



Accessibility Progress Report

General

Zayo Canada Inc. (“Zayo”) is committed to providing a barrier-free environment for all stakeholders, including clients, employees, job applicants, suppliers, and any visitors who enter the premises, access information provided by the company, or use the company’s goods and services.

This progress report contains details of the company’s policies, practices, and services in relation to the identification and removal of barriers. This plan is also used to establish prevention measures against new barriers emerging to ensure a barrier-free environment at the company.

This progress report is offered in any of the following formats upon request:

- Print;
- Large print;
- Audio; and
- Electronic.

The company welcomes any feedback from employees. Any feedback or questions regarding this plan or requests for copies of the progress report in an alternative format can be addressed to the following designated company representative:

Rhonda Dudley, Head of HRBP - Corporate Functions
866-364-6033
1401 Wynkoop St, #500 - Denver, CO 80202
HR@zayo.com

Feedback can be provided anonymously if desired. Feedback can be received in the following formats:

- Telephone;
- E-mail;
- Mail;

Employment

Zayo Canada Inc. understands that improving workplace accessibility and ensuring an accessible recruitment and selection process for applicants with disabilities can contribute to a more diverse and welcoming workplace culture.

The company has implemented the following policies, programs, practices, and services to identify, remove, and prevent new and existing barriers in relation to employment:

- Where necessary, accommodations are being made during the recruitment and selection stages, and throughout the employment lifecycle;

- All training and development programs provided will consider an employee's barriers and abilities, and are provided in alternative formats;
- Zayo has six Employee Resource Groups (ERG) to provide a platform for diverse voices to connect and collaborate on shared experiences, educate others, and develop internal leaders.

The company remains committed to addressing existing barriers and preventing new barriers in employment. After a thorough review of the policies, programs, practices, and services, and through feedback and consultations, the following barriers were identified that continue to exist in employment at the company:

- Zayo Canada Inc. understands that improving workplace accessibility and ensuring an accessible recruitment and selection process for applicants with disabilities can contribute to an environment where everyone can thrive. The company makes every effort to identify, remove, and prevent barriers by developing inclusive employment procedures that support persons with disabilities. Where necessary, accommodations are made during the recruitment and selection stages, and throughout an individual's employment.

The company will take the following actions in the short term to address these identified barriers, to be achieved in twelve months after this plan is published:

- Zayo lists ERG events on monthly calendars and posts relevant updates on Zayo's intranet;
- Zayo's various team members send frequent communications with focus on employee involvement;
- Zayo's Talent Acquisition team focuses on providing well-rounded candidate pools where individuals are evaluated based on skills, qualifications, and experience.

The company will take the following actions in the long term to address these identified barriers, that will take one to three years or more to achieve after this plan is published:

- Zayo is committed to fostering a welcoming and supportive environment where everyone can thrive and is aligned with our culture, values and operating norms;
- Zayo is an equal opportunity employer to all protected groups, including protected veterans and individuals with disabilities.
- Zayo's strategic priorities include an inclusive approach for all employment levels and stages in regard to inclusivity;
- Our ERGs are also focused on ensuring all Zayo employees feel included.

The Building Environment

Zayo Canada Inc. will make good faith efforts to ensure that elements of the building environment, including building interiors and exteriors, are designed to facilitate barrier-free access to goods or services. The company has implemented the following policies, programs, practices, and services to identify, remove, and prevent new and existing barriers in relation to the built environment:

- Entrance ramp located at the front of the building;
- Regularly maintained elevators; and
- Automatic door openers at its Canadian office location on Orbitor Drive, Mississauga ON.

The company remains committed to addressing existing barriers and preventing new barriers in the built environment. After a thorough review of the policies, programs, practices, and services, and through feedback and consultations, the following barriers were identified that continue to exist in the built environment at the company:

- None have been reported. Zayo Canada Inc. will make good faith efforts to address any barriers as they are requested or discovered.

The company will take the following actions in the short term to address these identified barriers, to be achieved after this plan is published:

- None have been reported. Zayo Canada Inc. will make good faith efforts to address any barriers as they are requested or discovered.

The company will take the following actions in the long term to address these identified barriers.

- Zayo Canada Inc. will make good faith efforts to address barriers at the time Zayo discovers any existing barriers.

Information and Communication Technologies (ICT)

Zayo Canada Inc understands that communication to and with the company is vital to an individual's access to the company's goods or services. The company has implemented the following information and communication technologies to allow individuals to communicate with the company:

- Accessible formats including: print, large print, audio, and electronic; and
- zHub (Internal Website)

To help ensure compliance with these services, the company has implemented the following policies, programs, practices, and services to identify, remove, and prevent new and existing barriers in relation to information and communication technology:

- Upon request, Zayo Canada Inc. provides or arranges for accessible formats and communication support for employees, applicants, or persons accessing the company's goods or services. Such accessible formats and communication supports are conversion-ready and are provided in a timely manner and at no additional cost;
- Zayo Canada Inc. consults with individuals to determine the specific barrier and the optimal way to provide support;
- Zayo's strategic priorities include an inclusive approach at all stages of the employee life cycle;
- Our Employee Resources groups are also focused on ensuring all Zayo employees feel included.

