

### *Introduction*

This document sets forth the revised Accessibility Plan for QuantumShift Communications, Inc. (dba vCom Solutions) (“QuantumShift”) for 2025 through 2028. vCom prides itself on providing an inclusive and welcoming environment for its employees, customers, and suppliers and is proud to have been named one of the “Bay Area’s Best Places to Work” for 18 consecutive years. This milestone is a testament to our collective spirit and the incredible impact of each team member, where everyone’s ideas, suggestions and contributions are necessary, welcome, and an integral part of our culture. The company has a Diversity, Equity, and Inclusion (“DEI”) task force, provides resources to its employees to help further educate on the significance and importance of DEI initiatives, regularly supports small and minority-owned businesses, and encourages each employee to use the company-sponsored time off for community service or volunteer activities of the employees’ choosing.

This Accessibility Plan sets forth the principles of the Accessible Canada Act (“ACA”) and outlines the steps the company will take to reduce and remove barriers for persons with disabilities.

### *Company*

QuantumShift Communications is a wholly owned subsidiary of vCom Solutions (a software and managed service provider) and is a 50-state Competitive Local Exchange Carrier (“CLEC”) in the United States and holds a Basic International Telecommunications (“BITS”) license from the Canadian Radio-television and Telecommunications Commission. The company is strictly a reseller of certain communications services and does not own, lease, or use any facilities. vCom has approximately 135 employees spread throughout 23 states domestically and caters only to business consumers in various industries including healthcare, manufacturing, legal, and banking.

This Accessibility Plan pertains to the services provided by QuantumShift including recognized barriers to accessibilities and actions the company will take to address such barriers.

### *Contact Information*

All inquiries pertaining to this Accessibility Plan may be addressed to:

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### *Accessibility Plan Development*

In developing this Accessibility Plan, various internal stakeholders were consulted including human resources, marketing, software development, legal and regulatory. The seven focus areas outlined in the ACA were reviewed and examined to determine where the company is succeeding and where there is room to improve.

1. Employment
2. The Built Environment
3. Information & Communication Technologies (“ICT”)
4. Communication, other than ICT
5. The Procurement of Goods, Services and Facilities
6. The Design & Delivery of Programs & Services
7. Transportation

This Accessibility Plan includes a summary of where the company is succeeding, and any identified barriers with plans to mitigate such barriers.

### 1. Consultations

ACA 42(5) / 51(5), 42(9) / 51(9): Based upon Human Resources surveys conducted annually, the company learned a small number of employees identify as having a disability. The result of that feedback prompted the company to partner with its insurance providers to offer the following services to its employees. No employees responded affirmatively as having a physical disability that requires additional accommodation.

- Science based games for mental health (app)
- Digital therapeutics platform and “MD Live,” a behavioral/mental health platform that includes virtual care appointments
- A program called “Ginger,” which is a mental health care platform with available coaches, mentors, therapists, and psychiatrists
- “My Strength,” a personalized behavior program application

#### *Noted Barriers*

- The company does not yet have a mechanism in place to consult with its customers. As the organization strictly sells using a B2B business model, there may be limitations on outreach given privacy concerns and the way in which the company may contact and engage with its clients. The contractual obligations of the company stipulate that the company shall use customer information only as necessary to perform its contractual obligations, which include planning/procurement of services, managing those services within its software platform, and occasionally marketing company offerings and services.

Regulations 5(c) / 21(c): The company’s website and platform is set out in a format that meets the requirements of both AA and AAA standards that are set forth in the Web Content Accessibility Guidelines (WCAG).

### 2. Employment

This focus area covers the experience of each candidate and employee, from recruitment to retirement. The company offers a range of benefits including short and long-term disability to its employees, as well as health and wellness programs. The online application platform used for candidates allows candidates to indicate if they are a disabled person, and the company’s human resources team receives disability awareness training. All interviewers are trained in asking appropriate questions which do not include any which may be perceived as discriminatory, and if in-person interviews are scheduled, the company may offer accommodation during the interview process. The company provides regular diversity, equity and inclusion training to its employees and regularly conducts surveys on perception of its culture. The results of the previously mentioned “Best Places to Work” survey revealed that 93% of employees view the company favorably in its practice of non-discriminatory practices and creating a sense of belonging.

#### *Noted Barriers*

- Some employees may not be aware that we can accommodate persons with disabilities in interviews.
- Further training on disabilities that are not physically visible may be needed.

#### *Action Plan*

In the future, the company plans to circulate awareness so team members know accommodations are available for in-person interviews, and so team members know how to access those resources. The company will continue to partner with its preferred vendor for online training courses and conduct additional awareness training on persons with disabilities.

