CMSI Consultation Response

Respondent Details

NAME
Marc Safman

COUNTRY
United States

PERMISSION
Yes, CMSI can disclose my feedback, name, and organisation.

STAKEHOLDER
Consultancy

ORGANISATION
Safman Consulting

COMMENTS & QUESTIONS BY DOCUMENT

> ### Document:
> ## Assurance

2. Roles and Responsibilities

SECTION: B. Assurance Providers

COMMENT:

Page 8

Assurance provider responsibilities:

Provide reasonable accommodation, , e.g., sign language interpreters, large print materials. Section should include a reminder about making reasonable accommodations for interviewees.

COMMENT:

Page 6

Notification - Please consider 60 or 90 days. 45 days does not allow enough time to ensure that notice is provided to disabled individuals.

COMMENT:

Page 7

Facility provided list- without intentional actions, stake holders and rights holders groups will continued to exclude disabled concerns.

---

3. Who Can Conduct External Assurance?

SECTION: 3.1 Assurance Provider Requirements

COMMENT:

Page 10

Subject matter references – Accessibility and disability inclusion

_____

COMMENT:

Page 11

4) Secretariat should recognize that disabled life experience should be counted as a credential for working as SME for accessibility, related issues.

_____

COMMENT:

12 One member of assurance team needs to demonstrate understanding of accessibility.

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4. Consolidated Standard External Assurance Process

SECTION: 4.1 Methodology

COMMENT:

Page 15

Re design The diagram

Different fonts used the minimum timeline section awkward difference form the text underneath

Font used is too small, not in black

Year 1, 2 3, 4- written in the circles- not legible

Avoid red font and bullet points

SECTION: 4.2 Planning, 4.2.11 Interviewing Workers, Stakeholders and Rights

COMMENT:

Page 23

Women , disabled or historically marginalized. Stop using the word "vulnerable"! ableist.

SECTION: 4.2 Planning, 4.2.8 Determining Methodology and Risk

COMMENT:

Page 21

Communication protocols, take out where they exist. Assurance providers need to identify people with sensory challenges that may otherwise be overlooked.

Suitable and advanced notice- should be 60 or 90 days to give time for disabled participants.

SECTION: NA

COMMENT:

Page 24

Consideration of gender and disabled perspectives.

_____

COMMENT:

Page 25

Performance area 8

Women, disabled 2sLGBT+, use historically underrepresented versus minority.

_____

SECTION: NA

COMMENT:

Page 27

Worker interview - Arranging reasonable accommodations.

_____

General Comment

COMMENT:

Throughout document

For emphasis, replace difficult to read fonts in italics and replace with bold, underline or both e.g. Page 7, Page 8

_____

<div style="text-align:center; background-color:#4a4f9e; color:white; padding:1em;">
Document:
Standard
</div>

General comment on Performance Area

COMMENT:

Font used- excellent, clean easy to read.

_____

COMMENT:

the phrase "stakeholders and rights-holders." Appears too frequently within 1 paragraph.

_____

COMMENT:

For emphasis, remove Italicized fonts and replace with bold, underline or both.

_____

COMMENT:

The document is awkwardly spaced with spillover sections. Insert more page breaks to keep sections on one page as much as possible.

SECTION: References

COMMENT:

Need to include as reference documents

Document came out September 2025

Inclusive Reporting: A Business Guide to Disability and the European Sustainability Reporting Standards

GRI Disability in sustainability reporting

Disability as a Blind Spot in Sustainability Frameworks and Standards

Convention on Rights of Persons with Disabilities

CRPD Article 9 Accessibility

UN Global Compact Guide for Business on the Rights of Persons with Disabilities

SDG 8

Putting the I in ESG: Inclusion of Persons with Disabilities as Strategic Advantage of Sustainability Practices for Corporates and Investors"

ILO Disability and work

Inclusive Reporting: A Business Guide to Disability and the European Sustainability Reporting Standards

