BROADGRAIN COMMODITIES INC. - ACCESSIBILITY PLAN

Multi-Year Accessibility Plan 2026–2030

Effective period: 2026–2030
Organization: BroadGrain Commodities Inc.
Applicable jurisdiction: Ontario, Canada
Plan owner: Human Resources Director
Approval date: October 14, 2026
Publication date: October 26, 2026
Review cycle: At least once every five years, and sooner where appropriate or required by changes in legislation, business practices, or identified accessibility barriers.

1. GENERAL

Statement of Commitment

BroadGrain Commodities Inc. ("BroadGrain" or the "Company") is committed to meeting its obligations under the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA), the *Integrated Accessibility Standards Regulation* (Ontario Regulation 191/11), the *Ontario Human Rights Code* as it relates to persons with disabilities, and other applicable accessibility and human rights legislation.

BroadGrain values an inclusive, accessible, and diverse workplace. We are committed to identifying, preventing, and removing accessibility barriers so that persons with disabilities can participate as fully and equitably as possible in our workplace and in their interactions with the Company.

We recognize that accessibility is an ongoing responsibility. We will continue to review our policies, practices, facilities, communications, and technologies to identify opportunities for improvement and meet the accessibility requirements applicable to our operations.

Accessibility Policies

BroadGrain maintains written accessibility policies describing how the Company achieves or will achieve accessibility by meeting applicable requirements under the AODA and its regulations. These policies include a statement of the Company's commitment to meeting the accessibility needs of persons with disabilities in a timely manner.

The Company will review and update its policies as needed to reflect changes in legislation, organizational practices, or identified accessibility barriers.

BroadGrain will make its written accessibility policies publicly available, notify employees and the public about their availability and how to access them, and provide the policies in an accessible format upon request, as required by law.

Feedback Process

BroadGrain considers feedback an important part of identifying and removing accessibility barriers. The Human Resources Director is responsible for ensuring accessibility-related feedback is received, reviewed, and directed to the appropriate individuals for consideration and follow-up.

Individuals may provide feedback through the following channels:

- **Anonymous feedback:** Through the Accessibility Form on the BroadGrain website, where available.
- **Mail:**

  Human Resources Director
  BroadGrain Commodities Inc.
  20 Adelaide Street East, Suite 900
  Toronto, Ontario M5C 2T6
  Canada

- **Email:** hrgroup@broadgrain.com
- **Telephone:** +1 877.804.0070 or +1 416.504.0070
- **Fax:** +1 416.504.0080

BroadGrain will review feedback to identify potential barriers and opportunities for improvement. Where appropriate, corrective actions will be assigned and monitored.

Information about the feedback process will be made available to the public. BroadGrain will provide accessible formats and communication supports for information about the feedback process upon request, as required by applicable legislation.

Accessibility Training

BroadGrain will provide training in accordance with the applicable accessibility standards under the AODA and the *Ontario Human Rights Code* as it relates to persons with disabilities.

Training will be provided to:

- All employees and volunteers, where applicable.
- Individuals involved in developing the Company's accessibility policies.
- Other individuals who provide goods, services, or facilities on behalf of BroadGrain, as applicable.

Training will be appropriate to each individual's duties and responsibilities and provided as soon as practicable. Additional training will be provided when relevant accessibility policies change.

BroadGrain will maintain the training records required by law, including the dates training is provided, the number of individuals trained, and the names of individuals trained.

The Human Resources department will periodically review training records to identify outstanding training requirements and ensure that appropriate personnel receive required training.

2. EMPLOYMENT

BroadGrain is committed to fair and inclusive recruitment, employment, and career development practices that respect the abilities and contributions of persons with disabilities.

Identification and Removal of Barriers

BroadGrain recognizes that barriers may arise during recruitment, onboarding, workplace communications, job performance, career development, and other aspects of employment.

The Company will review its employment practices to identify and address accessibility barriers. This includes, where applicable:

- Providing information about the availability of accommodation during recruitment and selection.
- Notifying successful applicants of applicable accommodation policies.
- Providing workplace accommodations in accordance with applicable requirements and the *Ontario Human Rights Code*.
- Providing accessible formats and communication supports for workplace information when required.
- Developing and documenting individual accommodation plans where required.
- Providing individualized workplace emergency response information when required.
- Maintaining and following an appropriate return-to-work process for employees returning from disability-related absences where required.
- Considering accessibility needs during performance management, career development, advancement, and redeployment.

Prevention of New Barriers

BroadGrain will periodically review recruitment materials, interview practices, job descriptions, and employment procedures to identify potential barriers.

Managers and Human Resources personnel will be encouraged to consider accessibility when making employment-related decisions and responding to accommodation requests.

BroadGrain will provide guidance to managers and employees regarding accessibility responsibilities and available accommodation processes.

Responsibility: Human Resources, with support from managers and other relevant departments.

3. THE BUILT ENVIRONMENT AND ACCESSIBLE ELEMENTS

BroadGrain recognizes the importance of physical environments that support safe, independent, and equitable access for persons with disabilities.

