

Intent

Kleysen Group Ltd (the “**Company**”) is committed to providing a barrier-free environment for all stakeholders, including customers, employees, job applicants, suppliers, and any visitors who enter the premises, access information provided by the Company, or use the Company’s services.

The Company will work to identify and remove barriers, and prevent new barriers, for persons with disabilities as they relate to employment, communication, the built environment, and transportation at the Company. This plan builds on advancements and progress from the 2023-2026 plan achievements and works to outline the Company’s Accessibility Plan and strategy for identifying, removing, and preventing these barriers.

The Company is part of a network of wholly-owned companies and limited partnerships that are subsidiaries of Mullen Group Ltd. (“**Mullen Group**”). Mullen Group’s corporate office (“**Corporate Office**”) provides the Company certain services and will assist with the development and implementation of the Accessibility Plan on an ongoing basis.

A summary of initial opportunities include:

- Improving the attraction of persons with disabilities to jobs in our company by addressing existing barriers and consulting with external agencies.
- Being better prepared to provide information in accessible formats when requested

Definitions

Barrier: Anything physical, architectural, technological, or attitudinal, anything that is based on information or communications, or anything that is the result of a policy or a practice that hinders the full and equal participation in society of a person with an impairment, including a physical, mental, intellectual, cognitive, learning, communication, or sensory impairment, or a functional limitation.

Disability: Any impairment, including a physical, mental, intellectual, cognitive, learning, communication, and sensory impairment, or functional limitation that is either permanent, temporary, or episodic in nature. It can be evident or not in interaction with a barrier to hinder a person’s full and equal participation in society.

Accessibility Plan: This Accessibility Plan includes an overview of our policies, programs, practices, and services in relation to the identification and removal of barriers and the prevention of new barriers. The Accessibility Plan was initially prepared and published by June 1, 2023, and will be updated every three years following that, or sooner if necessary.

The Accessibility Plan was developed in consultation with persons with disabilities and indicates how they were consulted. This process is followed for the creation of, and any updates, to the plan. The Company adheres to all requirements made by regulations in the development and ongoing maintenance of the Accessibility Plan.

General

This information is shared for the purposes of providing feedback and for requesting alternative formats of the plan and/or feedback process.

Feedback Process and Contact Information

The Company welcomes feedback regarding the manner in which it is implementing its Accessibility Plan and any barriers encountered by persons with disabilities. Persons who provide formal feedback will receive acknowledgement of their feedback in the same manner in which it was received, unless feedback is submitted anonymously. The Company is committed to reviewing the feedback received in good faith and taking steps to address barriers identified in this feedback.

Feedback can be submitted in person, by mail, by telephone and by email to:

Manager, Human Resources
1-204-488-5339 or 1-888-488-5550 ext. 5339
2800 McGillivray Boulevard, Oak Bluff, MB R4G 0B4
hr@kleysen.com

Feedback can be provided anonymously, if desired, and will remain confidential unless the person consents to the disclosure of their personal information. Feedback is received in whatever format the individual providing the feedback is most comfortable with. Any feedback received will be reviewed with the Company's Business Unit Leader, and provided to Corporate Office. Consideration will be given to the feedback upon review by the representative collecting feedback, the Company's Business Unit Leader and Corporate Office and a response or summary will be included in the next progress report.

Any changes to the Accessibility Plan or the feedback process are published as soon as reasonably possible and notice of any changes are reported to the Accessibility Commissioner. The personal information of anyone who provides feedback remains confidential in accordance with all applicable privacy laws.

Alternative Formats

The Accessibility Plan is offered in any of the following formats upon request:

- Print;
- Large print;
- Braille;
- Audio; and
- Electronic.

You can request alternative formats of the Accessibility Plan by contacting:

Manager, Human Resources
1-204-488-5339 or 1-888-488-5550 ext. 5339
2800 McGillivray Boulevard, Oak Bluff, MB R4G0B4
hr@kleysen.com

The Accessibility Plan will be made available as soon as feasible. In the instance of a request for the plan in a Braille or audio format, it will be provided 45 days after the day the request was received. Requests for other formats will be provided within 15 days after the day the request was received.

Addressing Areas Identified in the *Accessible Canada Act*:

i. Employment

The Company understands that further improving workplace accessibility and ensuring an accessible recruitment and selection process for applicants with disabilities can contribute to a more diverse and welcoming workplace culture. The Company continues to review its practices and procedures to identify, remove, and prevent barriers by developing, and updating inclusive employment procedures that support persons with disabilities. Where necessary, accommodations are made during the recruitment and selection stages, and throughout the employment lifecycle. Technological and systemic barriers may exist for employee orientation and training, as such, training and development programs provided by the Company should be reviewed to consider an employee's barriers and abilities. Systemic barriers can be identified with respect to conventions associated with the hiring process.

