Accessibility Plan
Progress Report

2023

Table of contents

1. General

Cogeco Inc.'s (Cogeco) *Multi-Year Accessibility Plan Progress Report (2023)* has been prepared in accordance with the requirements of the *Accessible Canada Act* (S.C. 2019, c.10) and its regulations ("ACA"). It is an update to the three-year plan (2023-2026) submitted June 1, 2023.

2. Description of Cogeco

Through its business units, Cogeco Connexion and Breezeline, Cogeco provides Internet, video and phone services to approximately 1.6 million residential and business customers in Canada as well as in thirteen states in the United States. Through Cogeco Media, it owns and operates 21 radio stations, primarily in the province of Québec, as well as a news agency. Cogeco's headquarters are located in Montréal, Québec. Cogeco's subordinate voting shares are listed on the Toronto Stock Exchange (TSX: CGO). The subordinate voting shares of Cogeco Communications Inc. are also listed on the Toronto Stock Exchange (TSX: CCA). As of 2023, Cogeco had 5,200 employees, and $3.1B in annual revenue.

3. Cogeco's Commitment to Accessibility

Cogeco's core values include a strong commitment to customer and community and social engagement, innovation and teamwork. We aim to be recognized as an equitable, inclusive and accessible employer, corporate citizen and service provider, and we recognize that accessible programs, practices, policies and products are key enablers to progressing toward that vision.

In recognition of the ACA's objective of achieving a barrier-free Canada by 2040, Cogeco and its subsidiaries have committed to proactively identifying, removing and preventing barriers to accessibility for people with disabilities in a timely manner. Of the ACA's priority areas, the following are most relevant to Cogeco: employment; the built environment; information and communication technologies (ICT); communication other than information and communication technologies; and goods and services.

In accordance with the ACA and its established Accessibility Standards and the related Canadian Radio-television and Telecommunications Commission ("CRTC" or "Commission") regulations published in July 2021, the following report outlines progress on Cogeco's three-year plan to identify, remove and prevent barriers facing people with disabilities. This includes the continuing improvement of access to Cogeco's facilities, policies, programs, practices and services for employees, customers and members of the community.

Cogeco is committed to the principles set out at section 6 of the ACA, that:

a. *all persons must be treated with dignity regardless of their disabilities;*

b. *all persons must have the same opportunity to make for themselves the lives that they are able and wish to have regardless of their disabilities;*

c. *all persons must have barrier-free access to full and equal participation in society, regardless of their disabilities;*

d. *all persons must have meaningful options and be free to make their own choices, with support if they desire, regardless of their disabilities;*

e. *laws, policies, programs, services and structures must take into account the disabilities of persons, the different ways that persons interact with their environments and the multiple and intersecting forms of marginalization and discrimination faced by persons;*

f. *persons with disabilities must be involved in the development and design of laws, policies, programs, services and structures; and*

g. *the development and revision of accessibility standards and the making of regulations must be done with the objective of achieving the highest level of accessibility for persons with disabilities.*

4. Contact information and feedback process

Cogeco has implemented a new mechanism for welcoming feedback from our employees, customers and members of the public about accessibility at Cogeco, and about our 2023-2026 Accessibility Plan and this Progress Report. We're committed to reviewing feedback received, and taking steps to address identified barriers.

Feedback related to any accessibility barriers can be submitted through a variety of mediums which will help to inform future Cogecopriorities. Accessibility-related feedback can be submitted anonymously, via telephone or email. Some feedback can be addressed immediately, while other feedback is considered for future accessibility plans. The feedback received by Cogeco in the past year, for example, has been taken into consideration in the preparation of this progress report.

In, our Accessibility Plan and progress reports can be requested in an alternate format.

The designated persons responsible for receiving accessibility feedback are :

For Cogeco Connexion Inc.:

Director, Diversity, Equity and Inclusion

telephone: 1-844-737-0223
email: accessibilite.accessibility@cogeco.com
mail: Cogeco Inc.
            1, Place Ville-Marie, Suite 3301
            Montréal (Québec) H3B 3N2

Additional accessibility information is available at:
https://www.cogeco.ca/en/accessibility

For Cogeco Média Inc.:

Director, Legal Affairs

telephone: 514-787-7903
email: marieclaude.laroche@cogeco.com
mail: Cogeco Média Inc.
            800, De la Gauchetière Street West, Suite 1100
            Montréal (Québec) H5A 1M1

Additional accessibility information is available at:
https://www.cogecomedia.com/accessibilite

5. Consultations

In the preparation of this Accessibility Plan Progress Report, Cogeco consulted both internally and externally with persons with disabilities.

