Scoular Canada Accessibility Plan

General

At Scoular Canada ULC ("Scoular Canada") we are committed safety, integrity and upstanding business conduct. As a business organization, we do what is right, not just easy or allowable. We strive to demonstrate our commitment to integrity and ethics, by complying with the law and treating our coworkers and others with respect and dignity.

With guidance from the Accessible Canada Act ("ACA") and the Accessible Canada Regulations ("Regulations"), Scoular Canada has developed this Accessibility Plan. We believe this Accessibility Plan will guide our organization in meeting our accessibility commitments to ensure we are including everyone as an inclusive organization.

Contact Information & Feedback

Scoular Canada welcomes feedback on our Accessibility Plan and on any barriers encountered. Please send your feedback to our Human Resources Manager.

You can send your feedback by email, phone or mail using the contact information below. We will respond to all feedback in a timely manner. If you require support while providing feedback, please let us know so we can do our best to accommodate your needs.

You can use the contact information listed below to ask us for a copy of our Accessibility Plan and our feedback process description in these **alternate formats**: print, large print, Braille, audio or an electronic format that is compatible with adaptive technology that is intended to assist persons with disabilities. We will provide the format you ask for as soon as possible. Braille and audio formats may take up to 45 days. Print, large print and electronic formats may take up to 20 days.

Contact Us:

Email: Kyle Gier, KGier@scoular.com, Human Resources Manager

Phone: 612-851-3772

Mail (publicly accessible business): 250 Marquette Avenue, Suite 1050, Minneapolis, MN

Alternative formats of this plan can be requested through the above channels.

Consultations

How we consulted persons with disabilities

Scoular Canada consulted with employees through an anonymous online survey. Through the survey, employees were able to indicate if they identified as a person with disabilities. The survey further asked that employees share their experiences regarding any barriers they encountered with Scoular Canada. All employees, including those that identified as having disabilities, were encouraged to provide feedback on how Scoular Canada can improve accessibility.

Areas in Section 5 of the ACA

Employment

Currently, Scoular Canada's job postings don't mention our commitment to accessibility and inclusion or explain how to ask for disability-related accommodations.

Additionally, we don't currently require all managers and human resources (HR) staff to take training on accessibility.

Action:

We will add text to all our job postings that mentions our commitment to accessibility and inclusion, and that tells applicants how to ask for accommodations. We will include examples of accommodations in our hiring process, such as providing a sign language interpreter for a job interview or giving someone extra time for a written exam. We will start including this text in our job postings within six (6) months.

Further, we will require all managers and HR staff to take accessibility training within six (6) months. The training will explain the need to provide employees with disabilities with equal opportunities to advance in their careers.

The Built Environment

Through our consultations with employees, we received feedback that there is an office location where the second floor is not accessible to persons with physical / mobile disabilities. It was further identified that some plant locations may have limited access to those with physical / mobile disabilities. We also received feedback that lighting and noise can sometimes present barriers in our office locations.

Our consultations also revealed that our employees feel that assistive technology, such as automatic door openers, may be beneficial to those with disabilities.

Action:

We will review/identify and remove barriers in the built environment where possible.

We will ensure our office locations offer focus-friendly accommodations like designated quiet/comfort spaces and soft lighting options.

Additionally, Scoular Canada has employees that are working in various office locations with some employees working from home. Our consultations with employees described working from home as a helpful accommodation.

Information And Communication Technologies ("ICT")

Scoular Canada is committed to making accessible communications a priority. We want everyone to clearly understand the information we share and have easy access to information in formats that work for them. We do this by giving people the choice to communicate with us in the way that best meets their accessibility needs. In turn, we will reply by using their preferred method. The communication methods offered on our website are email, telephone, online help, and mail.

Our marketing team works diligently to create an environment that is both user friendly and adaptable. In examining our internal and external web platforms, from typography and readability to content layout, color and images, we understand that there is always room for improvement.

Action:

We will continue to consult with our marketing team to determine how we can best enhance existing tools and consider accessibility when designing new ones in order to provide accommodation to those who require it to navigate our internal and external web platforms.

Feedback from our web platform users regarding accessibility will be reviewed and actioned upon as we receive it.

Communication, Other Than ICT

Scoular Canada may engage in communication formats such as multimedia, including web content, and varying forms of written communication.

Action:

To ensure Scoular Canada's communications remain accessible to all, we will avoid jargon and complex syntax in our communications. Where available, we will provide subtitles, and upon request, we will provide descriptive audio, or sign language interpretation.

The Procurement of Goods, Services and Facilities

Scoular Canada purchases various goods, services and facilities that support our company operations. We are dedicated to promoting accessibility at the procurement stage and considering accessibility requirements when purchasing goods, services, and facilities from external vendors where appropriate.

Action:

When procuring goods, services, and facilities, Scoular Canada will consider accessibility at the beginning of the process to ensure that vendors/suppliers do not present a barrier to anyone who uses them. We will continue to review our policies on supplier conduct to ensure our vendors and suppliers facilitate accessibility and act in compliance with applicable laws where required.

The Design and Delivery of Programs and Services

Scoular Canada doesn't always consider accessibility when developing new programs and services.

