offered to disabled customers so they can ensure the services they are receiving fulfill their needs, as well as possible adaptations to the contract documentation and account statements for these customers. Freedom Mobile must also ensure the accessibility of its website and customer service and fulfill a number of obligations regarding the promotion and presentation of its accessible products and services to those living with a disability.

As part of its telecommunications service offering, Freedom Mobile is also obliged to offer wireless plans and devices that specifically respond to the particular needs of customers with disabilities. In addition, the company must ensure barrier-free access to video relay services for deaf and hearing-impaired people, so that they may place calls using sign language, and permit the transmission of text messages to 911, where such service is possible.

Finally, in addition to many other CRTC regulations regarding the accessibility of its activities, Freedom Mobile is subject to a variety of federal, provincial, and municipal regulations that ensure the possibility of full participation of those living with disabilities within society, such as the Accessible Canada Act, and the Employment Equity Act.

5. FREEDOM MOBILE POLICIES, PROGRAMS, PRACTICES, AND SERVICES

The Accessible Canada Act establishes various areas in which organizations are required to act to recognize and eliminate barriers currently faced by those with disabilities—whether those are their employees or their customers.

Below is a list of Freedom Mobile’s main initiatives related to accessibility in the context of:

- Employment.
- Its built environment and the acquisition of goods, services, and facilities.
- Information and communication technologies.
- Other communications not covered by the aforementioned information and communication technologies.
- The creation and delivery of its programs and services.
- Transportation.

The timeline for achieving these initiatives has been subdivided into three categories: the short term, the medium term, and the long term.

5.1 Employment

At Freedom Mobile, we aim to provide a workplace that promotes equity, diversity, and inclusion for our entire workforce. We are aware that the diversity of individual employee experiences greatly contributes to enriching our company’s culture and its achievements, and it is important that we adequately represent the diversity of our customers.

To further promote integration of employees from minority groups within our organization, Freedom Mobile has already deployed several initiatives, and others will be put in place in the coming years.

Overall goal: Improved representation of different minority groups at Freedom by attracting and retaining a diversified workforce.

Through a better understanding of the presence and experiences of different minority groups within our workforce

DONE Performed self-identification survey of all employees.

DONE Established a diversity and inclusion committee.

SHORT TERM Organize discussion sessions on accessibility issues with staff members.

Through the improvement of our current human resource practices to improve accessibility at work

SHORT TERM Creation and internal communication of a policy guaranteeing a workplace that promotes diversity, equity, and inclusion.

ONGOING Training of human resources personnel on issues related to diversity, turning them into ambassadors for managers and employees.

ONGOING Communication to employees about initiatives established to promote an inclusive workplace.

Through the hiring of people with functional disabilities

MEDIUM TERM Identification of the best strategies for hiring, welcoming, and integrating people with disabilities into the workplace.

MEDIUM TERM Establishment of a partnership with an organization to promote the hiring of those living with a disability.

5.2 The built environment and the acquisition of goods, services, and facilities

Freedom Mobile currently owns facilities in different regions. While Freedom Mobile has its own construction standards that comply with the National Building Code, the specific context of each facility (year of construction, city or province, geolocation, etc.) requires the company to meet the challenge of complying with all standards that apply.

Global objective: Compliance with barrier-free design standards for all Freedom locations

Through the improvement of construction practices promoting accessibility

ONGOING Integration of barrier-free and accessible design standards into production specifications to cover different kinds of limitations.

ONGOING Updating of built environments, both current and future, to respect standards and ensure that the design of sites owned and leased by the company complies with these standards.

5.3 Information and communication technology (ICT)

Despite the presence of accessibility content on Freedom Mobile's public and internal website, this content has had minimal visibility and promotion over the years. Going forward, we would like customers with disabilities to be better informed when using our website and interacting with our frontline employees.

Global objectives

- Optimization of content accessibility to promote greater use.
- Creation of accesses reserved for people with disabilities to improve the delivery of services.

Through the emphasis and promotion of content related to accessibility on our website

ONGOING Revision and optimization of the Accessibility sections of our website, specifically with regard to their structure, content, visuals, and navigation.

SHORT TERM Publication on Freedom Mobile's website of a list of points of sale that respect accessibility standards for certain types of disabilities.

ONGOING Continue to include audio description or text transcription to any future support videos.

SHORT TERM Publication of an online feedback form on our website.

Through the improvement of accessibility to our advisors at customer contact centres for people with disabilities

MEDIUM TERM Establishing distinct phone lines and chat access.

SHORT TERM Promoting the use of the video relay service.

SHORT TERM Highlighting access to the chat function on our Support pages.

Through facilitation of access to content for people with disabilities, using our frontline employees, to improve management of their interactions

SHORT TERM Creation of a section dedicated to accessibility on Freedom's internal documentation platform, first focusing on the company's services for people with disabilities and their advantages, and second covering related internal processes and procedures.

