

# Marlink Accessibility Plan 2026

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### Revision history

Revision	Date	Updated by	Description
01	01.06.2023	CVL, RD	Initial revision
02	27.05.2026	CG, BSV	Second revision

# 1 General

This Accessibility Plan (2026) outlines Marlink’s approach to identifying, removing, and preventing barriers to accessibility across its operations.

The plan is prepared in accordance with the Accessible Canada Act (ACA) and the CRTC Accessibility Reporting Regulations and reflects Marlink’s commitment to continuous improvement.

This version builds on the 2023 Accessibility Plan, the 2025 Accessibility Progress Report and integrates accessibility into Marlink’s broader governance framework, including compliance, ESG, and operational processes.

Marlink recognises accessibility as part of its broader commitment to inclusion, equal opportunity, and responsible business conduct.

The organisation applies the principles of the Accessible Canada Act, including:

- Dignity
- Equal opportunity
- Barrier-free access
- Inclusion and participation
- Consideration of intersectionality
- Continuous improvement

These principles guide the development of policies, programs, and services, as well as operational decision-making.

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Post	Marlink AS, Lysaker torg 45, N-1366 Lysaker, NORWAY

## 1.1 Responsible person

Responsibility for this Accessibility Plan, including the feedback process and follow-up of accessibility measures, is assigned to:

- Role: Head of Quality and ESG
- Function: Overall responsibility for accessibility governance, compliance, and reporting under the Accessible Canada Act

Implementation at site level is supported by:

- Site Leads / Managing Directors (Daglig leder) – responsible for implementing accessibility measures locally and ensuring compliance with applicable requirements.

### Scope of application

This Accessibility Plan applies to Marlink AS and Marlink Inc., as the entities holding Canadian licences and therefore subject to the Accessible Canada Act (ACA) and the CRTC Accessibility Reporting Regulations.

Marlink does not have registered companies, physical locations or infrastructure in Canada. The obligation to publish this Accessibility Plan is therefore based on licensing requirements rather than physical presence.

While this plan focuses on these entities, accessibility is supported through policies, governance frameworks, and practices applied more broadly across the Marlink Group and its entities.

## 1.2 Areas not identified as material

The following areas are assessed but found not material to Marlink's operations.

### 1.2.1 Procurement of goods, services and facilities

Marlink does not currently identify procurement as a significant source of accessibility barriers due to its business-to-business operating model and limited direct interaction with end users.

Procurement processes are primarily related to technical services and infrastructure and are governed by existing policies and supplier requirements.

Accessibility considerations will be further evaluated as part of ongoing ESG and compliance development to ensure that procurement practices do not introduce new accessibility barriers.

### 1.2.2 Transportation

Marlink does not operate transportation services or infrastructure as part of its core business activities.

As such, transportation is not considered a material area for accessibility barriers within the scope of this plan.

Where transportation is relevant (e.g. employee travel or access to office locations), accessibility considerations are addressed through workplace policies and local site arrangements.

## 2 Governance Framework

Accessibility is integrated into Marlink's governance and management systems through the following elements:

### Policies:

- **Code of Conduct** – establishes expectations for non-discrimination, inclusion, and ethical behaviour
- **HSE Policy** – addresses safe, inclusive, and accessible work environments
- **Site Lead and Office Site Policy** – ensures adherence to applicable legal and regulatory requirements on site of operations.

### Roles and Responsibilities:

- **Safety Delegate (Verneombud)** – represents employees in workplace health, safety, and environment matters, including accessibility-related issues
- **Work Environment Committee (AMU)** – supports employee involvement in workplace conditions
- **Management and Site Leads** – responsible for implementation of accessibility-related measures

Internal audits have identified that visibility and accessibility of these roles must be improved, reinforcing their importance in accessibility governance

Marlink's governance framework is aligned with applicable national regulations, including accessibility and working environment legislation in jurisdictions where the company operates. These requirements are further operationalised through Marlink's [Site Leads](#) and Office Site Policy, which defines roles, responsibilities and implementation at site level.

### 2.1 Telecommunications Act – Section 24.1 Conditions

Marlink complies with applicable accessibility-related conditions under Section 24.1 of the Telecommunications Act, including requirements applicable to resellers of telecommunications services.

This includes providing paper billing in accessible formats upon request at no charge for persons with disabilities, in line with applicable regulatory requirements.

