Accessibility Plan.

Versature Communications Corp. *o/a net2phone Canada*

2024-2027

Table of Contents.

GENERAL

net2phone Canada Overview

net2phone Canada[1] is a Canadian SaaS-based hosted voice over IP business phone and communication solutions provider. Founded in 2003 as Versature Communications Corp, the company is trusted by clients and partners across the country. net2phone Canada is an award-winning company that is raising the bar with the highest quality customer support, full-featured phone systems, superior cloud-based technology, operational system integrations, and fully Canadian-based data centers.

net2phone Canada provides a reliable and scalable business phone solution to Canadian businesses across the country, focusing on localized Canadian support and hosted data.

Guiding Principles

Our accessibility efforts are guided by the principles outlined in the Accessibility Canada Act (ACA[2]), 2019 and the Accessibility for Ontarians with Disabilities Act (AODA), 2005 and focus on emphasizing dignity, respect, equal opportunity, barrier-free access, meaningful choice, inclusive design, collaboration, and continuous improvement.

Accessibility Statement

net2phone Canada is committed to providing a respectful, accessible and inclusive environment for all persons with disabilities. We are committed to providing this environment in a timely manner which considers the person's disability and embodies the principles of equal opportunity. net2phone Canada is committed to becoming a barrier-free environment and to meeting the requirements of all existing legislation as well as its own policies and goals related to identifying, removing and preventing barriers to people with disabilities that might interfere with their ability to interact with us. net2phone Canada strives to ensure that all people in our community are aware of their rights and responsibilities to foster an accessible and inclusive environment with and for persons with disabilities. We are also committed to and will strive to ensure that the Accessibility Canada Act (ACA), 2019 and the Accessibility for Ontarians with Disabilities Act (AODA), 2005 and

---

[1] "net2phone Canada," as well as "we," "us," and "our," refers to the Versature Communications Corp. who operates as net2phone Canada.
[2] Accessibility Canada Act (ACA)

their regulations, standards and all other relevant legislation concerning accessibility are strictly observed in a timely fashion.

Application & Feedback

This Accessibility Plan has been developed in accordance with the requirements of the Accessible Canada Act (S.C. 2019, c. 10) and its regulations (ACA). This plan applies to Versature Communications o/a net2phone Canada, further referred to as "net2phone Canada".

net2phone Canada has a process for receiving and responding to feedback, including feedback on the delivery of services to persons with disabilities.

Our Accessibility Plan and details of our accessibility feedback process are available in alternate formats such as print, large print, braille, audio, electronic format, or other agreed-upon formats.

Customers, team members, business partners and members of the public can provide accessibility feedback (including feedback on this plan) or request an alternate format of our Accessibility Plan or feedback process description as outlined below. Feedback can also be submitted anonymously.

Completing an online form
Email(s): accessibility@net2phone.ca, talktous@net2phone.ca
Phone: 1-888-508-2749
Regular Mail: 5424 Canotek Road, Ottawa, Ontario, K1J 1E9, Canada

Our designated accessibility officer at net2phone Canada is the Senior Director of Business Operations.

Executive Summary

At net2phone Canada accessibility is integral to our commitment to inclusivity and equity. We serve a diverse Canadian customer base and work with a diverse team, which is why we are dedicated to creating an accessible, respectful, and inclusive environment for all. This commitment extends to our team members, customers, and business partners, ensuring everyone feels valued, respected, and supported.

The net2phone Canada Accessibility Program Committee, composed of senior leadership members, oversees our Accessibility Program. This committee enhances our capabilities, drives our multi-year training strategy, supports feedback and consultation, and plays an active role in project management, professional development, communications, and team member engagement.

The net2phone Canada 2024-2027 Accessibility Plan was developed through consultations with persons with disabilities—including customers, team members, consultants and external organizations— and identifies opportunities to remove and prevent barriers in employment practices, the built environment, information communication and technology (ICT), communication, procurement, and the design and delivery of programs and services.