### 3. The Built Environment

All employees work remotely and are considered Work From Home (“WFH”) employees. While the company does maintain a corporate headquarters location in the state of California, the company does not have a physical location in Canada, nor does it have any physical location under Canadian federal authority. Emergency preparedness and safety training are conducted annually, including to WFH employees. The company is a leaseholder with a small suite in a business park and does not have direct control over public spaces such as lobbies, restrooms, kitchens, or other such common spaces. Adherence to state regulation concerning accessibility is followed by the company at the directive of the landlord. All exit doors within the company’s leased suite are clearly marked.

#### *Noted Barriers*

- Considering the company’s limited influence over its leased environment, all regulations stipulated by the landlord are strictly followed, and no barriers are noted.

#### **4. Information & Communication Technologies (“ICT”)**

This area pertains to the technologies that our employees and customers use, including hardware and software.

##### *Noted Barriers*

- None. The company has taken steps to ensure its website meets AA and AAA accessibility compliance standards.

##### *Action Plan*

In the future, the company may research what it can do to improve the experience users may have when using its mobile app.

#### **5. Communication, Other than ICT**

This area relates to communications with customers and employees, including print materials, publications, digital communications, and newsletters. Today, our social media and marketing teams communicate in clear, precise language and offer a variety of mediums by which customers may interact with us.

##### *Noted Barriers*

- The company does not currently have alternate means to communicate with customers, such as videos in American Sign Language (“ASL”), closed captioning, or alternative formats for information.
- Once the applicable accessibility plan for communication is implemented, company-wide training will be required.

##### *Action Plan*

Since the company is strictly marketing on a business-to-business (“B2B”) level, the issue of inaccessibility has never been raised by a client. However, the company may engage with a select group of clients to gather information on how more accessible formats for information may benefit their employees.

#### **6. The Design & Delivery of Programs & Services**

This area focuses on making all of the company’s programs and services available to all and includes considering individuals with disabilities when programs and services are implemented. It also requires the company to work toward continuous improvement of such programs and services for persons with disabilities. The company focuses on delivering high-value software and managed services, all employees are trained on products and services, and 24x7 customer support is offered to our customers. The company, as required by the individual states in the US, publishes annual notices of alternate means for accessing communication services, such as TTY and alternative formats in which to receive documents. Such services are not provided directly by the company, but by its underlying partners/vendors/suppliers or the designated vendor supplying such alternative services.

##### *Noted Barriers*

In the company’s 24 years in business, no customer has expressed an interest in obtaining communications in an alternate format, nor has any customer expressed an interest in how to obtain TTY services.

##### *Action Plan*

The company will continue outreach as it is obligated from a regulatory perspective to do so.

#### **7. The Procurement of Goods, Services & Facilities**

This section relates to how goods, services and facilities are procured by the company, including the processes involved in making decisions on what to purchase. The company conducts business strictly with incumbent local exchange carriers (“ILECs”), and other similarly situated partners, mainly because it is a reseller of communications services. The company does not procure facilities or any other goods or services in its capacity as a communications reseller.

##### *Noted Barriers*

- The company does not have a means to actively search for “diverse suppliers.”

##### *Action Plan*

In the future, the company will consider partners who have inclusive procurement practices and will search for disability-led organizations where applicable. The company will also continue existing partnerships with small and/or minority-owned businesses.

#### **8. Transportation**

The company has no transportation business and has no noted barriers or action plan.

### *Feedback Process*

The company has a toll-free number and a means for business customers to reach the designated ACA contact published on its monthly invoices. In the future, the company may add that feedback process to its website. This Accessibility Plan is published on the company's website: [Regulatory Policy | vCom](#)

Regulations 9(2) / 25(2): Feedback to the company may be provided by either providing your contact information, or it may be done so anonymously. All feedback may be submitted to:

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Regulations 9(4) / 25(4), 9(5) / 25(5): Individuals providing feedback (other than individuals who submit feedback anonymously) will receive an acknowledgement of any feedback via email, mail, or other acceptable means of communication. The company is committed to your privacy and will only use the information provided to respond or communicate with you, and for no other purpose. Your personal information shall remain confidential at all times.

Regulations 10(1)(c) / 26(1)(c): The company's website and platform is set out in a format that meets the requirements of both AA and AAA standards that are set forth in the Web Content Accessibility Guidelines (WCAG).

This concludes the Accessibility Plan for QuantumShift Communications, Inc. Any questions may be directed to the "Contact Information" as above noted.