



Algoma Central Corporation Accessibility Plan Year Three Progress Report

General

Executive Summary

The *Accessible Canada Act* which was adopted in 2019, is a federal law aimed at finding, removing and preventing barriers facing people with disabilities. As a federally regulated organization, Algoma is considered a regulated entity under the Act and must comply with the requirements including consulting with people with disabilities and publishing an accessibility plan, our feedback process and progress reports. This document outlines Algoma's Accessibility Plan and our process for consulting employees and receiving feedback. When preparing the Plan, Algoma took into account the following principles as outlined in the Act:

- (a)** all persons must be treated with dignity regardless of their disabilities;
- (b)** all persons must have the same opportunity to make for themselves the lives that they are able and wish to have regardless of their disabilities;
- (c)** all persons must have barrier-free access to full and equal participation in society, regardless of their disabilities;
- (d)** all persons must have meaningful options and be free to make their own choices, with support if they desire, regardless of their disabilities;
- (e)** laws, policies, programs, services and structures must take into account the disabilities of persons, the different ways that persons interact with their environments and the multiple and intersecting forms of marginalization and discrimination faced by persons;
- (f)** persons with disabilities must be involved in the development and design of laws, policies, programs, services and structures; and
- (g)** the development and revision of accessibility standards and the making of regulations must be done with the objective of achieving the highest level of accessibility for persons with disabilities.

Accessibility Statement

Algoma values its diverse workforce which includes persons with disabilities. We continue to promote a diverse and inclusive organization driven by our vision of being the Marine Carrier of Choice and our values of Integrity, Sustainability, Teamwork, Ownership and Passion.

As part of being the Marine Carrier of Choice, Algoma and its leadership takes seriously the responsibility of understanding and trying to remove barriers that can impact the experience of persons with disabilities whether physical or sensory in nature. Algoma is committed to working to remove those barriers to improve accessibility.

Feedback and Alternate Formats

Algoma welcomes feedback on any accessibility related items. The Vice President of Human Resources is the designated contact to receive this feedback on behalf of Algoma. The designated person will inform and involve other departments as required based on the feedback received. The designated person can also be contacted for requests for the plan in alternate formats.

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This plan is also available in alternate formats upon request: print, large print, audio and electronic format.

Key Areas

The Built Environment

Algoma's head office where the majority of our shore based employees work is located in an owned building in St. Catharines. In addition, we have an owned warehouse facility where a few employees work in Port Colborne. These buildings offer accessible entrances, parking and elevators as well as accessibility features inside the bathrooms.

We are aware that the doors to access the washrooms in these buildings are not automated. This barrier is due to older infrastructure that was constructed prior to the current accessibility standards. As these facilities are upgraded or replaced, accessibility requirements are reviewed to try to mitigate or eliminate existing barriers.

The other built environment where the majority of Algoma's employees work is on a marine vessel. All vessels are maintained to stringent Transport Canada Marine Safety regulations and safety standards. Vessels are inspected by Class Societies that are all International Association of Class Society (IACS) members on behalf of Transport Canada, to ensure compliance with all maritime regulations and codes. The Company's Safety Management System is audited to verify compliance with the International Safety

Management Code on all vessels and our offices independently by Class Society, Lloyd's Register.

Our vessels carry cargo not people other than employees who work on each vessel. Under Transport Canada requirements, seafarers must have a valid Marine Medical Certificate to work on a vessel to ensure they can perform routine and emergency duties safely and aren't at risk of needing immediate medical care which isn't available if the vessel is underway. When assessing a seafarer's fitness for duty a Transport Canada certified doctor must ensure that individual meets certain vision, hearing and physical capability standards. This requirement is a substantial barrier to hiring persons with disabilities and as a result, the built environment of a vessel is less relevant because persons with disabilities who would require accessible facilities aren't able to get the medical clearance to work on a vessel.

Actions, Timelines and Responsibilities

Algoma's VP Finance who is also in charge of facilities is responsible for ensuring an accessibility review is conducted whenever a facility undergoes a substantial renovation/remodel or when looking to purchase a facility.

Algoma will conduct a review of its buildings against current accessibility standards to identify any gaps. This review will provide Algoma with a clear understanding of the current state of its infrastructure and what improvements are needed to bring them up to the current accessibility standard.

Update on Action Items

Algoma is currently putting an accessibility audit together in order to evaluate our buildings against current accessibility standards in order to identify any gaps with the intent to conduct the audit by the end of 2025. This review will provide Algoma with a clear understanding of the current state of its infrastructure and what improvements are needed to bring them up to the current accessibility standard.

