

SCHEDULE A – INTRODUCTION AND OVERVIEW

CONTEXT

1. The DND/CAF Code of Values and Ethics requires all Canadian Armed Forces (“CAF”) members to respect human dignity and the value of every person, by treating every person with respect and fairness, helping to create and maintain safe and healthy workplaces that are free from Racial Discrimination and Racial Harassment.

2. To understand the context in which Class Members have experienced Racial Discrimination and Racial Harassment, it is necessary to consider all the components of Racism that exist in the CAF.
 - (a) On an interpersonal level, racialized individuals are likely to be subject to racist behavior that is based on the belief that people who are not of European descent are inferior; beliefs that are often passed down intergenerationally with their roots in Colonialism and the African slave trade.

 - (b) On a systemic level, these racist beliefs and attitudes permeate the structures and operations of institutions and organizations. These beliefs and attitudes are inherent in the policies and established practices that guide the actions of individuals.

 - (c) Indigenous, Black and other racialized persons suffer daily indignities that affect their mental and physical health, limit their access to resources and social inclusion, and reduce their capacity to advance economically and socially.¹

3. The organization acknowledges that the long-standing failure to meaningfully address Racial Discrimination and Racial Harassment within the Defence Team has resulted in a loss of trust on behalf of our people and Canadians more broadly, particularly those from racialized groups who endure disproportionate harm.

¹ Excerpt from the work of Plaintiffs’ Subject Matter Experts – Robert Wright and Andrea Currie, 2020.

4. Accordingly, Systemic Relief Measures (“**SRM**”) are required and form part of the Final Settlement Agreement (“**FSA**”). SRM means the activities that will address Racism, Systemic Racism, Racial Discrimination and Racial Harassment, all to improve the organizational culture and systems within the CAF, while supporting DND/CAF’s efforts to embrace a high-performing culture, characterized by trust, respect and where equity, diversity and inclusion can flourish. The SRM will also provide opportunities to focus on individuals that are affected by Racial Harassment and Racial Discrimination.
5. DND/CAF’s mission is to implement SRM that are operationally sustainable and meaningful and empathetic to the Class Members, all while improving the organizational culture within the Defence Team.
6. All the defined terms included in the FSA are relevant to the implementation of the SRM.
7. In Spring 2022, DND/CAF released the Minister of National Defence (“**MND**”) Advisory Panel on Systemic Racism and Discrimination with a focus on Anti-Indigenous and Anti-Black Racism, 2SLGBTQ2IA+ Prejudice, Gender Bias, and White Supremacy (“**Panel Report**”).
8. The Advisory Panel’s mandate was to conduct consultations and provide the MND with recommendations on how to eliminate Systemic Racism and Discrimination from DND/CAF. The Panel Report identified Systemic Barriers to inclusivity which run deep and wide in the Defence Team; deep within all the levels of leadership, and wide across the different units and directorates of the organization.²
9. The Panel Report called attention to thirteen opportunities to address these Systemic Barriers with an understanding that the Defence Team be held accountable for the rigorous implementation of the recommendations.³

² Minister of National Defence Advisory Panel on Systemic Racism and Discrimination. Final Report, January 2022, vii.

³ *Ibid.*

10. Also, on July 9, 2022, the Prime Minister and the MND delivered a historic apology to descendants of the Number 2 Construction Battalion, recognizing the legacy of Systemic Racism and Discrimination that denied the men of this all-Black battalion fighting role, support and care, and later recognition and commemoration. The apology was accompanied by a report of the Number 2 Construction Battalion National Apology Advisory Committee (“**NAAC**”). Most of the recommendations were achieved through the apology itself, with further consideration needed for the recommendations that propose the establishment of long-term programs.
11. To address how the Defence Team will implement both the NAAC and Panel Report recommendations in conjunction with other internal and external report recommendations and government wide Anti-Racism program and policy initiatives, the Chief, Professional Conduct and Culture (“**CPCC**”) developed an Anti-Racism Implementation Plan which forms part of the DND/CAF Culture Evolution Strategy.
12. The Anti-Racism Implementation Plan is built around the four themes of Recognition, Understanding, Building Capacity and Strengthening Voices, which are defined below:
 - (a) **Recognition**: Understanding our legacy of harms, and commemorating and celebrating historically underrepresented groups.
 - (b) **Understanding**: Engaging in research and outreach to raise awareness and knowledge about systemic racism and discrimination.
 - (c) **Building Capacity**: Enhancing the capacity at the leadership and team level to respond to the mandate to build a diverse, equitable, inclusive, and harassment-free workplace; developing tools, training materials, and resources to help identify and challenge Racial Discrimination and hateful conduct.
 - (d) **Strengthening Voices**: Shifting mindsets and evolving culture by elevating the voices of those with lived experience.

13. The implementation of the SRM included in the following schedules will link to the above themes to take a consistent thematic approach to the program and policy initiatives underway to resolve Systemic Barriers and address historical harms while collaborating efforts within DND/CAF and the broader government of Canada ecosystem. The SRMs will strengthen DND/CAF's overall approach to Anti-Racism implementation and contribute to the building of culturally evolved workplaces that break down the Systemic Barriers for Indigenous, Black, and other racialized peoples so they can advance and thrive in the organization.
14. The SRM will include a Research and Analysis initiative and Restorative Engagement Processes. Consultations will be conducted on the development, progress, and findings on both initiatives.

