

Aylo Freesites Ltd ("Pornhub Premium")

ACCESSIBILITY PROGRESS REPORT

Prepared in accordance with the *Accessible Canada Act*

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General

The ACA (Accessible Canada Act) aims to create a barrier-free Canada by 2040. This Accessibility Progress Report has been prepared in reference to our Initial Accessibility Plan, published June 1, 2025.

This Progress Report highlights Pornhub Premium commitment to fulfilling our obligations under the ACA and our continued efforts. It details the strides we have made in improving digital accessibility across our platform, adhering to WCAG 2.1 Level AA standards. Our commitment is to foster an inclusive environment where all users, regardless of their abilities, can seamlessly interact with our services. Accessibility considerations continue to be integrated into product development, engineering, customer support, and vendor management practices.

Contact Information

Contact Person: Director, Trust & Safety Policy and Operations

Email: accessibilityfeedback@pornhub.com

Feedback Form: <https://www.pornhubpremium.com/information/accessibility>

Feedback

Our platform offers a dedicated section where users or creators can submit accessibility feedback directly or anonymously. If preferred, feedback can also be submitted via phone, post, or email, with alternate formats available upon request.

We are committed to regularly reviewing and addressing accessibility feedback from users collected through formal channels such as contact forms and customer support. This ongoing feedback process enables us to make proactive adjustments that prevent barriers and improve the experience for all users.

All feedback is logged and diligently reviewed, ensuring that it feeds into our decision-making processes during design reviews or platform upgrades, underscoring our commitment to accessibility.

Since the publication of our Initial Plan, we have received 27 feedback submissions.

What we heard

A significant portion (92%) highlighted concerns related to website navigation and content accessibility. More specifically, for navigation, the feedback pointed to issues with keyboard navigation, screen reader capabilities, and improperly labeled elements. For content accessibility, feedback was related to video streaming features like closed captions and audio descriptions. These insights have been invaluable in shaping our ongoing improvements.

Status of Progress in Key Areas

Note that Built Environment and Transportation are not applicable because we do not provide services in these areas.

Employment

Barrier: Limited understanding of accessibility needs among staff across various departments, including customer support, engineering, and software development.

Progress Update: To address these challenges, we implemented comprehensive accessibility training programs that cater to both customer support representatives and engineering staff. For customer support, the training focused on effective communication strategies and understanding the diverse needs of customers with disabilities, ensuring a higher standard of service. For our engineering and software development teams, training was designed to emphasize the importance of prioritizing accessibility during the design and development phases of new features. Training completion rate reached 100% across both customer support and engineering teams, demonstrating strong organizational commitment to accessibility.

Additionally, accessibility training has been integrated into our onboarding process to nurture an inclusive workplace culture from the outset. This holistic approach ensures that accessibility is embedded across all levels of our organization's operations.

Information and Communication Technologies

Barrier: Users relying on keyboard-only input and screen readers face navigation challenges on priority pages with webforms, modals, and checkouts.

Progress Update: We have implemented significant upgrades to ensure our priority pages and webforms are accessible to all users, particularly focusing on navigation.

Notably, 24% of the feedback submissions we received were related to navigation challenges, guiding our prioritization of these enhancements.

- **Keyboard Accessibility:** Our webpages, menus, modals, and checkout flows are now navigable using only a keyboard. We have ensured that keyboard focus is visually indicated, enhancing the browsing experience for users who do not use a mouse. We also ensured that all form fields have valid labels, enabling a seamless and intuitive interaction with forms.
- **Screen Reader Compatibility:** Enhancements include the implementation of alternative text for key site features. This ensures that users relying on screen readers can receive comprehensive descriptions of images and icons. Furthermore, our improvements to the site's heading hierarchy allow for a navigable digital experience by logically structuring content.

Design and Delivery of Programs and Services

Barrier: Core site features and content were not accessible to users with sensory or cognitive impairments.