The Design and Delivery of Programs and Services

Algoma delivers product to private customer facilities who would have their own accessibility plans and requirements. We do not provide products or services on an individual basis or to the general public. Therefore, the design and delivery of program and services relates primarily to Algoma's employees.

Algoma has a policy committee that consists of representatives from each of the bargaining units that represents the majority of Algoma's employees, our shipboard crew. The purpose of this committee is to help Algoma ensure a safe working environment by reviewing safety programs and standards as well as risks and to develop prevention and mitigation methods to address those risks.

In addition to the policy committee that aims to provide a safe work environment, due to the diverse nature of Algoma's employee group, Algoma developed a Diversity, Equity and Inclusion Roadmap. The Roadmap includes a number of focus areas and actions aimed at fostering diversity and inclusion in our workplace for all employees including persons with disabilities. The Roadmap was created in early 2023 and will play an important part in guiding our DEI activities in the coming years helping Algoma make positive steps to social and workplace inclusion and participation.

Delivery of employee based programs including communication, training, support programs, job and employee information and so forth are offered in various formats including in-person, virtual, print and electronic. When requested, alternate formats are considered on an as needed basis.

As part of the support programs offered to employees, Algoma offers an Employee Family and Assistance Program which provides confidential support on a variety of topics including physical/mental health, wellness and diversity at no cost to the employees. The support is offered in a variety of methods including print, electronic, voice, text and in person.

To gauge employee's needs, Algoma conducts an employee survey every couple of years. The survey addresses belonging and inclusivity which are an important component of providing persons with disabilities a supportive environment. However, in prior surveys, the questions were more generic in nature. To better understand our employee experiences and needs the survey we rolled out in spring 2023 had more extension questions and the opportunity for free form comment. This feedback was used as part of the consultation process. Algoma also wants to find more direct ways of understanding the working experience of persons with disabilities at Algoma and how we can better support these employees.

Algoma has an experienced team dedicated to health and wellness whose core responsibilities are managing our disability management program, early and safe return to work planning, helping employee navigate the medical landscape, and promoting health and wellness resources to employees. The team works with our employees and their medical practitioners to determine their accommodation needs and with managers to remove job specific barriers and create modified work opportunities. The team's activities are key to the workplace accommodation process.

Actions, Timelines and Responsibilities

Algoma's employee survey was updated to include questions that specifically gauge an employee's perceptions and experiences related to diversity, equity and inclusion. The results were used to form part of the consultation process in developing this plan but will be further analyzed over the coming year once the DEI Council is in place to identify areas for improvement and whether or not there are shared needs related to certain groups such as persons with disabilities.

To further understand the needs of our employees and ensure we put the right programs and processes in place to address those needs, in 2023, Algoma will create a DEI Council. The intent will be to have a Council that is a diverse group representing a cross section of our employees including persons with disabilities. The group will help us assess survey outcomes, develop the appropriate programs and processes to respond to those needs as well as help communicate to employees and bring their voice back to the working group and Algoma's leadership. The Council will have the support of Algoma's Executives and be sponsored by a Sr. Leader, the VP of Human Resources to ensure the importance of the Council is evident and the group receives the appropriate support and resources.

Update Algoma's job postings to include a statement that affirms our commitment to inclusivity of qualified applicants and providing reasonable accommodation to persons with disabilities. In addition, before resumes are shared with hiring managers, the documents will be redacted to remove any details that are not specific to a person's experience and education including dates, hobbies, address, names and so forth to ensure bias is removed from the screening process.

Update on Action Items

Algoma created a DEI Council. The Council represents a diverse, cross section of our employees. The group helps to assess employee feedback through our employee survey and other avenues, provide suggestions on and review of programs and processes to respond to the diverse needs of our employee group including those with disabilities, as well as help communicate to employees and bring their voice back to the working group and Algoma's leadership. In 2024, we reached out to employees who voluntarily identified themselves as a person with disabilities to ask if they would be interested in joining as a committee member. Unfortunately, we did not have anyone come forward to join. In 2025, we are hoping to expand our committee and will continue to try to add a member who has designated themselves as a person with a disability. For now, we do try to ensure our committee discusses relevant items and seeks out feedback when appropriate.

Our external job postings now contain a statement that affirms our commitment to inclusivity of qualified applicants and providing reasonable accommodation to persons with disabilities. We are committed to applying this standard more consistently going forward.

