



VODAFONE US INC.

Accessibility Plan

2024-2026



Table of Contents

1.0 General	3
Application	3
Principles of the ACA.....	3
Vodafone US Inc. Overview	3
Accessibility Statement	4
2.0 Executive Summary	4
3.0 Consultations	5
4.0 Key Areas	5
Employment	5
Identified Barriers.....	5
Actions and Timelines.....	6
Environment	6
Identified Barriers.....	6
Actions and Timelines.....	6
Information and Communication Technologies	7
Identified Barriers.....	7
Actions and Timelines.....	8
Communication	8
Identified Barriers.....	8
Actions and Timelines.....	8
The Procurement of Goods, Services and Facilities	9
Identified Barriers.....	9
Actions and Timelines.....	9
The Design and Delivery of Programs and Services	9
Identified Barriers.....	9
Actions and Timelines.....	10
Transportation	10
5.0 Regulatory Conditions	10
License Conditions under Part II of the Broadcasting Act	10
Provisions of any Order made under subsection 9(4) of the Broadcasting Act 11	
Provisions of any Regulations made under subsection 10(1) of the Broadcasting Act	11



Conditions under section 24 or 24.1 of the Telecommunications Act.....	11
Provisions of any Regulations made under the Telecommunications Act.....	11
6.0 Conclusion	11
7.0 Appendices	11
Appendix A – ACA Section 6, Principles.....	11
Appendix B – <i>Broadcasting Act</i> Requirements	12
Appendix C – <i>Telecommunications Act</i> Requirements	12



1.0 General

Application

This Accessibility Plan has been prepared in accordance with the requirements of the *Accessible Canada Act* (S.C. 2019, c. 10) and its regulations (ACA).

Vodafone US Inc. has a procedure for receiving and responding to feedback, including comments on how services are delivered to persons with disabilities.

You can provide accessibility feedback (including feedback on this plan) or request an alternate format of our Accessibility Plan or description of our feedback process in a number of ways, including by:

- Phone: +1 720 498 3063
- Email: bryan.ganno@vodafone.com
- Regular mail: 1615 Platte Street, Suite 02-115, Denver, CO 80202
- For more information visit www.vodafone.com/accessibility

The person responsible for receiving accessibility feedback at Vodafone US Inc. is the Compliance Manager. Feedback can be provided anonymously.

Principles of the ACA

Vodafone's Accessibility Plan has been written in accordance with principles set out in the ACA (see Appendix A).

VODAFONE US INC. Overview

Vodafone US Inc. provides hundreds of customers in the US and around the world technology and telecommunication services such as wireless, fixed, hardware and platforms.

In the Americas region, which consists of the United States, Canada, and Latin America, Vodafone:

- Is focused on delivering fixed and wireless solutions to multinational customers.

We deliver and manage services in various languages and countries from our state-of-the-



art worldwide communications network.

Accessibility Statement

Vodafone US Inc. is committed to treating all people in a way that allows them to maintain their dignity and independence. Our purpose is to advance how people connect with each other and the world – including persons with disabilities. An important part of doing this is to identify and remove barriers persons with disabilities encounter.

2.0 Executive Summary

This plan summarizes actions that have been taken and are planned to make sure Vodafone and its services, workplace and practices are free of real or perceived barriers.

We also make it a priority to improve service for our customers, including persons with disabilities.

To help create this Accessibility Plan, Vodafone US Inc. consulted with persons with disabilities -- including customers, employees and external organizations that specialize in accessibility. These consultations allowed us to outline opportunities to identify, remove and prevent barriers in:

- employment practices,
- formed environment,
- technology,
- communication,
- procurement of goods, services and facilities,
- the design and delivery of programs and services.

3.0 Consultation

During the development phase of our plan, we focused on identifying accessibility barriers experienced by persons living with many various types of disabilities.

The information we were able to gather enhanced our learning experience and helped prioritize the actions that are central to our Accessibility Plan.