Reflecting our operations as of May 1, 2024, our plan incorporates contributions from accessibility experts and feedback from our consultations. We identified barriers in physical locations, online interactions, and the provision of accommodations for team members with disabilities and will be able to identify, remove and prevent barriers in:

- employment practices,
- built environment,
- information communication and technology (ICT),
- communication, other than ICT,
- procurement of goods, services and facilities,
- the design and delivery of programs and services
- transportation

By implementing these strategic steps, we are committed to removing barriers and creating an inclusive and accessible environment for all team members, customers, and business partners. Our ongoing efforts will ensure we meet and exceed the requirements of relevant accessibility legislation, fostering a truly inclusive community.

Consultations

We held internal and external consultations with team members, customers and third-party external consultants to understand the environment, barriers and gather feedback in relation to our accessibility policies as an environment, which have contributed to develop this plan.

Over the past two years, we conducted consultations through interviews, meetings, surveys, team member exit interviews, and client feedback to our Client Services team. These consultations were executed in a variety of environments including virtually leveraging remote video conferencing software, in-person, and through written engagements.
We engaged a diverse group, including individuals with disabilities and those who manage people with disabilities, covering neurodiversity, mobility, hearing, and visual impairments.

Through our consultations, we discovered we are performing well in the following areas:
- New, and long-term net2phone Canada team members said that our company culture and accessibility policies have improved over time, and meet their expectations overall.
- Accommodation requests are handled swiftly, confidentially and with empathy.
- Members of our leadership team consistently strive to create well-supported and comfortable workplaces for persons with disabilities or requiring accommodations.
- Team Members have received annual training on accessibility practices inline with AODA requirements, which is uniformly applied across all team members regardless of which province they are working from.
- Customers with disabilities have been extremely satisfied with our Customer Support and Success teams interactions and stated they felt well-heard and respected in their communications.
- Our training and customer-facing documentation is largely designed with accessibility in mind and we have been applying continuous improvements as identified.

We also uncovered that we need to improve in the following areas:
- Reduce barriers and improve workplace communications.
- Improve awareness of our Accessibility Programs and create more engaging training programs and content.
- Improve understanding of the process for Disability Accommodation Requests amongst all employees and leadership levels.
- Improve awareness of where to access both our Accessibility Programs and Policies as well as supporting documentation and training.
- That most, but not all of net2phone Canada's leadership team have achieved certifications in StigmaZero's Workplace Mental Health Training

- Our local office is not as accessibility friendly as it could be. While we have disability parking spots and our office is on ground level, we do not have automatic doors or ramps installed on the premises, though net2phone Canada leases the premises and does not own it.
- We could more regularly review feedback on ICT and Communications barriers.
- Incorporate more accessible formats in digital communications internally and externally.

Areas Described Under Section 5 of the ACA

net2phone Canada's Accessibility Plan includes ongoing accessibility actions, and barriers we have identified as part of our consultative approach and details the actions we will take to identify, prevent and remove various barriers experienced by those with disabilities.

In this plan, we will focus on the seven priority areas described under Section 5 of the ACA.

These areas include:
- Employment
- The Built Environment
- Information and communication technologies (ICT)
- Communication, Other than ICT
- The Procurement of Goods, Services and Facilities
- The Design and Delivery of Programs and Services
- Transportation

This Accessibility Plan outlines the priority areas for net2phone Canada. Each priority area section will include:
- A short summary
- What we are doing well
- Barriers to accessibility
- Planned actions to address the barriers identified

    Our actions can be divided into four timeframes:
    - Ongoing/current actions
    - Short-term actions
    - Medium-term actions
    - Long-term actions

EMPLOYMENT

Employment Summary

Resolving employment barriers ensures equal opportunities at net2phone Canada. We prioritize a safe, supportive workplace that values diversity, equity, inclusion, and belonging. Our commitment spans recruitment, retention, career growth, and supporting those needing accommodations. This extends throughout the entire team member journey, from team member onboarding to departure.

