

SiriusXM Canada Accessibility Plan - June 2023

A. INTRODUCTION:

SiriusXM Canada is committed to becoming a barrier-free organization and has created and implemented an initial accessibility plan (“**Accessibility Plan**”) in accordance with the *Accessible Canada Act* and the regulations made thereunder. In setting this goal, SiriusXM Canada has ensured it has aligned its accessibility commitments in the following categories:

- Employment
- Built Environment
- Information and Communications Technologies (ICT)
- Communications, other than ICT
- Procurement of Goods, Services, and Facilities
- Design and Delivery of Programs and Services (DDPS)
- Transportation

Each category includes SiriusXM Canada’s outcome statement that addresses key barriers and solutions, and actions that target the barriers and lead to the outcome. The action plans for each accessibility category include measurable, relevant, timely, and specific processes aimed at achieving SiriusXM Canada’s accessibility goals to assist in tracking its progress.

B. GENERAL:

Our Compliance Officer has been designated by SiriusXM Canada to receive feedback on any accessibility barriers and on our Accessibility Plan. Feedback may be provided to our Compliance Officer in any of the following ways:

- Mail to 1000-351 King St E, Toronto, ON, M5A 0L6
- Telephone at 416-513-7400
- Email to Accessibility@siriusxm.ca
- by web-based contact form, found here:
<https://www.siriusxm.ca/accessibility/feedback/>

Any personal information received by SiriusXM Canada remains confidential unless the person consents to the disclosure of their personal information.

SiriusXM Canada confirms that the electronic publication of the feedback process description meets the requirements of Level AA conformance as set out in the Web Content Accessibility Guidance (WCAG).

Individuals can request that our Compliance Officer provide a copy of the Accessibility Plan in an alternate format.

The available alternate formats are as follows:

- Large print (larger and clearer font);
- Electronic (a format that is compatible with adaptive technology that is intended to assist persons with disabilities); and
- Any other format that we agree to provide in order to accommodate.

C. GUIDING PRINCIPLES:

In preparing this Accessibility Plan, SiriusXM Canada has taken into account the principles set out in section 6 of the *Accessible Canada Act*. Those principles are:

- all persons must be treated with dignity regardless of their disabilities;
- 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;
- all persons must have barrier-free access to full and equal participation in society, regardless of their disabilities;
- all persons must have meaningful options and be free to make their own choices, with support if they desire, regardless of their disabilities;
- 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;
- persons with disabilities must be involved in the development and design of laws, policies, programs, services, and structures; and
- 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.

D. CONSULTATIONS:

SiriusXM Canada's approach to drafting this Accessibility Plan was to learn from our customers' and employees' accessibility needs and to engage various consultants experienced in auditing and commenting on accessibility. The Rick Hansen Foundation performed an accessibility audit on our built environment and communications other than ICT. SiteImprove provided evaluation and consultation on our ICT and DDPS processes. Our own personnel and Human Resources department provided meaningful feedback on our employment processes.

Consulting firm Korn Ferry has been engaged to provide training on an on-going basis to the executive leadership team and to our staff in order to promote accessibility awareness, as a part of our broader diversity, equity, and inclusion initiatives.

In drafting this Accessibility Plan, SiriusXM Canada also engaged its internal Diversity, Equity, and Inclusion Council, who offered to be the first to review and comment at each stage of development. Additionally, an accessibility feedback form was made available to the public to garner feedback on how SiriusXM Canada can improve its accessibility processes.

E. ACCESSIBLE AND INCLUSIVE FEEDBACK METHODS:

The consultation process provided participants with targeted questions, sufficient information, time, and different means of participation. The main methods of consultation were:

- Engaging employees in voluntary interviews to provide feedback on what accessibility barriers they or their customers face and suggestions on how to remove such barriers.
- Collecting public feedback through our Accessibility Feedback webpage created so that anyone interacting with SiriusXM Canada and www.siriusxm.ca can provide feedback anonymously on the accessibility of our services and sites.
- Leveraging past experiences of our business relating to accessibility.

- Engaging various accessibility experts to provide gap analysis reports that identify short-term and long-term areas for improving accessibility opportunities.

Because of the need for knowledge and understanding related to accessibility within its workforce, promoting information related to accessibility and accessible work practices is a top priority for SiriusXM Canada. Such efforts will help employees across the organization increase their accessibility knowledge by drawing their attention to the resources that exist and ensuring the resources are easy to find. Additionally, the Diversity, Equity and Inclusion Council have arranged for ongoing specialized training through Korn Ferry Consulting firm for its executive leadership staff and for all employees. Such training will be provided to enable management and employees to understand unconscious bias and the accessibility needs of individuals with disability.