Identification and Removal of Barriers

Where BroadGrain owns, leases, or controls workplace premises, it will consider accessibility when reviewing the physical work environment, facilities, equipment, and tools used by employees and visitors.

Where appropriate, BroadGrain will work with landlords, property managers, contractors, and service providers to address accessibility barriers within its control or responsibility.

Reviews may consider:

- Accessible routes and entrances.
- Doorways, corridors, and circulation areas.
- Access to meeting rooms and other workplace facilities.
- Signage and wayfinding.
- Accessible washrooms and other relevant facilities.
- Workplace equipment and tools where accessibility concerns are identified.

Applicable building-code, construction, renovation, and accommodation obligations will be assessed separately and addressed as required.

Prevention of New Barriers

BroadGrain will consider accessibility when planning workplace changes, renovations, relocations, and facility improvements.

Where accessibility barriers are identified, BroadGrain will assess appropriate corrective measures and determine priorities based on applicable legal requirements, safety, operational needs, and the needs of affected individuals.

Maintenance of Accessible Elements in Public Spaces

Where BroadGrain constructs or redevelops public spaces covered by the AODA's Design of Public Spaces Standards, it will assess and meet the applicable requirements.

For accessible elements in public spaces under its control to which the maintenance requirements apply, BroadGrain will maintain appropriate procedures for preventative maintenance and emergency repairs.

Where a temporary disruption affects an accessible element and notice is required, BroadGrain will provide information about the disruption, its anticipated duration where known, and available alternatives where applicable.

BroadGrain will periodically review applicable accessible elements under its control and address identified maintenance concerns.

Responsibility: Relevant facilities, property management, or operations personnel, with support from Human Resources as appropriate.

4. INFORMATION AND COMMUNICATION TECHNOLOGIES

BroadGrain uses digital technologies to support its operations, including its public website, electronic communication platforms, and digital content.

Identification and Removal of Barriers

BroadGrain is committed to maintaining the accessibility of its public website and applicable web content. The Company's public website conforms to the applicable requirements of Web Content Accessibility Guidelines (WCAG) 2.0 Level AA under the *Integrated Accessibility Standards Regulation*, subject to the scope, exceptions, and qualifications set out in the regulation.

BroadGrain will continue to consider accessibility when reviewing or updating its website, publishing digital content, and introducing or procuring new digital technologies, as applicable. Reviews may consider:

- Keyboard navigation and accessible page structure.
- Alternative text for meaningful images.
- Appropriate headings, labels, and links.
- Readability, contrast, and text presentation.
- Accessible forms and interactive features.
- Compatibility with assistive technologies.
- Accessibility of applicable electronic documents and digital content.

Prevention of New Barriers

BroadGrain will address identified accessibility issues in a timely manner, prioritizing issues that significantly affect access to essential information or functions.

When requested, BroadGrain will provide or arrange accessible formats and communication supports for information and communications under its control, in accordance with applicable legal requirements. The individual making the request will be consulted to determine an appropriate format or support, as required.

Where an exception or alternative process applies under the regulation, BroadGrain will assess the applicable requirements before determining how the request will be addressed.

BroadGrain will consider accessibility when selecting, implementing, and updating digital tools and will work with external providers, where appropriate, to address accessibility barriers within its control.

Responsibility: The department responsible for the website and digital technologies, with support from Human Resources and external providers where appropriate.

5. COMMUNICATION AND ACCESSIBLE INFORMATION

BroadGrain recognizes that individuals have different communication needs and that information should be accessible to persons with disabilities.

Identification and Removal of Barriers

BroadGrain will communicate with persons with disabilities in a manner that takes their accessibility needs into account.

Where required, BroadGrain will provide or arrange accessible formats and communication supports for information under its control, in consultation with the individual making the request and in accordance with applicable requirements.

Prevention of New Barriers

BroadGrain will consider accessibility when developing and distributing communications, including:

- Using clear, plain language where appropriate.
- Providing meaningful alternative text for relevant images.
- Using readable formatting and descriptive headings.
- Considering accessibility when preparing electronic documents and presentations.
- Providing alternative communication methods where appropriate.
- Ensuring information about accessibility policies and feedback procedures is available in accessible formats upon request.

Where accessible formats or communication supports are required, the Company will provide them in a timely manner, at no additional cost where required, and in accordance with applicable legislation.

BroadGrain will review its communication practices periodically and address identified barriers.

Responsibility: Human Resources and the departments responsible for preparing and distributing communications.

6. PROCUREMENT OF GOODS, SERVICES AND FACILITIES

BroadGrain purchases technology, equipment, supplies, and services to support its business operations.

Identification and Removal of Barriers

BroadGrain recognizes that accessibility can vary between products, equipment, and services. When selecting equipment or technology, the Company will consider accessibility needs where relevant to the intended use and the needs of employees or other users.

Prevention of New Barriers

BroadGrain will consider accessibility options when purchasing or replacing equipment and technology, particularly where the purchase may affect an employee's ability to perform their duties or access workplace information.

Where a product or service presents an accessibility barrier, BroadGrain will assess reasonable alternatives or accommodations, as applicable.