What we are doing well in Employment

- Our leadership team members are inclusive, diverse and meet accommodation requests with respect, dignity and empathy.
- We have steadily diversified our team, welcoming individuals from varied backgrounds and abilities, and fostering a more inclusive and diverse work environment.
- Establish open forums and discussions where team members feel safe, respected, and comfortable sharing their experiences with disabilities.
- Leadership team members have proactively sought to understand disabilities, dispel misconceptions, and adapt their leadership and communication styles to effectively support individuals who have disclosed disabilities.

Identified Employment Barriers to Accessibility

- Our recruitment and hiring practices do not adequately promote the disclosure of disabilities or our accommodation process.
- There is a need to continuously improve engagement, promotion, and communication to support accessibility, and break down barriers and misconceptions to enhance a supportive workplace culture and community.
- The absence of an optional gender disclaimer in hiring, recruitment, and workplace communications creates a perceived lack of inclusivity.
- There is a general lack of awareness and focus surrounding our accessibility policies, plans and accommodation request procedures.

Employment Action Plan

Short Term

- Introduce our refreshed Company Policy Handbook, ensuring comprehensive awareness across all team members regarding our policies, plans, and procedures.

- Launch enhanced annual training programs on accessibility, workplace harassment, and health and safety.
- Assess the recruitment process to identify and remove accessibility barriers

Medium Term

- Create a defined process to facilitate accommodation disclosure, feedback and information access about our policies during the recruitment and hiring process.
- Include an optional gender identification section (he/him, she/her, they/them, prefer not to disclose) in applications to use appropriate pronouns during interviews.
- Review the effectiveness of training and improve content to enhance information retention.
- Implement regular employee feedback surveys to gauge perceptions regarding barriers, misconceptions, and comprehension of our accessibility plans, policies, and procedures.

Long Term

- Create a defined process to facilitate accommodation disclosure, feedback and information access about our policies during the recruitment and hiring process.
- Publish information on available assistive technology and services on our company intranet.
- Enhance leadership team members' understanding of our accessibility policies, plans, and accommodation processes while gathering feedback for review and improvement.

On-Going

- Foster an inclusive culture and work environment for all team members.
- Support leadership team members in expanding their understanding through training programs, regular discussion forums, and accessible resources and materials.
- Expand our Accessibility Program Committee to meet regularly, monitor progress, gather and review feedback, and adjust our accessibility plan as needed.
- Revise and update our Company Policy Handbook, with particular emphasis on accessibility and personal conduct.
- Organize annual company-wide events to promote inclusivity, foster relationships, celebrate diversity, and enhance workplace communication.
- Continue to improve how we communicate and collaborate with persons with disabilities.

THE BUILT ENVIRONMENT

The Built Environment Summary

net2phone Canada prioritizes accessibility at our offices. We allocate funds for repairs and replacements and provide multiple feedback channels for our physical spaces' accessibility. We ensure feedback guides our change efforts. We consistently review the built environment to address new accessibility and safety issues. We pledge to retrofit existing spaces and enhance office renovation planning with accessibility needs in mind. Partnering with our team and external collaborators, we seek to understand and address barriers faced by individuals with disabilities in our offices.

What we are doing well in the Built Environment

- net2phone Canada is committed to ensuring that our premises are accessible.
- We allocate funds for repairs and replacements and implement changes based on received feedback.
- We conduct regular reviews and assessments of the workplace environment for health and safety risks. Additionally, we have a certified Joint Health and Safety Committee that meets regularly to review audits, feedback, and areas for improvement.
- We offer dedicated quiet spaces, assistive technology, and other accommodations to support individuals with disabilities in overcoming barriers and meeting their accommodation needs in the workplace.

