

ACCESSIBILITY PLAN

GENERAL

EXECUTIVE SUMMARY

This document outlines The Group CSL Inc.'s ("CSL") Accessibility Plan (the "Plan"). As required by the *Accessible Canada Act* (the "Act"), not only does it sets out the measures CSL will undertake to include and give access to people with disabilities, but it also sets out the process CSL followed in preparing the Plan, its feedback process and the progress reports regarding the implementation of the Plan.

This Plan applies to CSL and all its affiliated companies located in Canada. It applies to all aspects of CSL's operations, including its procurement of goods, services and facilities, information and technology, communication, design and delivery of programs and services, transportation, and employment opportunities.

STATEMENT OF COMMITMENT

CSL recognizes its obligation to act responsibly towards people. As such, the organization is committed to building a culture of inclusivity and accessibility and prohibits discrimination based on disability. We outline our expectations for our employees in our Employee Handbook, but we are also committed to a barrier-free Canada for everyone; our employees, suppliers, clients and the public in general.

YOUR INPUT AND FEEDACK

We welcome feedback on accessibility and our Plan includes a feedback process so that employees and members of the public can share their ideas and input with us. To provide feedback on accessibility, use one of the contact methods below. If you require support while providing feedback, let us know, and we will do our best to accommodate your needs. If you provide your contact information, we are committed to responding to your feedback in a timely manner and in the format that we received it. You may also choose to provide feedback anonymously.

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| CONTACT | Dominique Cyr, Director of Human Resources |
| MAILING ADDRESS | 759 Square Victoria, 6 th Floor, Montreal, Quebec, Canada H2Y 2K3 |
| EMAIL | dominique.cyr@cslships.com |
| PHONE NUMBER | 514-982-3874 |

ETHICSPPOINT HOTLINE

EthicsPoint is a confidential, third-party reporting service available to anyone who would like to report any wrongdoing related to CSL anonymously.

Submit a report online at www.cslships.com/whistleblower-process or call toll-free in Canada and the United States at 1-866-384-4277.

Consult the website: www.cslships.com/whistleblower-process if calling from elsewhere in the world.

REPORTING ON OUR PLAN

As required by the Act, we will publish a status report every year that will outline our progress against our commitments. We will review and update our Plan every three years as contemplated by the legislation. Progress reports and updates to our Plan will be done in consultation with persons with disabilities, and when not applicable, with external organizations supporting people with disabilities.

ADDRESSING AREAS IDENTIFIED IN THE ACT

EMPLOYMENT

At CSL, diversity, equity and inclusion are at the core of our values and culture. We strive to foster workplaces where everyone is valued, appreciated and empowered to be who they are. We recognize that varied ideas, perspectives, abilities and backgrounds create a stronger and more creative work environment and company and bring us closer to our customers and the communities in which we operate.

CSL intends to continue to improve its practices when it comes to diversity, equity and inclusion, in view of creating an environment where people with disabilities have the same opportunity to succeed as other employees without disabilities. When applicable, we intend to clearly indicate if a position could be appropriate for persons with disabilities by adding an accessibility statement to our postings.

CSL currently offers a wide range of learning resources that target diversity and inclusion in the workplace. We strive to enrich our offer by adding training specifically on the notion of unconscious bias in different contexts, including during the recruitment & selection process. We recognize that our managers and employees are at the core of how we can create an inclusive workplace for all, including for people with disabilities. Therefore, we intend to continue to train our workforce in order to build awareness towards people with disabilities.

As part of the actions that CSL has already undertaken, its hire documentation now includes a few questions to enable a better identification of employees with disabilities, for those who so wish to declare their situation, in view of determining how CSL can better accommodate them.

Barrier 1

CSL has limited resources, both human and material, that are dedicated to the employment processes and related accessibility actions.

Actions

As we have limited resources, we intend to establish solid partnership with external organizations to support CSL in identifying and implementing actions related to our Plan.