- **External consultations:** In Telecom Regulatory Policy CRTC 2023-41, *Mobile wireless service plans that meet the needs of Canadians with various disabilities* ("TRP CRTC 2023-41"), the Commission directed wireless service providers ("WSPs") to engage in regular consultations with persons with disabilities to address their concerns. The outcome of these discussions was to be outlined in annual WSP filings such as this one.

- The Commission also identified within the decision that having industry discussions coordinated by an external organization would be an acceptable approach. In June 2023, WSPs including Cogeco, moved ahead with a collaborative industry approach that would serve accessibility groups and carriers the most efficiently and effectively. The Canadian Telecommunications Association ("CTA", formerly CWTA) facilitated the virtual consultation, with direction and support from carriers, on their behalf. The consultations were held virtually in Q4 of 2023. Topic areas included:

  - Assessment of wireless accessibility offerings in a way that meets needs of Canadians with various disabilities;

  - Promotion of wireless accessibility offerings and customer service in a way that meets the needs of Canadians with various disabilities;

  - Unfettered access or use of specific services including VRS and other services and applications; and verifying eligibility for wireless accessibility offerings.

- Issues surfaced in the course of these industry consultations are appended to this report.

- In addition, in the past year, Cogeco met with the Government of Canada's Chief Accessibility Officer ("CAO") to speak more broadly about accessibility initiatives in our wireline Internet and video services, as well as human resources practices, and to contribute to the CAO's initial report: Everyone's business: Accessibility in Canada - Report from the Chief Accessibility Officer, 2023.

- **Internal consultations:** Cogeco has continued to engage its Employee Resource Group (*Connect Abilities*) for employees who identify as persons with disabilities. Connect Abilities is focused on helping Cogeco better address employees' accessibility needs, reducing internal attitudinal barriers, and increasing awareness about the importance of inclusion, accessibility and allyship as well as offering networking opportunities. In 2023, members of Connect Abilities guided several key employee initiatives outlined in the table below.

6. Progress on Key Plan Elements and Actions from Cogeco's 2023-2026 Report

Based on findings that surfaced through internal and external consultation processes, we provide, below, a table of accessibility actions Cogeco identified related to both workplace and customer environment. Areas of focus include internal employee systems, governance and processes, wellbeing and talent attraction, as well as customer and community initiatives. Some of the actions described herein have already been implemented, while others are currently underway and/or are expected to be implemented within the next two years. The table summarizes the commitments made as part of the 2023-26 plan, and progress made in 2023 specifically. We plan to continue to provide progress updates annually, and adapt our plans to ensure that they address any barriers newly identified by our employees, customers or other stakeholders.

A. EMPLOYMENT (INTERNAL SYSTEMS/POLICIES, PROGRAMS, PRACTICES IN RELATION TO THE IDENTIFICATION AND REMOVAL OF BARRIERS AND PREVENTION OF NEW BARRIERS)

Aligned with Cogeco's focus on diversity, equity and inclusion (DEI), Cogeco, both as part of the Accessibility Plan and prior to, has taken several impactful steps to drive an inclusive, equitable and accessible workplace as it relates to ensuring equitable systems, employee well-being and an inclusive workplace culture. As part of the 2023-2026 Accessibility Plan, Cogeco identified several key areas of opportunity and actions to enhance workplace culture, support the employee experience and help attract and retain talent. The commitment areas and 2023 progress are captured as follows:

