SULTRAN Ltd. & PACIFIC COAST TERMINALS Co. Ltd.

2026 Accessibility Progress Report

GENERAL

Summary

Sultran Ltd. and Pacific Coast Terminals Co. Ltd. ("Sultran/PCT") have made significant progress toward the accessibility goals set out in our Accessibility Plan. Our Accessibility Plan consisted of 10 goals with 21 associated actions. Of these, we have:

- Completed 13 action items
- Made progress on 3 items
- Have 5 pending action items

Accessibility Statement

We are dedicated to contributing to a barrier-free Canada where every individual, including those with disabilities, can thrive and access equal employment opportunities. We are committed to actively identifying, preventing, and eliminating obstacles faced by individuals with disabilities in our workplace.

Feedback

Sultran/PCT is committed to providing a receptive and transparent feedback process, including the option to provide feedback anonymously.

We have a designated person and established process to receive and address any feedback you may have for us about accessibility:

- Contact: People and Culture Advisor
- By telephone: +1 (403) 265-1486
- By e-mail: HRAdminmail@sultran.com
- Through our websites: https://pct.ca/sustainability/, https://www.sultran.com/sustainability/
- By regular mail:

  Attn: People and Culture Advisor
  600 Bow Valley Square 2
  205 - 5th Avenue SW
  Calgary, Alberta, Canada T2P 2V7

By using this contact information, employees, customers, and members of the public can send us:

- A request to receive this plan in an alternative format (see *Alternative Formats*)
- A request to receive the description of our accessibility feedback process
- Your feedback on accessibility

Alternative Formats

Sultran/PCT's Accessibility Plan and a description of our accessibility feedback process will be made available in the following alternative formats:

- Print
- Large print
- Electronic format
- Braille
- Audio format

- Other formats compatible with adaptive technology that are intended to assist persons with disabilities

Requests for print, large print, and electronic formats will be fulfilled within 20 days from the date of your request and requests for Braille and audio formats will be fulfilled within 45 days.

Alternative formats of Sultran/PCT's Accessibility Plan can be requested by email at hradminmail@sultran.com, by phone at +1 (403) 265-1486, or anonymously through our online form submission https://pct.ca/sustainability/

For more information, we encourage you to visit our website: sultran.com or pct.ca

PRIORITY AREAS

Area 1: Employment

Our Accessibility Goal

Sultran/PCT aims to foster an inclusive and equitable workplace environment where all employees, including those with disabilities or requiring accommodations, have equal access to opportunities for recruitment, onboarding, career progression, and professional development. This will be achieved through the implementation of clear accommodation policies, ongoing training on diversity, equity, and inclusion, and the promotion of a respectful workplace culture, ultimately ensuring that all employees can thrive and contribute to the company's success.

ACTIONS

Commitments:

1. Emphasize our ability and willingness to provide accommodations during the recruitment and onboarding process by:

    1.1. Developing and implementing an Accommodation Policy and request process in recruitment (i.e., application, interview, and assessment processes), onboarding, and training to make sure that the accommodation request option is explicitly available to candidates and employees.

    Status: Complete 2025

    Action: Created an Accommodation Policy that was rolled out to staff in February 2025.

2. Further our commitment to reducing bias in all employment practices and career progression opportunities by ensuring a thorough understanding and non-biased approach to performance management through training by:

    2.1. Finalizing and publishing Sultran/PCT's Respectful Workplace Policy internally and including a link to the policy on all job ads as part of our equal employment opportunity statement.

    Status: Complete 2025

    Action: Update to website complete, and updates to recruitment materials (including job postings) complete.

    2.2. Researching and creating a plan to provide training for managers and employees with a focus on Diversity, Equity and Inclusion that engages people with lived experience to inform on accessibility and the removal of barriers in the workplace.

    Status: Not Started

    Action: Requires completion of other aspects of the Accessibility initiatives before a full training program can be developed.

    2.3. Developing a campaign that promotes and encourages all employees to develop and build their careers at Sultran/PCT.

    Status: Not Started

Action: A focus for next year as we continue to grow our business and assess the needs of the organization.

