

FULLER GROUP OF COMPANIES AND SEMPER PARATUS MANAGEMENT	
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Accessibility Policy

This policy is consistent with the Integrated Accessibility Standards made under the *Accessibility for Ontarians with Disabilities Act, 2005*, as amended from time to time (the “AODA”), and which apply to the Fuller Group of Companies and Semper Paratus Management (together, the “Employer” or “Company”).

Purpose

Employer is committed to provide and maintain:

- An accessible environment;
- Accessible delivery of service; and
- Accessible and equitable employment practices.

We are committed to meeting the needs of people with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and by meeting the accessibility requirements under the *AODA*.

The Employer will use reasonable efforts to ensure that the policies, practices, and procedures governing the provision of its services to persons with disabilities are consistent with the following principles:

- Services are provided in a way that respects the dignity and independence of persons with disabilities;
- Reasonable efforts will be taken to ensure persons with disabilities can benefit from the same services, in the same place, and in a similar way to others;
- Persons with disabilities have opportunities equal to others to obtain, use, and benefit from the Employer’s services; and
- When communicating with persons with disabilities, the Employer will consider the person’s disability.

Scope

This Policy applies to all hourly, salary and unionized employees of the Employer, and to all Employer’s services that are provided externally to the public or to third parties. \

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Definitions

For the purpose of this policy, the “**Employer**” or “**Company**” includes:

Semper Paratus Management Inc.
Thomas Fuller Construction Co. Limited
2050190 Ontario Ltd.
Metcalf Realty Company Limited (“MRCL”)
Tall Ships Landing Developments (Division of MRCL)
Fuller Marine Services (Division of MRCL)
Just Right Self Storage (Division of MRCL)
Metview Realty Limited

Disability means:

- a) Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, blindness or visual impairment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device;
- b) A condition of mental impairment or a developmental disability;
- c) A learning disability, or a dysfunction in one or more of the processes involved in understating or using symbols or spoken language;
- d) A mental disorder; or
- e) An injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

Guide dog means a dog trained as a guide dog for a person who is blind.

Service animal means an animal for a person with a disability where the animal can be readily identified as one that is being used by the person for reasons relating to their disability (as a result of visual indicators, such as the vest or harness worn by the animal, or where the person provides a letter from a designated regulated health professional confirming that they require the animal for reasons relating to the disability).

Support person means, in relation to a person with a disability, another person who accompanies them in order to help with communication, mobility, personal care or medical needs, or with access to goods and services.

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Policy

1. Assistive Devices:

We are committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our services. We will make all reasonable efforts to ensure that our employees are trained and familiar with various assistive devices that may be used by people with disabilities while accessing our services.

2. Service Animals:

A person with a disability is welcome to be accompanied by a guide dog or other service animal when on the Company's premises. In the event that a service animal is excluded by law from the premises, the Company will make all reasonable efforts to ensure other resources or supports are available to enable the person with a disability to obtain, use or benefit from the services offered by the Company. It is the responsibility of the person using the service animal to ensure that the service animal is kept under control at all times.

3. Support Persons:

A person with a disability may enter the Company's premises with a support person and be accompanied by the support person while on the premises.

The Company does not charge fees for support persons or, if fees are charged for admission to the premises (e.g., for a special event), the Company shall provide notice of the amount in advance.

The Company may require a person with a disability to be accompanied by a support person when on the premises but only if, after consulting with the person with a disability and considering the available evidence, the Company determines that a support person is necessary to protect the health and safety of the person with a disability or the health and safety of others on the premises, and there is no other reasonable way to protect the health and safety of the person with a disability or others on the premises.

4. Accessible Communication and Information:

The Company is committed to meeting the communication needs of people with disabilities. We will communicate with people with disabilities with sensitivity and in ways that consider their disability. We are available to answer any questions clients or others may have in person, by telephone, or via email.