Businesses leading the way on disability inclusion

C159 - Vocational Rehabilitation and Employment (Disabled Persons) Convention, 1983 (No. 159)

World Bank Environmental and Social Framework

ESS10: Stakeholder Engagement and Information Disclosure

World Bank Disability Inclusion and Accountability Framework

Performance Area 01: Corporate Requirements

SECTION: 1.1 Corporate Accountability, Leading Practice

COMMENT:

Include targets for disability hiring in hr strategy

SECTION: 1.1 Corporate Accountability, Towards Good Practice

COMMENT:

Need to stress commitment to accessibility and disability inclusion. Someone from senior management must be assigned responsibilities for Accessible operations.

In the publicly disclosed policies, the pdfs need to be accessible and policies need to have meaningful incorporation of accessibility, disability concerns in those policies, e.g. publish Accessibility statement on website.

ensure there is a written interactive process that facilitates injured worker/worker returning from medical leave and disability employment. Websites, should have clear contact to request accommodations in the application process.

See GRI Disability in sustainability reporting and Inclusive Reporting: A Business Guide to Disability and the European Sustainability Reporting Standards (page 6 Accessible Reporting)

SECTION: 1.2 Sustainability Reporting, Leading Practice

COMMENT:

ADD Leading practice

During mergers and acquisitions, establish committee to conduct holistic review with a disabled lens that focuses on enhancing disability inclusion, e.g., initiate remediations of websites and documents, barrier free policies.

Rationale- M&A creates opportunities for companies to initiate accessibility remediation plans for websites, documents, events. One company might have established disability inclusion policies yet the other might not be at the same level of accessibility and commitment. See Teck-Anglo. Anglo is the only member of the |Valuable 500. However, Anglo takes an ineffective tick the box approach. Both Anglo and Teck have needs to do remediations of websites and documents. The merger is a perfect opportunity to enhance operations while gaining cost efficiencies that might otherwise make these remediations seem prohibitive. In short - mergers are the best time to commence disability inclusion initiatives!

SECTION: 1.2 Sustainability Reporting, Towards Good Practice

COMMENT:

sustainable documents must be fully accessible . see Inclusive Reporting: A Business Guide to Disability and the European Sustainability Reporting Standards (page 6 Accessible Reporting)

COMMENT:

Note ICMM refers to GRI in its documents (Social and Economic Framework. The CMSI should make clear GRI is the standard sustainability standard. GRI is the only standard that has specific disability guidance.

SECTION: 1.4 Risk Assessment

COMMENT:

The value in risk assessment is engaging the public. The leading practice Engage external stakeholders and rights-holders in the risk assessment process. I do not know what you would put as leading practice. Need to amplify inclusive community engagement.

Inclusive Reporting: A Business Guide to Disability and the European Sustainability Reporting Standards (Page 4 Recommendation: Engage directly with persons with disabilities and their representative organizations during stakeholder consultations.)

GRI Disability in sustainability reporting Pdf 21 2-29 Approach to stakeholder engagement

World Bank Environmental and Social Framework ESS10: Stakeholder Engagement and Information Disclosure(Promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle)

SECTION: 1.5 Corporate Crisis Management, Good Practice, 2

COMMENT:

I don't expect you to include detail but this sort of emergency planning amplifies the need to talk to experts like me in holistic planning. Accessibility inclusion point governments and corporations overlook – emergency response there needs to plan for hearing vision and mobility challenges. When buying equipment- needs to

have capacity for Real time text AND video relay. Signage is another issue. Are the planned evacuation areas fully accessible with accessible rest rooms? Universal design in all areas.

SECTION: Glossary and Interpretive Guidance

COMMENT:

Page 23 should include specific references to

GRI Disability reporting in Sustainability reporting

IInclusive Reporting: A Business Guide to Disability and the European Sustainability Reporting Standards

Accessibility is a business standard that needs to be amplified. Barrier free work places and operations facilitate disability inclusion. the inclusive sustainability reporting document was published |September 2025. Incorporating it into CMSI shows to corporate governance across industries that mining standards are setting an example of leading practice.