Identified Built Environment Barriers to Accessibility

- Certain spaces may pose challenges for individuals with disabilities due to noise levels or lighting conditions.
- Entrances, washrooms, and emergency exits lack features for people with physical disabilities requiring assistance opening, such as wheelchair or walker access. These features are managed by the building landlords, not by net2phone Canada.
- Our emergency response procedures are not up to date and are not inclusive of people with disabilities.
- There is a lack of visible signage for ease of navigation through the premises.

The Built Environment Action Plan

On-Going

- Enable team members to ensure that workspaces, aisles, entrances, and exits are free of physical barriers.
- Continue to include accessibility upgrades as part of workplace renovations.
- We will continue to budget for repairs and replacements related to accessibility.
- Enhance awareness to all team members of the availability of suitable workspaces to accommodate their needs, such as quiet rooms, noise-cancelling headphones, and additional lighting.

Short Term

- Review lighting conditions, repair as needed, and offer alternative lighting sources or workspaces for individuals with disabilities.
- Improve communication regarding the availability of quiet workspaces and noise-cancelling headphone options.
- Initiate a comprehensive review of all company policies and manuals to eliminate any expectations based on a person's gender.

Medium Term

- Explore implementation of workplace wayfinding and navigation improvements including the use of mobile applications.
- Develop and include visible and accessible signage when renovating workspaces.
- Revise our emergency response procedures, creating individual emergency response plans for individuals with disabilities.

Long Term

- We will collaborate with our landlords to explore options for accessible entrances to both the building and bathrooms, and review existing office lease agreements to incorporate accessibility at renewal time.
- Team members who manage our office space will undergo additional training focused on accessibility within the built environment.

INFORMATION AND COMMUNICATION TECHNOLOGIES (ICT)

The ICT Summary

We strive for top-notch digital accessibility by tackling ICT-related barriers. Our continuous improvement strategy keeps us aligned with technological advancements. net2phone Canada is committed to identifying and resolving barriers in our websites, mobile apps, networks, and communication systems for both customers and team members.

What we are doing well in Information and Communication Technologies

- Chat tools, drop-down menus and the selection of options are reviewed and designed with accessibility in mind in client-facing communication and tools.
- Adhere to the Accessibility for Ontarians with Disabilities Act (AODA) regulations and Canadian Radio-Television and Telecommunications Commission (CRTC) requirements for inclusive language and accessible content.

Identified ICT Barriers to Accessibility

- Some websites and training tools lack accessibility features such as closed captioning, auditory formats, or alternatives and may not be fully optimized.
- All team members use Google Workspace which provides a range of accessibility features, but team members are not well-aware of the accessibility features available.
- Feedback on ICT Barriers is not uniformly collected on a regular basis.

The ICT Action Plan

On-Going

- Review and improve websites, content and applications to enhance accessibility on a regular basis to plan for necessary improvements.
- Work with developers, manufacturers and vendors to improve accessibility features.

- We take steps to ensure that all public facing websites and content conform with the Website Content and Accessibility Guidelines (WCAG) 2.0 Level AA and complete regular scans to identify anything out of compliance in order to resolve it.

Short Term

- Improve awareness of Google Workspace's accessibility features among all team members through the development of new training content and resources.
- Work with our development partner to resolve any non-compliance issues identified during our WCAG 2.0 standard scan.

Medium Term

- Conduct a thorough review of our in-app learning resources to ensure they are fully optimized for accessibility.
- Conduct regular internal feedback sessions or surveys on ICT barriers.

Long Term

- Ensure that important internal corporate communications are crafted with accessibility as a priority.
- Update all training videos and podcasts have closed captions or transcriptions available.

COMMUNICATION, OTHER THAN ICT

The Communication Summary

At net2phone Canada, we are committed to ensuring accessibility in all forms of communication, including print materials, publications, and digital communications such as websites, training and technical documentation, digital materials, and e-newsletters. This commitment also extends to presentations, formal team member gatherings, and other communication methods. We strive to make all our communications accessible to everyone.

