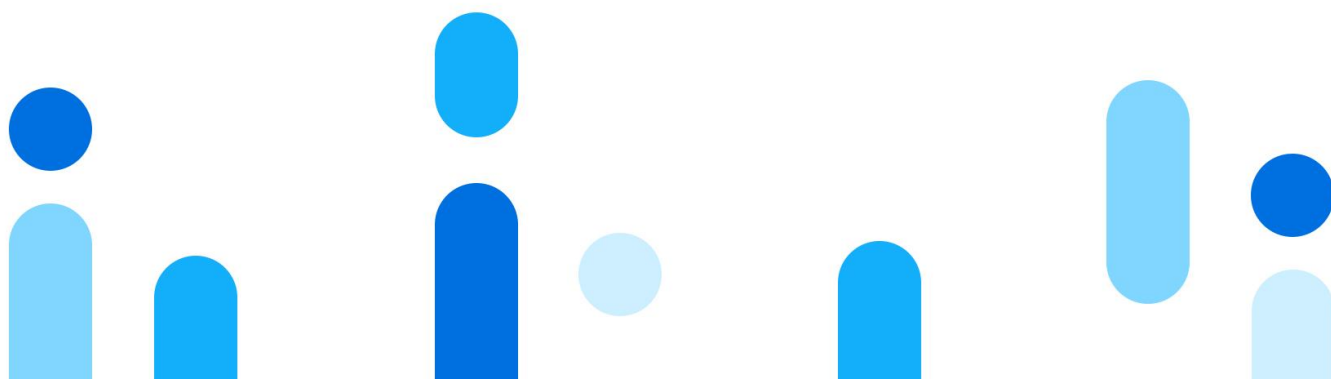




ACCESSIBILITY PLAN

STINGRAY GROUP INC.

June 1, 2026



1. General

Stingray Group Inc. (“**Stingray**”) is committed to creating a barrier-free environment for its employees, clients, and community, in alignment with the principles of the *Accessible Canada Act* (“**ACA**”). This three-year strategic plan outlines our approach to identifying, removing, and preventing accessibility barriers across our operations.

Stingray has made progress in identifying and addressing accessibility barriers. However, we recognize that more work is needed. This plan details specific, actionable goals for the 2026-2029 period. Key initiatives include enhancing physical infrastructure at our offices, advancing digital accessibility in our products and internal tools, and strengthening our inclusive hiring and accommodation processes.

(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

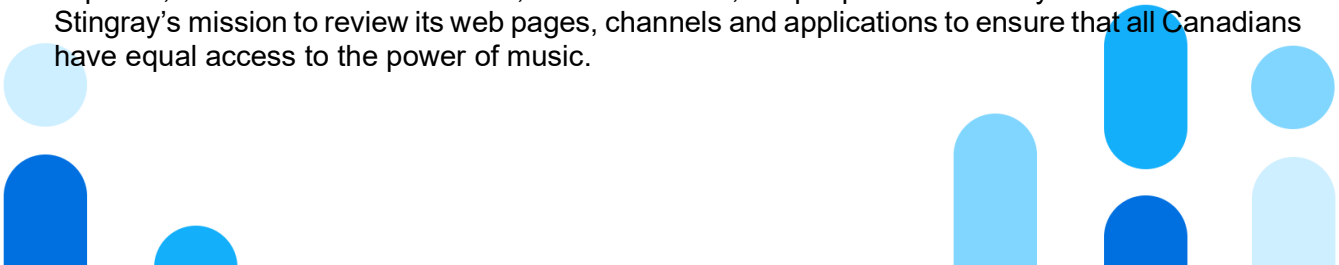
Telephone Number:
(514) 664-1244, ext. 2428

E-Mail address:
lfeldman@stingray.com

2. Executive Summary

Stingray Group Inc. (TSX: RAY), the world’s leading connected streaming media company, delivers the best curated audio and video content to consumers worldwide. As a pioneer in multiplatform streaming and distribution, Stingray’s vast digital content portfolio includes thousands of live audio and radio stations, premium music channels, concerts and music documentaries, karaoke products, as well as ambience and wellness channels. Its offering is distributed via connected TVs, smart speakers, mobile, connected cars and retail. Reaching hundreds of millions of consumers every month, Stingray’s products offer an unparalleled advertising reach, enabling brands to connect with an engaged audience across the world. Home to globally renowned brands such as TuneIn, Singing Machine, Stingray Karaoke and Qello Concerts, Stingray is powered by a worldwide team of more than 1,000 employees.

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 Commitment

Stingray demonstrates a strong commitment to accessibility for both users of its services and its employees by aligning its practices with the foundational principles set out in *Canadian accessibility regulations*. This commitment is reflected in its efforts to design inclusive programming, accessible digital platforms, and equitable workplace policies that support individuals with diverse needs.

