UPDATED ACCESSIBILITY PLAN

Airus, Inc. d/b/a Peerless Network

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Introduction

As a telecommunications service provider (TSP), Airus, Inc. d/b/a Peerless Network ("the Company") remains committed to fostering an accessible and inclusive environment for customers, employees, applicants, business partners, and other stakeholders. Accessibility continues to be a key consideration in the Company's operations, communications, and decision-making processes as we strive to ensure that our services and workplace are welcoming and usable for all individuals, including persons with disabilities.

The Company recognizes that accessibility is an ongoing journey requiring continuous evaluation, engagement, and improvement. Our goal remains to identify, prevent, and remove barriers to accessibility wherever they may exist and to promote equitable access to telecommunications services that connect people, businesses, and communities.

As part of our commitment, the Company continues to assess opportunities to improve accessibility across its operations. In addition to maintaining accessible communication tools and technologies, we have increased our focus on ensuring that our physical work environments support accessibility and inclusion. This includes reviewing workplace accommodations, evaluating office facilities for accessibility considerations, and working to ensure that employees and visitors can access our spaces in a safe and inclusive manner.

The Company also remains committed to accessibility education and awareness. Members of our regulatory and legal teams continue to participate in accessibility-related training and professional development opportunities, including programs focused on disability awareness, mobility accessibility, and evolving accessibility requirements. These efforts help ensure that our policies, practices, and services reflect current standards and support the diverse needs of the communities we serve.

As we continue implementing our Updated Accessibility Plan and developing future Progress Reports, we welcome feedback and engagement that help us identify opportunities for improvement and strengthen our commitment to accessibility.

Subsection 42(1) or 51(1) of the ACA: Policies, practices, and services to reduce and remove barriers.

Employment

The Company is committed to fostering an inclusive and accessible workplace where all employees and applicants, including persons with disabilities, have equitable opportunities to participate and succeed. Accessibility considerations are integrated throughout the

employment lifecycle, including recruitment, hiring, onboarding, training, development, promotion, retention, accommodation, and separation from employment.

The Company complies with all applicable federal, provincial, and municipal accessibility, human rights, and employment requirements. We are committed to maintaining a workplace free from discrimination, harassment, retaliation, and other barriers that may prevent persons with disabilities from fully participating in employment opportunities.

As part of our efforts to identify, remove, and prevent barriers, the Company reviews its employment practices and workplace procedures on an ongoing basis to ensure they remain accessible and responsive to employee needs. Accessibility considerations are incorporated into workplace policies and decision-making processes whenever reasonably practicable. The Company also continues to evaluate opportunities to enhance accessibility within its physical work environments, including workplace accommodations and accessibility-related needs for employees and visitors.

The Company provides reasonable accommodations to qualified employees and applicants with disabilities, unless doing so would impose an undue hardship. Employees and applicants may request accommodations at any stage of the employment relationship. Upon receiving a request, the Company engages in an individualized and collaborative process to better understand the person's needs and identify appropriate accommodation options. Any medical or personal information received in connection with an accommodation request is treated confidentially and shared only as necessary to facilitate the accommodation process.

The Company encourages employees to communicate accessibility concerns, accommodation needs, and potential barriers they encounter in the workplace. Employee feedback plays an important role in helping the Company identify accessibility issues, evaluate existing practices, and prevent the creation of new barriers. Employees may raise concerns through management, People Operations (POP), or through the Company's accessibility feedback process.

The Company recognizes the importance of including the perspectives of persons with disabilities when evaluating accessibility initiatives. Feedback received from employees, applicants, customers, and other stakeholders is considered as part of the Company's ongoing efforts to improve accessibility and support the principles of dignity, inclusion, equal opportunity, and full participation.

The Company website has a specific form to submit feedback on accessibility efforts. This publicly available accessibility feedback mechanism through its website, allowing individuals to submit accessibility-related comments, concerns, or suggestions. Information received through this process is reviewed and considered as part of the Company's accessibility planning and ongoing efforts to identify, remove, and prevent barriers.