Progress Update: We have undertaken extensive measures to enhance the accessibility of content across our platforms, with a focus on:

- **Alternative Text:** We have implemented alternative text for images, icons, and controls critical in user interaction, ensuring visually impaired users receive necessary context for navigating and understanding site content.
- **ARIA Labels for Dynamic Content:** Dynamic content areas now utilize ARIA labels to convey important updates, relaying real-time information to users employing screen readers. This structure allows instant awareness of changes or notifications as they occur, enhancing user engagement and interaction.
- **Heading Hierarchy:** Our websites now boast a refined heading hierarchy, logically ordered to optimize navigation. This hierarchical structuring aids users, especially those using screen readers, providing a straightforward path through content and ensuring consistency and clarity in information delivery.
- **Closed Captions:** Accounting for approximately 20% of the feedback received, we have thoroughly reviewed captioning accessibility and are developing a standardized approach that accommodates varying video players and systems.

Implementation is in progress, with the goal of ensuring accurate, consistent, and inclusive captioning for all video content.

Procurement of Goods, Services, and Facilities

Barrier: Pre-existing service agreements lacked explicit accessibility requirements.

Progress Update: To ensure all procured goods and services meet accessibility standards, we revised our vendor contracts to explicitly state adherence to WCAG 2.1/2.2 AA criteria. This includes providing clear accessibility guidelines to potential vendors, requiring detailed documentation on their compliance processes, and establishing regular checkpoints for assessment and feedback.

Communication, other than Information and Communication Technologies

Barrier: Insufficient access to client feedback channels and support for individuals with communication disabilities.

Progress Update: We continue to offer our feedback mechanisms to include multiple formats, ensuring inclusivity for users with varied communication needs. This includes anonymous webform, phone, post or email. Coupled with our training initiative, Pornhub Premium now offers more inclusive channels for feedback and support.

Continued Barrier Prevention and Foresight

At Pornhub Premium, we are unwavering in our commitment to making our services accessible and inclusive for all users, regardless of their abilities. Using assessments from external experts and internal evaluations, we will continue to proactively monitor and prevent potential accessibility barriers:

Digital

- Anticipate and address challenges for screen readers and keyboard navigation.
- Forms and interactive elements, such as buttons and menus, will continue to be designed with accessibility considerations in mind– with accessibility tags to ensure usability for all.

- Proper heading structures and alternative text will continue to be incorporated where relevant, supporting assistive technologies and enhancing usability.
- Prioritize the implementation and enhancement of closed captions and audio descriptions across our video streaming content.

Information and Communication Technologies

- Maintenance and regularly audit/review our public-facing websites, platforms, and digital tools to ensure ongoing alignment with WCAG 2.1 Level AA standards, addressing evolving technologies and accessibility needs proactively.

Feedback

We are committed to regularly reviewing and addressing accessibility feedback from users collected through formal channels such as contact forms and customer support. Our platform continues to offer a dedicated section where users or creators can submit accessibility feedback directly or anonymously. This ongoing feedback process enables us to make proactive adjustments that prevent barriers and improve the experience for all users. Examples of accepted feedback include:

- Difficulty navigating content using assistive tools
- Platform interaction issues (e.g., cannot submit a form)
- Suggestions for alternate content delivery
- Video playback improvements

Consultation

After our initial consultation several years ago, we are actively assessing external partnerships to ensure our platforms adhere to the highest standards of digital accessibility. In our assessments, we are seeking consultations that include expert analysts with disabilities, who can perform comprehensive client-facing platform-specific assessments on:

- Closed captions
- Descriptive audio

- Screen reader compatibility
- Keyboard navigation
- Logical headings
- Image alt-text
- Form-labeling
- Color contrast

In addition, our platform continues to offer a dedicated feedback section where users or creators can submit accessibility feedback directly or anonymously.

Monitoring and Review

To ensure we continue meeting ACA and CRTC requirements, Pornhub Premium will:

- Publish the second annual progress report in June 2027
- Review the Initial Accessibility Plan in full and publish an updated Accessibility Plan no later than June 2028
- Ensure the Accessibility Plan and Accessibility Progress Report remains available in PDF formats on each of our platforms
- Ongoing training for our client facing customer representatives, engineers and software developers
- Continue to maintain a record of all feedback received and of measurable outcomes linked to our accessibility improvements and efforts
- Review new user-facing vendor agreements to ensure a minimum WCAG 2.1 Level AA standard