

# STINGRAY GROUP INC.

## ACCESSIBILITY PLAN

June 1, 2023

## **1. General**

In 2019, the *Accessible Canada Act* (the “**ACA**”) came into force. Its purpose is to make Canada barrier-free by January 1, 2040, by identifying and removing barriers and preventing new ones. The ACA applies certain requirements to federally regulated entities, including the broadcasting sector by way of the Canadian Radio-television and Telecommunications Commission (“**CRTC**”). As a federally regulated, broadcasting entity, Stingray Group Inc. (“**Stingray**”) is committed to accessibility and believes that everyone, regardless of their ability, should have equal access to its services and applications. This Accessibility Plan (the “**Plan**”) has been developed and implemented with a view to resolving usability issues that may negatively impact people with disabilities and are adopting inclusive design and testing practices to prevent them from happening again.

### **(a) Position / title of the person designated to receive feedback about accessibility:**

Senior Vice-President, General Counsel and Corporate Secretary

### **(b) Contact information for the public to communicate with the broadcasting entity:**

Address:

Stingray Group Inc.  
Attention: Lloyd Perry Feldman  
730 Wellington  
Montreal, Quebec  
H3C 1T4

Telephone Number:

(514) 664-1244, ext. 2428

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[lfeldman@stingray.com](mailto:lfeldman@stingray.com)

## **2. Executive Summary**

Stingray is a premium provider of curated direct-to-consumer and B2B services, including audio television channels, over 100 radio stations, subscription video on demand (SVOD) content, 4K UHD television channels, karaoke products, digital signage, in-store music, and music apps. To make our digital offerings, web and mobile apps, accessible to everyone, including people with visual, auditory, motor, speech or cognitive disabilities, we will need to implement various forms of assistive technology or usability features, including (where appropriate) the continuous use of captions, alt-text for screen readers, zoom functions, simple presentation layouts and more. It is Stingray’s mission to review its web pages, channels and applications to ensure that all Canadians have equal access to the power of music!

### **3. Accessibility Summary**

Stingray's mission is to bring the power of music to the masses and provide a music service or channel for every moment, place, and mood. Certainly, making our services accessible for everyone will widen our available target audience and open new business opportunities. Moreover, optimizations made in UI/UX for accessibility also benefit people without disabilities, providing for a better overall user experience.

### **4. Areas of Accessibility**

#### **4.1 Provisions of any Regulations made under Subsection 10(1) of the Broadcasting Act**

Describe the provisions of any Regulations that relate to the identification and removal of barriers and the prevention of new barriers:

Stingray has not been the subject of any Regulations made under Subsection 10(1) of the *Broadcasting Act*.

#### **4.2 Barriers by Area:**

Stingray policies, programs, practices, and services in relation to the identification and removal of barriers (and the prevention of new barriers) in the following areas are discussed below:

##### *(a) Employment*

Stingray does not discriminate when engaging employees. Indeed, Stingray is committed to diversity in recruitment, retention, promotion, and in providing an accessible environment. Diversity gives our business a competitive edge.

Stingray takes proactive measures to eliminate barriers for individuals with disabilities by conducting Employment Systems Reviews, reviewing its processes, and consulting with employees. Every time new policies or tools are introduced, they are evaluated to ensure they do not create any additional barriers for people with disabilities.

Stingray's commitment to diversity and willingness to provide accommodations where required are also communicated to prospective employees on all recruitment materials. The Company has robust anti-discrimination policies and provides information to all staff and managers in this regard. Stingray is committed to reasonable accommodations that allow individuals with a disability to apply for a job, perform the essential functions of the job, and enjoy equal access to benefits available to other Stingray employees in the workplace. Stingray understands that successful accommodations require an interactive process between the employer and the employee, and Stingray stands ready to accommodate all qualified employees and candidates. Accommodation policies are comprehensive and lay out a simple and objective methods for requesting and assessing requests for accommodation.

Stingray also provides a comprehensive extended medical insurance plan, including the access to a telehealth platform to promote wellness and support our employees with disabilities.

*(b) The Built Environment*

Stingray's Montreal headquarters, Toronto offices and nearly all satellite offices and facilities in each Province across Canada are fully accessible to employees and other individuals with physical disabilities.

When considering the procurement of new facilities, renewal of leases, or renovation of existing spaces, the project manager will include consideration regarding accessibility for Stingray's employees and visitors.

Stingray has systems in place that would allow almost every employee to work remotely if needed, and Stingray has made available the information communication technologies and policies to accommodate full and/or part-time remote or telework opportunities. Stingray also offers flexibility in work schedules where required.

Consultations with employees highlighted an opportunity to better utilize vacant space in some of our offices to offer quiet working spaces that could be available to be utilized from time to time by employees with sensory and certain psychological impairments.

Consultations with employees with disabilities have also highlighted a significant barrier in several of our smaller Rural Alberta facilities where our offices are located on the second floor of a building without an elevator, and in our Edmonton location where all studios are one step up. Additionally, the entrance to our Ottawa offices is difficult to access for people who use wheelchairs. Local teams will investigate options to eliminate these barriers with fixes in the short term where possible (ramps etc.), but others will require longer term planning. While Stingray's Montreal headquarters are fully accessible to employees and other individuals with disabilities (as noted herein), consultations with employees have called attention to the need for an additional wheelchair accessible entrance to the office building which Stingray shares with other (third party) tenants. Stingray is currently investigating solutions, with a view to improving accessibility by way of adding an additional wheelchair accessible entrance in the short term.