4.0 Key Areas

Vodafone US Inc.'s Accessibility Plan reflects barriers we identified as part of our



consultation path and provides the actions we will take to prevent and remove different barriers experienced by persons with disabilities. There are also ongoing actions we will take to ensure progress is being made.

Our initial actions will focus on the areas outlined in the sections below. We will provide updates on our progress annually and adapt our plans as we identify new barriers and learn from our progress.

Employment

Resolving employment-related barriers helps ensure everyone has the same employment opportunities at Vodafone. We are committed to a workplace that promotes a culture that values diversity, equity, inclusion and belonging.

Identified Barriers:

- Team members could have better awareness of the available accommodations – or the barriers experienced – by persons with disabilities.
- The process to accommodate for disabilities is considered burdensome; there is a lack of awareness of the support available for employees and their managers during the accommodation process.
- There is a lack of understanding among job applicants, recruiters and hiring managers on the types of accommodations available for persons with disabilities who are applying, interviewing and qualifying for jobs.

Actions and Timelines:

Short-Term:

- Begin rollout of enhanced accessibility training.
- Encourage participation through our various employee resource groups.
- Increase awareness of Vodafone’s accommodation process for applicants, team members and leaders.

Medium-Term:

- Continue rollout of enhanced accessibility training.
- Review and evaluate the effectiveness of training.
- Review and adjust current processes to support an improved candidate experience.

Long-Term:

- Create a consolidated inventory of resources used to support accommodation.
- Use internal feedback and consultations and collaborate with persons with disabilities to ensure that accessibility standards are integrated across our business – including workplace policies, employment standards, programs, and work environments.

Ongoing:



- Continue to enhance our accommodation processes.
- Continue to evaluate how well our processes for workplace accommodation are performing.
- Continue to improve how we engage and collaborate with persons with disabilities.

Environment

Addressing barriers related to the company's environment helps us ensure that people using our offices and building spaces have barrier-free access. We will work with our team members and external partners to better understand and address barriers experienced by persons with disabilities.

Identified Barriers:

- Noise levels or lighting in certain spaces may create challenges for persons with disabilities.
- Signage is sometimes complex or difficult to navigate.

Actions and Timelines:

Short-Term:

- Ensure team members know all spaces must be clear of physical barriers to enable customer mobility and encourage the use of a barrier-free ledge on checkout counters.
- Review existing procedures and manuals to ensure they promote barrier-free pathways; remove such barriers and proactively ensure these barriers do not occur in the future.
- Refer employees and leaders to the accommodation process if physical barriers are identified in the workplace.

Long-Term:

- Explore implementation of workspace wayfinding and navigation including the use of mobile applications.
- Develop and include accessible signage standards when retrofitting buildings and renovating workspaces.

Ongoing:

- Continue efforts to include accessibility upgrades as part of building retrofits and renovation of workspaces and existing retail locations.

Information and Communication Technologies

By addressing information and communication technology-related barriers, we can achieve a high standard for digital accessibility. We apply a continuous improvement path that endeavors to keep pace with technology advancements in our society. Our actions include plans to identify and resolve barriers found in our websites, mobile



applications, networks, and telecommunication and computer systems used by customers and team members.

Identified Barriers:

- Websites and mobile apps may not always be easy to navigate because of the large volume of information; also, the language used may be too complex and difficult to understand.
- Websites and mobile apps may not offer alternate methods of communication for transactions.
- Chat tools, drop-down menus, selection of options and online forms are not consistently accessible.
- Our products and services can be enhanced to provide more accessibility features – such as varied activation methods, audio prompts, visual prompts and tactile markers.
- The amount of information required during an online transaction can sometimes be challenging. More time to complete a transaction may be required.

Actions and Timelines:

Short-Term:

- Adopt accessibility guidelines for information and communication technology.
- Make accessibility central in developing and buying devices and equipment.
- Standardize digital accessibility guidelines, policies and practices.
- Adopt universal design principles and best practices in digital accessibility.