A 2024 report from AccessibilityChecker.org found that 88% of the websites analysed failed to comply with current web accessibility standards.

of the top 1,000 U.S. websites, only 6.1% were fully compliant with zero critical accessibility errors –meaning about 94% were not.

Performance Area 02: Business Integrity

SECTION: Glossary and Interpretive Guidance

COMMENT:

needs to include definition of discrimination

SECTION: NA

COMMENT:

A KYC policy cannot be set at the local level. It has to be part of a comprehensive board approved AML bribery policy.

COMMENT:

Needs to be applicable to the corporate level. Anti-corruption , anti-money laundering policies are board approved corporate that apply across the company. I used to work in anti-money laundering. You cannot allow each facility to set a policy. The company will get in trouble due to lack of effective oversight control by senior management and board.

COMMENT:

Identify and address key ethical and integrity risks Comment: Integrity risks should reference discrimination

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Performance Area 05: Human Rights

SECTION: Glossary and Interpretive Guidance

COMMENT:

needs to recognize Disabled individuals in definition and glossary- CRPD.

Convention on Rights of Persons with Disabilities

CRPD Article 9 Accessibility

UN Global Compact Guide for Business on the Rights of Persons with Disabilities

SDG 8

Performance Area 07: Rights of Workers

SECTION: 7.1 Rights of Workers, Good Practice, 10

COMMENT:

ADD Another point to specifically reference injured medical leave workers returning to work – Implement appropriate measures to safeguard the health and wellbeing of injured workers and ensure comprehensive support for workers returning to work after an injury/medical leave.

SECTION: 7.1 Rights of Workers, Good Practice, 13

COMMENT:

barrier free recruitment and references inclusive reporting, having a written interactive plan to facilitate injured worker/worker returning from medical leave and disability employment, proactive job modification analysis. All business operations should be accessible.

SECTION: 7.1 Rights of Workers, Good Practice, 2

COMMENT:

Avoid vulnerable. Specifically mention disabled and other historically marginalized /under represented. Avoid "vulnerable" this is a pejorative word that supports ableism, sexism, racism and colonialism.

SECTION: 7.1 Rights of Workers, Leading Practice, 3

COMMENT:

Redundant/Merge Points 3 and 7 are Not leading practices. These are toward good practice.

SECTION: 7.1 Rights of Workers, Leading Practice, 7

COMMENT:

Currently under leading practices but should be merged into point 4 good practice on page 55

ADD volunteer, community work days off

SECTION: 7.1 Rights of Workers, Leading Practice

COMMENT:

Barrier free recruiting includes a written interactive process. SEE this relevant case Skinner v. Newmont Mining Corp., Case No. 2:18-cv-01787-KJD-VCF, (D. Nev. Aug. 2, 2019)

C159 - Vocational Rehabilitation and Employment (Disabled Persons) Convention, 1983 (No. 159)

Inclusive Reporting: A Business Guide to Disability and the European Sustainability Reporting Standards

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SECTION: 7.1 Rights of Workers, Towards Good Practice, 3

COMMENT:

should be disabled and neurodivergent, Using "physical ability" is inaccurate and excludes neurodivergent and disabled.

COMMENT:

Publicly commit to barrier free workplace

SECTION: Glossary and Interpretive Guidance

COMMENT:

Add

Interactive process- a written plan that enables entity to engage workers who may need reasonable accommodation in order to be hired or return to work from injury or leave.