Barrier 2

At CSL, many of our onboard positions require a Transport Canada Medical certificate with very specific physical and medical requirements. Onboard a vessel, many safety measures must be respected to ensure the highest standards when it comes to the wellbeing of the crew. When hiring for these positions, the candidates must have successfully completed their medical exam with Transport Canada.

Actions

CSL intend to conduct an analysis of the onboard work environment to identify potential positions where we could accommodate certain disabilities. However, for the time being, emphasis will be put on office positions when it comes to accessibility.

BUILT ENVIRONMENT

CSL office employees work at different locations. Most of our office employees work at our head office in Montreal, where we are tenants of the building. We have completed a construction project in 2020 which allows us to offer a range of workstations based on activity base work. We offer closed offices, open workstations, moveable tables and collaboration tables.

A group of office employees is in Halifax, where we are also tenants of the building. There are several medical clinics in the same building and hence, CSL office is accessible for people with a physical disability, including restrooms.

In addition, we own a warehouse in Ste-Catharines. We are aware this facility does not offer the requirements to accommodate a person with reduced mobility. This barrier is due to older infrastructures that were constructed prior to the current accessibility standards.

Other CSL built environments are our vessels. Most of CSL's employees work on one of our vessels. All CSL's vessels are maintained to Transport Canada Marine Safety regulations and safety standards. Vessels are inspected by Class Societies that are all International Association of Class Society members on behalf of Transport Canada, to ensure compliance with all marine regulations and codes. The company safety Management system is audited to verify compliance with the International Safety Management Code.

CSL vessels carry cargo, not people (other than the ship crew members). Under Transport Canada requirements, seafarers must have at all times a valid Marine Medical Certificate to be able to work on a vessel. This requirement is to ensure that employees can perform both routine and emergency duties safely and are not at risk of needing immediate medical care. When assessing a seafarer's fitness for duty, a Transport Canada certified medical 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 limits CSL abilities to recruit people for vessels operations.

Desired outcomes

The desired outcome is to ensure that all working environments are accessible to people with disabilities.

Barrier 1

Head office (Montreal):

The head office (Montreal) building is accessible for people with wheelchairs. However, the entrance doors to our offices are not automated. There is a bathroom large enough for people with disabilities, but again, the door is not automated.

Actions

Following some discussions with the owner of the building, the owner is currently carrying out a study to automate bathroom doors for people with disabilities. This project should start next year.

Barrier 2

The St-Catharines' (MDC) facility is not accessible to employees or visitors with reduce mobility.

Actions

It is CSL's intention to conduct a workspace assessment of the Ste-Catharines building against current accessibility standards. This analysis will provide CSL with a clear understanding of the current state of the building and improvements needed to provide an accessible environment for all person with disabilities. This will namely mean modification of the building access with automated doors on its main entrances and sanitary facilities.

INFORMATION AND COMMUNICATION TECHNOLOGY

Desired outcomes

Ensure that the IT team is aware of the technological tools available to enable people with disabilities to communicate with CSL employees, either via telephone, computers, or other electronic equipment.

For the office location, CSL used Microsoft Teams communication platform. This platform provides a variety of accessible features that includes live captations, recording of meetings permitting participants to reply, add text, etc. These features help people with different abilities to participate and contribute to discussions and meetings.

On our ships, CSL uses technology such as electronic chart display and information systems (ECDIS), loading cargo programs and others. These programs are industry specific and consequently, the ability to adapt them is limited.

Barrier 1

CSL needs to evaluate all the available equipment and software so we can accommodate employees with disabilities.

Actions

The IT department will research the market to find and evaluate solutions that are available to assist any employee with a disability. The search will focus primarily on office positions and the necessary equipment.

CORPORATE COMMUNICATIONS AND MARKETING (OTHER THAN INFORMATION AND COMMUNICATION TECHNOLOGY)

Desired outcomes

When it comes to communicating both internally to employees and externally to diverse stakeholders, we strive to ensure that our approach and tone, and the channels and platforms we use, are inclusive and accessible to individuals with diverse abilities. This includes creating an environment where employees with disabilities can fully participate in all aspects of corporate communications, from internal memos and training materials to external marketing and customer communications.