We had intended on implementing resume redacting. We started including that step in our recruitment process but have since put this action item on hold until we implement our new HR system as many of these platforms have an integrated tool that allows for masked screening. Without an automated system, the process was too cumbersome and time consuming as we receive a large number of resumes from a variety of sources with different formatting. In 2024 we conducted a review process of available systems

which included a review of this feature as well as other accessibility considerations. We intend to select the system and begin the implementation process in 2025.

Information and communication technologies (ICT)

Algoma uses a variety of communication technology for various purposes.

We utilize Microsoft Teams as our main communication platform within our office locations i.e. voice and chat as well as our online meeting platform. Microsoft Teams has a variety of accessible features including live captions, being able to record a meeting so participants can reply it, adding text to visuals, voice control, transcriptions, and an accessibility checker. These features allows people with different abilities to fully participate and contribute in meetings and discussions. While Microsoft Teams, has many accessibility features, a possible barrier is the lack of formal training on those features to make employees aware they are available and how to use them.

In addition, upon request we have adapted technologies or installed accessible equipment to assist employees in being able to utilize communication technology. Items such as sit stand equipment for monitors, hands-free headsets and volume adapters are all items we have incorporated to enhance the employee experience and remove barriers.

On area of communication technology that could have improved accessibility features especially since it is a resource for both internal and external audiences is our company website. The platform is an older platform that has not undergone any significant updates in many years.

Other frequently used technologies programs that are installed/utilized on our vessels include electronic chart display and information systems (ECDIS), loading and unloading cargo programs, fuel monitoring systems and so forth. Since these programs are often specific to the marine industry the accessibility features appear to be minimal as they are not as progressed in implementing these features as other more broadly used software and technologies are. This does create a barrier for persons with disabilities but as noted, the Canadian marine industry is limited in being able to offer opportunities to persons with disabilities as a result of the Transport Canada fitness requirement in place due to the nature of the work and safety requirements of the industry.

Actions, Timelines and Responsibilities

Algoma is in the process of revamping our website. The updated website will be developed in accordance with accessibility guidelines incorporating features to ensure an enhanced and inclusive experience for all stakeholders.

Although part of the procurement actions on a broader scale, when a need is identified to implement new communication information technology, vendors will be asked to provide details on available accessibility features that will then be reviewed and

considered by the implementation team when make their assessment on the suitability of applications.

Update on Action Items

We have updated our website which was developed in accordance with WCAG 2.0 AA's requirements, a global standard with regards to accessibility rules and regulations.

Examples of features includes the following:

- Interactive elements that can be navigated using the keyboard are surrounded by a visual outline whenever they are focused.
 - o Who is affected by these issues?
 - Motor impaired
 - Cognitive disability
- All HTML title elements (H1-6) have texts. If images or links are used, they include an alternative or screen-reader only text.
 - o Who is affected by these issues?
 - Vision impaired
- The majority of elements behave as buttons but are built using other tags such as span, div, a or others, include a "role" attribute that equals to "button".
 - o Who is affected by these issues?
 - Motor impaired
 - Cognitive disability
 - Vision impaired

The features help to provide a more inclusive experience for all stakeholders.

As of July 2023, when a need is identified to implement new communication information technology, vendors will be asked to provide details on available accessibility features that will then be reviewed and considered by the implementation team when make their assessment on the suitability of applications. As an example of this, as we are currently going through a process to implement new ERP software, vendors are being asked to review accessibility tools available within the platform.

Communication, other than ICT

Communication with both internal and external stakeholders is done via a variety of methods and mediums depending on the intended purpose and/or audience. Upon request employees, applicants, customer and supplier representatives can request communication be in a specific format i.e. email, voice, text, and we do our best to accommodate these individual needs. Along these lines, one barrier that has been identified is a potential lack of awareness and understanding of what individuals may need and what considerations might help a person be able to fully participate in the workplace through enhanced communications.

Algoma has a reporting hotline for employees to report significant concerns or violations. Employees can access the hotline in a variety of ways including phone, mail or online. This allows employees to use the method that they feel most comfortable with.

Another barrier to employees and potential employees who may require communication accommodation is the requirement for the majority of our workforce to pass a Transport Canada Medical assessment which includes minimum visual and hearing requirements for safety reasons. Unfortunately, this is a regulated requirement and not a condition that Algoma can overcome. Therefore, we are limited in what options we can provide employees that would enhance our communication accessibility and allow them to fully participate in the workplace if they do not at least meet Transport Canada's minimum requirements.