References

UN Global Compact Guide for Business on the Rights of Persons with Disabilities

SDG 8

Putting the I in ESG: Inclusion of Persons with Disabilities as Strategic Advantage of Sustainability Practices for Corporates and Investors"

ILO Disability and work

Inclusive Reporting: A Business Guide to Disability and the European Sustainability Reporting Standards

Businesses leading the way on disability inclusion

C159 - Vocational Rehabilitation and Employment (Disabled Persons) Convention, 1983 (No. 159)

Performance Area 08: Diversity, Equity, and Inclusion

SECTION: 8.1 Governance of Diversity, Equity, and Inclusion (Corporate Level), Good Practice, 1

COMMENT:

Strengthen GP1 by amplifying Barrier free operations, universal design! "Implement a strategy on DEI that emphasizes barrier free operations for recruitment, retention and promotion." Barrier free is the code for accessible. Reference Inclusive Reporting: A Business Guide to Disability and the European Sustainability Reporting Standards

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SECTION: 8.1 Governance of Diversity, Equity, and Inclusion (Corporate Level), Good Practice, 3

COMMENT:

could reference GRI Disability in sustainability reporting and Inclusive Reporting: A Business Guide to Disability and the European Sustainability Reporting Standards

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SECTION: 8.1 Governance of Diversity, Equity, and Inclusion (Corporate Level), Good Practice, 7

COMMENT:

add e.g., benefits, career development … people need to think holistically- universal design

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SECTION: 8.1 Governance of Diversity, Equity, and Inclusion (Corporate Level), Leading Practice, 1

COMMENT:

leading practice one is redundant when you think about it. By incorporating DEI into corporate governance, strategy with assigned people, you are altering HR and sustainability reporting (GRI) policies that are already included in regularly scheduled audits. DEI success means integration into business as usual operations. This might be leading practice for facility level.

SECTION: 8.1 Governance of Diversity, Equity, and Inclusion (Corporate Level)

COMMENT:

add a footnote reference the Inclusive Reporting: A Business Guide to Disability and the European Sustainability Reporting Standards

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SECTION: 8.2 Management of Diversity, Equity, and Inclusion (Facility Level), Good Practice, 1

COMMENT:

add worker rehabilitation. Remove the word accessibility. The word accessibility doesn't add value to this entry.

SECTION: 8.2 Management of Diversity, Equity, and Inclusion (Facility Level), Good Practice, 3

COMMENT:

CMSI needs to be consistent.

Conduct a review of infrastructure to identify, prioritize, and implement processes to resolve barriers to digital and physical inclusion and accessibility.

SECTION: 8.2 Management of Diversity, Equity, and Inclusion (Facility Level), Good Practice, 4

COMMENT:

Comment 4 is inaccurate, misleading. Remove the first part "where it is safe…risk assessment.

The term is reasonable accommodation. Job modifications are the norm when discussing reasonable accommodations. Barrier free operations. This point has assistive technology all wrong.it is confusing and inconsistent with what you are trying to say.

Not all reasonable accommodations job modification requires technology! Stressing barrier free recruiting, injured workers returning to work is essential. Let's discuss to clarify.

Inclusive Reporting: A Business Guide to Disability and the European Sustainability Reporting Standards

Businesses leading the way on disability inclusion

C159 - Vocational Rehabilitation and Employment (Disabled Persons) Convention, 1983 (No. 159)

Skinner v. Newmont Mining Corp., Case No. 2:18-cv-01787-KJD-VCF, (D. Nev. Aug. 2, 2019)

SECTION: 8.2 Management of Diversity, Equity, and Inclusion (Facility Level), Good Practice, 7

COMMENT:

should be merged into Towards good practice 4 (methods of data collection) and 5 (baseline data) on page 62
. By embracing the accessibility that facilitates barrier free operations CMSI is demonstrating the corporate
leadership needed to achieve disability inclusion the SDGs.

SECTION: 8.2 Management of Diversity, Equity, and Inclusion (Facility Level), Good Practice, 8

COMMENT:

should be merged into Towards good practice 4 (methods of data collection) and 5 (baseline data) on page 62
. By embracing the accessibility that facilitates barrier free operations CMSI is demonstrating the corporate
leadership needed to achieve disability inclusion the SDGs.

