

Rebtel Accessibility Plan 2026-2029

Updated 29 May 2026

1. Introduction

In our dedication to delivering customer-centric service, Rebtel places a high priority on improving our accessibility, remove barriers and provide a great user experience for all our customers. We further strive to provide services and treat our employees in a way that respects the dignity and independence of all individuals. An important part of this work is to identify, prevent and remove barriers experienced by persons with disabilities. This plan outlines initiatives to accomplish these goals.

We have internal and external processes in place to identify accessibility barriers in Rebtel's technical platforms, communications and interactions, as well as in our offices. The aforesaid includes feedback procedures and consultations with customers, employees and disability organizations.

Our Accessibility Plan outlines identified barriers, our actions to address them, and strategies to prevent future issues over the next three years. It also highlights some of our existing accessibility initiatives. We will review and update our plan as required and publish a progress report in line with our regulatory obligations. We understand that improving accessibility is an ongoing process. This Accessibility Plan reflects Rebtel's current expectations and may change to meet the evolving needs of our employees and customers in accordance with applicable law.

2. General

2.1 Providing Feedback

We encourage questions, concerns, and feedback related to accessibility from our customers and other stakeholders. If you have comments about this Accessibility Plan or have experienced barriers while interacting with Rebtel or using our products and services, please let us know.

You can share your feedback on accessibility through your preferred contact method with us, including:

Telephone: +46 70 269 40 04

Email: accessibility@rebtel.com

Mail:

Rebtel Networks AB

Attn: Accessibility Contact, Office of the Chief Product Officer

Jakobsbergsgatan 16

SE-111 44, Stockholm

Sweden

If you would like a response, please let us know your preferred communication method. Otherwise, we will reply using the same method you used.

Our agents forward all accessibility feedback to the Office of the Chief Product Officer, which tracks and evaluates it to inform updates to our Accessibility Plan and related policies.

Your personal information will be kept confidential and handled according to our Privacy Policy.

3. Priority Areas

Our accessibility work to identify, prevent, and remove barriers experienced by persons with disabilities and other stakeholders is structured as per the areas listed below, also considered as our areas of priority.

3.1 Information Communication and Technology (ICT)

By addressing information and communication technology-related barriers, we can achieve a high standard for digital accessibility. We apply a continuous improvement approach that endeavours to keep pace with technology advancements in our society. Our actions include plans to identify and resolve barriers relating to our websites, mobile applications, networks and systems used by our customers and employees.

Identified barriers

- Some parts of our websites and mobile applications can be difficult to navigate due to the volume of information presented, and some language may be more complex than necessary for all users.
- Some interactive elements such as chat tools, drop-down menus and online forms may not be consistently accessible across all platforms and browsers.
- Our products and services rely primarily on visual interfaces, and there is room to broaden the range of accessibility features over time.

- The amount of information required during certain online transactions, such as account setup and payment, can sometimes be challenging for users relying on assistive technology.
- Although our websites include accessibility information, this content has had limited visibility, which we have addressed by publishing a dedicated Accessibility landing page.
- Customers using assistive technology may encounter some friction when interacting with our digital-first customer support channels.

Policies and Actions

- Continue to evaluate our web and mobile platforms against WCAG 2.1 Level AA as a reference standard, prioritising fixes based on user impact and engineering feasibility.
- Reference established accessibility guidelines (WCAG 2.1) when designing and reviewing new digital information and communication technology.
- Continue to make incremental accessibility improvements to our websites and applications as part of our normal product development cycles. Completed work in this area includes VoiceOver support on iOS, TalkBack support on Android, iOS test-ids for screen-reader QA, a VoiceOver label fix on the top-up flow (March 2026), an AAA-contrast color palette documented in design system, and a refactor of the web number search component for semantic HTML and keyboard navigation (March 2026).
- Maintain general onboarding materials that include awareness of accessibility considerations for staff whose work touches customer-facing products or communications.
- Maintain a repeatable approach to monitoring accessibility, building on the accessibility QA cycles we have already run, which covered 120% / 150% zoom, WCAG 2.1 baseline checks and screen-reader compatibility on web, iOS and Android.

Our next steps

- Continue our internal accessibility QA cycles against WCAG 2.1 Level AA as a reference standard. A full external WCAG audit is not currently planned, as we believe our existing internal review process, combined with ongoing remediation, provides a proportionate level of assurance given the size of our customer base.
- Maintain the dedicated Accessibility landing page on our website and review its content periodically.