The Built Environment

The Company does not currently maintain physical office locations in Canada. However, accessibility considerations remain an important part of how the Company manages and evaluates physical workspaces under its control.

For Company facilities located outside Canada that are accessible to employees or members of the public, accessibility features may include wheelchair-accessible entrances and routes, accessible restroom facilities, accessible parking, braille signage, elevator accessibility features, and emergency evacuation accommodations designed to support individuals with disabilities.

The Company is committed to identifying, removing, and preventing barriers within its physical work environments. Accessibility needs are evaluated on an ongoing basis, and employees are encouraged to raise concerns regarding workplace accessibility or request accommodations that support their full participation in the workplace.

During the reporting period, the Company continued to assess and address physical workplace accessibility needs through its accommodation process. For example, the Company implemented workplace modifications in its Chicago office in response to employee feedback, including ergonomic workstation adjustments, specialized seating, and modifications to the workspace environment designed to improve accessibility and employee comfort. This reflects the Company's commitment to responding to individual accessibility needs and removing barriers wherever reasonably practicable.

The Company will continue to consider accessibility in the management of its physical work environments and welcomes feedback from employees, visitors, and other stakeholders regarding opportunities for improvement. Feedback received through the Company's accessibility processes is reviewed and considered as part of ongoing efforts to support accessibility, inclusion, and barrier prevention.

Service Animals

The Company is committed to ensuring that individuals with disabilities who rely on service animals can access Company-managed facilities on an equal basis with others. Although the Company does not currently maintain physical office locations in Canada, where the Company manages or controls physical spaces that are accessible to employees, visitors, or members of the public, service animals are permitted in accordance with applicable laws and accessibility requirements.

The Company recognizes that service animals can play an important role in supporting the independence, mobility, communication, safety, and participation of persons with disabilities. Employees and visitors accompanied by a service animal will be permitted to access Company-managed spaces unless restrictions are required by law or for health and safety reasons.

To help prevent barriers, the Company seeks to ensure that employees responsible for workplace management and visitor access understand the importance of accommodating individuals who rely on service animals. Questions regarding service animals will be handled respectfully, with consideration for the individual's privacy, dignity, and independence.

The Company welcomes feedback regarding accessibility barriers related to physical access, workplace accommodations, or service animals. Feedback received through the Company's accessibility feedback processes is reviewed and considered as part of ongoing efforts to identify, remove, and prevent barriers for persons with disabilities. The Company will continue to monitor its practices and evaluate opportunities to improve accessibility and inclusion for individuals who rely on service animals.

Communications

The Company is committed to providing communications that are accessible, inclusive, and responsive to the needs of persons with disabilities. To identify, remove, and prevent communication barriers, the Company makes reasonable efforts to communicate with persons with disabilities in ways that take into account their individual accessibility needs. Upon request and where reasonably practicable, information may be provided in alternative formats or through accessible communication methods.

The Company works with individuals on a case-by-case basis to determine appropriate communication supports and seeks to provide information in a manner that respects the person's dignity, independence, and preferred method of communication. Depending on the circumstances and needs identified, accommodations may include accessible electronic communications, alternative document formats, Telecommunications Relay Services (TRS), or other communication supports.

Telecommunications Relay Services (TRS) are services that enable individuals who are deaf, hard of hearing, deaf-blind, or who have speech disabilities to communicate with voice telephone users through specially trained communications assistants or other technologically supported methods. To help reduce communication barriers and increase awareness of available accessibility resources, the Company provides information regarding TRS and related services through customer bill inserts and makes information and links to applicable U.S.-based TRS resources available on its website. These efforts are intended to educate customers about

accessible communications options and support equitable access to telecommunications services.