Despite this challenge, in general when an employee accessibility need is identified, a review is conducted based on their position, their needs and the available technologies and equipment to determine gaps and what reasonable accommodations are available and can be provided to address those.

Actions, Timelines and Responsibilities

Algoma has implemented a new online training platform. Algoma will develop a module to provide accessibility awareness training which will include the importance of communication including the considering the needs of the person they are communicating with, such as clear, concise, and plain language, gestures, large print, writing, or various other means including electronic options and the importance of seeking information whether an alternative forms of communication may be required.

Update on Action Items

Algoma is in the process of developing a module to provide accessibility awareness training which will include the importance of communication including considering the needs of the person they are communicating with, such as clear, concise, and plain language, gestures, large print, writing, or various other means including electronic options and the importance of seeking information whether an alternative forms of communication may be required. The training will also review the Accessible Canada Act and the different types of disabilities and Algoma's Accessibility Plan. We are also in the process of developing a broader training program on diversity, equity and inclusion which will incorporate the topic of disabilities and the need for accessibility in order to be equitable and inclusive.

Transportation

Algoma employs individuals from across Canada. Since our vessels transit the Great Lakes and St. Lawrence Seaway, many employees have to travel by air and/or ground transportation to join a vessel. As already stated, as a result of vessel based employees

needing a Transport Canada Medical Fitness Certificate to be eligible to work onboard a vessel, the accessibility needs of the employees who are eligible to work on our vessels is reduced. However, in the case where an employee has accessibility need we work with our travel provider to find the best option.

We are also encouraged by the requirements of the Accessibility Act covering transportation service providers like the airlines and rail companies and knowing those entities have to address accessibility barriers that might be impacting our employees while travelling to and from work.

Actions, Timelines and Responsibilities

Algoma's Fleet Personnel and Purchasing teams will continue to work with our travel provider when an accessibility need is identified to ensure the individual's needs are considered and best accommodated.

Update on Action Items

When an accessibility need is identified, Algoma's Fleet Personnel and Purchasing teams work with our travel provider to ensure the individual's needs are reviewed to determine how best to accommodate those needs.

Procurement

Algoma's goal is to consider accessibility requirements whenever relevant when procuring goods, services, and facilities so that the deliverables provide accessibility features that help provide a more inclusive and supportive environment.

We have identified a few barriers that exist in our procurement process. There is a lack of awareness of the need and benefits of including accessibility considerations in the process. Availability of goods or services with accessibility features may be a barrier or the identification and again awareness of the availability of these features may in fact be the barrier. In addition, vendors and service providers often haven't considered accessibility as part of their process.

Actions, Timelines and Responsibilities

Algoma will develop a process that requires all vendors of relevant products and services to include their accessibility considerations in their proposals.

Update on Action Items

A question has been added to our Know Your Vendor form to encourage our purchasing team to review accessibility considerations and for vendors to provide applicable information during the procurement process.

Employment

At Algoma we want to be the Marine Carrier of Choice which from an employee and potential employee perspective means being their employer of choice. In order to be the employer of choice, we want to provide an environment where employees can contribute at their full potential through access to meaningful employment opportunities and promotions.

Algoma communicates our support to employees and our commitment to creating an inclusive environment for all in a variety of ways, through our monthly newsletters, our website, our sustainability reports, employee meetings and so forth. However, we tend to do so on a more general basis. In order for persons with disabilities to know exactly how they can be supported, and for them not to believe there are barriers when there may not be, we have to ensure we communicate specific employment related supports and programs that are in place to address accessibility needs.

Algoma has extensive training programs from job specific training to leadership training. To foster a more inclusive environment and the potential for barriers, Algoma has identified a gap in our training and the recognition we need to develop and implement a training focused on unconscious bias, macroaggressions and the value of diversity.

Algoma includes assessments as part of our recruitment process. These include a cognitive and behavioural assessments. These assessments can create a potential barrier for persons with disabilities. Although value added in the recruitment process, Algoma needs to consider whether or not the value outweighs the potential barrier they create.

Algoma has a performance management process that evaluates employee performance throughout the year with a comprehensive year-end review. To ensure consistency and prevent bias, Algoma's leadership meets as part of the year end process to review all employee evaluations before they are finalized and then form part of an employee's compensation review. Future opportunities for promotion and development for each staff member are also discussed annually with Algoma's leadership team. When opportunities are identified, Algoma works with the applicable employees to ensure their readiness.