2022 Actions	2023 Commitment & Action Taken	2024 - 2026 Actions to be taken
Governance Cogeco undertook an extensive internal review of its governance structures, policies and practices. The outcome of this resulted in the development and enhancement of a variety of governance models and policies to communicate the importance of inclusion and accessibility both internally and to prospective employees. To drive a greater focus on and awareness and accountability for health, safety and wellbeing of employees, Cogeco Connexion implemented a new governance model. A Health and Wellness Steering Committee was established, including executive champions of mental health and wellbeing and clearly defined roles and responsibilities for committee members, who all received formal training.	Cogeco launched new internal Employee Resource Groups, including *Connect Abilities*, which is focused on helping Cogeco better address employees' accessibility needs, reduce internal attitudinal barriers, increasing awareness of the importance of inclusion, accessibility and allyship, as well as offer networking opportunities. During Mental Health awareness month *Connect Abilities* members work with Cogeco's existing Health and Wellness team to offer a variety of initiatives such as roundtables, yoga, meditation and virtual learning, including a podcast series on autism awareness.	Continue to align internal governance stakeholders to integrate planning and execution.
Talent Acquisition To attract a greater diversity of candidates and broaden the pool of talent, Cogeco established several partnerships with external organizations to disseminate job openings to over 800 diversity-focused organizations nationally. For the last two years, Cogeco has participated in the Annual Canadian Congress on Disability Inclusion Conference and Talent forum hosted by Employment and Social Development Canada.	Implemented enhanced tracking of candidate data to ensure applicants are not self-disqualifying, and potential bias is mitigated throughout the talent acquisition process. Updated employment brand messages on Cogeco's career site and in job postings, to demonstrate a commitment to accommodation, accessibility and an inclusive workplace culture.	Advanced work with hiring managers and business leaders to maximize diversity of applicants and minimize bias in the hiring process. Continue broadening talent pools by working with targeted organizations that will help Cogeco attract prospective talent with disabilities, including neuro diversities, such as formalizing a relationship with Neuroplus.

2022 Actions	2023 Commitment & Action Taken	2024 - 2026 Actions to be taken
Review of internal processes and policies (Accommodation Process) A review of Cogeco's accommodation process was undertaken and an opportunity was identified to roll out a process to capture employee accommodations in a more standardized way.	Cogeco introduced updated standardized guidelines, and implemented a new accommodation process through our human resource and financial management system, expanding the program across all business units. The new process was launched in 2023, in collaboration with HR Partners.	Communicate the new accommodation process, procedures and guidelines to people leaders and begin capturing reporting. In-service education for leaders on topics including the duty to accommodate, common types of accommodations to decrease stigma, and the importance of flexible work. Begin to capture accommodations reporting (in Cogeco's Employment Equity report). Consider developing and implementing a formal accommodation policy with references to available assistive technology.
Awareness Embedded several new LinkedIn learning courses and tools related to accommodation, accessibility and disability in the workplace.	Developed and posted a number of tools related to workplace accessibility including "Leading an accessible and inclusive event". Assigned product teams inclusive design training.	The Director, Diversity, Equity & Inclusion will continually monitor and stay informed on accessibility resources available through central agencies as they become available.
Premises Accessibility A review of all internal real estate began and several key enhancements were made.	Continued enhancements were made to several premises and a formal review of Cogeco's premises was undertaken prioritizing key enhancements for FY24 and FY25.	Continue addressing internal premises enhancements required. New fully accessible office in Kingston as well as a customer centre; new office in Baie-Saint-Paul and studio in Milton.
Workforce Representation / Self Identification In 2022, Cogeco launched a self identification survey: 78% of colleagues completed the survey. At that time the representation of employees who identified themselves as having a disability was 3%.	In 2023 Cogeco re-launched the self-identification campaign survey to continue to capture workforce representation of under-represented groups centrally through internal systems. This enables Cogeco to obtain a more comprehensive overview of our workforce representation. By the end of 2023, 86% of employees had completed the survey. The representation of employees who identified themselves as persons with disabilities increased by 65% to 5.1% overall, and Cogeco is seeing an increased hiring rate and fewer departures than in previous years.	Continue to destigmatize the workforce to encourage self identification. Continue to monitor workforce representation of persons with disabilities relative to labour pool availability.