COMMENT:

ADD AT THE END OF SENTENCE , e.g. requesting a reasonable accommodation. Foot note to Inclusive Re-
porting: A Business Guide to Disability and the European Sustainability Reporting Standards

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SECTION: 8.2 Management of Diversity, Equity, and Inclusion (Facility Level), Good Practice, 9

COMMENT:

add footnote reference to GRI disability reporting in sustainability; I Inclusive Reporting: A Business Guide to
Disability and the European Sustainability Reporting Standards

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SECTION: 8.2 Management of Diversity, Equity, and Inclusion (Facility Level), Leading Practice, 3

COMMENT:

Add footnote reference to GRI disability reporting in sustainability, Inclusive reporting

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SECTION: 8.2 Management of Diversity, Equity, and Inclusion (Facility Level), Leading Practice, 4

COMMENT:

Add footnote reference to GRI disability reporting in sustainability, Inclusive reporting

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SECTION: 8.2 Management of Diversity, Equity, and Inclusion (Facility Level), Leading Practice

COMMENT:

Pont 5 Collaborate with local stakeholders to develop long term workforce development initiatives targeting
disabled individuals.

SECTION: 8.2 Management of Diversity, Equity, and Inclusion (Facility Level), Towards Good Practice, 4

COMMENT:

Footnote to GRI Disability reporting and the inclusive business guide.

SECTION: 8.2 Management of Diversity, Equity, and Inclusion (Facility Level), Towards Good Practice, 5

COMMENT:

Footnote to GRI Disability reporting and the inclusive business guide.

SECTION: Glossary and Interpretive Guidance

COMMENT:

Needs to be rewritten to correctly emphasize criticality of digital over physical barriers. You can't be in business without the internet.

Accessibility refers to the practice of universal design–making digital and physical environments and systems usable by everyone, regardless of their abilities, to ensure equal opportunities and inclusion. This involves removing barriers to: 1) digital barriers to websites, documents, social media content and online events; physical barriers to buildings, work spaces and equipment, to create an environment where all employees and candidates can fully participate and contribute.

COMMENT:

inclusion definition- you can remove the last sentence.

DEI objectives definition: after retention add word advancement…. and engagement.. a little further down in definition add promotion when mentioning retention.

SECTION: References

COMMENT:

Performance area 8 Page 66

GRI Disability in sustainability reporting

Disability as a Blind Spot in Sustainability Frameworks and Standards

UN Global Compact Guide for Business on the Rights of Persons with Disabilities

Putting the I in ESG: Inclusion of Persons with Disabilities as Strategic Advantage of Sustainability Practices for Corporates and Investors"

ILO Disability and work

Inclusive Reporting: A Business Guide to Disability and the European Sustainability Reporting Standards

Businesses leading the way on disability inclusion

Performance Area 09: Safe, Healthy and Respectful Workplaces

SECTION: 9.1 Health and Safety Management, Towards Good Practice, 6

COMMENT:

reinforce emphasis to disability inclusion by recognizing on the job hearing loss and eye injuries , add an e.g. ear and eye protection equipment

SECTION: 9.1 Health and Safety Management, Towards Good Practice

COMMENT:

Add Towards good practice 8.

Create and maintain a written interactive process to facilitate worker rehabilitation.

C159 - Vocational Rehabilitation and Employment (Disabled Persons) Convention, 1983 (No. 159)

Putting the I in ESG: Inclusion of Persons with Disabilities as Strategic Advantage of Sustainability Practices for Corporates and Investors"

ILO Disability and work

Inclusive Reporting: A Business Guide to Disability and the European Sustainability Reporting Standards

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SECTION: 9.3 Training, Behaviour and Culture, Leading Practice

COMMENT:

Add as a leading practice:

Proactively review job functions, workflows to identify possible accommodations/modifications

C159 - Vocational Rehabilitation and Employment (Disabled Persons) Convention, 1983 (No. 159)

SECTION: 9.4 Monitoring, Performance and Reporting, Good Practice, 2

COMMENT:

Comment include Footnote for GRI disability reporting in sustainability reporting

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SECTION: 9.4 Monitoring, Performance and Reporting, Good Practice, 5

COMMENT:

Record zero fatalities in the reporting year should be moved to the towards good practice section

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SECTION: Glossary and Interpretive Guidance

COMMENT:

Interactive process- a written plan that enables entity to engage workers who may need reasonable accommodation in order to be hired or return to work from injury or leave.