To foster an inclusive environment where our differences are celebrated, Algoma has committed to increasing awareness of the value of diversity at Algoma. At the end of 2022 Algoma began increasing our training and awareness around diversity, equity and inclusion starting with Algoma's leadership. In early 2023, we conducted an awareness training session with our Captains and Chiefs who are our shipboard managers as well as staff. To further raise awareness training on unconscious bias, macroaggressions and the value of diversity will be rolled out to the rest of the workforce.

Actions, Timelines and Responsibilities

Algoma is in the process of developing an employee handbook for shore based staff. The handbook will include an Accessibility Policy to create better awareness around Algoma's commitment to creating a barrier free workplace and support that is available to persons with disabilities.

To further awareness across our workforce about inclusivity and the need to support persons with disabilities, Algoma will include an overview of any accessibility supports that are in place, our commitment to providing a barrier free workplace and the process to request accommodation in our employee orientation process.

Algoma will conduct an analysis should to determine the value of our recruitment assessment tools vs the potential barrier these assessments create for persons with disabilities and if the value is significant, then a review will be done to determine what accommodation can be provided or if alternative assessments with accessibility features can be utilized instead.

Once Algoma's DEI Council is established, one of the focus areas will be on identifying and mitigating or eliminating biases and barriers in the hiring, development and promotion processes that Algoma has in place to ensure these processes are equitable and in turn opportunities are available to persons with disabilities. If barriers are identified Algoma will develop a further action plan to address them. If no barriers are identified and instead there is a perception of barriers, Algoma will develop an action plan to better communicate our practices to clear up any misconceptions.

Algoma will develop an online training module to include in our LMS system on microaggressions, unconscious bias and the value of diversity.

Update on Action Items

Algoma implemented an updated employee handbook for shore based staff which included a newly developed Accessibility Policy to create better awareness around Algoma's commitment to creating a barrier free workplace and support that is available to persons with disabilities.

Algoma is in the process of developing online training modules that focus on accessibility and diversity, equity and inclusion.

With the assistance of our DEI Committee a Mental Health Policy was drafted which will be published in 2025.

Consultations

Algoma conducted an employee survey and included questions relating to diversity, equity and inclusion. More specifically asking if opportunities are equitable, if managers demonstrate wanted behaviours, what Algoma is doing well regards to building an

equitable and inclusive environment and where we need to improve. The response rate was 62% and included both shipboard and shore staff.

One area that was identified in our consultation process was a concern around Algoma's hiring practices being a potential barrier and although not the case, the impression that hiring and promotional decisions are governed by who a person knows vs their skill set. This perception creates a potential barrier for all candidates including persons with disabilities. This feedback was considered in our action plans.

Although not direct feedback, we recognize based on the sentiment expressed in some responses we received during this process that there is a need for greater awareness training around the value of diversity, equity and inclusion. While most employee comments expressed an appreciation for a diverse workforce and the role Algoma is playing in creating such a workplace, some employees expressed less positive remarks which means there is still work to do in this regard. As such, we have included a number of training items in our action plans.

Aside from the feedback identified above which we have included actions to address, the overall feedback from employees is that Algoma is taking all the right steps to be inclusive and diverse, to create better awareness and to address concerns when brought forward.

In addition to the feedback we received that was considered in developing this Plan, we would like to get additional feedback on Algoma's Accessibility Plan specifically and have sent the Plan directly to a group of employees who through the Employment Equity workforce surveys have identified themselves as being a person with a disability as well as wanting to be involved in any feedback process. If additional feedback is received we will update our plan and action items accordingly.

Actions, Timelines and Responsibilities

Algoma's Accessibility Plan will be sent to employees who have voluntarily identified themselves as persons with disabilities. Any feedback received will be reviewed by leadership and our DEI Council and incorporated as applicable in our updated plan.

The employee survey will be distributed again in 2025 with the same questions. Feedback on related items will be reviewed by senior management as well as our DEI Committee and considered in the update of our Accessibility Plan next year.

Update on Action Items

The Accessibility Plan was distributed to those who voluntarily recognized themselves as being a persons with disabilities. We did not receive any feedback on the plan and/or suggested action items.

Planning and Reporting Cycle

Algoma has implemented a three year planning and reporting cycle as follows:

- First year – prepare and publish an accessibility plan – Complete June 1, 2023
- Second year – prepare and publish a progress report – Complete June 1, 2024
- Third year – prepare and publish a progress report – Complete June 1, 2025