### 3 Consultations

Marlink recognises the importance of consultation. As noted in the 2025 Accessibility Progress Report, consultation has been limited due to:

- Marlink operates primarily in a business-to-business (B2B) environment and does not typically have direct contact with end users of its services. As a result, structured consultation with individual persons with disabilities is limited
- Services are often customised to specific customer requirements and cannot be subject to open or general consultation processes
- Legal and data protection constraints

Accessibility considerations are therefore addressed through:

- Internal consultations with employees and workplace representatives
- External expertise (e.g. architects, building owners and specialists)
- Compliance with applicable legal and regulatory frameworks in relevant jurisdiction

Marlink has established feedback mechanisms via:

- Website accessibility page
- Internal platforms (Orbit)

Marlink recognises that consultation activities may involve discussions related to accessibility needs. Any such input is handled in accordance with applicable data protection legislation, including the General Data Protection Regulation (GDPR).

Marlink does not require individuals to disclose personal health or disability-related information as part of consultation processes. Feedback is collected and considered in a general and non-identifiable manner, focusing on accessibility needs and workplace conditions rather than individual characteristics.

As part of its approach to identifying accessibility needs and barriers, Marlink also relies on established health, safety and working environment processes, including workplace inspections, safety rounds (vernerunder), and internal audits. These mechanisms support compliance with applicable working environment legislation and provide structured input on workplace conditions, including accessibility-related aspects.

In Norway, where Marlink AS (Marlink's main contracting entity) is incorporated and we have local office(s), accessibility improvements have been discussed and assessed through interaction between office management, employees and external stakeholders, including an interior architect and the building owner for refurbishment of locations.

These discussions have addressed practical accessibility measures such as entrance design, visual contrast, signage, workspace layout and evacuation considerations.

External input and applicable regulations, including requirements for universal design, Norwegian building standards (TEK17), working environment Act has been addressed to ensure accessibility is addressed in a structured manner.

This approach supports Marlink's ongoing efforts to identify, assess and improve accessibility-related conditions in the workplace.

## 4 Consulting for the Accessibility Plan

The Accessibility Plan continues to be developed with input from accessibility expertise and feedback mechanisms.

Marlink will further strengthen consultation by:

- Using structured internal and external feedback
- Leveraging audit findings from both physical and digital environments
- Integrating accessibility into governance and improvement processes

The Accessibility Plan has been reviewed by a group of internal stakeholders, including 10 employees representing site management, safety deputy, HR and legal expertise with extensive experience in governance and operations.

## 5 Employment

Marlink is committed to equal opportunities and accessible workplaces

Our commitments

- Ensure fair and inclusive recruitment processes
- Provide reasonable accommodation for employees with disabilities
- Support inclusive working environments through HSE policies

Internal audits have identified the need to improve:

- Visibility of safety delegate (verneombud)
- Accessibility of work environment committees
- Awareness of reporting channels

These roles are essential to supporting accessibility in the workplace.

## 6 The Built Environment

Marlink continues to assess accessibility through internal audits and improvement initiatives.

### Our commitments

- Ensure compliance with applicable regulations
- Provide accessible facilities where possible
- Integrate accessibility into facilities design and upgrades

### Identified strengths

- Accessible facilities (elevators, restroom)
- Ergonomic workstations

### Improvements

Accessibility is being addressed in:

- Refurbishment of Eik (2025)
- Planned Lysaker office improvements (2026)

These initiatives aim to remove identified barriers and prevent new ones.

### 6.1 Regulatory framework and compliance

Marlink operates across multiple jurisdictions and ensures accessibility compliance in accordance with applicable national regulations and standards.

In the United States, Marlink facilities comply with the Americans with Disabilities Act (ADA) and Occupational Safety and Health Administration (OSHA) standards (1910). Accessibility and regulatory compliance have been assessed as part of recent building renovations, with no deficiencies identified.

In Norway, accessibility and working environment requirements are governed by the Working Environment Act (Arbeidsmiljøloven) and applicable building regulations (TEK17), which set requirements for universal design and accessibility in buildings and workplaces.

Compliance is supported through internal HSE processes, safety delegate (verneombud) functions, and work environment committees (AMU).

These frameworks support Marlink's approach to identifying, removing, and preventing accessibility barriers in the built environment.

## 6.2 Operational assessment – Norway

Accessibility at operational sites is assessed as part of regular health, safety and working environment processes.

At the Eik Teleport facility, the building provides partial accessibility, including:

- Lift access for both goods and personnel
- Accessibility for wheelchair users at ground floor level, including office areas and toilet facilities

Accessibility and working environment conditions are further assessed through periodic workplace inspections (vernerunder), including risk assessments and follow-up plans.

