

Accessibility Progress Report 2025: Marlink AS and Marlink Inc.

General

This second progress report has been prepared to meet our organization's obligations under the [Accessible Canada Act](#) (ACA), the Canadian Radio-Television and Telecommunications Commission (CRTC) [Accessibility Reporting Regulations](#), and the [Accessible Canada Regulations](#) (ACR). It provides updates on the progress we have made in implementing our accessibility plan for Marlink AS and Marlink Inc.

How to Provide Feedback

Please send your feedback to our Quality & ESG Team. You can send your feedback by email or phone using the contact information listed below. For more information on how you can send your feedback, see our [accessibility feedback process](#).

How to Request Alternate Formats

You can use the contact information listed below to request a copy of our feedback process description or our progress report in alternate formats: print, large print, Braille, audio, or an electronic format compatible with adaptive technology. We will provide the format you request 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: esg@marlink.com

Phone: +1 310 616 5594 or +1 855 769 3959 (toll-free)

Feedback

We receive feedback from our employees through our Populum survey biannually. There has been no feedback on accessibility issues through this survey. Additionally, there has been no feedback through our ACA accessibility feedback process.

Number of feedback submissions received: 0

Consultations

Due to Norwegian law and the European Union's General Data Protection Regulation (GDPR), we were not able to consult internally with persons with disabilities when preparing this progress report.

Consulting with persons with disabilities outside our organization is likewise impractical due to the exclusively business-to-business (B2B) nature of our services. As a provider of specialized satellite communications services to B2B customers only, Marlink has no connection to consumer disability rights advocacy organizations in Canada or other markets. Most members of these organizations likely do not even know of Marlink's existence, and those consumers who have heard of Marlink likely have a limited understanding of the scope of the company's services.

Employment

We do not have any employees in Canada, nor any buildings. Therefore, no barriers have been identified. It is important to state that we comply with Norwegian law, which includes accessibility in many ways. Examples of this include:

Workplace Inclusion

Marlink complies with The Equality and Anti-Discrimination Act in Norway (Likestillings- og diskrimineringsloven):

- Prohibits discrimination based on disability in employment.
- Employers are required to make reasonable accommodations to ensure equal opportunities.
- Applies to all stages of employment: hiring, working conditions, promotion, and termination.

These topics are handled through mechanisms such as:

Equality and Anti-Discrimination Ombud (Likestillings- og diskrimineringsombudet):

- Investigates complaints of discrimination, including failure to provide reasonable accommodation.
- Can issue recommendations and refer cases to the Anti-Discrimination Tribunal.

Anti-Discrimination Tribunal (Diskrimineringsnemnda):

- A semi-judicial body that can make binding decisions and impose fines on employers or service providers who violate anti-discrimination laws.

Labour Inspection Authority (Arbeidstilsynet):

- Monitors compliance with workplace regulations, including accessibility and inclusion measures.
- Regular mandatory internal inspections by safety delegates and working Environmental committees are conducted.

Built Environment

We do not have any employees in Canada, nor any buildings. Therefore, no barriers have been identified. However, Marlink complies with Universal Design and Building Standards formed by Norwegian authorities. This is handled through mechanisms such as The Planning and Building Act (Plan- og bygningsloven):

- Requires universal design in public buildings and facilities.
- New constructions and major renovations must be accessible to all, including people with disabilities.
- Applies to entrances, restrooms, elevators, signage, and more.

Procurement

Marlink ensures that procurement processes consider accessibility requirements.

Design and Delivery of Programs and Services

Marlink complies with The Norwegian Anti-Discrimination and Accessibility Act (Diskriminerings- og tilgjengelighetsloven) (now merged into the Equality Act):

- Ensures that public and private service providers offer accessible services.
- Covers transportation, education, healthcare, digital services, and more.
- Digital content must follow universal design principles (e.g., websites, apps).