Barrier 1

CSL's corporate communications tools, resources and practices, including emails, documents, presentations, websites and other printed and digital communications and are not all designed with accessibility in mind, leading to the unintentional exclusion of individuals with disabilities.

Actions

- Adopt and adhere to international accessibility standards such as WCAG (Web Content Accessibility Guidelines in its latest version) for digital communications, ensuring content is perceivable and understandable for all.
- Implement fully inclusive and accessible formats including fonts and text sizes for readability, HTML for web content, tagged PDFs with alternative text, captions and audio description for videos, contrast for colors, proper heading structures, braille format.
- Integrate inclusive design practices into the development of all communication materials, considering the diverse needs of employees with disabilities from the outset.
- Regularly evaluate and update communication technologies and platforms to ensure compatibility with assistive technologies.
- Establish feedback mechanisms to gather input from employees with disabilities on the accessibility of communication materials and use this feedback to continually improve accessibility.

Barrier 2

Many employees may not be fully aware of the specific needs and challenges faced by individuals with disabilities when communicating internally or externally and may inadvertently exclude those individuals or fail to communicate adequately.

Actions

- Develop and communicate clear “Accessible Communications Guidelines” to all employees, emphasizing CSL’s commitment to creating an inclusive communication environment.
- Conduct awareness training sessions for employees to educate them about the importance of accessibility and how to create accessible communications.

PROCURING GOODS, SERVICES AND FACILITIES

CSL will ensure that accessibility is considered in our buying process and will aim at identifying existing barriers in our actual 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.

Desired outcomes

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

Barrier 1

Lack of awareness of the need and benefits 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. Also, vendors and service providers often haven’t considered accessibility as part of their process.

Actions

CSL will explore a process by which all vendors of relevant products and services are to include accessibility considerations in their proposals. CSL will explore some training for its employees who are involved in the procurement of goods and services to be aware of accessibility considerations and what they should look for when accessing a vendor and reviewing what they are offering and most importantly, that they will abide by the requirements of the Act.

DESIGNING AND DELIVERING PROGRAMS AND SERVICES

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

Desired outcomes

When designing and delivering the Company’s internal and external programs and services, accessibility considerations must be part of the process.

Barrier 1

There has not been an assessment on current programs and services to evaluate their level of accessibility. Accessibility is not thoroughly considered when new programs and services are put in place.

Actions

CSL will conduct a review of current programs and services to determine the current level of accessibility, CSL will insure accessibility feature are incorporated into all new programs and services prior to implementation and that all new programs and services created in the future will have consideration for accessibility.

TRANSPORTATION

CSL does not coordinate a transportation system, or a fleet of transportation as defined in the Act. Hence the standards for transportation are not in scope of this plan.

Our consultation process

CSL has no employee who is known to CSL to have a disability. We gathered feedback and input from our team members and external organizations in several ways; internal survey, focus group and roundtable discussions, discussions with organizations representing the interests of people with disabilities and we have read reports and studies prepared by such entities.

We will continue to consult with our employees, including those with disabilities when in their presence, and any working groups that have been consulted to prepared this Plan, in view of measuring our progress an ensure that we realize the changes we've set out to achieve.

DEFINITIONS

Accessibility

Refers to the needs of persons with disabilities being intentionally and thoughtfully considered when product, services and facilities are built or modified so they can be used and enjoyed by persons of all abilities.

Barrier

The *Accessible Canada Act* defines a barrier as “anything – including 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 persons with an impairment including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation.”

Disability

The *Accessible Canada Act* defines a disability as “any impairment, – including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation – whether permanent, temporary or episodic in nature, or evident or not, that, interaction with a barrier, hinders a person’s full and equal participation in society.”