



Algoma Central Corporation Accessibility Plan 2026 - 2028

Executive Summary

The *Accessible Canada Act* (“the 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 this 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.

Phone: (905) 687-7823

Email: cathy.smith@algonet.com

Address: 63 Church Street, Suite 600, St. Catharines, ON, L2R 3C4

In addition to the above, concerns can also be reported through Algoma's secure and confidential reporting system, ClearView via the following reporting methods:

- Online through the website www.clearviewconnects.com
- By telephone at: 1-866-846-7659
- By mail at:

ClearView Connects
P.O. Box 11017
Toronto, Ontario
M1E 1N0

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 individuals meet certain vision, hearing and physical capability standards. This requirement is a substantial barrier to hiring persons with disabilities as there are limitations to getting medical clearance to work on a vessel. Therefore, the focus of accessibility in our built environment is on our shore operations.

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 periodically conducts a review of its buildings against current accessibility standards to identify any gaps. This review provides 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.

Algoma will conduct an updated workplace accessibility audit in 2026 to evaluate our buildings against current accessibility standards in order to identify any gaps. This review will provide Algoma with a clear understanding of the current state of its

infrastructure and what improvements are still needed to bring them up to the current accessibility standards.

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 relate 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.

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 on a bi-annual basis. The survey seeks feedback from all employees including those with disabilities on a variety of topics including belonging, equity, diversity and inclusivity at Algoma. Employees are also provided with the opportunity to input free form comments which provides additional input for review. This feedback is used as part of the consultation process to gain insight into employee priorities, what Algoma should continue doing and where improvements are needed. 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

With the implementation of our new ERP system in 2027-2028, Algoma will incorporate accessibility features that are not part of our current, 20-year-old system, into new processes with the aim to reduce bias in hiring and performance management as well as making the system itself more accessible via screen reader capability and visual adjustments. The accessibility features of the system was a key component of the selection process.

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 replay and listen at their own pace, adding text to visuals, voice control, transcriptions, and an accessibility checker. These features allow 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.

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.

Our website is in compliance 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.

- 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.
 - 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".
 - Who is affected by these issues?
 - Motor impaired
 - Cognitive disability
 - Vision impaired

The features help to provide an inclusive experience for all stakeholders.

When a need is identified to implement new communication information technology, vendors are 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.

Actions, Timelines and Responsibilities

We will implement training on the accessibility features of our systems. This training will help to ensure equitable digital inclusion empowering users to operate systems independently.

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 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, the different types of disabilities, Algoma's Accessibility Plan and specifically the types of accommodation that may be available at Algoma depending on position and work environment.

Transportation

Algoma employs individuals from across Canada. Since our vessels transit the Great Lakes and St. Lawrence Seaway, many employees travel by air and/or ground transportation to join a vessel. The available accessible options are driven by the travel providers. We are also encouraged by the requirements of the Act covering transportation service providers like the airlines and rail companies and recognizing those entities must address accessibility barriers that might be impacting our employees while travelling to and from work.

As already stated, as vessel-based employees need a Transport Canada Medical Fitness Certificate to be eligible to work onboard a vessel, the accessibility needs in general and with transportation more specifically aren't as full scope as they otherwise would be without this limitation. However, in the case where an employee has an accessibility requirement when traveling, we work with our travel provider to source alternative options

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 foster a more inclusive and supportive environment.

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.

Actions, Timelines and Responsibilities

The training development as outlined in the Communication section will positively impact our procurement process by providing those involved to have greater awareness of the purpose and considerations relating to accessibility requirements.

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 regular employee 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 opportunities for removal of barriers, we have to ensure we communicate specific employment related supports and programs that are in place to address accessibility needs.

Algoma has implemented an updated employee handbook for shore-based staff which includes 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.

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.

Algoma has extensive training programs from job specific training to leadership training. To foster a more inclusive environment and remove the potential for barriers, Algoma identified a gap in our training and the recognition we need to develop training relating to accessibility.

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.

Actions, Timelines and Responsibilities

To foster an inclusive environment where our differences are celebrated, Algoma has committed to increasing awareness of the value of diversity at Algoma. Algoma began increasing our training conducting awareness training session with our leadership team, 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.

Algoma will conduct an analysis 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.

Consultations

Algoma conducted an all 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.

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 inclusion and valuing differences.

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.

We had asked for feedback on our Plan from employees who self-identified as having a disability. Unfortunately, no feedback was received.

Actions, Timelines and Responsibilities

Algoma values employee feedback to gain insight into the employee experience. Although our employee survey touches on inclusion and equity, it doesn't speak specifically to accessibility and related considerations. Algoma will apply alternative methods to request direct feedback from employees who have self-identified as a person with disabilities in hopes to gather additional perspectives to further our accessibility approach.

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, 2026
- Second year – prepare and publish a progress report – Complete June 1, 2027
- Third year – prepare and publish a progress report – Complete June 1, 2028