- The Company will continuously review job application processes for persons with disabilities who experience barriers and evaluate potential alternatives.
- Review corporate policies, with the support of Corporate Office, that pertain to accommodations for employees and candidates with disabilities and make plans to remove any barriers that are discovered.
- Continue to train new managers responsible for hiring on the barriers that may exist in the hiring, selection and accommodation process, with support from Corporate Office.
- Review Human Resource policies for improvements with respect to inclusion and accessibility, with support from Corporate Office.
- Provide online learning on accessibility and inclusiveness to employees.
- Review potential opportunities, where suitable, for establishing mentorship for employees of the Company that are persons with disabilities.

ii. The Built Environment

The Company has terminals and offices in 3 provinces in Canada (Manitoba, Saskatchewan and Alberta). Each facility is unique in the size and services offered. The Company wishes to improve its publicly accessible facilities with a goal of working towards making such facilities free of physical barriers, in order to promote a space of

inclusivity. Physical barriers may exist in the Company's offices and facilities, that can be improved upon some of which include (*but are not limited to*):

- For locations with accessibility barriers that are deemed inaccessible, review each unique situation so we can successfully accommodate when needed.
- Review posted signage around the terminal to ensure all necessary signage is in good condition, posted and visible.
- With support from Corporate Office, the Company will evaluate its offices and facilities to assess the need for further accessibility features.
- The Company will review and update, as necessary, its emergency and disaster response plans to account for employees, and visitors with disabilities.
- Review Company workspaces, and customer facing facility areas to identify any physical barriers.
- In the event of an emergency the company has assigned floor captains to ensure that all spaces are vacated and to assist anyone out of the building if needed (i.e. checking bathrooms, boardrooms, knocking on closed offices)

iii. Information and Communication Technologies (ICT)

Software with accessibility functionality is already utilized by the Company; however, the Company recognizes that systemic barriers exist within technology and presumptions made about its use. The Company wishes to remove barriers and improve accessibility for employees with disabilities, by making such technology more accessible.

- Add accessibility as an evaluation metric when acquiring or developing new software or technology, with support from Corporate Office.
- Review any new website content for any minor barriers, including assessing the following:
 - Text contrast;
 - Text size;
 - Navigation and compatibility with screen readers; and
 - Clear formatting.
- Provide guidance and support on the accessibility features of utilized software with existing accessibility features.

iv. Communication other than ICT

The Company acknowledges that content and medium are both important in providing accessible communication to its customers, employees, job applicants, suppliers, and any visitors that access the premises. Communication barriers exist in the content and format of online information, in-person interactions and meetings and presentations. One of the Company's goals is to work towards providing more accessible communications.

- It was identified that there are some positions who, due to the nature of their role, do not have a company email and therefore may miss important company communications which can cause them to be unaware of accessibility-related policies, processes and benefits. We will review this process with various business units who send out essential information to ensure that we are including the personal emails for employees who do not have a company email.
- Engaging in a conversation with employees, or potential employees, when they identify or share a disability or potential accommodation required.
- In cases where accommodation is requested, notify appropriate Kleysten individuals involved. Ensure all visitors are given information on how to access buildings and sites.
- Provide training on accessibility and barriers for employees who work on communications, including information on potential different communication styles.
- Evaluate website, social media posts, meetings and presentation conventions and practices to create a plan to address barriers to accessibility if discovered, including assessing the following:
 - Adding alternative text for images;
 - Using high contrast font; and
 - Providing transcripts of audio and video posts, where appropriate.
- Review orientation processes and resources for new employees for improvements to accessibility, with the support of Corporate Office.

v. Procurement of Goods, Services and Facilities

Procurement practices have the potential to be subject to unconscious bias and systemic barriers. It is the Company's goal to consider accessibility in its procurement processes, where possible.

- Review procurement practices and improve, where reasonable and applicable, to consider accessibility in the purchase of goods, services and the use or purchase of facilities.

vi. Design and Delivery of Programs and Services

The Company's primary customers are other businesses, and as such, evaluating the design and delivery of programs and services to the public is not applicable. The Company considers the design and delivery of programs and services as it might apply to its employees and customers.

- Review the accessibility of design and delivery of programs and services with respect to employees and customers with disabilities.

vii. Transportation

The Company's business may provide transportation, logistics services, and/or specialized and industrial services, it does not provide passenger transportation services. As such, barriers to the public and passenger-based services are not considered. The Company's focus is on continually evaluating potential barriers that exist for employees and candidates. Such barriers might include, physical barriers, like ramps, curbs, vehicle and

equipment design or lack of vehicle and equipment adaptability. The Company will work towards reducing barriers for employees with disabilities to the extent reasonable, pursuant to applicable occupational health and safety legislation, and other relevant legislation.