Reasonable accommodation- A reasonable accommodation is any modification or adjustment to a job, the work environment, or the way things are usually done that enables a qualified individual with a disability to perform the essential functions of the position, or to enjoy equal benefits and privileges of employment.

–29 C.F.R. § 1630.2(o)

Examples include:

Making existing work spaces accessible

Modifying work schedules or equipment

Providing interpreters, readers, or assistive technology

Adjusting policies or procedures

SECTION: References

COMMENT:

References

C159 - Vocational Rehabilitation and Employment (Disabled Persons) Convention, 1983 (No. 159)

C159 - Vocational Rehabilitation and Employment (Disabled Persons) Convention, 1983 (No. 159)

Putting the I in ESG: Inclusion of Persons with Disabilities as Strategic Advantage of Sustainability Practices for Corporates and Investors"

ILO Disability and work

Inclusive Reporting: A Business Guide to Disability and the European Sustainability Reporting Standards

Performance Area 10: Emergency Preparedness and Response

SECTION: 10.1 Emergency Preparedness and Response, Towards Good Practice, 5

COMMENT:

Remove the word vulnerable

SECTION: 10.1 Emergency Preparedness and Response, Towards Good Practice, 7

COMMENT:

This is a key area. Training spotlight The notification equipment , notification systems need to always include Real Time text and Video Relay capabilities. Part of Next Gen 911.

Performance Area 12: Engagement

SECTION: 12.1 Engagement, Good Practice, 1

COMMENT:

edit for clarity. "Stakeholders and rights-holders" is repeated three times in a short paragraph. In current form, point lacks clarity.

SECTION: 12.1 Engagement, Good Practice, 6

COMMENT:

replace "vulnerable" with neurodivergent and disabled, and underrepresented. Add at end of entry: For example, provide meaningful access to effective communication for DeafBlind, Blind and Deaf individuals.

SECTION: 12.1 Engagement, Towards Good Practice, 2

COMMENT:

Comment Identify and map the stakeholders and rights-holders, and their legitimate representatives, that are directly and indirectly affected, potentially affected by, or that have an interest in the Facility's activities, including women, neurodivergent and disabled, and historically marginalized groups. If not already defined, the Facility should establish a definition of "local" in their context.

Comment - need to stop using "vulnerable". Humans are not vulnerable. The term is pejorative preferred by historically privileged. Disabled are not vulnerable.

Replace with historically marginalized. ADD for emphasis neurodivergent and disabled to this entry.

SECTION: 12.1 Engagement, Towards Good Practice, 3

COMMENT:

Comment Identify and map the stakeholders and rights-holders, and their legitimate representatives, that are directly and indirectly affected, potentially affected by, or that have an interest in the Facility's activities, including women, neurodivergent and disabled, and historically marginalized groups. If not already defined, the Facility should establish a definition of "local" in their context.

Comment - need to stop using "vulnerable". Humans are not vulnerable. The term is pejorative preferred by historically privileged. Disabled are not vulnerable.

Replace with historically marginalized. ADD for emphasis neurodivergent and disabled to this entry.

SECTION: Glossary and Interpretive Guidance

COMMENT:

Vulnerable and underrepresented stakeholders

Comment Remove the word vulnerable.

Historically marginalized or underrepresented stakeholders.

Comment Remove word vulnerability. These communities/groups could be based on ….

SECTION: References

COMMENT:

References

World Bank Environmental and Social Framework

ESS10: Stakeholder Engagement and Information Disclosure

World Bank Disability Inclusion and Accountability Framework

GRI Disability in sustainability reporting Pdf 21 2-29 Approach to stakeholder engagement

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Performance Area 13: Community Impacts and Benefits

SECTION: 13.1 Community Impact Management, Good Practice, 2

COMMENT:

Facilitate and encourage the participation of women, vulnerable disabled, neurodivergent, and underrepresented stakeholders and rights-holders in the assessment of adverse impacts, as appropriate, and consider how these groups, and others, could be differentially affected by the Facility's activities.

