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SignalWire Accessibility Plan for CRTC Accessibility Reporting Regulations

ABOUT THIS PLAN

SignalWire, Inc. (“**SignalWire**”) is a telecommunications Software-as-a-Service (SaaS) company regulated under the Accessible Canada Act (ACA) and subject to the CRTC Accessibility Reporting Regulations. SignalWire is committed to identifying, removing, and preventing barriers to accessibility across all areas of our digital operations. This Accessibility Plan reflects the seven principles set out in Section 6 of the ACA.

1. SECTION 1: Policies, programs, practices and services in relation to the identification and removal of barriers, and the prevention of new barriers (§ 51(1) of the ACA).

1.1. **Employment.** SignalWire’s workforce is fully remote. All hiring, onboarding, collaboration, and day-to-day work takes place through digital tools and platforms. This creates both opportunities and responsibilities for accessibility. Current and planned measures include:

- Reviewing job postings and online application processes to remove language or digital barriers that may inadvertently screen out qualified persons with disabilities.
- Auditing the accessibility of all platforms used in the hiring process (e.g., applicant tracking systems, video interview tools) and replacing or supplementing tools that present barriers.
- Providing remote workplace accommodations upon request, including software licenses for assistive technologies, ergonomic equipment subsidies for home offices, modified schedules, and alternative formats for internal documents and communications.
- Examining all employee-facing digital tools and platforms (e.g., project management software, communication platforms, HR systems) with WCAG Level AA or equivalent accessibility standards in mind.
- Training managers and HR staff on their duties under the ACA and applicable human rights legislation, with a focus on remote accommodation processes.
- Including accessibility as a standing agenda item in annual HR policy reviews.

- 1.2. **The Built Environment.** As a fully remote organization, SignalWire does not operate customer-facing physical premises or a central office. Employees work from their own homes or chosen remote locations. Accordingly, there are no shared physical spaces under our direct control that require an accessibility audit. Where SignalWire establishes temporary shared physical spaces in the future (e.g., event hosting), SignalWire commits to ensuring those spaces comply with applicable accessibility standards before use.
- 1.3. **Information and Communication Technologies (ICT).** As a SaaS company, our product is a digital service. ICT accessibility is therefore a significant area of obligation and represents a high priority. SignalWire's platform, website, and all supporting digital tools must be accessible to all users. Current and planned measures include:
- Committing to Level AA conformance with the Web Content Accessibility Guidelines (WCAG) for the SaaS platform, customer-facing website, self-serve portal, and documentation.
 - Auditing existing platform features and content for accessibility gaps, beginning with core user workflows (e.g., account creation, onboarding, core product features, billing, and support).
 - Providing a public-facing accessibility statement and offering VPATs (Voluntary Product Accessibility Templates) or equivalent conformance reports.
 - Establishing an internal accessibility review step in the product development process so that new features are evaluated for accessibility before release.
 - Ensuring that automated testing tools are integrated into the CI/CD pipeline to catch regressions early.
 - Offering customer-facing content and documentation in accessible formats upon request (e.g., plain language, screen-reader-compatible formats).
 - Auditing third-party components and libraries integrated into the platform for accessibility and raising issues with vendors where deficiencies are found.
- 1.4. **Communication, Other Than ICT.** Although operations are digital-first, SignalWire recognizes that some customers may prefer or require non-digital communication options. Current and planned measures include:
- Training customer-facing staff to communicate effectively with customers who are deaf, hard of hearing, have speech disabilities, or have other communication needs, including through text-based, relay, and asynchronous support channels.
 - Making invoices, account notices, and terms of service available in accessible formats upon request (e.g., plain language, large text).
 - Ensuring our customer support offering includes at minimum one accessible non-voice channel (e.g., live chat, email, or ticketing system) that does not require a phone call.
 - Accepting relay service calls and noting this availability clearly in our support documentation.

1.5. **The Procurement of Goods, Services and Facilities.** As a SaaS company, SignalWire's procurement is primarily software and digital services, including internal tools for collaboration, HR, customer support, finance, and development. The accessibility of these tools directly affects our employees, including those with disabilities. Current and planned measures include:

- Incorporating accessibility criteria into our procurement and vendor evaluation process for software and digital services, when applicable.
- Requesting VPATs or equivalent conformance documentation from software vendors prior to or at contract renewal.
- Including accessibility requirements in contracts and service agreements with major vendors, and escalating known accessibility deficiencies through vendor support channels.