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The Company will post a notice on its website notifying the public of the availability of a) this policy and b) accessible formats and communication supports. When asked, we will arrange for the timely provision of accessible formats and communication supports where necessary, at no additional cost. This includes publicly available information about our services, as well as publicly available emergency information, this policy, and any feedback processes that may be offered from time to time. We will consult with people with disabilities to determine their information and communication needs.

5. Employment:

The Employer is committed to fair and accessible employment practices.

We will notify applicants through any job posting that, when requested, the Employer will accommodate people with disabilities during the recruitment, assessment, and selection process, and when employees are hired. We will consult with people with disabilities to determine their employment-related accommodation needs.

The Employer will notify successful applicants of our accommodation policies at the time they are offered employment and will provide updated information to employees whenever there is a change to the Company's policies, practices or procedures governing the accommodation of employees with disabilities.

When asked, the Employer will provide accessible formats and communication supports for information necessary for employees with disabilities to do their job, and for information that is generally available to all employees. We will consult with employees with disabilities when we are requested to provide accessible formats and communication supports, in order to determine the suitability of same.

When necessary, the Employer will provide employees with disabilities with individualized emergency response information as soon as practicable after the Employer becomes aware of the employee's need for accommodation due to disability. Individualized emergency response information, if any, will be reviewed if the employee changes work locations, when the employee's accommodation needs are reviewed, and whenever the Employer reviews its general emergency response policies.

The Employer will consider the accessibility needs of employees with disabilities when using its performance management and career development and advancement processes, if any. We will create a return-to-work process and plan for employees who have been absent from work due to a disability.

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6. Notice of Temporary Disruption:

The Company will notify the public in the event of a planned or unexpected disruption in the facilities or services usually used by persons with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

The notice will be clearly posted at the main entrance of the affected Company's location or communicated by such method as is reasonable in the circumstances (e.g., on Company's website). It is recognized that the ability to provide appropriate notice of a disruption may be limited in cases of an emergency causing the temporary disruption.

7. Training for Employees:

The Employer is committed to provide and utilize courses from the Provincial government, as part of a training program, to train its employees, any volunteers or cooperative education students, and any other individuals who provide services to the public on Employer's behalf, as well as its employees who participate in developing policies, practices and procedures governing the provision of services to the public, on the provision of its services to persons with disabilities. The training will be provided as soon as practicable after an individual commences their duties, and will include the following topics:

- The purpose of the *AODA*;
- The requirements of the Integrated Accessibility Standards;
- Company's policies, practices and procedures relating to the Integrated Accessibility Standards, as are relevant to the employee's work responsibilities;
- How to interact with persons with various types of disabilities;
- How to interact with persons who use an assistive device or require the assistance of a guide dog, service animal or support person;
- How to use any equipment or devices available within the Company that may help with the provision of services to persons with disabilities;
- What to do if a person with a disability is having difficulty accessing Company's services; and
- The Ontario *Human Rights Code* as it pertains to persons with disabilities.

The Employer will provide training on an ongoing basis whenever changes are made to Company's policies, practices or procedures governing the provision of services to persons with disabilities.

Training will be provided in a way that best suits the duties of employees.

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8. Feedback Process:

The Company welcomes any feedback regarding the methods it uses to provide services to persons with disabilities, and this feedback process itself. Individuals may provide their feedback in person, by telephone, in writing or by email to the Human Resources Manager.

Every complaint received will be reviewed and assessed, and directed to the appropriate person for action, if necessary. Where possible, the issues in the complaint will be addressed. If a complaint cannot be addressed, the person making the complaint will be advised.

The Company will make all reasonable efforts to ensure that this feedback process is accessible to people with disabilities. Accessible formats and communications supports will be provided upon request, at no additional cost, and the Company will post a notice on its website notifying the public of this feedback process, and of the availability of accessible formats and communication supports.

9. Design of Public Spaces

The Company will comply with the Accessibility Standards for the Design of Public Spaces if it makes any major modifications to its existing public spaces, such as the reception desk or waiting area, or any other public space covered by that Accessibility Standard.

Modifications to This or Other Policies

Changes will not be made to this policy unless the impact of the changes on persons with disabilities has been considered.