Ongoing:

- Continue to improve websites and applications to enhance accessibility.
- Develop an audit program to monitor the accessibility of information and communication technology.
- Work with content providers, partners, manufacturers and vendors to improve accessibility features and ensure they are maintained.
- Continue to simplify our processes and use language that is concise and easy to understand.
- Continue to evaluate the accessibility of the information and communications technologies we use when addressing both internal and external audiences.
- Continuously improve training, tools, and support materials for team members to meet information and technology accessibility guidelines.

Communication

By addressing communication-related barriers, we will improve the accessibility of the documents that we create at Vodafone. Our brand guidelines will provide direction on how to create documents and advertising that promote our products and services in a



way that meets accessibility requirements.

Identified Barriers:

- Customers may not be aware that they can request certain types of documents (such as bills and other documents that contain critical information) in alternate formats to meet their accessibility needs.
- Document templates and communication guidelines may not always be accessible.
- Alternate options and methods of communication are not consistently mentioned in marketing materials or advertisements.

Actions and Timelines:

Short-Term:

- Develop accessibility guidelines for creating documents.
- Improve customer awareness of the services provided.

Ongoing:

- Promotion of accessibility products, services, and alternate options and methods of communications to increase awareness and usage.
- Continuous refinement of communication guidelines to create content that is simple, concise, and easy to understand.
- Ensure accessibility needs receive consideration in the development of marketing and advertising materials.

The Procurement of Goods, Services and Facilities

We strive to ensure our procurement practices address accessibility procurement barriers and encourage the use of suppliers who are part of our supplier diversity program. When interacting with new and existing suppliers, we communicate our accessibility expectations and requirements.

Identified Barriers:

- Existing procurement practices may not consistently meet accessibility requirements.

Actions and Timelines:

Ongoing:

- Continue to evaluate current procurement policies, processes and tools to improve accessibility.

The Design and Delivery of Programs and Services

By addressing the design and delivery of programs and service-related barriers, we aim to ensure persons with disabilities have meaningful options. We want to ensure they are free to make their own choices, with support if they desire, regardless of their disabilities. This



includes improving the accessibility of our systems and networks and improving our efforts to provide great customer experiences.

Identified Barriers:

- Team members have different levels of knowledge and awareness when it comes to the barriers experienced by customers with disabilities, such as how to respond to inquiries and requests for accommodations.
- Accessible products and services are not broadly promoted to customers.
- Large service windows (the timeframe when a technician will visit a customer), limited hours of operation, or long waits in line at retail stores can make it challenging for persons with disabilities to access support when it is needed. Situations such as arranging for an interpreter or a support person, and planning times for a pick-up or a return of equipment by courier or at stores, all need consideration.
- Alternate options and methods of communications are not consistently made available to persons with disabilities when they try to complete certain transactions, or when requesting support.

Actions and Timelines:

Medium-Term:

- Optimize virtual assistants to support products and services related to accessibility.

Long-Term:

- Identify ways to improve systems and processes for common transactions.

Ongoing:

- Continue to monitor customer surveys and feedback to identify areas for improvement.
- Continue to coach and train team members on best practices in customer service, for example: knowledge on how to send replacement equipment to customers with accessibility challenges.
- Explore ways to further increase customer awareness of Bell's accessibility products and services and of our Accessibility Services Centre.

Transportation

Transportation does not currently apply to Vodafone's operations.

5.0 Regulatory Conditions

As required by section 42(1) and section 51(1) of the ACA, we have set out the following applicable conditions and provisions:



License Conditions under Part II of the Broadcasting Act

License conditions that relate to the identification and removal of barriers and the prevention of new barriers are set out in Appendix B.

Provisions of any Order made under subsection 9(4) of the Broadcasting Act

Provisions of any order that relates to the identification and removal of barriers and the prevention of new barriers are set out in Appendix B.