Action:

When designing new programs, Scoular Canada will ensure that visually, the design and format is readable with content that is visually accessible. When available, we will make available content that can be accessible in other formats such as large print PDFs or text transcriptions, for example. We will also develop and promote guidelines on how to apply the accessibility lens when reviewing

company policies, programs and services and provide training on the Accessible Canada Act and Accessible Canada Regulations for those whose role is to develop programs, processes and procedures.

Transportation

This area under the Accessible Canada Act is not applicable to Scoular Canada as we do not offer transportation.

Conclusion

Scoular Canada will monitor and measure our process to make sure we are meeting our accessibility goals and removing the barriers that have been identified. Scoular Canada will continue to encourage feedback and any received feedback will be used to help Scoular Canada further implement our Accessibility Plan. In accordance with the requirements of the ACA, Scoular Canada will publish progress reports on the implementation of our Accessibility Plan.

Glossary (recommended)

Accessibility: The practice of making or ensuring that environments, services, and information are easily accessible, reached and usable to all people, regardless of ability. As it pertains to Scoular Canada's Accessibility Plan, accessible further relates to a person with a disability being afforded the same opportunity to access environments, services and information as independently as a person without a disability.

Under the ACA, the following definitions[1] apply:

Barrier: means 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. (obstacle)

Disability: means 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, in interaction with a barrier, hinders a person's full and equal participation in society. (*handicap*)

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[1] Accessible Canada Act, S.C. 2019, c. 10, Assented to 2019-06-21. Short Title, Interpretation, Definitions (2) https://laws-lois.justice.gc.ca/eng/acts/A-0.6/page-1.html#h-1153411.

Scoular Canada Accessibility Plan Progress Report 2025

Employment:

Scoular Canada recognizes the importance of fostering an inclusive and accessible workplace. At present, our job postings do not consistently reflect our commitment to accessibility and inclusion, nor do they provide clear instructions for applicants on how to request disability-related accommodations. Additionally, accessibility training is not yet a requirement for all managers and human resources (HR) staff.

We are continuing the process of updating our job postings to include a statement affirming our commitment to accessibility and inclusion. Concurrently, as we recognize the need for mandatory accessibility training for managers and HR personnel, this action item remains in progress as we work to establish an adequate training program that will emphasize the importance of equitable career advancement opportunities for employees with disabilities.

The Built Environment:

We continue to make progress in this action area, advancing initiatives to enhance accessibility across our operations. We have begun the process of identifying barriers in our built environments; however, ongoing additional work remains to fully achieve our objectives. We remain committed to completing this action area and are actively addressing the necessary requirements to ensure successful implementation in accordance with the timeline presented.

Information And Communication Technologies ("ICT")

This action item is actively in progress and will remain a continuous area of focus. We are working with our marketing team to assess and enhance the accessibility of our internal and external web platforms. This includes ongoing evaluations of typography, readability, content layout, color contrast, and image use to ensure a user-friendly and adaptable digital environment.

We continue to offer multiple communication methods on our website—email, telephone, online help, and mail—and we respond using the method preferred by the individual.

We are also committed to reviewing and acting on feedback from users regarding the accessibility of our web platforms. This feedback is an essential part of our improvement process and helps guide future enhancements.

Communication:

Scoular Canada continues to uphold its commitment to accessible communication across all non-ICT formats, including multimedia content and written materials.

This action item remains active and continues as originally stated. We are consistently applying plain language principles in our communications by avoiding jargon and complex syntax to ensure clarity and inclusivity.

Where applicable, we are providing subtitles for multimedia content, and we remain prepared to offer descriptive audio or sign language interpretation upon request. These practices are now embedded in our communication processes and will continue to be applied to future content.

Scoular Canada remains dedicated to ensuring that all individuals can access and understand our communications, and we will continue to improve our practices as new needs and opportunities arise.

Procurement:

Scoular Canada continues to integrate accessibility considerations into our procurement processes to ensure that the goods, services, and facilities we acquire do not create barriers for individuals with disabilities.

This action item remains ongoing and continues as originally stated. Accessibility is considered at the outset of procurement activities, and we are actively reviewing our supplier conduct policies to ensure alignment with accessibility standards and applicable legislation.

We remain committed to working with vendors and suppliers who support inclusive practices and contribute to an accessible environment for all users. This commitment is embedded in our procurement approach and will continue to guide our decision-making moving forward.

Design and Delivery of Programs:

Scoular Canada is actively working to integrate accessibility into the design and development of new programs and services. We recognize the importance of ensuring that all content and formats are accessible to individuals with diverse needs.

This action item remains in progress and ongoing. When developing new programs, we are prioritizing visual accessibility by ensuring that design and formatting choices support readability and clarity. Where possible, we are making content available in alternative formats such as large print PDFs and text transcriptions. We are also in the process of developing internal guidelines to help staff apply an accessibility lens when reviewing or creating company policies, programs, and services. In addition, training on the Accessible Canada Act and Accessible Canada Regulations to employees involved in program and process development remains under consideration for completion.

Transportation:

We confirm this area under the Accessible Canada Act remains not applicable to Scoular Canada as we do not offer transportation.