- Assess the accommodations that would be reasonably necessary that we can implement for vehicles and equipment that would be compliant with the Company's occupational health and safety, and other relevant legislative, contractual, and other obligations for opportunities to improve accessibility.
- Ongoing review of parking lots and walkways to ensure that weather and seasonal related damage is addressed in a timely fashion. For example, potholes due to temperature changes, curbs that are hit while clearing snow and have shifted may need repair.

Consultations

The Company understands that collaborating with persons with disabilities is an important factor in developing an Accessibility Plan. We reached out to Simaril, a non-profit organization, that supports people with physical, intellectual and mental disabilities. They support approximately 180 people and have 55 outreach staff/programs as a part of their organization.

We met with the CEO by phone on June 2, 2026 to discuss their organization and ask the following questions to gain insight on some of the common barriers they experience to determine any changes we, as a company, can integrate to become more accessible and accommodating to future candidates:

From your experience, what are the most common physical barriers people face when accessing services or facilities?

- Transportation is a major challenge. Individuals often need to book transportation well in advance for scheduled events so for an appointment that may only take 10 minutes, they could arrive up to 2 hours early and then wait another 2 hours afterward for transportation home.
- Winter conditions create additional barriers for people with mobility challenges, including snow covered or icy sidewalks, difficult building access, doors not opening properly, and lack of wheelchair-accessible buttons.

What attitudinal barriers do people with disabilities still encounter most often in the community or workplace?

- People in the workplace need more education about disabilities, and employers should take the time to understand what each employee is comfortable with and what supports they may need.
- Employers often want to hire people with disabilities, but they can see it as a big commitment and may have concerns about safety or how to provide the right accommodations.
- Some people may feel uncomfortable or nervous about how they look, speak, or interact with others, which can make workplace relationships more difficult.

- Feeling included can be just as important as having a job. One example shared was of a man who worked at a local retail store building furniture in the back. He loved the work, but coworkers rarely talked to him or offered help. While he enjoyed his job, he missed out on the social side of being part of a team.

What communication barriers come up most often, and what changes help make information more accessible and easier to understand?

- More training and educational courses need to be available to help employees better understand disability inclusion, accessibility, and how to support coworkers with different needs.
- Ongoing learning opportunities can help create a more welcoming workplace and give employees the confidence to interact respectfully and effectively with people of all abilities.

From your perspective, what makes events and activities truly inclusive and accessible for people with disabilities?

- It is important to know your audience when planning events, as people may have different accessibility needs and preferences.
- Things like food and drinks should be considered ahead of time, including whether someone may need help eating or drinking. For example, some people with MS may need a straw to drink comfortably.
- Seating is also important. Make sure people can easily see and hear what is going on.
- Keeping events moving and avoiding long periods of downtime can help make the experience more comfortable, especially for people who are neurodivergent.

What's one thing that stands out to you from your experience, or something you would suggest to companies/employers that you feel is still a challenge and isn't being addressed properly?

- Almost everyone has someone in their life who is living with a disability, whether it is a family member, friend, coworker, or neighbour.
- Many people find it difficult to ask for help, which is why open conversations and greater awareness are so important.
- Disabilities can take many different forms, and people are often managing more than one challenge at a time.
- More training is needed to help people understand how to interact respectfully and sensitively with individuals with disabilities.
- It is important to recognize that disability is not limited to visible conditions, such as using a wheelchair. Many disabilities are invisible and can affect people in different ways.

Progress Reports

The Company prepares, publishes, and submits a progress report to the Accessibility Commissioner regarding the implementation of the Accessibility Plan each year the plan is not required to be updated. This report follows a similar structure to the Accessibility Plan and includes feedback and contact information, information about the consultations completed for the development of the plan, and any good faith feedback received on the

Accessibility Plan. The report addresses how the consultations and feedback were taken into consideration during the process. Progress reports can be made available upon request and are available in all accessible formats the Accessibility Plan is available in.

Document Retention

The Company keeps detailed records of the creation, implementation, and updating of the Accessibility Plan and progress reports. The Accessibility Plan and feedback process are retained within Human Resources confidential files for seven years from the publication date. Any feedback provided to the company is retained for seven years from the date it is received. Where necessary, names and personal information of individuals and employees who participated in the feedback process are redacted to ensure confidentiality and privacy. The Company will not retain contact information for any anonymously provided feedback.