In preparing this Accessibility Plan, Stingray actively integrated the principles set out in Section 6 of the Accessible Canada Act to guide our methodology and strategic priorities. The principle that people with disabilities must be involved in the development of policies and programs (Principle f) was central to our approach; we directly consulted our employees who experience disabilities through anonymous surveys, focus groups, and one-on-one conversations to identify existing barriers and shape the initiatives outlined in this document. Furthermore, the principles of barrier-free access (Principle c) and achieving the highest level of accessibility (Principle g) drove our decision to conduct comprehensive audits of both our physical workspaces and digital infrastructure, ensuring our goals target the most impactful areas for improvement. Finally, by recognizing the diverse ways individuals interact with their environments (Principle e), we tailored our planned accommodations and digital tool enhancements to provide meaningful options (Principle d) that respect the dignity (Principle a) and promote the equal opportunity (Principle b) of every Stingray employee.

4. Areas of Accessibility

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

While Stingray is not the subject of any bespoke accessibility orders or regulations made exclusively for it under Subsection 10(1) of the Broadcasting Act, our broadcasting undertakings comply with the CRTC's standard regulatory requirements and conditions of service relating to accessibility. This includes adhering to industry standards for the provision of closed captioning across our applicable audio-visual platforms, ensuring the continuous identification and removal of barriers for persons with hearing impairments.

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 is committed to fostering a workplace where all employees, including those with disabilities, can thrive. We will focus on removing barriers in our employment practices, policies, and culture.



Standardizing Accommodation Processes: We will review and formalize our employee accommodation process to ensure it is transparent, confidential, and consistently applied. This will empower employees to request the support they need with clarity and confidence. In addition, we will track accommodation requests to identify recurring needs, trends, and systemic barriers, enabling us to implement broader, proactive solutions where possible and reduce the need for individual requests over time.

Enhancing Inclusive Hiring: Our talent acquisition team will continue to refine our recruitment, assessment, and onboarding processes to ensure they are inclusive and accessible, enabling us to attract and retain a diverse and talented workforce. To support this, we will ensure that our recruitment and selection training materials for hiring managers explicitly cover best practices for inclusive hiring and mitigating unconscious bias.

Promoting Employee Wellness and Support: We will launch initiatives to increase awareness and adoption of our Employee Assistance Program (EAP). Furthermore, we will explore new wellness initiatives, such as establishing a dedicated wellness space and formalizing a policy for ergonomic equipment like standing desks, to support the well-being of all employees. We will provide training to all employees and managers during the plan term on the topic of promoting an inclusive workplace free of discrimination.

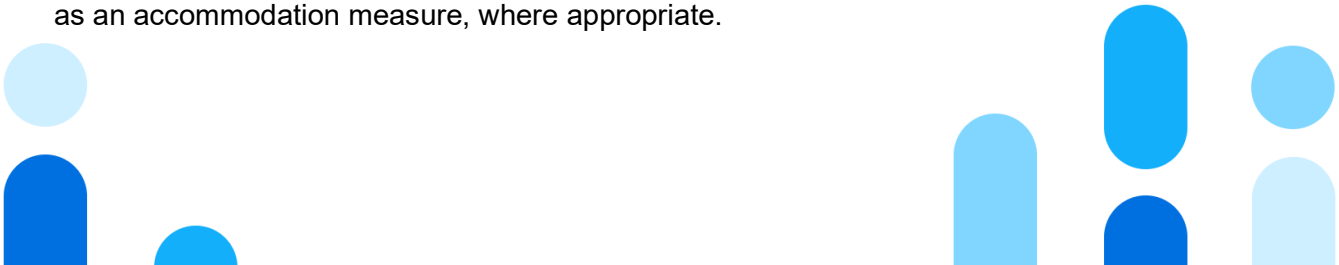
Celebrating Diversity: Stingray is committed to celebrating diversity through the lens of persons with disabilities by actively recognizing and amplifying their contributions across the organization. This includes sharing success stories from MentorAbility mentorships, highlighting the achievements of employees from diverse backgrounds, and fostering an inclusive culture where all voices are valued. Stingray also strengthens its community impact by engaging with partners such as the Canadian Mental Health Association (CMHA), Special Olympics, and the United Way, supporting fundraising and other initiatives that advance awareness and support for people with disabilities.

(b) The Built Environment

We are dedicated to ensuring our physical spaces are safe and accessible for everyone.

Improving Physical Access at our Montreal Headquarters: We have taken meaningful steps to improve the physical accessibility of our Montreal headquarters, including upgrading the 1st-floor bathroom sink. We have also validated the accessibility of our fleet of multifunction printers. While we have already upgraded several units to fully compliant Konica devices designed for users with reduced mobility, we are committed to replacing the remaining units across our offices wherever accessibility demands require it. Building on this momentum, we will complete the planned access ramp project to provide a barrier-free entrance.

Enhancing Emergency Preparedness: Stingray is committed to the safety of all employees, including those with reduced mobility. In accordance with applicable legal obligations, we will make the necessary arrangements to ensure that appropriate emergency evacuation provisions are in place for all employees present on-site. This includes developing individualized Personal Emergency Evacuation Plans (PEEPs) and/or a buddy system, leveraging designated Areas of Rescue Assistance and trained staff support, in consultation with our safety committee. Flexible and remote work arrangements, and other accommodations as necessary, may also be offered as an accommodation measure, where appropriate.