The Company also considers accessibility when developing customer-facing communications, policies, and informational materials. Accessibility feedback received from customers, employees, and other stakeholders is reviewed and considered as part of ongoing efforts to improve communication practices and prevent new barriers from being introduced.

Product Information

The Company is committed to ensuring that information about its products and services is accessible to persons with disabilities. Access to clear and accessible product information helps customers make informed decisions and fully utilize the telecommunications services we provide. To identify, remove, and prevent barriers to access, the Company makes reasonable efforts to provide product-related information in accessible formats and through accessible communication methods when requested and where reasonably practicable. This includes information regarding product functionality, installation, support resources, and available accessibility features.

Depending on an individual's needs, product information may be provided through alternative formats or communication methods, including:

- Braille
- Large print
- Accessible electronic text
- Internet-based accessible content
- Telecommunications relay services
- Captioned or audio-described video materials
- Other accessible formats or communication supports, where appropriate

The Company works with customers on a case-by-case basis to understand and address accessibility needs and seeks to provide information in a manner that promotes dignity, independence, and equal access. Customer feedback regarding the accessibility of product information is reviewed and considered as part of our ongoing efforts to improve accessibility and prevent new barriers from being introduced.

As technologies, products, and customer expectations evolve, the Company will continue to evaluate opportunities to enhance the accessibility of product information and support materials for persons with disabilities.

Design and Delivery of Programs and Services

The Company is committed to considering accessibility in the design, development, implementation, and delivery of its programs and services. We recognize that proactively incorporating accessibility principles helps identify, remove, and prevent barriers before they impact customers, employees, or other stakeholders.

When developing or enhancing websites, web-based applications, and digital tools, the Company endeavors to incorporate accessibility considerations throughout the design and development process. We utilize technologies and development frameworks that support accessibility and seek to promote compatibility with commonly used assistive technologies. The Company also seeks to consider accessibility when introducing new programs, services, processes, and customer-facing resources. By evaluating accessibility during planning and implementation activities, we aim to reduce the risk of introducing new barriers and to support equitable access to our services.

Feedback from customers, employees, and other stakeholders, including persons with disabilities, plays an important role in helping the Company identify opportunities for improvement. Accessibility-related feedback is reviewed and considered as part of ongoing efforts to improve the accessibility of our programs, services, and digital platforms.

Alternative Formats

The Company recognizes that access to information is essential to the full and equal participation of persons with disabilities. To identify, remove, and prevent barriers to accessing information, the Company makes reasonable efforts to provide documents and communications in alternative formats and through accessible communication methods upon request.

Customers who self-identify as having a disability may request paper billing at no additional charge where available. The Company also endeavors to provide customer-facing information and regulatory notices in accessible formats where required or requested and where reasonably practicable.

Accessibility Plans, Updated Accessibility Plans, and Progress Reports, and descriptions of the Company's accessibility feedback process published under the Accessible Canada Act are available upon request in alternative formats, including:

- Print
- Large print
- Braille

- Audio format
- Electronic formats compatible with assistive technologies
- Other formats agreed upon by the individual and the Company

Where appropriate, the Company may also provide product information, customer support materials, regulatory notices, and other relevant communications in accessible formats or through accessible communication methods to address individual accessibility needs.

The Company works with individuals on a case-by-case basis to determine the most appropriate format or communication method and seeks to provide information in a manner that respects dignity, independence, inclusion, and equal access.

Feedback regarding the availability, accessibility, or effectiveness of alternative formats is reviewed and considered as part of the Company's ongoing efforts to improve accessibility and prevent new barriers to information access. The Company remains committed to evaluating opportunities to enhance the accessibility of its communications and information resources as technologies and customer needs evolve.

Website Accessibility

The Company is committed to providing accessible digital experiences and recognizes that website accessibility is an important component of equal access to information, services, and customer support. Accessibility considerations are incorporated into the design, development, and maintenance of the Company's websites and digital platforms to help identify, remove, and prevent barriers for persons with disabilities.