B. CUSTOMER/COMMUNITY (INFORMATION AND COMMUNICATION TECHNOLOGIES; COMMUNICATION OTHER THAN INFORMATION AND COMMUNICATION TECHNOLOGIES; PROCUREMENT OF GOODS, SERVICES AND FACILITIES; AND DESIGN AND DELIVERY OF PROGRAMS AND SERVICES)

2022 Actions	2023 Commitment & Action Taken	2024 - 2026 Actions to be taken
Websites and applications Cogeco Connexion began offering live and closed captions notification options using light and vibration. And the new My Account App also offered accessibility features for customers to navigate apps on phones.	Cogeco continues to identify and introduce various alternative accessible formats for users to have a variety of means to communicate according to their needs. This includes non-verbal options, usability and compatibility of websites etc. Began implementing descriptive videos on our webpages. Assessed accessibility compliance of the webmail platform.	Ensure mobile applications are coded for navigation with assistive technology. Cogeco Media plans to launch its new digital environments, and ensure that they comply with applicable accessibility standards. Progressively update webpages.
Audio Transcription For people with hearing disabilities, Cogeco Media tested solutions to transcribe audio wherein radio content is published in writing on the website.	Cogeco Media completed audio transcription project.	Consider implementing a voice to text solution for other areas of our businesses, to transcribe audio files into text and publish on the website for people with a hearing disability. Monitor demand for signing at store and contact centre level eg. using Direct Video Calling (access to VRS & VRI at store) or offering a voice feedback option or talkback option to assist customers in selecting programs.
Customer Feedback In accordance with regulation, Cogeco improved its customer accessibility feedback mechanism and process to address customer inquiries regarding accessibility, including a dedicated contact for accessibility questions, and feedback on our accessibility enhancements, across our channels.	Responded to approximately 10 customer accessibility issues. Cogeco implemented a new customer escalation approach to surface, triage and direct customer inquiries internally.	Customer feedback will be aggregated for review of key themes with additional actions to be added to the three year plan.
Connecting Families Recognizing the needs of the aging population in Canada and the community at large Cogeco expanded the *Connecting Families program* to offer a discounted product offer to a larger intersection of low-income families and seniors, many of whom identify as having a disability.	Continued to offer the initiative to qualified households, in accordance with the industry-wide 2022-2027 agreement.	Will continue to offer the initiative as agreed.
Charitable and community Cogeco has also established a number of ongoing charitable and in-kind partnerships with organizations such as *Discover Ability* (with whom we are working to increase awareness of their offering on Cogeco's community television channels), and the *Ontario Chamber of Commerce* (in support of programming to improve accessibility and hiring within our communities.)	Continued support for, and partnership with, community organizations.	Continued support for, and partnership with, community organizations.

2022 Actions	2023 Commitment & Action Taken	2024 – 2026 Actions to be taken
Premises Cogeco identified an opportunity to address built-environment-related barriers, to ensure that customers entering Cogeco's premises have barrier-free access.	Facilities Management conducted an audit of premises Cogeco owns, leases, and has recently invested in, and identified locations with large customer bases to prioritize for enhancements. Added two accessible customer centres and wheelchair ramps in Hamilton and St-Raymond.	AODA checklist to be applied to premises review with enhancements to be executed.
Procurement and product Accessibility Cogeco is focused on ensuring that there is ease of use for products and processes end to end. Cogeco's procurement team has been working closely with product teams to inform decisions regarding hardware solutions and provide equipment that answers accessibility needs. Cogeco leverages external experts to help design, iterate and make valuable decisions around accessibility for clients with various profiles and needs, to understand their needs, improve product, and track customers' response and feedback post-launch. For example, Cogeco's development partner Accedo informs user experience decisions regarding accessibility support.	Introduced enhancements ensuring that accessibility is embedded into the product briefing process and roadmap for all future releases (accessibility now a key requirement within briefing templates.) Customer journey roadmap was updated to include employee focus groups to provide feedback on the accessibility of future applications, products and services. Accessibility features have been built into mobile platforms and features. Cogeco's newest video services incorporated design considerations for the varied needs of customers with disabilities. This is done through "Empathy Sessions'' and design processes to update hardware and software. (Examples of accessible product consideration include a recent remote control redesign. This redesign features increased button spacing and shortcut buttons.)	Engage employees and customers to ensure accessibility requirements are being met by testing and giving feedback on services, devices, practices and policies. When creating new programs or policies such as training initiatives for service representatives, gathering input from *Connect Abilities* committee members to participate in focus groups to improve product accessibility.
Training	Provided enhanced accessibility training for customer facing employees (including in-home installation employees), and ensure that our employees are aware of and equipped to communicate the available accessibility services and features to customers. In addition, Cogeco has been piloting customized approaches for technical support within multi-dwelling units, primarily housing for senior residents. This includes education workshops for seniors on Cogeco products and guidance for customers at time of onboarding. Assigned LinkedIn Learning Inclusive Design training to marketing colleagues.	Consider introducing Accessibility Standards for Customer Service. Leverage *Connect Abilities* committee members in developing/reviewing future messaging and training.