World Bank Environmental and Social Framework ESS10: Stakeholder Engagement and Information Disclosure (Promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle)

SECTION: 13.1 Community Impact Management, Good Practice, 4

COMMENT:

Remove vulnerable. Add disabled and neurodivergent.

See Inclusive Reporting: A Business Guide to Disability and the European Sustainability Reporting Standards (Page 4 Recommendation: Engage directly with persons with disabilities and their representative organizations during stakeholder consultations.)

SECTION: 13.1 Community Impact Management, Leading Practice, 1

COMMENT:

create footnote to Inclusive Reporting: A Business Guide to Disability and the European Sustainability Reporting Standards (Page 4 Recommendation: Engage directly with persons with disabilities and their representative organizations during stakeholder consultations.) GRI Disability in sustainability reporting Pdf 21 2-29 Approach to stakeholder engagement World Bank Environmental and Social Framework ESS10: Stakeholder Engagement and Information Disclosure (Promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle)

SECTION: 13.1 Community Impact Management, Leading Practice, 4

COMMENT:

should be moved to towards good practice category. Providing support , training and or external resources to stakeholders and rights holders to fully participate Add for example, interpreters, captioners and braille to ensure effective communication to DeafBlind, Blind, Deaf, hard of hearing.

World Bank Environmental and Social Framework

ESS10: Stakeholder Engagement and Information Disclosure

(Promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle)

SECTION: 13.2 Community Development and Benefits, Good Practice, 2

COMMENT:

Replace vulnerable with neurodivergent and disabled.

Inclusive Reporting: A Business Guide to Disability and the European Sustainability Reporting Standards (Page 4 Recommendation: Engage directly with persons with disabilities and their representative organizations during stakeholder consultations.)

GRI Disability in sustainability reporting Pdf 21 2-29 Approach to stakeholder engagement

World Bank Environmental and Social Framework

ESS10: Stakeholder Engagement and Information Disclosure

SECTION: 13.2 Community Development and Benefits, Leading Practice

COMMENT:

These are the areas that CMSI should emphasize targeting long term investment in disability inclusion, e.g. training supporting disabled job training (Deaf drilling operators, deafblind financial analysts), STEM initiatives, installing hearing loops, accessible pedestrian signals, promoting Braille literacy, regional paratransit, accessible facilities (ice rink, sports complexes, schools), assistive technology equipment, cultural and art recognizing disabilities.

SECTION: Glossary and Interpretive Guidance

COMMENT:

Meaningful engagement

Comment -replace word vulnerable with historically marginalized populations

Page 92

Vulnerable and underrepresented stakeholders-Comment See adjustments at earlier mention of definition.

SECTION: References

COMMENT:

Reference

Inclusive Reporting: A Business Guide to Disability and the European Sustainability Reporting Standards

GRI Disability in sustainability reporting

World Bank Environmental and Social Framework

ESS10: Stakeholder Engagement and Information Disclosure

Document:
Claims

1. Introduction

COMMENT:

Introduction only references greenwashing. The CMSI address more than environmental concerns and the statement should reflect Social and Governance are just as important as the Environmental.

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4. Monitoring and Enforcement

COMMENT:

Page 9

Page 11

The color-coded parts of the page need better contrast-

The lettering in the colored blocks is too small.

Black font on a colored background would better.

Do you even need the color coding?

The red background -red is the hardest color to read. Colorblindness- white font with red background is difficult to read. Black font!

Annex II: Examples of the Different Types of Claims

COMMENT:

Page 16

Replace white font with Black font. Increase font size.

General Comment

COMMENT:

Throughout the document

For emphasis, replace difficult to read fonts in italics and replace with bold, underline or both e.g. Page 7, Page 8