What we are doing well in Communication

- We provide easy to digest educational resources to enable our customers through multiple formats such as text, video and live training in video format to support diverse needs and learning styles.
- Our social media team follows accessibility guidelines and writes social media posts in a way that simplifies our content as best as possible.
- We provide videos in American Sign Language (ASL) and Quebec Sign Language (LSQ), as well as text translations to indigenous languages where we provide service in accordance with CRTC regulatory mandates.
- We offer alternative formats upon request.

Identified Communication Barriers to Accessibility

- Team members and customers with disabilities may lack awareness of available accommodations for communication and training in their preferred formats.
- Customers may not realize they can request certain documents, like invoices, essential forms, and others, in alternative accessible formats.
- Employees may not all communicate effectively in the same way, and there are perceptions of communication styles that may lead to misunderstandings.
- Out-dated company policies may not be free of gendered terminology, which does not align with our inclusive culture.

The Communication Action Plan

On-Going

- Continue to simplify our processes and use language and delivery methods which are considered and easy to understand.
- Continuously enhance content, training, tools, and support materials for both customers and team members to align with information and technology accessibility guidelines.
- Host formal employee gatherings with accessibility in mind, regularly asking employees if they need accommodations during these events.

Short Term

- Review and update our Company Policies to be free of gendered terminology and be more inclusive.
- Add more resources to our intranet for inclusion and diversity.
- Increase awareness within the leadership team in regards to the availability of requests for communication accommodations to support learning, written, and verbal communication disabilities.

Medium Term

- Raise awareness on the availability of requesting client-facing or public content in alternative formats.
- Raise awareness amongst customers on the ability to request accessible formats for certain documents.
- Provide accessible document training to content creators.
- Ensure documentation is OCR scanable for screen readers.

Long Term

- Provide open forums, resources and training sessions to increase awareness of communication styles in the workplace.
- Introduce semi-annual reviews of creative content to ensure accessibility standards are met.

PROCUREMENT OF GOODS, SERVICES AND FACILITIES

The Procurement of Goods, Services and Facilities Summary

At net2phone Canada, procurement involves buying goods, services, and leasing facilities from suppliers. Our procurement priority focuses on evaluating purchases and ensuring all related documents consider accessibility. We strive to address accessibility barriers, promote supplier diversity, and communicate our accessibility expectations to all suppliers.

What we are doing well in the Procurement of Goods, Services and Facilities

- net2phone Canada is taking proactive steps to support diverse suppliers.

Identified Procurement of Goods, Services and Facilities Barriers to Accessibility

- Not all documents related to procurement are readily accessible and available with accessibility in mind.
- Some vendors have language barriers and assistive technology needs to be provided to team members to better navigate procurement processes.

The Procurement of Goods, Services and Facilities Action Plan

On-Going

- Continue to evaluate current procurement practices to improve accessibility

Short Term

- Survey procurement staff to identify specific procurement accessibility barriers on a regular basis.
- Ensure any new procurement resources are accessible.

Medium Term

- Provide feedback to and work with our vendors on how to improve systems and processes with accessibility in mind.

Long Term

- Provide accessibility-specific training to our procurement team members.
- Investigate the creation of a Supplier Code of Conduct where suppliers have and uphold accessibility, diversity and inclusion policies.

DESIGN AND DELIVERY OF PROGRAMS AND SERVICES

The Design and Delivery of Programs and Services Summary

net2phone Canada strives to eliminate barriers in the design and delivery of programs and services to ensure individuals with disabilities have meaningful options. Our goal is to empower them to make their own choices, with support if needed, irrespective of their disabilities. This involves enhancing the accessibility of our systems and networks and optimizing our efforts to deliver exceptional customer experiences.

What we are doing well in the Design and Delivery of Programs and Services

- We uphold a strong internal focus on delivering excellent customer service to all customers, including customers and team members with disabilities.
- Leadership promptly provides appropriate resources and options when team members inquire about accessibility accommodations.
- net2phone Canada offers accessible support to customers by telephone, live-chat, email and as well as video conferencing upon request.
- We openly welcome feedback from customers and team members, especially those with accessibility needs.