Provisions of any Regulations made under subsection 10(1) of the Broadcasting Act

Provisions of any regulations that relate to the identification and removal of barriers and the prevention of new barriers are set out in Appendix B.

Conditions under section 24 or 24.1 of the Telecommunications Act

Conditions that relate to the identification and removal of barriers and the prevention of new barriers are set out in Appendix C.

Provisions of any Regulations made under the Telecommunications Act

Provisions of any regulations that relate to the identification and removal of barriers and the prevention of new barriers are set out in Appendix C.

6.0 Conclusion

It is Vodafone's belief we will support persons with disabilities by addressing the barriers identified. It is our goal to advance how all Canadians connect with each other and the world. Our motivation stems from the chance to enhance accessibility for both our new customers and team members, contributing to the realization of a barrier-free Canada,

As part of our commitment to accessibility, we will continue to collaborate with persons with disabilities. We will publish an updated Accessibility Plan every three years and communicate updates by publishing interim progress reports every year in between, in accordance with the ACA.

7.0 Appendices

Appendix A – ACA Section 6, Principles

In preparing this Accessibility Plan, we have taken into account the principles set out 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 – Broadcasting Act Requirements

This section is not applicable to Vodafone US Inc.

Appendix C – Telecommunications Act Requirements

As required by section 51(1) of the ACA, this Appendix sets out:

- 51(1)(b) - the conditions imposed under section 24 or 24.1 of the *Telecommunications Act* to which some or all of Vodafone US Inc. 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 Vodafone US Inc.

This Appendix does not include requirements that have not been in force for at least three months before the day on which the Accessibility Plan must be published or expectations/encouragements, which do not rise to the level of imposed conditions.

1. Offering and Promotion of Accessible Products and Services

- Wireless Service Providers (WSPs) must offer mobile wireless service plans that meet the needs of Canadians with disabilities.



- WSPs must promote and publicize their disability-specific products and services on their websites and using other methods.
- WSPs must offer at least one type of wireless mobile handset that will provide access for persons who are blind and/or have moderate-to-severe mobility or cognitive disabilities.
- Telecommunications Service Providers (TSPs) must make general call centers accessible to the point of providing a reasonable accommodation by training customer service representatives to handle questions from persons with disabilities and familiarizing customer service representatives with accessible products and services.
- Internet Service Providers (ISPs) subject to the Internet Code must ensure that customer service representatives receive training on rights and responsibilities under the Internet Code, including accessibility needs.
- TSPs must make their interactive voice response (IVR) systems accessible. A service provider with a disability call center could meet this requirement by developing and implementing a process for the appropriate transfer of calls to that call center.
- Bell Canada and Bell Mobility must use funds from Bell Canada's deferral account to implement certain initiatives to enhance access to telecommunications services for persons with disabilities. Bell Canada and Bell Mobility must file annual reports about these initiatives until the deferral funds are fully used.
- A Critical Information Summary, provided under either the Internet Code or the Wireless Code, must set out information, including about the extended trial period for customers who self-identify as having a disability.
- ISPs subject to the Internet Code must file compliance reports including a description of how they are ensuring that their customer service representatives are knowledgeable about rights and responsibilities under the Internet Code, including those related to persons with disabilities.
- Certain WSPs must create and promote videos in American sign language (ASL) or langue des signes québécoise (LSQ) to promote the Wireless Code and explain common terminology.
- ISPs subject to the Internet Code must create and promote videos in ASL/LSQ to promote the Internet Code, including the extended trial period for persons with disabilities, and explain common terminology.
- TSPs that will transition to ten-digit local dialing in order to implement 9-8-8 must provide information about the transition to ten-digit local dialing in ASL and LSQ.
- WSPs must engage in regular, at least yearly, consultations with persons with disabilities and groups representing their interests.
- WSPs must file annual reports in an accessible format regarding accessible plans and ongoing consultations. These annual reports must include certain types of information specified by the Commission.