F. EMPLOYMENT:

Outcome:

SiriusXM Canada's mission for accessibility under the Employment category is for job seekers and employees with disabilities to see SiriusXM Canada as an employer of choice and an organization where they can contribute at their full potential through full access to employment opportunities, engagement within the workplace community, and career advancement.

Barriers:

The barriers and solutions related to Employment as reported through consultations and through our feedback processes fell within the following categories:

1. The Duty to Accommodate:

The barriers we heard about included the following:

- Adequacy of accommodation measures.
- Allowing and encouraging flexible hours and part-time work.
- Understanding when and where accommodations are required.

2. Retention and Promotion:

The barriers and solutions we heard about included the following:

- Ensure that all employees are respected and feel valued.
- Use disability inclusive policies to ensure everyone has equitable opportunity for advancement.
- Ensure representation of persons with disabilities at the management level.
- Stop any stigma that may be associated with disability.

Actions:

SiriusXM Canada is taking steps to remove and/or prevent the above-listed barriers, including:

- Establishing a centralized point of contact for all questions and requests related to accommodations.
- Ensuring employees have channels available to them for disability-related issues.
- Providing third-party led training sessions on diversity, equity, and inclusion through providers like Korn Ferry.
- Creating and maintaining a list of all accessibility training courses and tools available to employees.
- Implementing a calendar for future accessibility training courses that employees can register for.
- Linking our Equal Employment Opportunity policy to all job postings in order to promote more hiring of individuals with disabilities.

SiriusXM Canada practices inclusive and accessible hiring so that all candidates, including those with disabilities, have the opportunity to demonstrate their capacities. Supporting actions include:

- Improving the accessibility of candidate assessment with tools and resources that are readily available.
- Encouraging participation in initiatives that promote inclusion.
- Reducing and mitigating the effects of bias through training.
- Recruiting employees with disabilities according to workforce availability.
- Accepting applications through various modes, not just online.

- Including our Equal Employer Opportunity statement in all our job postings.

SiriusXM Canada provides employees with disabilities opportunities to enhance career satisfaction and advancements. This initiative is supported by the following actions, which include:

- Providing talent management support and mentorship.
- Offering training for executive leadership team to increase accessibility awareness and to ensure they make themselves available to their teams for accessibility issues.
- Reviewing and updating its Employment Equity Policy on a regular basis.

Our Human Resources department is actively engaged in updating its processes and anticipates implementation of these above action items in the short to medium term.

G. BUILT ENVIRONMENT:

Outcome:

SiriusXM Canada's goal for achieving accessibility under the Built Environment category is to allow employees and visitors, including those with disabilities, to make best use of SiriusXM Canada facilities by providing barrier-free access.

Barriers:

Significant barriers to accessibility were identified in our former head office space, which was located in a heritage loft building. SiriusXM Canada has also had an accessibility assessment performed by the Rick Hansen Foundation of our new head office space, which has identified some opportunities to strengthen the accessibility of our physical location further.

Actions:

Sirius XM Canada chose to move its head office from a heritage building with significant accessibility challenges to a contemporary building constructed in 2016 with modern building code and accessibility considerations. Sirius XM Canada

made accessibility a priority in selecting the building, location and in its design improvements.

As of August 2022, SiriusXM Canada relocated to its new office which improved a significant number of accessibility deficiencies in its former office space, including improved wheelchair access, stairless access, washroom facilities, upgraded boardroom delivery and capture of sound, improved screens in our boardrooms, video conferencing transcription availability, and enhanced capability for hybrid remote in-person meetings.

Further, SiriusXM Canada engaged the Rick Hansen Foundation to perform an accessibility audit on our facility and has subsequently achieved accessibility certification with the CSA Group in association with the Rick Hansen Foundation. SiriusXM Canada will publicly list its office as Accessibility Certified.

Going forward, in the short and medium terms, SiriusXM Canada plans to assess and implement recommendations from the Rick Hansen Foundation to further enhance the accessibility score of our facility.

In the long-term, SiriusXM Canada, in collaboration with our Diversity, Equity, and Inclusion Council, plans to engage our property manager to advocate for accessibility enhancements to the common elements in our building as recommended by the Rick Hansen Foundation to further improve our accessibility.

H. INFORMATION AND COMMUNICATIONS TECHNOLOGY:

Outcome:

Information and communications technology provides all users, including SiriusXM staff and customers with disabilities, with leading edge tools that can improve efficiency and enhance functionality.