Accessibility Audits: We will continue to expand our role as National Partner for the MentorAbility program and during this plan term, we will partner with them as they develop comprehensive accessibility audit materials which will be used at all Stingray Radio locations.

(c) Information and Communication Technologies

Stingray will ensure that our digital tools and technologies empower, rather than hinder, our employees.

Adopting Web Accessibility Standards: We will formally adopt the Web Content Accessibility Guidelines (WCAG) 2.1 Level AA as our standard for employee-facing web pages and applications. We will also continue to make progressive improvements across our broader digital tools.

Preparing for New Federal Digital Accessibility Requirements: We will provide accessibility training to relevant employees, ensure our employee-facing web pages and applications meet recognized accessibility standards, offer alternative means of access where full conformance is not feasible, prepare for the timely publication of an accessibility statement, and maintain proper records to support compliance.

Enhancing Internal Tool Accessibility: We will research and propose accessibility enhancements for our internal platforms, including exploring vocal command functionalities for our internal AI tool Sonata, to ensure all employees can collaborate and work efficiently.

Establishing a Digital Accessibility Training Program: We will put in place a training program on the fundamentals of digital accessibility for employees who develop, maintain, or purchase digital technologies. The program will draw on recognized resources from established industry providers and will be refreshed regularly to keep our teams current.

Inventorying Employee-Facing Digital Properties: We will take inventory of our employee-facing web pages and applications to identify the digital tools covered by the new requirements. New employee-facing web pages and applications, as well as updates to existing ones, will be designed to meet WCAG 2.1 Level AA standards going forward.

Building a Periodic Accessibility Review Process: Over time, we will gradually put in place a process for periodic accessibility reviews of our employee-facing web pages and applications. The goal of these reviews is to help us identify gaps against WCAG 2.1 Level AA criteria and remediate them as needed.

Publishing an Accessibility Statement: We are currently evaluating our digital ecosystem and internal processes to prepare for the publication of a comprehensive, public-facing accessibility statement ahead of the December 2028 regulatory deadline. Once published, the statement will describe the accessibility features we have in place, provide a contact for accessibility-related questions, note any known gaps and the alternative means of access we offer to address them, and outline our roadmap and timelines for closing those gaps. The statement will be reviewed and refreshed at least annually.



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

To ensure accessibility is seamlessly integrated into our operations, we are embedding accessibility criteria into our overall procurement and infrastructure strategy. Within the next 12-18 months, we will **implement guidelines requiring that accessibility be a decision point in the acquisition of all goods, services, and facilities**. This proactive approach extends to our **physical spaces**; when leasing new facilities, such as our upcoming upgrades in Kelowna, BC, and Sydney, NS, we prioritize locations that already incorporate barrier-free design features, ensuring an inclusive environment from the outset.

(e) The Design and Delivery of Programs and Services

Our commitment to accessibility extends to the programs and services we deliver to our customers.

Reviewing Radio Programming Accessibility: Accessibility of Stingray Radio's programming to listeners experiencing disability continues to improve with increased multiplatform listening options. All Stingray Radio stations are available on various websites and streaming applications, including Stingray-owned TuneIn, a streaming app with built-in accessibility features including screen reader compatibility, keyboard navigation, and adjustable playback speeds. TuneIn is also compatible with smart speakers and iOS/Android accessibility features. During the Plan term we will also provide training on improving clarity and structure of spoken content, and accessible social media posts.

Ensuring Accessible Digital Content: We will continue to enhance the accessibility of our digital products by consistently implementing features such as closed captions, alt-text for images, zoom functions, and clear, simple layouts.

(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

Consultation is at the heart of our accessibility strategy. We believe that meaningful progress can only be achieved by listening to and learning from the lived experiences of people with disabilities.

Employee Feedback: We will continue to use anonymous feedback tools like our weekly Officevibe survey to gather ongoing input. We also create more direct opportunities for employees with disabilities to share their perspectives and help shape our initiatives. In the preparation of this plan, we conducted an anonymous employee survey directed at employees living with disabilities about workplace barriers, accommodation experiences, and ideas for improvement. We also offered focus groups and one-on-one conversations. We will continue to consult all employees on an annual basis, as well as semiannually, through our Employment Equity Committees.

External Partnerships: We will collaborate with organizations, such as the Canadian Association for Supported Employment and their MentorAbility program to benefit from their expertise and ensure our plan is aligned with best practices. Stingray's Senior Director of Human Resources continues to participate in the MentorAbility's Abilities at Work committee – an advisory committee of national employers that meets on a semi-monthly basis to discuss initiatives, research, and support each other in the areas of accessibility and inclusivity for people experiencing disability.

Neurodiversity and Workspace Audit: Recognizing the importance of cognitive diversity, we are partnering with NeuroPlus to conduct a comprehensive audit of our workspaces. This assessment will evaluate our offices both from a physical accessibility standpoint and through a neurodivergent lens. The insights gained will help us develop a robust strategy to support our neurodivergent employees and create an environment where everyone can perform at their best.

Transparent Process: We are committed to a transparent consultation process. We will clearly document who we consulted with (while protecting privacy), the topics discussed, the methods used, and, most importantly, how the feedback we received was actioned in this plan and its implementation.