Mechanisms that follow up this law include:

Universal Design Requirements:

Enforced through the Planning and Building Act, with municipalities responsible for ensuring compliance in construction and renovation projects.

Digital Accessibility:

Public websites and digital services must follow universal design principles, monitored by the Norwegian Digitalisation Agency.

Transportation

We do not have any employees in Canada, nor any buildings or vehicles. Therefore, no barriers have been identified.

Conditions under Section 24.1 of the Telecommunications Act

As a business-to-business (B2B) service provider, Marlink delivers billing and invoicing in accordance with the specific terms and conditions established with each client. While we do not serve the general consumer market, we are fully committed to fulfilling all contractual obligations, including those related to accessibility.

Where relevant, Marlink supports accessibility through:

- The use of Microsoft 365 accessibility tools to ensure digital communications and documents are inclusive.
- Offering reasonable accommodations for clients who request alternative formats or support channels.

Communication, Other Than ICT

Marlink also prioritizes accessibility in non-digital communication channels. This includes:

- Ensuring marketing campaigns are accessible through the use of plain language and alternative formats.
- Delivering important notices in formats that accommodate diverse user needs.
- Providing accessible technical support and customer service, including relay services and multilingual assistance where applicable.

Information and Communication Technologies (ICT)

Marlink's commitment to accessibility extends across all digital internal and customer-facing platforms. This includes our website, APIs for integration with customer software and networks, electronic documentation, and any training videos or multimedia content we produce. Where applicable, related content from other sections—such as website accessibility or digital documentation—has been consolidated here to provide a comprehensive overview of our ICT accessibility efforts.

To support inclusive communication and content creation, Marlink utilizes Microsoft 365's built-in accessibility features, including the Accessibility Checker, Immersive Reader, and live captions in Microsoft Teams.

Marlink operates within Microsoft's SharePoint ecosystem, ensuring adherence to the WCAG 2.1 AA guidelines. Through our collaboration with an external partner, we have implemented an additional accessibility layer that enhances user navigation—such as enabling keyboard tabbing between interface elements—and improves compatibility with screen readers across different components.

We recognize that accessibility is an evolving priority, and we are committed to continuous improvement. As part of our ongoing development, further optimizations will be introduced in future software releases to enhance user experience.

In addition to these technical measures, Marlink has taken proactive steps to identify and address potential barriers to accessibility through an internal audit. This audit focused on three key areas:

- **Content and Document Review:** Evaluated the accessibility of key documents, including the Marlink Accessibility Plan.
- **Functionality Testing:** Assessed the technical configuration of documents to ensure they meet accessibility standards.
- **Staff Interviews:** Conducted interviews with support engineers to evaluate their training and readiness to handle accessibility-related inquiries.

The audit has provided valuable insights into our current accessibility practices and highlighted areas for improvement. Marlink is committed to acting on these findings and enhancing our accessibility efforts to ensure alignment with the Accessible Canada Act and other relevant standards.

Conclusion

Marlink AS and Marlink Inc. have assessed and revised the scope of their accessibility measures to ensure compliance with the ACA. The result identified that Marlink AS and Marlink Inc. are the companies that hold Canadian licences and therefore are obliged to report under the act. This reassessment was part of an internal audit aimed at identifying barriers and improving accessibility across our services.

The audit documented several opportunities for improvement, including:

- Enhancing the initial voice message response to include options for individuals with hearing and speech disabilities.
- Ensuring that the contact numbers listed for accessibility support cover all Marlink group services, not just the Maritime Business Unit.

These findings and recommendations will guide our ongoing efforts to enhance accessibility and ensure that our services are inclusive and compliant with relevant regulations.

Also, it has been identified to in the future to do a technical audit of our publicly available digital platforms.

We will continue to monitor and measure our progress to ensure we meet our remaining accessibility goals and remove or prevent the remaining barriers identified in our accessibility plan in accordance with the new scope that has been defined. We encourage feedback using our feedback process and will use it to help fully implement our accessibility plan.