As a potential barrier, Stingray also recognizes that photocopy machines cannot be easily accessed by individuals who use wheelchairs if the controls are not easy to reach and the systems are not at an accessible height. Similarly, those who have low vision cannot access instructions and labels available only in small print. Those who are blind cannot access instructions presented only in visual form. Accordingly, Stingray will undertake to ensure that these machines (and all office equipment/tools) are adapted and/or replaced with accessible machines and equipment in due course as the applicable equipment leases expire. Over the course of the next three years, this potential barrier will be removed.

*(c) Information and Communication Technologies*

Stingray considers itself as a leading technology company. As such, Stingray does and will make available to its employees all manner of adaptive and assistive technology, comprising a wide range of devices, that allow individuals with disabilities to access

computers. It includes mini-, expanded, and other alternative keyboards; speech input systems; and alternatives to a standard mouse. For individuals with visual impairments, Stingray provides software for enlarging screen images; in addition, speech output systems for reading text presented on the screen. Similarly, for employees who are deaf or hard of hearing, Stingray will provide adaptive and assistive telecommunication devices.

Stingray also provides multiple communication channels that are accessible to people with disabilities, including email, telephone, video conference and Teams text messaging. These communication channels are compatible with assistive technologies.

Consultation with employees with disabilities indicated the need to ensure written corporate communication is concise, and point form where possible in order to be more accessible to employees with dyslexia. We will also look at ways to prevent the potential stigma faced by employees who are hearing impaired and less likely to engage during larger group meetings.

*(d) The Procurement of Goods, Services, and Facilities*

Stingray has always been sensitive to the needs of individuals with disabilities and has generally accommodated employees on a one-to-one basis, ensuring an accessible work environment and providing adaptive and assistive technologies to employees with disabilities on an “as needed” basis. However, to ensure the prevention of new barriers, Stingray undertakes to develop and institute a new procurement policy that will have accessibility criteria incorporated. This new procurement policy will adopt a flexible approach, with three primary considerations: (i) considering accessibility before making a purchase (to avoid costly retrofitting in the future); (ii) consider accessibility over the entire lifecycle of the goods, services, or facilities to be procured; and (iii) consultations with employees with disabilities and stakeholders (to involve the people who will use a product, service, or facility). The key question for Stingray will be: “Can people with disabilities use or benefit from the proposed goods or services on an equitable basis?”; and in the case of new facilities: “Is the proposed facility or infrastructure barrier-free and accessible?” Stingray expects to have a new procurement policy in place within the next twelve to eighteen months.

*(e) The Design and Delivery of Programs and Services*

As a leading global music company, many of stingray’s products and services are audio (Stingray Music) or audio-visual (short form music videos, long form concerts and documentaries, karaoke). Where possible, Stingray provides closed captioning for its audio-visual products for customers with hearing impairments. Indeed, many of Stingray’s distribution platforms in Canada and the United States already require closed captioning of all audio-visual content.

As mentioned hereinabove, to make Stingray’s digital offerings, web and mobile apps, accessible to everyone, including people with visual, auditory, motor, speech or cognitive disabilities, we will need to implement various forms of assistive technology or usability features, including (where appropriate) the continuous use of captions, alt-text for screen readers, zoom functions, simple presentation layouts and more. In this connection, Stingray’s economic interests are well-aligned with the ACA, as optimizations made in UI/UX for accessibility also benefit people without disabilities, providing for a better overall user experience. As such, Stingray undertakes to continually review and optimize its

digital offerings, web and mobile apps to ensure that all barriers are removed and to prevent the creation of new barriers. We hope and expect that customer feedback and direct consultation with stakeholders will help Stingray identify barriers that have not already been remedied.

(f) *Transportation*

Stingray does not provide transportation services. However, we subsidize part of the monthly cost of public transit passes.

**4.3 Licence Conditions under Part II of the *Broadcasting Act***

Describe any licence conditions that relate to the identification and removal of barriers and the prevention of new barriers.

None of Stingray's licence conditions relate to the identification and removal of barriers and the prevention of new barriers:

**4.4 Provisions of any order made under Subsection 9.4 of the *Broadcasting Act***

Describe the provisions of any order that relate to the identification and removal of barriers and the prevention of new barriers:

Stingray has not been the subject of any orders made under Subsection 9.4 of the *Broadcasting Act*.

**5. Consultations**

Describe the manner for conducting consultations with persons with disabilities in the preparation of the document:

Stingray has been collecting and collating feedback received from its employees and B2B and B2C customers for years, including employees and customers with disabilities, with a view to: (a) improving accessibility, (b) removing barriers; and (c) optimizing our digital offerings, web and mobile apps. More recently, Stingray has undertaken to formalize the consultation process and involve persons with disabilities in this process. Simultaneously to its publication, Stingray will share this document with its employees who identify as disabled and has reached out to organizations that represent or provide support to individuals with disabilities, seeking broader community feedback regarding Stingray's services. The results of these consultations will be shared in our annual progress report.

In April and May 2023, Stingray Radio and Stingray Group inc. conducted a confidential survey of all employees asking specifically employees with disabilities to describe any barriers that they have or currently face in their employment with Stingray as part of the preparation of this Plan. Employees were also given the option to provide the feedback directly to HR or their manager verbally, by phone, Teams, or through email. 6% of Radio respondents and 9% of Stingray Group inc. respondents were people with disabilities, and results of the consultations are noted throughout this Plan.

Stingray also consults with employees on a weekly basis through an anonymous employee survey tool. Employees can provide suggestions, interact with their managers and HR on an anonymous basis, and answer questions on a variety of topics surrounding employee engagement that include safety, discrimination, and inclusivity.