Area 2: Built Environment

Our Accessibility Goal

Our goal is to create accessible physical spaces across all Sultran/PCT's locations, fostering inclusivity and ensuring equitable access for employees, visitors, and guests. This goal will be achieved through the integration of accessible design principles, wherever possible, in all renovation and construction projects, the implementation of safety and security measures that consider the needs of individuals with disabilities and sensitivities, and the ongoing commitment to identify and address accessibility barriers in existing facilities.

ACTIONS

Commitments:

1. Enhance accessibility wherever possible at PCT location by:

    1.1. Removing scented complimentary toiletries from washroom facilities and replacing them with unscented products.

    Status: Complete 2025

    Action: Replaced scented hygiene items and sent a notice communicating the no-scent policy.

    1.2. Implement accessible design within the parameters of our existing renovation project.

    Status: Complete 2025

    Action: Enhancements made throughout the building including automatic door functionality on all washrooms and major capital improvements to the main entrance of the Port Moody facility. These important upgrades will better accommodate access for persons with mobility issues.

    1.3. Investing in the installation of high-contrast, tactile signage throughout the office spaces at Pacific Coast Terminals.

    Status: Complete 2025

    Action: Signage installed as per specifications and recommendations.

2. Further our commitment to Health & Safety by ensuring all employees and guests have access to safety and security information throughout PCT in Port Moody by:

    2.1. Identifying, budgeting, and planning training opportunities for floor/area wardens to support people with all types of disabilities in the case of an emergency.

    Status: Not Started

    Action: Training program to be developed as other areas of actions within the Accessibility plan are completed.

3. Identify areas for improvements at our Calgary Headquarters by:

3.1. Conducting an accessibility audit of the Calgary office building in collaboration with the building owner to identify possible renovations and timelines for upgrades.

Status: Complete 2025

Action: Meeting with the building representatives occurred in late 2024, and consultations will continue with any ongoing upgrades.

3.2. Upon the expiration of the current office lease in 2027, ensure that prospective future office spaces in Calgary comply with Alberta's building standards for accessibility. Priority will be given to selecting spaces that maximize accessibility and compliance to the province's accessible building standards.

Status: Not Started

Action: Current office lease expires in 2027, and future office spaces will not be explored until late 2026.

Area 3: Information and Communication Technologies (ICT)

Our Accessibility Goal

One way to achieve our accessibility goals is to remove barriers to ICT. To do so, we will identify and address barriers found in our ICT systems, such as on our websites, networks, proprietary software systems, computer systems, and other technologies used at Sultran/PCT to conduct our day-to-day business.

ACTIONS

Commitments:

1. Ensure employees are aware of accessibility features available to them through the various internal ICT systems and tools by:

1.1. Ensuring that digital and information technology accommodations are explicitly included as part of Sultran/PCT's new Accommodation Policy and Request Process.

Status: Complete 2026

Action: Final approvals received and included in existing policies.

1.2. Conduct an audit of Sultran/PCT's existing ICT systems and tools, where available, to determine the current level of accessibility available to employees within each program.

Status: Complete 2026

Action: Assessment complete, and guide created and provided to all employees.

1.3. Creating an "Accessibility Tools" guide for employees to be shared during onboarding and orientation.

Status: In progress

Action: Draft provided and Corporate Services to operationalize by Summer 2026.

2. Increase accessibility in our ICT systems in consultation with professionals with lived experience of disabilities by:

   2.1. Launching new website for Sultran and PCT using WCAG 2.1 AA standards and current web development technologies.

   Status: Complete 2025

   Action: New technologies will use these standards, as confirmed by our external providers and consultants.

   2.2. Incorporating WCAG 2.1 AA standards into the design of our new employee intranet and Orion (internally developed software) by June 2026 and new websites for Sultran and PCT, wherever possible.

   Status: In progress

   Action: New technologies will use these standards, as confirmed by our external provider. Further work on the intranet is required, and follow-up is expected in fall 2026.

Area 4: Communication, other than ICT

Our Accessibility Goal

Using accessible design and plain language, Sultran/PCT's goal is for all company communications to be accessible and inclusive, fostering equal understanding and participation for individuals of all abilities. We aim to break down communication barriers and create a more equitable experience for employees, contractors, customers, union workers, and members of the public.