Barriers:

The barriers and solutions related to Information and Communications Technology as reported through consultations and our feedback mechanisms fell within the following categories:

1. Planning and Acquiring New Digital Systems and Technology:

The barriers we heard about included the following:

- It is difficult to obtain adequate speech recognition software, or this software is inconsistently available.
- A few of our meeting spaces lack large monitor screens, video conferencing capabilities, or have suboptimal sound quality.
- Difficulty anticipating how technology or processes might fail individuals with particular disabilities can make technology planning difficult.

The solutions to these barriers include:

- Developing AI tools that can recognize and communicate with individuals verbally as an additional technological communication feature to address users who cannot access keyboard functionality. It is SiriusXM Canada's aim to integrate such a new digital system and technology in the medium to long term.
- Outfitting meeting spaces with improved technology features such as larger screens, video conferencing capabilities with closed-captioning and upgraded microphones to enhance sound quality.
- Designing *ad hoc* processes for bespoke accommodations to meet immediate customer needs and reflecting on technological improvements that can be made to address repeated shortcomings.

2. Adapting and Updating Existing Programs and Technology:

The barriers we heard about included the following:

- Automated closed captioning in video conferencing could historically only be enabled by the meeting host, and not by any participant who might discretely want the captioning service.
- Certain meeting rooms lack audio capabilities and other technology features to assist individuals with hearing disabilities.
- Assisted listening technologies (e.g., hearing loops) do not use a standard communication platform causing compatibility issues for segments of the population they are meant to serve.

The solutions to these barriers includes:

- Enabling video conferencing closed-caption features to be accessed and implemented by the end-user, not just the meeting host.
- Identifying meeting rooms equipped with enhanced audio and visual technologies and prioritizing their use by anyone with a disability.

3. Providing User Training, Guidance, and Resources:

The barriers we heard about included the following:

- A catalogue of accessibility functions and assistive technology is not available or is not reaching its target audience.
- Employees are not aware of our various deployed technologies that function to improve accessibility.
- Employees are unaware of readily available training or assistance on information and communication technology.

The solution to these barriers include:

- Having a central digital repository for staff to access training manuals, guides and resources for assistive technologies.
- Training employees on technologies that are available to assist them.
- Providing executive leadership with accessibility training on an on-going basis.

Actions:

SiriusXM Canada intends to incorporate accessibility considerations into our planning, upgrading, and acquisition of digital systems and technology and to perform routine scanning to monitor for emerging advancements in accessible technology.

Supporting actions include:

- Adopting accessibility guidelines for information and communication technology.
- Making video-conference meetings with closed captioning technology available to participants.

- Providing specialized equipment to individuals who require accessibility support.
- Ensuring that available accessibility functionality is considered when selecting and implementing software systems.
- Considering accessibility feedback received through our various feedback channels in our planning, acquisition, and upgrading of digital systems.

SiriusXM Canada regularly enables accessibility features in existing programs and technology and assesses current programs and technology for accessibility features to identify gaps.

SiriusXM Canada aims to develop a plan to establish a central location of resources to support employees in becoming aware of and understanding how to use tools and systems to ensure internal and external applications are accessible.

Supporting actions include:

- Creating an employee resources page that is available through SiriusXM Canada's intranet site. The page will include resources that are accessible in a variety of formats.
- Collaborating with IT experts to develop, promote, and deliver IT accessibility training tailored for different audiences within the organization.

SiriusXM Canada aims to complete these accessibility-driven solutions in the medium to long term.

I. COMMUNICATION, OTHER THAN ICT:

Outcome:

Clients, partners, and employees of SiriusXM Canada, as well as the public, can communicate and interact with the organization through means that work for them, in language and formats they can easily use and understand.

Barriers:

The barriers and solutions related to Communications as reported through consultations and our feedback mechanisms fell within the following categories:

1. Clear Enunciation:

The barriers and solutions we heard about included the following:

- Plain language should be used.
- Customers may need personalized solutions for their accessibility-related issues.
- Following up with a written summary for all transactions.

2. Alternate formats, including templates and tools:

The barriers and solutions we heard about included the following:

- Accessibility of communications for employees and customers should be given the same priority as official languages.
- Templates should include large fonts and high contrast colours.
- Customers may not be aware of alternate methods of communications that may be available.

Actions:

SiriusXM Canada integrates disability inclusion and accessibility awareness into the organization's communications output so that employees and customers, including those with disabilities, see themselves considered and reflected.

Supporting actions include:

- Implementing and promoting the accessibility feedback form on SiriusXM Canada's website and learning from the feedback provided.
- Reviewing and updating SiriusXM Canada's website to ensure it is accessible.
- Improve awareness of and accessibility to the alternate methods of communications that are available to customers.
- Continually refine communications so that content is simple and easy to understand.