The most recent inspection at Eik Teleport was conducted on 6 May 2026.

These processes support the identification and continuous improvement of accessibility-related conditions at operational sites.

At the Lysaker office, accessibility has been evaluated through a detailed internal audit conducted in 2025, including physical inspection, employee interviews and review of workplace practices.

The office provides accessible facilities such as elevators, restrooms and ergonomic workstations.

The assessment also identified specific accessibility-related barriers, including:

- Lack of automatic door opening systems
- Fire and emergency instructions not positioned within accessible reach
- Limited accessibility and visibility of emergency procedures

Identified barriers are followed up through corrective actions, site-level improvement initiatives and planned upgrades, including office improvements scheduled for 2026.

As part of ongoing improvements at the Lysaker office, specific accessibility measures have been identified and discussed, including:

- Replacement of entrance doors and elevator access to improve wheelchair access
- Use of contrast colours to support visually impaired users
- Improved signage design, including clear and universally understood symbols
- Consideration of evacuation procedures for persons with reduced mobility

These measures have been developed based on internal assessments, dialogue with employees, and input from external experts and the building owner, in line with applicable regulations.

Additional adaptations can be implemented where needed to accommodate specific accessibility requirements.

These processes support the systematic identification and continuous improvement of accessibility-related conditions at office locations.

### **6.3 Operational assessment – US**

Accessibility and regulatory compliance have been assessed and verified as part of recent building renovation projects, including review of required compliance postings. These reviews have not identified any accessibility deficiencies.

Accessibility considerations are also integrated into ongoing health, safety and environmental processes, supporting the continuous identification and prevention of barriers across operational sites.

## **7 Information and Communication Technologies**

Marlink ensures accessibility in digital systems and communication platforms.

### **Our commitments**

- Use accessibility features in Microsoft 365
- Align with accessibility standards (e.g. WCAG)
- Provide accessible formats upon request

### **Identified barriers (Market Communications audit)**

- Limited search and navigation functionality in Internal Webpages
- Inconsistent or outdated contact information

These barriers impact access to information and are being addressed through continuous improvement.

Accessibility in digital systems is assessed through internal audits. Audits conducted in 2025, including a digital assessment, identified barriers related to search functionality, information availability and communication.

These findings are followed up through corrective actions and continuous improvement processes.

## **8 Communications (excluding ICT)**

Marlink ensures accessibility in non-digital communication.

### **Our commitments**

- Provide alternative formats upon request
- Ensure communication is inclusive and understandable
- Support accessible customer communication channels

## 9 Design and delivery of programs and services

Marlink is committed to accessible service delivery.

Accessibility considerations include:

- Customer support channels
- Communication formats
- Service delivery processes

Accessibility is integrated into program design and delivery.

## 10 Continuous Improvement

Accessibility is part of Marlink's continuous improvement approach. Follow-up of findings from workplace inspections and audits is part of our regular routines.

Improvement mechanisms include:

- Internal audits
- Process Improvement Plans (PIP)
- Corrective actions
- Integration into ESG and compliance reporting

Marlink will:

- Follow up identified barriers
- Improve digital and physical accessibility
- Monitor progress over time

Follow-up actions identified through workplace discussions and inspections are incorporated into improvement plans and risk assessments.

## 11 Feedback Process and Contact

Marlink provides accessible mechanisms for feedback on accessibility:

- Email: [esg@marlink.com](mailto:esg@marlink.com)
- Website feedback form [Accessibility Feedback Form - Marlink](#)
- Internal feedback channels
- Postal address: Marlink AS, Lysaker torg 45, N-1366 Lysaker, NORWAY
- Call us at any of the following telephone numbers, depending on the country/region you are calling from:
  - Americas (including from within Canada): +1 310 616 5594 or +1 855 769 3959 (toll free)
  - Europe, Middle East, or Africa: +33 1 70 48 98 98
  - Asia Pacific: +65 64 29 83 11

Feedback will be reviewed, recorded for trending and used to improve accessibility measures. The ESG-team in Marlink will be responsible for handling the feedback process. Feedback can be submitted anonymously (phone or postal). Feedback will be acknowledged and handled in accordance with internal procedures.

### 11.1 Request for alternative formats

Requests for this Accessibility Plan or related documents can also be made in alternative formats.

- Accessible PDF
- Large print
- Other formats as required

Requests can be submitted via the contact methods listed above.