ACTIONS

Commitments:

1. Incorporate principles of accessible design into our formal communication and brand standards by:

   1.1. Review Sultran/PCT's Communication and Brand Guidelines to identify areas where improvements can be made in the use of plain language and accessible design.

   Status: Complete 2025

   Action: Worked through these parameters when working with our design team and updating current branding.

   1.2. Providing employees, union workers, and customers with the opportunity to request accommodations related to communications and training materials.

   Status: Complete 2025

   Action: Has been incorporated as part of our onboarding process and we've redone our site orientation video that is shown to all staff and visitors. There is continued work being done to also update websites, and training sessions accordingly.

Area 5: Procurement of Goods, Services, and Facilities

Our Accessibility Goal

Sultran/PCT's goal is to establish inclusive procurement practices that promote accessible governance among our vendors and prioritize accessibility and barrier-free options when purchasing goods, services, and facilities.

ACTIONS

Commitments:

1. Ensure good accessibility governance by updating the formal Procurement Policy to integrate accessibility standards into the procurement process by:

    1.1. Developing and publishing a new Procurement Policy that prioritizes the selection of goods, services, and facilities that offer barrier-free options or promote accessibility.

    Status: In progress

    Action: Project guidelines have been set. Further review anticipated for June 2027.

    1.2. Providing all employees responsible for procurement with training on the new policy and how to identify accessible design.

    Status: Not Started

    Action: Pending completion of 1.1 above.

Area 6: Design and Delivery of Programs and Services

Our Accessibility Goal

We aim to enhance our customer service and program design and delivery by fostering and providing our staff with the knowledge and skills to address the diverse needs of our customers and their employees.

ACTIONS

Commitments:

1. Provide guidance and support related to removing barriers in customer engagement through the delivery of programs and services by:

    1.1. Work with HR to include customer-facing employees in the Diversity, Equity and Inclusion training plan (see Employment: Commitment 2).

    Status: Complete 2026

    Action: Enhanced wheelchair accessibility, updated the orientation video, installed braille signage, and increased accessible parking options.

Area 7: Transportation

Our Accessibility Goal

Our goal is to ensure that all visitors and guests to the Pacific Coast Terminals and other sites where we operate, can be safely transported between and on location.

ACTIONS

Commitments:

1. Implement a plan to replace Sultran/PCT's current transportation options with at least one accessible option for visitors by:

    1.1. Implement a plan to extend Sultran/PCT's accommodation request process to visitors who require accessible transportation options and ensure options are available on an as-needed basis.

    Status: Complete 2025

    Action: Options assessed, and accessibility vehicle to replace existing passenger van for when transporting visitors on site.

FEEDBACK

In the first year following the publication of the Sultran/PCT Accessibility Plan, we have not received any feedback from employees, customers, or the general public. As such, we have been unable to incorporate any feedback into our first Progress Report.

We will continue to work with our accessibility working group to ensure we are actively seeking feedback whenever possible.

CONSULTATIONS

Summary

The concept of "Nothing About Us Without Us" supports the principle that persons with disabilities must be involved in the development of Sultran/PCT's plan to help us identify opportunities to advance accessibility in our policies, procedures, and built environment. We consulted with the British Columbia Centre for Ability (BCCFA) in the development of our Accessibility Plan.

Consultation Process

In May 2025, we met with the Associate Director of the Accessible Employers Association for a follow-up review of our progress and to discuss the impact and significance of our goals toward creating an accessible workplace and experience for our employees, customers, and the public.

Results

Results of our sessions will be communicated in future progress reports as we continue to engage in our consultation process.

Future Consultations

Future versions of Sultran/PCT's Accessibility Plan will place greater emphasis on conducting a more comprehensive consultation process to fully align with the concept of "Nothing About Us Without Us." Our goal is to engage broader consultation mechanisms with organizations, employees, and customers through testimonials and storytelling, feedback surveys, and facilitated consultative sessions. We recognize that the more robust our consultation phase is in future republications of our plan, the more likely it is that barriers will be identified and meaningful progress on accessibility, as well as equity, diversity, and inclusion, will be achieved.