The Company endeavors to make information related to its telecommunications services, products, and customer support resources accessible to persons with disabilities. In addition, customer service functions that are available through the Company's websites are designed with accessibility in mind. If a customer is unable to access a website-based function due to an accessibility barrier, the Company will make reasonable efforts to provide an alternative means of access and will not charge or otherwise disadvantage the individual for using an alternate channel.

To support continuous improvement, the Company's website development team has implemented an internal ticketing process to facilitate the prompt review, tracking, and resolution of reported website accessibility concerns. This process helps the Company respond more efficiently to accessibility requests, identify recurring issues, and reduce the likelihood of new barriers being introduced into its digital environment.

The Company maintains a dedicated accessibility page on its website, which includes downloaded Accessibility Plans, Progress Reports, and a method for submitting accessibility feedback. Feedback received from customers, employees, and other stakeholders is reviewed and considered as part of ongoing efforts to improve website accessibility and enhance the user experience for persons with disabilities.

The Company will continue to evaluate its digital platforms and adopt reasonable measures to improve accessibility, support compatibility with assistive technologies, and promote equal access to online information and services. Through these efforts, the Company seeks to uphold the principles of dignity, independence, inclusion, and full participation for persons with disabilities.

Subsection 44(4) or 53(4) of the ACA: Consultation with persons with disabilities.

Consulting for the Accessibility Plan

The Company recognizes that meaningful accessibility planning requires input from persons with disabilities and consideration of their lived experiences. In developing its Accessibility Plan, the Company consulted with an external accessibility advisor who is a person with a disability and who possesses extensive professional and personal experience in accessibility matters.

The advisor reviewed drafts of the Accessibility Plan and provided feedback regarding potential barriers affecting persons with disabilities, including barriers related to digital accessibility, communications, customer interactions, and access to information. This feedback helped the Company better understand how accessibility barriers may impact individuals with varying accessibility needs and informed the development of accessibility measures described throughout the Accessibility Plan and the Updated Accessibility Plan.

The Company considered the advisor's recommendations when evaluating its existing policies, practices, programs, and services and identifying opportunities to remove barriers and prevent new barriers. The consultation process also reinforced the importance of designing accessibility initiatives that promote dignity, independence, equal opportunity, and full participation for persons with disabilities.

In addition to this consultation, the Company continues to maintain an accessibility feedback process through which customers, employees, and other stakeholders, including persons with disabilities, may provide comments, concerns, and suggestions regarding accessibility. Feedback received through these channels is reviewed and considered as part of the Company's ongoing accessibility planning efforts and continuous improvement initiatives.

The Company remains committed to consulting with persons with disabilities as it implements this Updated Accessibility Plan, prepares future Progress Reports, and evaluates opportunities to further identify, remove, and prevent barriers to accessibility.

Consulting for the Progress Report and Updated Accessibility Plan

The Company recognizes the value of incorporating the perspectives and lived experiences of persons with disabilities into its accessibility planning and reporting activities. One of the Company's employees, who has been diagnosed with multiple learning disabilities, has played an important role in the development and ongoing refinement of the Company's Updated Accessibility Plan. This employee is actively involved with a national nonprofit organization that brings together persons with disabilities and their allies to promote equity, inclusion, accessibility, and meaningful participation in all aspects of society. The organization advocates for the removal of barriers that may limit opportunities for individuals with disabilities and works to support both physical and mental well-being.

The Company consulted with this employee during updates to the Accessibility Plan and in the preparation of Progress Reports. Through ongoing discussions and feedback, the employee has provided valuable insight into potential accessibility barriers and opportunities for improvement. This input has helped the Company evaluate existing policies, practices, programs, and services and has informed efforts to identify, remove, and prevent barriers to accessibility.