If BroadGrain designs, procures, or acquires a self-service kiosk intended for public use, it will have regard to accessibility for persons with disabilities, as required by section 6 of the *Integrated Accessibility Standards Regulation*.

Responsibility: The department responsible for the purchase, with support from Human Resources, Information Technology, or other relevant personnel as appropriate.

7. DESIGN AND DELIVERY OF PROGRAMS AND SERVICES

BroadGrain's operations primarily support its business activities and relationships with employees, clients, suppliers, and other business partners.

BroadGrain will assess the accessibility requirements that apply to its activities and the goods, services, or facilities it provides.

Identification and Removal of Barriers

Where BroadGrain provides goods or services covered by the AODA's customer service requirements, it will meet the applicable obligations. These include, as applicable:

- Providing goods or services in a manner that respects the dignity and independence of persons with disabilities.
- Communicating in a manner that takes accessibility needs into account.
- Permitting service animals and support persons in accordance with applicable requirements and exceptions.
- Providing notice of temporary service disruptions where required.
- Maintaining an accessible feedback process.
- Providing required accessibility training.
- Providing accessible formats and communication supports where required.

Prevention of New Barriers

BroadGrain will consider accessibility when introducing new services, changing service delivery practices, or implementing new systems that affect access to its goods, services, or facilities.

Where a new activity creates additional accessibility obligations, BroadGrain will identify and implement the applicable requirements.

Responsibility: The department responsible for the relevant service or business activity, with support from Human Resources.

8. TRANSPORTATION

BroadGrain does not currently operate transportation services for the public that are subject to the transportation requirements of the *Integrated Accessibility Standards Regulation*.

If BroadGrain's operations change and it begins operating a service covered by those requirements, the Company will assess its obligations and implement the applicable measures.

Responsibility: Operations and Human Resources, as applicable.

9. CONSULTATION AND FEEDBACK FROM PERSONS WITH DISABILITIES

BroadGrain recognizes that input from persons with disabilities can help identify barriers and improve accessibility.

The Company will encourage employees and other individuals to identify accessibility barriers and suggest improvements through its established feedback process.

Feedback will be reviewed and considered when assessing accessibility policies, workplace practices, communications, and other relevant areas.

Where appropriate, BroadGrain will seek input from persons with disabilities when reviewing identified barriers or considering changes that may affect accessibility.

The Company will document significant accessibility issues and the actions taken to address them, as appropriate.

10. IMPLEMENTATION, MONITORING AND REVIEW

BroadGrain recognizes that accessibility planning is an ongoing process. This plan guides the identification, prevention, and removal of accessibility barriers and supports compliance with applicable accessibility legislation.

Implementation

BroadGrain will use the following schedule to guide implementation of this plan:

- 2026: Confirm the availability of accessibility policies and feedback channels; review applicable training requirements and records; and confirm responsibility for outstanding accessibility actions.
- 2027–2029: Continue accessibility training, review feedback and accommodation practices, maintain website accessibility, and address identified barriers as they arise.
- Annually: Review significant accessibility issues and outstanding corrective actions, assign responsibility, and establish target completion dates.

- By 2030, or sooner where required: Review and update this plan and assess priorities for the next planning period.

Actions will be prioritized according to applicable legal requirements, the impact of identified barriers, and operational circumstances. This schedule does not defer any legal obligation that is already in effect.

The Human Resources Director will coordinate implementation and review of this plan, with support from relevant departments and managers.

Responsibility for individual actions will be assigned to the appropriate department or personnel based on the nature of the issue.

Monitoring

BroadGrain will periodically review its accessibility practices and supporting records, including:

- Accessibility policy reviews and updates.
- Training completion records.
- Feedback received and actions taken.
- Workplace accommodation procedures.
- Website and digital accessibility concerns.
- Applicable facility maintenance and improvement issues.
- Changes in business operations that may create new accessibility obligations.

As an internal management practice, BroadGrain will review significant accessibility issues and outstanding corrective actions at least annually. Where gaps are identified, the Company will assess appropriate corrective action, assign responsibility, and establish a target completion date.

Review and Update

This plan covers the period from 2026 through 2030. BroadGrain will review and update the plan at least once every five years, and earlier where required or appropriate because of significant changes in legislation, business practices, or identified accessibility barriers.

The plan will be posted on BroadGrain's website, if the Company has one, and provided in an accessible format upon request, as required by law.

BroadGrain will maintain documentation of its accessibility planning and progress and will meet any applicable accessibility compliance reporting obligations.

FOR MORE INFORMATION

For further information about this plan, BroadGrain's accessibility policies, or the feedback process, please contact:

Human Resources Department
BroadGrain Commodities Inc.

20 Adelaide Street East, Suite 900
Toronto, Ontario M5C 2T6
Canada

Email: hrgroup@broadgrain.com
Telephone: +1 877.804.0070 or +1 416.504.0070
Fax: +1 416.504.0080

BroadGrain will provide this plan and its written accessibility policies in an accessible format upon request, as required by applicable legislation.