Through compliance of our website with WCAG standards

LONG TERM Availability of plug-ins that facilitate control over or quick evaluation of our website's accessibility.

5.4 Communications beyond ICT

Our employees are rarely made aware of informative content intended for people with disabilities, such as our available services, awareness of their issues, and our practices during interactions with these customers. We would like to remedy this situation through a series of communication, training, and documentation initiatives aimed at our entire workforce.

Global objectives

- Awareness by employees of the challenges faced by people with disabilities to optimize their knowledge and soft skills when interacting with these customers.
- More information provided to all personnel about our services available for people with disabilities.

Through the deployment of company-wide communication plans providing visibility for initiatives in our Accessibility Plan

SHORT TERM Creation of a page dedicated to accessibility on the company's Intranet.

SHORT TERM Creation of a guide with accessibility terminology and best practices in communication.

SHORT TERM Creation of a continuing education program on accessibility and inclusion aimed at all employees.

Through enhanced access to and use of content related to people with disabilities for frontline employees, to facilitate and improve management of our interactions with these customers

SHORT TERM Identification of the best relationship and communication practices to adopt in our operations, and their documentation.

5.5 Communication with customers

Since the initial creation of sections devoted to accessibility on our website, they have had very few optimizations. For customers living with disabilities, the ability to quickly access relevant, adapted information is not always simple. Improvements need to be made to these sections to better serve these customers.

Global objective: Enhance the service we provide on our web platforms for customers living with disabilities, thereby facilitating their decision making and responding to their need for support.

Through the enhancement and optimization of content on our website related to accessibility

ONGOING Maximizing the visibility of the Accessibility section of our website.

ONGOING Optimize and redesign the existing accessibility page to create a better customer experience

Through increased communication with our customers concerning what we have done to achieve the goals of accessibility legislation

LONG TERM Planning customer communications to highlight the various initiatives in our Accessibility Plan.

5.6 The design and performance of programs and services

People with functional disabilities that contact our frontline employees do not currently benefit from a sales or support approach that is adapted or that meets their needs. Freedom would like to facilitate access to its products and services for these customers, particularly through training and awareness initiatives for staff members.

Global objectives

- Training specialized, frontline teams of employees to perfect our service offering adapted to the needs of people with disabilities.
- Awareness of all employees to the need to simplify our processes and improve our interactions and communications with these customers.

Through allocating a team of experts to respond to the specific needs of disabled people and to ensure that they are satisfied with the services they receive

MEDIUM TERM Development of training for frontline employees, who will become specialized agents for interactions with people living with disabilities including dedicated phone lines, live chat, retail operations, and visits from technicians.

LONG TERM Assessment of optimal solutions for offering services to hearing-impaired people in targeted stores.

Through raising awareness of all staff to the reality of those living with disabilities, to optimize their knowledge and soft skills when managing interactions with them

ONGOING Creation of a communication strategy and sensitivity training modules throughout the year.

MEDIUM TERM Enhancement of initial training with the addition of content on accessibility for frontline employees.

Through improved access to our products and services for people living with disabilities

DONE Continuation of discount on Mobile plan for people with disabilities.

DONE Simplification of accessibility procedures for adapted services and subscription to the T911 service.

DONE Simplification of process for presenting proof in order to access adapted services.

LONG TERM Re-evaluation of the current service offering for people with disabilities, with a proposal for enhancement if necessary.

By ensuring our website respect accessibility standards

ONGOING Awareness and training initiatives targeting the digital team regarding WCAG web accessibility standards to ensure hosted content is compliant when the team creates or modifies our webpages.

5.7 Transportation

Freedom Mobile does not offer transportation services. Therefore, the company has no specific accessibility objectives or initiatives related to transportation.

6. CONCLUSION

Everyone is important to Freedom Mobile. The company is committed to listening to all customers and taking the necessary steps to improve its products and services. Freedom Mobile continues to work in partnership with its stakeholders; by adopting exemplary practices, the company will be able to offer an inclusive and satisfying experience to everyone.

Freedom Mobile understands that this plan is only a first step towards creating barrier-free access for people living with disabilities. The company takes a progressive and evolutionary approach to accessibility. It takes into consideration the needs and contributions of its collaborators, customers, and employees. In compliance with the Accessible Canada Act, Freedom Mobile will publish an accessibility report every three years and will communicate updates on its accessibility initiatives and consultations, as well as the progress it has made, in an annual report. The first annual report will be published in 2024; the first update to the plan will be in 2026.

Throughout the next phases of its plan, Freedom Mobile intends to work closely with organizations representing the interests and defending the rights of those living with disabilities and create lasting relationships with them.