

Accessibility Plan 2023-2026

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 outlines 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.

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 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 regulation in the development and ongoing maintenance of the Accessibility Plan.

General

This information is provided 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
(204) 488-5398 or 1888 488-5550 ext. 5398
2800 McGillivray Boulevard, Oak Bluff, MB R4G0B4
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
(204) 488-5398 or 1888 488-5550 ext. 5398
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.

i. Employment

The Company understands that 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 reviews its practices and procedures to identify, remove, and prevent barriers by developing 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 review current 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.
- Train those 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.
- Offer training on unconscious bias to human resources employees to improve awareness of accessibility issues.
- Review potential opportunities, where suitable, for establishing mentorship for employees of the Company that are persons with disabilities.

ii. The Built Environment

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.

- 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.
- Evaluate facilities to verify that smoke, fire and other emergency alarms have visual and auditory signals, and assess if improvements are required.
- Review Company workspaces, and customer facing facility areas to identify any physical barriers, by the end of 2025 and plan improvements.

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 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.

- 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 virtual meeting practices for accessibility, including the provision of presentations and real time transcripts, and considering alternative means of communication.
- 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 available 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 for safe implementation.

Consultation

The Company understands that collaborating with persons with disabilities is an important factor in developing an Accessibility Plan. Mullen Group consulted with the Foothills Advocacy in Motion Society ("**FAIM**") on behalf of its federally regulated subsidiaries in the development of this Accessibility Plan (the "**Consultation**"). The Consultation process was two-fold and included:

- a) a review completed by FAIM of a draft of the Accessibility Plan; and
- b) several in person conversations with persons with disabilities facilitated by FAIM

The first facet of the Consultation consisted of FAIM reviewing and providing feedback on a draft of the Accessibility Plan, prior to the in-person portion of the Consultation. The second facet of the Consultation included in-person discussions that were facilitated by a staff member of FAIM. These discussions posed questions and asked for input regarding the barriers faced by persons with disabilities, including, physical, attitudinal, technological and communication barriers. These conversations also asked for input on recommendations for improving policies and procedures to support persons with disabilities, and for recommendations on the inclusiveness and accessibility of events and activities.

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.