1.6. **The Design and Delivery of Programs and Services.** SignalWire's core product is a SaaS platform delivered over telecommunications infrastructure. Accessibility in the design and delivery of that platform is central to SignalWire's obligations under the ACA. Current and planned measures include:

- Embedding accessibility review into our product development lifecycle.
- Maintaining a public accessibility statement on our website that describes our current conformance status, known limitations, and how to request accommodations or report issues.
- Maintaining a VPAT or equivalent conformance report to support customers, including public sector organizations, that require documented accessibility conformance before procuring software.
- Reviewing our onboarding flows, documentation, and in-app support resources to ensure they are accessible and usable by persons with a range of disabilities.
- Establishing a clear, accessible, and documented process for customers to report accessibility barriers or request accommodations, with a committed response time.
- Promoting awareness of platform accessibility features and settings (e.g., keyboard navigation, screen reader support, contrast options) through our help center and onboarding materials.

1.7. **Transportation.** As a fully remote SaaS company, SignalWire does not operate vehicles, transit routes, or passenger transportation services of any kind. Transportation is not applicable to our operations at this time. Should our operating model change in a way that introduces transportation responsibilities, SignalWire will update this plan accordingly.

2. **SECTION 2: The manner in which SignalWire consulted persons with disabilities in the preparation of the plan (§51(5) of the ACA).**

- 2.1. **How SignalWire Consulted.** All consultation activities were conducted through accessible digital channels. SignalWire also used digital tools to analyze the accessibility of its platform.
- 2.2. **How Feedback Shaped This Plan.** The input SignalWire received directly influenced the priorities and commitments set out in Section 1.
- 2.3. **Ongoing Consultation.** SignalWire is committed to ongoing dialogue with persons with disabilities and the utilization of technology to determine the accessibility of its platform.

3. **SECTION 3: How SignalWire took into account the principles set out in §6 of the ACA in the preparation of the plan.**

- 3.1. **Principle 1: Dignity.** SignalWire is committed to ensuring that customers and employees with disabilities are treated with the same respect as all others. Its training initiatives are designed to eliminate attitudes and practices that demean or patronize people with disabilities.
- 3.2. **Equal Opportunity.** SignalWire's employment and design commitments are intended to ensure that people with disabilities have equal access to the jobs and services it offers. In a remote-first environment, this means that digital tools, from its hiring platforms to its SaaS product, must not create barriers that prevent people with disabilities from fully participating as employees or customers.
- 3.3. **Barrier-Free Access and Participation.** As SignalWire's services are delivered entirely digitally, its platform and communications are the primary means through which customers interact with it. Ensuring its SaaS product and digital touchpoints are accessible is how it fulfils this principle.
- 3.4. **Meaningful Choice and Self-Determination.** SignalWire will publish clear information about accessible service options and accommodation processes so that people with disabilities can make informed choices without needing to disclose more than they choose.
- 3.5. **Integration and Intersectionality.** SignalWire recognizes that many people with disabilities also experience other forms of marginalization. Its accessibility reviews will consider intersecting barriers and avoid approaches that address disability in isolation.
- 3.6. **Involvement of Persons with Disabilities.** People with disabilities were consulted during the development of this plan, and SignalWire is committed to ongoing consultation in future reviews.
- 3.7. **Highest Level of Accessibility.** SignalWire treats the standards in this plan as a floor, not a ceiling. It will seek to go beyond minimum compliance where feasible and will monitor emerging accessibility standards and best practices to continuously improve.

How to Provide Feedback

SignalWire welcomes feedback on this plan and on any accessibility barriers you have experienced. You can reach SignalWire by:

- **Email:** compliance@signalwire.com
- **Phone:** (650) 382-0000
- **Mail:** 228 Hamilton Ave, 3rd Floor, Palo Alto, CA 94301

TTY/Relay connection is available.

You can expect a response within 30 days of receipt. Upon request, SignalWire can provide a response in an accessible format.

Notification to the CRTC

As a Class T3 telecommunications provider, SignalWire has submitted the Attestation under the CRTC Accessibility Reporting Regulations (Form 860) via the CRTC's Data Collection System, as required under the CRTC Accessibility Reporting Regulations.

This plan is published in clear, simple language. The electronic version of this plan is designed to meet WCAG Level AA conformance requirements.