- Ensure call centre agents are aware of accessibility processes and that they know how to respond in situations requiring bespoke accommodations for our customers.

J. PROCUREMENT:

Outcome:

SiriusXM Canada's project managers and the leadership team consider accessibility requirements when relevant in their specifications for procuring goods, services, and facilities so that the deliverables provide the necessary accessibility features.

Barriers:

The barriers related to this category included the following:

1. Existing procurement practices may not consistently account for accessibility.
2. Lack of common industry standards that account for accessibility for certain goods or services

Actions:

SiriusXM Canada shall consider accessibility in its procurement actions and provide guidance on accessibility considerations during procurement processes.

Supporting actions include:

- Procurement and contract approvers will provide accessibility guidance.
- Provide staff with training and opportunities to increase their knowledge of accessibility requirements.
- Regular evaluation of current procurement policies and processes to ensure accessibility considerations are addressed.
- Consideration of available accessibility features in the acquisition, implementation, or upgrading of new or existing software platforms.

K. DESIGN AND DELIVERY OF PROGRAMS AND SERVICES (DDPS):

Outcome:

SiriusXM Canada's mission for accessibility under this category is for persons with disabilities to have a better user experience when engaging with SiriusXM Canada through its website and services.

Barriers:

The barriers and solutions related to the DDPS as reported through consultation with SiteImprove of SiriusXM Canada services fell within the following categories:

1. SiriusXM Canada is subject to its licensor's technology development lifecycle.
2. Team members may not have knowledge and awareness of the barriers encountered by customers who have disabilities.
3. Alternate methods of communications available to our customers may not be readily apparent to customers or immediately be offered by our customer service centre.

Solutions to the above barriers include:

- Optimizing AI functions to support products and services for individuals with disabilities.
- Identifying and implementing bespoke solutions to improve services for individuals with disabilities.
- Engaging with SiriusXM Canada's licensor to encourage accessibility features in its services, content and online processes.

Actions:

SiriusXM Canada is committed to eliminating the accessibility barriers from its Design and Delivery of Services.

Supporting actions include:

- Offering different modes of communications to customers in all instances to promote accessibility.
- Making channels like "chat" more widely available to our customers.

- Advocating for improvements to accessibility of our technology with our licensors.
- Promoting awareness of accessibility issues through training of our employees and our customer service representatives.

By regularly monitoring customer surveys and feedback, and coaching team members on customer service, SiriusXM Canada is maintaining its ongoing obligation of addressing accessibility. We encourage any accessibility feedback, including those relating to our online platforms to be provided via our designated accessibility feedback email, at accessibility@siriusxm.ca.

L. TRANSPORTATION:

Transportation is one of the categories listed under the *Accessible Canada Act*. We list it in this Plan as required by the *Accessible Canada Act*, but it is not included in the scope of SiriusXM Canada's mandate.

M. UPDATES TO THE ACCESSIBILITY PLAN:

PROGRESS REPORTS:

As required by the *Accessible Canada Act* and the *Accessible Canada Regulations*, SiriusXM Canada must prepare and publish progress reports about the implementation of the above Accessibility Plan. This is to ensure that we maintain the energy and motivation toward achieving our goals. The actions provided for each accessibility category are relevant, achievable, timely, and specific. Thus, measurement and tracking are built-in.

Accessibility at SiriusXM Canada will be monitored collaboratively by its Human Resources, Public Relations, and our Compliance Officer, who will monitor the tracking of implementation against the actions, and maintain open dialogue with the Diversity, Equity, and Inclusion Council and our Compliance Officer every quarter.

Additionally, and as prescribed by the Regulations by the Canadian Radio-television and Telecommunications Commission, the first progress report must be published by June 1st 2024. The second progress report will be published by June 1, 2025.

SiriusXM Canada will, in preparation for submitting the annual reports, retain records of any feedback it receives, maintain regular engagement with its internal teams, and perform ongoing consultations to monitor for changes and to identify new goals for achieving accessibility for all. These processes support the redevelopment and publication of a new Accessibility Plan every three years.

N. CONCLUSION:

By addressing the barriers as described in this Accessibility Plan, SiriusXM Canada believes it can make meaningful change for persons with disabilities. The opportunity to improve accessibility for our employees, partners, and customers is the motivation SiriusXM Canada needs to do its part to realize a barrier-free, accessible Canada. As we move to implement our Accessibility Plan, we will continue to engage and consult with individuals with disabilities. The Accessibility Plan will be updated and published every three years, with progress reports published every year in between.