7. Conclusion

To enable Cogeco to continue to meet Accessibility commitments and requirements of the ACA, as part of Cogeco's three-year plan, in 2023 Cogeco has:

- Regularly conferred with key internal stakeholders regarding progress to ensure that progress is being made on the action items noted above as well as to evaluate the effectiveness of the implementation of barrier removal and prevention strategies and plan for increased accessibility throughout Cogeco.

- Continued to raise internal awareness about the ACA and consider accessibility and inclusive design in all new products, services and solutions.

- Identified new avenues to collaborate with employees - including via Employee Resource Groups - and customers with disabilities to identify new barriers and opportunities, and learn from their experience.

- Continued to review and proactively address any new accessibility barriers.

- In preparation for upcoming progress reports, Cogeco is consulting with persons with disabilities, as per the ACA's requirements. including on the topic of accessible mobile wireless plans - with disabilities stakeholder groups per the ACA & CRTC requirements; this process may also include hosting a focus group with customers with disabilities to surface net new opportunities specific to advertising materials, products, services and or information.

Cogeco continues to be committed to removing accessibility barriers for our customers and employees. To that end, Cogeco will continue to consult with persons with disabilities, both internally and externally, in the coming years. We will strive to improve accessibility and contribute to the realization of a barrier-free Canada.

As required by the ACA, we will publish an updated Accessibility Plan every three years, and publish annual progress reports in the interim.

8. Appendix

Barriers identified as part of CTA industry consultations (2023) with persons with disabilities

Interaction	Nature of Issue	Examples
Shopping	When shopping for services individuals who are blind or partially sighted primarily reported issues with websites and contact centres.	• Websites are not fully accessible. Videos need captions. • Websites are difficult to navigate (using screen readers). • Websites have too many elements or too much information or complexity.
Contact Centres	Service representatives unaware of accessible products or services available.	
Service Set up and communication	When setting up services, many of the barriers reported were related to in-home installation.	• Technicians need training on how to support customers who are blind or deaf, how to turn on accessibility features and need to be informed in advance of the disability.
Managing	When managing services or making changes, barriers identified on websites.	• Websites or Mobile applications can be difficult to navigate. • Service representatives were not aware of the type of equipment for customers with disabilities and or how to adjust equipment in order to make it accessible.
Services	Blind or partially sighted participants noted barriers to websites, apps, service support and equipment.	• Websites and apps are not all completely accessible. • Another comment that was received was that there is no chat tool in the app which can be a challenge. • When speaking to service representatives, lack of understanding on how to provide instructions for someone who has a visual impairment. • Equipment lacking audible feedback or voice descriptions (tactile markers should be added).
Features	Accessible features a must when choosing a device or equipment or service ; anything visual has to have spoken or audio output, tactile markers etc.	• Features such as voiceover, Siri, descriptive video, or other related features can allow someone who is Blind or partially sighted to use their devices or equipment independently. • Importance placed on features that make devices or equipment accessible. Anything visual must have a spoken or audio output. • Many in-home devices, such as telephones or remote controls, do not have audible feedback on the keypads. • No service providers have fully accessible services currently. Cost can also be a major factor when deciding on a service. • Examples include screen magnification, text-to-speech (NVDA, Voice Over, Talkback, or others), and speech-to-text (Siri, Google home, Alexa). • Some of the only devices that can be used independently are smartphones that include or are compatible with accessibility features or apps.