The company remains committed to addressing existing barriers and preventing new barriers in relation to information and communication technologies. After a thorough review of the policies, programs, practices, and services, and through feedback and consultations, the following barriers were identified that continue to exist in relation to information and communication technologies at the company:

- None have been identified at this time. Zayo Canada Inc. will make good faith efforts to address any barriers that arise in this context.

The company will take the following actions in the short term to address these identified barriers, to be achieved in twelve months after this progress plan is published:

- Zayo Canada Inc. will make good faith efforts to address barriers at the time Zayo discovers any existing barriers.

Communication Other Than ICT

Zayo Canada Inc understands that communication to and with the company can take many forms and requires a variety of options to be inclusive of all individuals. The company has implemented the following information and communication technologies to allow individuals to communicate with the company:

- American Sign Language;
- Quebec Sign Language; and
- Indigenous sign languages.

The Procurement of Goods

Zayo Canada Inc. is committed to ensuring that all individuals can obtain the company's goods and services. The company has implemented the following methods to allow individuals to obtain our goods and services:

- Online website orders;
- Telephone orders; and
- In person.

Services and Facilities

Zayo Canada Inc. is committed to making good faith efforts to ensure that all of its services and facilities are accessible to all individuals. The company has implemented the following methods to allow individuals to access our services and facilities:

- Entrance ramp located at the front of the building;
- Regularly maintained elevators; and
- Automatic door openers at its Canadian office location on Orbitor Drive, Mississauga, ON.

The Design and Delivery of Programs and Services

Zayo Canada Inc is committed to ensuring that all its programs and services are designed in a manner accessible to all individuals. The company has implemented the following methods to ensure this accessibility:

- Zayo Canada Inc. reviews the principles of the Accessible Canada Act periodically to ensure it is guided by those principles.

Transportation

Zayo Canada Inc strives to ensure accessible transportation services are available for persons with a disability. The company has implemented the following methods to ensure accessible transportation:

- Entrance ramp located at the front of the building on Orbitor Drive, Mississauga ON; and
- Ramp to enter and exit the transportation vehicle if needed.

Consultations

Zayo Canada Inc. recognizes that persons with disabilities are equal participants in all areas of life. The company is guided by the recognized principles of the *Accessible Canada Act*:

- 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 can and want 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;
- 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 persons face;
- Persons with disabilities must be involved in the development and design of 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.

The company will take the following actions to address any identified barriers, to be achieved in twelve months after the company discovers potential barriers during a consultation:

- Zayo Canada Inc. will make good faith efforts to address barriers at the time Zayo discovers any existing barriers. None have been identified at this time.

Industry-Specific Requirements

Zayo Canada Inc. is regulated under the Broadcasting Act, Telecommunications Act and meets all industry requirements.

The company has implemented the following policies, programs, practices, and services to identify, remove, and prevent new and existing barriers in relation to these areas:

- None have been identified at this time. Zayo Canada Inc. will make good faith efforts to address any barriers that arise in this context.

The company remains committed to addressing existing barriers and preventing new barriers in relation to these specific areas. After a thorough review of the policies, programs, practices, and services, and through feedback and consultations, the following barriers were identified that

continue to exist in relation to the company's specific obligations under the (*Broadcasting Act, Telecommunications Act, or Canada Transportation Act*):

- None have been identified at this time. Zayo Canada Inc. will make good faith efforts to address any barriers that arise in this context.

Feedback

- Zayo Canada Inc. has not received any Accessibility feedback or requests in the last twelve months.

Training

Zayo Canada Inc. understands the importance of ensuring all staff are trained to understand, protect, and deliver access to the company's goods and services to persons with disabilities. Staff receive ongoing training to ensure up-to-date compliance with the laws, regulations, and social expectations regarding accessibility for persons with disabilities.

The company has implemented accessibility training to its employees to address and prevent new and existing barriers throughout the organization. This includes:

- Zayo offered employees Corporate training, including specific courses required by the Canada Labor Code through Atlas – The Citation Hub (Human Rights);
- Zayo implemented Learning Management Systems through its Workday platform and provides access to LinkedIn Learning to all employees.

The company remains committed to continually addressing existing barriers and preventing new barriers. After a thorough review of the company's accessibility training documents, and through feedback and consultations, the following barriers were identified:

- None have been identified at this time. Zayo Canada Inc. will make good faith efforts to address any barriers that arise in this context.

Budget and Resources

Zayo Canada Inc. will continue to work to identify and remove barriers, and prevent new barriers, for persons with disabilities as they relate to employment, communication, the built environment, and transportation at the company.

- The company will allocate the necessary budget for accessibility improvements as applicable. No outstanding needs have been identified at this time. Zayo Canada Inc. will make good faith efforts to address any barriers that arise in this context.

Glossary

Barrier: Anything physical, architectural, technological, or attitudinal, anything that is based on information or communications, or anything that is the result of a policy or a practice that hinders the full and equal participation in society of a person with an impairment, including a physical, mental, intellectual, cognitive, learning, communication, or sensory impairment, or a functional limitation.

Disability: Any impairment, including a physical, mental, intellectual, cognitive, learning, communication, and sensory impairment, or functional limitation that is either permanent, temporary, or episodic in nature. It can be evident or not in interaction with a barrier to hinder a person's full and equal participation in society.

Date: May 30, 2025

Accessibility Progress report completed by: _____

DocuSigned by:

Rhonda Dudley

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