The Company values this ongoing collaboration and believes that incorporating the perspectives of persons with disabilities helps promote accessibility principles including dignity, independence, inclusion, equal opportunity, and full participation. Feedback from employees, customers, and other stakeholders will continue to be considered as part of the Company's accessibility planning and continuous improvement efforts.

Subsection 44(5) or 53(5) of the ACA: Feedback process and how that feedback was taken into consideration.

Feedback Process and How Feedback Was Taken into Consideration

The Company recognizes that ongoing feedback from persons with disabilities, employees, customers, and other stakeholders is essential to identifying, removing, and preventing accessibility barriers. As part of its commitment to continuous improvement, the Company maintains processes through which individuals may provide feedback regarding accessibility barriers, accessibility initiatives, and opportunities for improvement.

During this reporting period, the Company did not receive accessibility-related feedback from members of the public through its formal accessibility feedback channels. However, accessibility considerations continued to be informed through consultation with employees and accessibility stakeholders, including an employee with lived experience of disability who participated in the development of the Updated Accessibility Plan.

The Company reviews accessibility-related feedback as part of its ongoing accessibility governance process. Responsibility for receiving and coordinating accessibility feedback has been assigned to the Director of Regulatory Affairs. Feedback received is shared with relevant internal stakeholders, including Legal and Regulatory personnel, and is considered when evaluating existing policies, programs, practices, services, and accessibility initiatives.

The Company's Updated Accessibility Plan is reviewed at least annually by an interdepartmental team, including representatives from Legal and Regulatory. As part of that review process, the Company evaluates accessibility feedback, identifies potential barriers, assesses opportunities for improvement, and considers measures to prevent new barriers from being introduced.

The Company encourages employees, customers, visitors, and members of the public to report accessibility concerns and suggest improvements. Accessibility feedback may be submitted through the Company's dedicated accessibility webpage, including an option for individuals who wish to provide feedback anonymously.

Feedback received through the Company's accessibility processes helps inform ongoing accessibility planning and supports the Company's commitment to the principles of dignity, independence, inclusion, equal opportunity, and full participation for persons with disabilities. The Company will continue to consider accessibility feedback in future updates and reports, and efforts to identify, remove, and prevent barriers.

Conclusion: Accessibility Commitment and ACA Compliance

Policies, Programs, Practices, and Services

The Company remains committed to identifying, removing, and preventing barriers to accessibility across its policies, programs, practices, and services. Throughout this Updated Accessibility Plan, the Company has described the measures it has implemented to promote accessibility in employment, communications, digital platforms, customer interactions, workplace accommodations, and the provision of information. The Company will continue to evaluate these areas on an ongoing basis and will consider accessibility needs when developing new initiatives, processes, technologies, and services.

Consultation with Persons with Disabilities

The Company recognizes that persons with disabilities are best positioned to identify barriers and provide insight into effective accessibility solutions. In preparing its Updated Accessibility Plan, the Company consulted with individuals with lived experience of disability, including an external accessibility advisor and an employee with disabilities who participated in the review of accessibility initiatives, plan updates, and progress reporting. The Company also maintains an accessibility feedback process through which employees, customers, and members of the public may submit comments, concerns, and recommendations regarding accessibility.

Consideration of the Accessible Canada Act Principles

The Company has considered the principles of the Accessible Canada Act in the development and implementation of this Accessibility Plan. In particular, the Company recognizes the importance of dignity, independence, inclusion, equal opportunity, and full participation for persons with disabilities. These principles guide the Company's approach to identifying, removing, and preventing barriers and inform its efforts to foster an accessible and inclusive environment for employees, customers, and other stakeholders.

Continuous Improvement

Accessibility is an ongoing process, and the Company is committed to continuous improvement. We will continue to review our policies, programs, practices, and services; consider accessibility feedback received from stakeholders; consult with persons with disabilities where appropriate; and take reasonable steps to identify, remove, and prevent barriers. Through these efforts, the Company seeks to advance accessibility and ensure meaningful access and participation for persons with disabilities.