

Aylo Freesites Ltd ("Thumbzilla")

ACCESSIBILITY PLAN

Prepared in accordance with the *Accessible Canada Act*

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Contents

Executive Summary	3
Purpose and Vision	3
Statement of Commitment	3
Accessibility Principles.....	3
Dignity	4
Independence	4
Equal Opportunity	4
Accessibility by Design.....	4
Intersectionality	5
Inclusive Collaboration	5
Innovation and Ambition	5
Barrier Prevention and Foresight.....	6
Digital.....	6
Information and Communication Technologies.....	6
Feedback	6
Consultation Process	6
Feedback Process.....	6
User Facing Platforms	6
Monitoring and Review	7

Executive Summary

This Initial Accessibility Plan outlines Thumbzilla’s approach to addressing barriers faced by individuals with disabilities, in compliance with the *Accessible Canada Act* (ACA).

This plan presents our commitment to accessibility by identifying key challenges, defining tailored actions, and aligning with federal standards. It also reflects our company-wide approach, which combines user-driven insights and continuous investment in equity and digital inclusion.

Purpose and Vision

The ACA’s goal is to achieve a barrier-free Canada by 2040. As part of a global portfolio of adult entertainment brands, Thumbzilla is contributing to this vision by embedding accessibility into our user experience and platform operations.

Accessibility means more than meeting regulatory standards. It means creating welcoming digital environments where people can participate and thrive, regardless of ability. We believe that participation, representation, and thoughtful design benefit everyone.

Statement of Commitment

For our online users and creators, Thumbzilla features dedicated Accessibility Pages designed to promote inclusion and ease of engagement. These pages offer clearly visible and intuitive pathways for submitting feedback, raising concerns, or requesting content in alternative accessible formats.

At Thumbzilla, we believe accessibility is not merely a feature but it is a fundamental human right. This core value informs every aspect of our user experience design and defines our commitment to creating equitable, barrier-free digital environments for all.

Accessibility Principles

In accordance with Section 6 of the Accessible Canada Act (ACA), Thumbzilla has grounded its Initial Accessibility Plan in the seven guiding principles to ensure a thoughtful, inclusive, and proactive approach to accessibility across all areas of operation.

Dignity

All individuals have inherent worth and must be treated with respect and fairness.

- Thumbzilla affirms that accessibility is a fundamental right, not a privilege. This principle guides every aspect of our user experience reflected in our commitment to inclusive digital design, respectful customer support, and accessible content delivery. Our goal is to ensure that every user feels respected, empowered, and welcomed when engaging with our platforms.

Independence

People with disabilities must have the freedom to access and interact with digital platforms on their own terms.

- Thumbzilla is committed to empowering users by designing platforms that support independent navigation and interaction. Our goal is to ensure that users with disabilities can explore, engage with, and enjoy our content independently without the need for assistance or workaround solutions.

Equal Opportunity

Everyone deserves full and equitable participation in digital communities.

- At Thumbzilla, we are committed to ensuring that all users, regardless of ability, have equal access to our platforms and content. Through accessible design we work to remove barriers that might hinder engagement. By following universal design principles and prioritizing inclusive development, we strive to create an environment where all users can enjoy, contribute to, and interact with our digital experiences on equal footing.

Accessibility by Design

Barriers should be identified and removed before they impact the user experience.

- At Thumbzilla, accessibility is a core component of our platform planning and development. User feedback and requests for accommodation are handled with care, helping us prevent barriers before they emerge and ensuring smooth, inclusive access for all.

Intersectionality

Disability often intersects with other aspects of identity, such as race, gender, and socioeconomic status.

- At Thumbzilla, we recognize that the online accessibility needs of our users are not one-dimensional. We strive to create inclusive digital experiences that acknowledge and reflect the diverse backgrounds, identities, and lived experiences of our global community. Our design and accessibility efforts are driven by the understanding that meaningful inclusion must consider this intersectional reality.

Inclusive Collaboration

People with disabilities should have a voice in shaping the digital experiences they use.

- Thumbzilla is committed to building accessible platforms informed by the insights and lived experiences of users with disabilities. We have consulted with accessibility experts and individuals with disabilities to evaluate features such as video functionality, screen reader compatibility, and interface navigation. Feedback tools embedded in each platform invite ongoing dialogue, giving our community a direct role in the evolution of our accessibility efforts.

Innovation and Ambition

Accessibility should strive for progress and not just compliance.

- We believe accessibility is an ever-evolving goal, and we are committed to staying ahead of emerging needs and technologies. Our ambition is not only to meet standards but to elevate digital access for our entire user base through innovation, responsiveness, and inclusive design.

Through this plan, Thumbzilla reinforces its deep commitment to building a more inclusive, responsive, and accessible digital environment that benefits everyone.

Barrier Prevention and Foresight

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 remain consistently designed with accessibility tags to ensure usability for all.
- Proper heading structures and alt text will always be applied where relevant, supporting assistive technologies and enhancing usability.

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. This ongoing feedback process enables us to make proactive adjustments that prevent barriers and improve the experience for all users.

Consultation Process

A form and contact option were made available on the Accessibility pages across platforms within our corporate group to gather feedback. In addition to eliciting meaningful change towards more accessible platforms, the broader consultation provided valuable insights that informed the preparation of this accessibility plan.

Feedback Process

User Facing Platforms

Our platform offers a dedicated section where users or creators can submit accessibility feedback directly or anonymously.

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

Feedback channels managed by the Trust & Safety Regulations team include:

- Web form embedded on each site's Accessibility Page
- Optional submission via phone, post, or alternate formats, upon request

All feedback is logged, reviewed, and considered during design reviews or platform upgrades.

Monitoring and Review

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

- Publish annual progress reports starting June 2026
- Ensure the Accessibility Plan remains available in accessible PDF formats on each platform
- Enroll client facing customer service in accessibility related continuous training
- Provide on-going accessibility training to our product, engineering, and trust and safety teams.
- Review this plan in full and update it no later than June 2028
- Maintain a record of all feedback received and of measurable outcomes linked to accessibility planning