

Ligado Accessibility Progress Report

June 2025

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General Application

This Accessibility Progress Report (the “Progress Report”) applies to Ligado Networks Corp. (“Ligado”) and has been prepared in accordance with the requirements of the *Accessible Canada Act* (“ACA”) and its regulations. Ligado operates as a wholesale provider of satellite services and does not provide any telecommunications services to end-user customers. The [Ligado Accessibility Plan](#) and Progress Report include requirements relevant to Ligado as a wholesale provider.

Ligado has a process for receiving and responding to feedback, including feedback on how services are delivered to persons with disabilities. The Progress Report and a description of our accessibility feedback process are available in alternative formats upon request.

You can provide accessibility feedback or request an alternative format of our Accessibility Plan Progress Report and description of our feedback process in the following ways:

- » Completing an [online form](#)
- » Via Email: compliance@ligado.com
- » Via Phone:
 - Corporate Headquarters (Reston, VA): [877-678-2920](tel:877-678-2920)
 - Operations Office (Ottawa, ON): [613-742-0000](tel:613-742-0000)
 - Customer Support: [800-216-6728](tel:800-216-6728)
- » Standard Mail: 1601 Telesat Court, Ottawa, ON K1B 1B9

For more information on Ligado’s website, visit [Ligado.com/accessibility-feedback](https://ligado.com/accessibility-feedback)

The person responsible for receiving accessibility feedback at Ligado is the [Vice President, Risk & Compliance](#).

Feedback can be provided anonymously.

Executive Summary

Ligado employees have the flexibility to work remotely resulting in significantly reduced employee presence at our physical office locations. This shift has had a direct impact on certain aspects of our Accessibility Plan, particularly those related to physical workplace accommodations and on-site accessibility upgrades.

While reduced office attendance has limited opportunities for in-person accessibility assessments and modifications, we have refocused our efforts to enhance digital accessibility and ensure that our remote work infrastructure is inclusive for all employees.

Key initiatives have included:

- Conducting accessibility audits of our digital platforms and communication tools.
- Providing accommodations for employees working from home, including assistive technologies and ergonomic support.
- Reviewing policies to ensure remote work practices align with accessibility standards and employee needs.

We remain committed to continuous improvement and will reassess physical office accessibility if employees return to on-site work in increased numbers in the future.

Consultations

As our physical facilities are not used by a majority of our employees thereby impacting their work experiences, our consultation efforts have evolved accordingly. We expanded our employee engagement efforts to include virtual surveys, one-on-one interviews when applicable, and accessible digital feedback tools. We continue to offer these in multiple languages and formats (written, video, audio) to meet individual needs and preferences.

Status of Progress in Key Areas

Employment

We remain committed to a safe and inclusive workplace and have made the following advancements:

Progress Achieved:

- Created awareness of accessibility to foster a more inclusive workplace
- Expanded and digitized our accommodation request process to ensure seamless accessibility for remote employees.
- Conducted an anonymous accessibility survey specific to remote work to identify emerging barriers and areas for improvement.

Information and Communication Technologies (ICT)

Digital accessibility is now central to our operations.

Progress Achieved:

- Conducted a Web Content Accessibility Guidelines (“WCAG 2.1”) audit (the “Audit”) of the Company’s website and prioritized remediation of high-impact barriers. The goal of the Audit was to ensure that digital content is accessible to people with various disabilities, including:
 - Visual impairments (e.g., blindness, low vision, color blindness)
 - Hearing impairments
 - Cognitive or learning disabilities
 - Motor impairments

Next Steps:

- Launch a regular audit cycle to review accessibility of all internal and external digital assets.

Communication, other than IT

Clear, accessible communication remains essential in a remote environment.

Progress Achieved:

- Established a protocol for responding to requests for materials in alternative formats, with all formats made available within a 15-business-day window.

Next Steps:

- Standardize document templates for accessibility, including support for screen readers and large print.
- Develop accessibility guides tailored to communication in remote meetings and collaborative platforms.

The Procurement of Goods, Services and Facilities

- We continue to ensure our procurement practices address accessibility procurement barriers on an as-needed basis.

The Design and Delivery of Programs and Services

As a wholesale provider, Ligado does not design programs for end users but continues to support accessibility for wholesale customers.

Next Steps:

- Review wholesale partner agreements to ensure that accessibility obligations are communicated and met where applicable.
- Establish regular communications with wholesale customers to collaborate on accessibility strategies where needed.

Transportation

Not applicable to Ligado's operations and remains unchanged.

Regulatory Conditions

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

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 B](#).

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 B](#).

Conclusion

Ligado remains committed to fostering a barrier-free, inclusive remote work environment. We have made meaningful progress in enhancing accessibility under our operating model but recognize that accessibility is an ongoing journey. We will continue to consult with employees, evaluate our digital platforms, and take proactive measures to meet the diverse needs of all individuals.

Our next full Accessibility Plan will be published in 2027, with another progress report to follow in 2026.

For feedback or more information, please visit: [Ligado.com/accessibility-feedback](https://ligado.com/accessibility-feedback)

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 – 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 of the *Telecommunications Act* to which Ligado 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 Ligado.

Ligado operates as a wholesale provider of satellite services and does not provide any telecommunications services to end-user customers. This Appendix includes requirements relevant to Ligado as a wholesale provider and does not include requirements that have not been in force for at least three months before the day on which the Accessibility Plan¹ must be published or expectations/encouragements, which do not rise to the level of imposed conditions.

1. Alternative Formats

- Telecommunications Service Providers (“TSPs”) must provide paper bills upon request at no charge to customers who self- identify as a person with a disability.²
- 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.³
- 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.⁴

2. Website Accessibility

- TSPs must make the information on telecommunications services on their websites accessible to the point of providing a reasonable accommodation for persons with disabilities.
- TSPs must have an easy-to-find home page link to the accessibility section of their websites, if their websites include such sections.⁵
- Accessibility plans, progress reports, and descriptions of feedback processes published under the ACA must be published in a way that meets WCAG 2.1.⁶

¹ According to the *Accessible Canada Act* (S.C. 2019, c. 10), section 51(6).

² Telecom and Broadcasting Decision CRTC 2022-28, *When and how communications service providers must provide paper bills*.

³ Telecom Order CRTC 98-626; TD 2002-13, *Extending the availability of alternative formats to consumers who are blind*; and, TO 2001-690, *Alternative formats for a person who is blind*.

⁴ CRTC Accessibility Reporting Regulations (SOR/2021-160), sections 24, 27, and 31.

⁵ Ibid., paragraph 57.

⁶ CRTC Accessibility Reporting Regulations (SOR/2021-160). sections 21, 26, and 30.