Identified Design and Delivery of Programs and Services Barriers to Accessibility

- Some team members may lack awareness of barriers faced by customers and how to effectively respond to accommodation requests.
- Accessible products and features are not broadly promoted to customers and team members.
- While customer and team member accessibility feedback in relation to the design and delivery of programs and services is collected, it is not consistently reviewed.
- Not all team members are aware of the accessible features and products net2phone Canada offers.

The Design and Delivery of Programs and Services Action Plan

On-Going

- Continuously review and improve our internal and client-facing training materials and resources with a continued focus on delivering excellent customer service in an accessibility-friendly environment.
- Continue to monitor customer surveys and feedback to identify areas for improvement

Short Term

- Provide all customer-facing team members with additional accessibility awareness training in a variety of formats and resources.

Medium Term

- Implement a consistent review process for accessibility feedback from both customers and team members regarding our products and services.
- Review training content and learning materials to ensure they incorporate accessibility call-outs and are designed with accessibility as a priority.

Long Term

- Create both an internal and customer-facing guide on accessibility driven features, hardware and services.
- Ensure all company-wide training modules are accessible.

TRANSPORTATION

Transportation does not currently apply to net2phone Canada's operations.

Appendices

APPENDIX A: ACA SECTION 6 PRINCIPLES

In developing this Accessibility Plan, we have considered the principles outlined in section 6 of the ACA.

(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.

APPENDIX B: *TELECOMMUNICATIONS ACT*[3] REQUIREMENTS

The Canadian Radio-Television and Telecommunications Commission (CRTC) regulates broadcasting and telecommunications in Canada. Under the Telecommunications Act, the CRTC has established requirements for identifying, removing, and preventing barriers. net2phone Canada complies with all applicable CRTC conditions of licence, regulations, orders, and service conditions. The Appendix provides references to the relevant CRTC regulations, policies, orders, and decisions.

In compliance with section 51(1) of the ACA, this Appendix sets out:

---

[3] **Telecommunications Act** **(S.C. 1993, c. 38)**

- 51(1)(b) - the conditions imposed under section 24 or 24.1 of the Telecommunications Act to which some or all of net2phone Canada is subject that relate to the identification and removal of barriers and the prevention of new barriers; and
- 51(1)(c) - the provisions of any regulations made under the Telecommunications Act that relate to the identification and removal of barriers and the prevention of new barriers and that apply to some or all of net2phone Canada
- [Requirements Under the Telecommunications Act for Accessibility Plans](#), (Sections 51-59)

Accessibility of Alternative Formats

- [CRTC Accessibility Reporting Regulations (SOR/2021-160)](#) (sections 24, 27, and 31)
- [Telecom Order 2001-690, Telecom and Broadcasting Decision CRTC 2022-28](#) , (alternative format billing and paper billing on request and at no charge)
- [Telecommunications Regulatory Policy CRTC 2010-132](#) (paragraph 21) and [Telecom Regulatory Policy CRTC 2022-234](#) (paragraph 142), dialing plan changes
- [Broadcasting and Telecom Regulatory Policy CRTC 2009-430, Accessibility of telecommunications and broadcasting services (paragraphs 68, 69)](#)

Requirements Related to 9-1-1 Service

- [Telecom Decision 2005-21 ("TD 2005-21")](#), Emergency service obligations for local VoIP service providers, para 98.
- [Telecom Regulatory Policy CRTC 2022-234,](#) Introduction of 9-8-8 as the three-digit abbreviated dialing code for mental health crisis and suicide prevention services
- [Telecom Decision CRTC 2013-22, CISC Emergency Service Working Group – Consensus report regarding Text Messaging with 9-1-1 trial and service implementation](#)

Requirements Related to Website Accessibility

- [Broadcasting and Telecom Regulatory Policy CRTC 2009-430, Accessibility of telecommunications and broadcasting services](#) (paragraphs 56, 57 and 65)

net2phone
CANADA