- Continue to favour plain language in customer-facing copy where practical, as part of normal copy and UX review.
- Continue to consider accessibility when selecting or updating the information and communications technologies we use, where this is practical and proportionate.

Timeline

- Ongoing

3.2 Communication, other than ICT

By addressing barriers relating to communication other than information and communications technology (ICT), such as customer support interactions, written correspondence, marketing materials, design and delivery of service information, we will improve the accessibility of the Rebtel products and services, including customer support functions.

Identified barriers

- Awareness of accessibility-related content and practices is uneven across teams, particularly outside of customer-facing roles.
- Our customer support is delivered primarily through digital channels (in-app and web-based). Customers with cognitive or learning disabilities may find purely digital workflows harder to navigate without additional plain-language guidance.
- Our marketing communications, such as email campaigns and social media posts, are not systematically reviewed for accessibility today.

Policies and Actions

- Encourage the use of plain language and accessible formatting in documents, marketing and other communications where practical.
- Continue to offer customer support through both in-app chat and email, and surface these channels clearly on our Accessibility landing page. We are not committing to adding voice-based support channels at this stage, as our customer base interacts overwhelmingly through digital channels.
- Make our Accessibility Plan and progress reports available on request in an alternate electronic format compatible with screen readers. We are not planning to maintain ongoing braille, large-print or audio versions on a standing basis, as

we have not seen demand for these formats from our customer base; we will revisit this if requests are received via our feedback channels.

- Continue to raise awareness of accessibility considerations among staff in customer-facing roles, as part of normal onboarding and team communications.

Our next steps

- Refer to accessibility considerations in onboarding materials for customer support staff, as part of regular content reviews.
- Continue to refine our tone-of-voice and communication guidelines to favour clear, simple language where practical.
- Continue to publish a dedicated accessibility contact (accessibility@rebtel.com) on our Accessibility landing page, with feedback routed to the Office of the Chief Product Officer.

Timeline

- Ongoing

3.3 The design and delivery of programs and services

By addressing the barriers relating to design and delivery of Rebtel's core programs, products and services, we aim to ensure persons with disabilities have meaningful options and customer experience.

Identified barriers

- Accessibility is considered during product development on a case-by-case basis rather than through a standalone formal review step. We believe this is proportionate to the size and scope of our operations.
- We have not commissioned a full external WCAG audit. Internal QA cycles have addressed key areas including 120% / 150% zoom, WCAG 2.1 baseline checks, screen-reader compatibility (VoiceOver on iOS, TalkBack on Android), and a documented AAA-contrast color palette on web. Remaining potential barriers, such as some touch-target sizes and error-message verbosity, are tracked through our normal product backlog rather than through a one-off audit.
- The end-to-end purchase journey has not been the subject of a dedicated accessibility audit, but key steps such as the iOS and Android top-up flow have received targeted accessibility fixes.

- Levels of accessibility awareness vary across teams, particularly outside of front-end engineering and design.
- Our products are designed around a primarily digital, self-service model, and dedicated alternative channels (such as voice support) are not consistently available.

Policies and Actions

- Continue to consider accessibility during product development, particularly for customer-facing features, without introducing a separate formal accessibility gate. Accessibility considerations are surfaced through design and front-end engineering review rather than a standalone process.
- Continue to consider accessibility when reviewing key end-to-end customer journeys, prioritising journeys with the highest customer impact.
- Continue to include accessibility awareness in general onboarding. We are not committing to a formal, role-specific accessibility training programme at this stage; instead, we rely on team-level knowledge-sharing within design and front-end engineering, which is where most accessibility decisions are made in practice.
- Continue to consider accessibility when iterating on automated customer-support flows. We do not currently operate dedicated voice-based virtual assistants and have no plans to introduce them in this plan period.

Our next steps

- Continue to run internal accessibility QA cycles as part of our normal release process. A separate, larger external audit is not planned for this plan period.
- Accessibility responsibility sits with the Office of the Chief Product Officer, working with front-end engineering and design leads on day-to-day decisions, rather than with a dedicated named accessibility role.
- Where targeted accessibility issues are identified through internal QA or customer feedback, we will continue to address them through our normal product backlog rather than through a standalone audit-and-remediation programme.
- Continue to monitor customer feedback, including any feedback received via accessibility@rebtel.com, and use it to inform priorities.