2. Message Relay Service (MRS)

- All local exchange carriers (LECs) must provide teletypewriter (TTY) and Internet protocol (IP) Relay services to their telephone customers 24 hours a day, 7 days a week.
- WSPs must provide IP Relay to their retail customers 24 hours a day, 7 days a week.
- MRS Providers providing IP Relay and MRS Providers with an obligation to provide TTY must meet the minimum requirements set out in Appendix 1 to TRP2018-466.
- Certain TSPs must file annual reports on quality-of-service data, as set out in Appendix 2 to TRP 2018-466.
- TSPs must fund video relay service (VRS) via the National Contribution Fund.
- Bell Canada and certain affiliates must equip certain of their payphones with TTY.
- WSPs must take steps to ensure that Deaf and Hard of Hearing sign language users are able to make and receive calls through VRS in a comparable way to hearing users accessing voice services.

3. Trial Periods

- If a customer self-identifies as a person with a disability, then ISPs subject to the Internet Code must offer an extended trial period of at least 30 days, and the permitted usage amounts must be at least double the service provider's usage limits for the standard trial period.
- If a customer self-identifies as a person with a disability, then WSPs must offer a 30-day extended trial period, and the permitted usage amounts must be at least double the service provider's usage limits for the standard trial period. WSPs must also promote the extended trial period in the accessibility section of their website.

4. 9-1-1

- MRS providers must provide access to 9-1-1 service.
- WSPs and incumbent local exchange carriers (ILECs) must provide Text with 9-1-1 service.

5. Alternative Formats

- TSPs must provide paper bills upon request at no charge to customers who self-identify as a person with a disability.
- Canadian carriers must provide bills, bill inserts, and information setting out the rates, terms and conditions in alternative accessible formats, such as in braille or large print, for people with a visual disability.
- ISPs subject to the Internet Code must provide a copy of the contract, related documents, and Critical Information Summary in an accessible format for persons with disabilities upon request, at no charge.



- WSPs must provide a copy of the contract, related documents, and Critical Information Summary in an accessible format for persons with disabilities upon request, at no charge.
- ILECs/TSPs, as applicable, must provide the following documents in alternative formats to persons with visual impairments, upon request: information on the National Do Not Call List, information on Bill Management Tools, retail quality of service information, notification of the removal of the last payphone in a community, the incumbent local exchange carriers' communications plans on local forbearance, and information on dialing plan changes.
- Accessibility plans, progress reports, and descriptions of feedback processes published under the ACA must be made available, upon request, in print, large print, braille, audio format, electronic format that is compatible with adaptive technology that is intended to assist persons with disabilities, or any other format that the person and the regulated entity agree upon and for which there is proof of the agreement.

6. Website Accessibility

- TSPs must make the information on telecommunications and broadcasting services and products on their websites accessible to the point of providing a reasonable accommodation for persons with disabilities.
- TSPs must make customer service functions that are available solely over the service providers' websites accessible. If a customer service function on the service providers' website is not accessible, then persons with disabilities cannot be charged or disadvantaged for using an alternate channel to access those functions.
- TSPs must have an easy-to-find home page link to the accessibility section of their websites, if their websites include such sections.
- If a service provider subject to the Internet Code applies overage fees, the service provider must offer tools, at no charge, to help a customer monitor and manage their data usage and any additional fees incurred during a monthly billing cycle. These tools must be accessible to customers with disabilities.
- MRS providers must ensure that any IP Relay related web and mobile interfaces meet W3C Web Content Accessibility Guidelines (WCAG).
- Accessibility plans, progress reports, and descriptions of feedback processes published under the ACA must be published in a way that meets WCAG guidelines.

7. Passing On Obligations

- Canadian carriers, as a condition of offering and providing telecommunications services to non-carriers, must include in their tariffs and in service contracts or other arrangements with these non-carriers, the requirement that the non-



carriers and all of their wholesale customers and subordinate wholesale customers, abide by certain obligations, including those set out in the Appendix to TRP 2017-11 related to accessibility and the removal of barriers.