Timeline

- Ongoing

3.4 Procurement

We endeavour to ensure our procurement practices address accessibility procurement barriers.

Identified barriers

- Procurement decisions are made primarily on commercial and operational criteria, and accessibility considerations are not consistently called out in supplier selection.

Policies and Actions

- Take accessibility considerations into account, where relevant, when evaluating new tools and suppliers that affect customer-facing or workplace experiences.
- Where relevant, communicate our accessibility expectations to new and existing suppliers of customer-facing or employee-facing tools.

Our next steps

- Document a lightweight, principles-based approach to accessibility in procurement. We do not plan to introduce a separate accessibility procurement standard, as our procurement volumes do not warrant a dedicated process.

Timeline

- Ongoing

3.5 Employment

Rebtel is committed to providing a workplace that promotes equity, diversity and inclusion across our workforce. The diversity of individual employee experiences contributes to our company culture and helps us better understand the diversity of our customer base.

Identified barriers

- Internal communications about accessibility and accommodation could be more consistent across teams and locations.
- Awareness of available workplace accommodations varies across the organisation.

- Some employees and managers may not be fully aware of the support available during the accommodation process.
- Information about accommodations available during recruitment and interviewing is not consistently surfaced to applicants, recruiters and hiring managers.

Policies and Actions

- Continue to foster a working environment that supports diversity and accessibility, through normal HR communications and management practices.
- Continue to include accessibility as part of broader diversity and inclusion communications, where appropriate.
- Make accommodation information available to hiring managers and recruiters on request.
- Continue to handle workplace accommodation requests through our standard HR processes.
- Review the workplace accommodation process informally based on employee feedback as it is received.
- Continue to engage with employees with disabilities through existing HR and management channels.

Our next steps

- Maintain accessibility awareness as part of standard onboarding. A separate, enhanced accessibility training programme is not planned for this plan period, as our workforce size and structure does not warrant a dedicated programme.
- Review the accessibility content of onboarding materials periodically as part of normal HR content reviews.
- Use existing internal channels (e.g., team meetings, all-hands) to share accessibility-related information when relevant.
- Continue to make information about Rebtel's accommodation process available through HR on request.
- We do not plan to maintain a standalone inventory of accommodation resources at this stage; relevant information is held within HR and made available on request.
- Rebtel does not currently operate a dedicated accessibility-focused Employee Resource Group, given the size of our workforce. We will revisit this if there is sufficient employee interest.

- Continue to handle accommodation requests during recruitment through our existing HR and recruiting processes.
- Continue to make HR available to team leaders for guidance on accommodation and inclusion as situations arise.
- Continue to consider internal feedback, including from employees with disabilities, when reviewing workplace policies, employment standards and work environments, through existing HR channels.
- We do not plan to run dedicated accessibility discussion sessions on a standing basis. Accessibility topics are addressed through existing forums (team meetings, HR communications) when relevant.
- Communicate inclusion-related initiatives to employees through standard internal communications channels.
- Apply our existing onboarding and integration processes, which include accommodation on request, rather than maintaining a separate strategy for hiring people with disabilities.

Timeline

- Ongoing

3.6 Built environment and Transportation

Addressing barriers related to the built environment helps us ensure that people using our offices have barrier-free access. Rebtel is dedicated to provide barrier-free access to all publicly accessible areas of its premises and ensuring that its employees have unobstructed access to its offices.

Rebtel's offices are leased premises and are not directly open to the general public. We aim to provide reasonable access to our offices for employees and visitors, working with our landlords on any building-level accessibility matters.

Rebtel does not provide transportation services and therefore has no specific accessibility objectives or initiatives related to transportation.

Identified barriers

- Open-plan office areas can have variable noise and lighting conditions, which may create challenges for some employees.
- We operate flexible seating in some offices, which can make it harder for some team members to locate colleagues on a given day.

Policies and Actions

- Where we carry out office changes, take reasonable accessibility considerations into account, in coordination with our landlords.
- Continue to handle workplace accessibility concerns raised by employees through our standard HR accommodation process.

Our next steps

- A formal third-party accessibility audit of our offices is not planned. Our operations are conducted remotely / through digital channels and we do not maintain a public-facing office.
- Continue to address built-environment concerns reactively, working with employees and landlords as specific issues are identified.
- Continue to remind team members through standard office communications to keep shared spaces clear.
- Where we have the opportunity to influence office fit-out, take noise and acoustics into reasonable consideration.

Timeline

- Ongoing
-