PURPOSE

15. To eliminate Racial Discrimination and Racial Harassment by responding to, addressing, and removing Systemic Barriers in the CAF that restrict building a workplace that is characterized by trust, free from Racial Discrimination and Racial Harassment and where every person is treated with dignity and respect.

OBJECTIVES

16. The SRM will be undertaken in pursuit of the following:
 - (a) in pursuit of the objectives explained below and those found in each Schedule hereto;
 - (b) in accordance with the guiding principles set out in paragraph 21 of this Schedule A; and
 - (c) in consideration of the expertise and lived experience of Indigenous, Black and other racialized current and former CAF members.

17. The overarching objectives of the SRM are as follows:
 - (a) To enhance understanding of the scope, prevalence and nature of Racism, Systemic Racism, Racial Discrimination and Racial Harassment and how to break down Systemic Barriers.
 - (b) To identify key cultural factors and behaviours that enable positive culture evolution, and that proactively address Racial Discrimination and Racial Harassment in the DND/CAF to effect lasting positive culture change across the organization.
 - (c) To provide recommendations designed to retain, restore trust, and support survivors of Racial Discrimination and Racial Harassment in the CAF.

REPORTING REQUIREMENTS

18. Mid-way into FSA implementation, the Lead Organizations will deliver to the Chief of Defence Staff (“**CDS**”) and the Deputy Minister (“**DM**”) an interim progress report, addressing issues for immediate consideration by the CDS and DM that may become apparent during the implementation of the SRM.
19. Upon completion of FSA implementation, the Lead Organizations, through the Coordinating Committee, will provide recommendations arising from the implementation of the SRM through a final report, to be delivered to the CDS and the DM.
20. The final report will be made public.

GUIDING PRINCIPLES

21. The following principles guide the implementation of the SRM:

- (a) **Cultural Humility**: Framework for moving toward equity. It is an approach that recognizes the role of power and privilege, as well as the imbalances inherent within systems and organizations.
- (b) **Distinctness and Intersectionality of Racism**: Recognition that Racial Discrimination and Racial Harassment are experienced differently by various groups, and within groups along intersectional lines.
- (c) **Evidence-informed Approach**: An approach based on concrete evidence gathered through research.
- (d) **Inclusive Process**: The expertise and experiential knowledge of Indigenous, Black and other racialized CAF members are valued and must be meaningfully engaged at every stage of the work. Their perspectives through their lived experiences and guidance inform all aspects of planning and decision-making.
- (e) **Historical Impact**: Recognition of a historical and contextual approach that includes Canada's history of colonialism, slavery and segregation.
- (f) **Organizational / Collective Impact Approach**: Recognizes the importance to work with all commands and units across CAF to address Systemic Barriers.
- (g) **Restorative Approach**: A principle-based approach that puts people and their relationships (to one another, between groups and with institutions and organizations) at the centre and within the context of relative power. A restorative approach requires attention to the connections, contexts, causes and impacts of Racial Discrimination and Racial Harassment to identify what needs to happen to address these harms, and link these actions to real change.
- (h) **Trauma Informed Care**: Every system and organization is impacted by trauma and has the potential to re-traumatize people and interfere with recovery. Trauma informed systems and organizations provide for everyone within that system or organization by having a basic understanding of the impact that trauma can have

on individuals seeking support, and a process that is client- centered, responsive and supports healing.

- (i) **Universalism:** The concept that everyone benefits from targeted removal of Systemic Barriers faced by Indigenous, Black or other racialized peoples. Reducing barriers leads to a better working environment for everyone.

COORDINATING COMMITTEE

- 22. To ensure that the SRM work is integrated and that the recommendations made regarding the outcome of each initiative's work are considered together, a Coordinating Committee ("CC") will be established.
- 23. The CC will be chaired by the Director General of Culture at CPCC and will provide advice, guidance, and direction, as necessary to the Lead Organizations and/or Subject Matter Experts, for each of the pillar's work.
- 24. The CC will coordinate implementation of the SRM and consolidate the timelines for all reports and briefings.
- 25. A minimum of three current and/or former CAF Members, each of whom identify as a Class Member, and who serve or has served in either the Regular Force, the Primary Reserve, the COATS, or Rangers will be represented on the CC.
- 26. Canada shall be responsible for reasonable travel expenses incurred by the Class Member Representatives while carrying out their obligations.
- 27. SMEs and representatives of the Lead Organizations will also be represented on the CC.
- 28. The process for selecting Class Member representation will be as follows:

- (a) the Defence Advisory Group Secretariat will compile a list of potential Class Member representatives on the CC, which will include current and former CAF members;
 - (b) the list of proposed Class Member representatives will then be provided to the Parties for consideration;
 - (c) the Parties will make all reasonable efforts to reach agreement upon the selection of three Class Member representatives from the list; but
 - (d) failing any such agreement between the Parties, class counsel shall select the representatives from the list.
29. The CC may engage other professional and collective bodies as necessary to complete its work.
30. Terms of Reference for the CC will be developed in consultation with Class Counsel.

SYSTEMIC RELIEF MEASURES

SCHEDULE B – RESEARCH AND ANALYSIS

PURPOSE

1. The purpose of this pillar is to conduct Research and Analysis. The research process must include Participatory Action Research (“**PAR**”), a Racial Lens, and a Multi-Level Analysis Framework.
2. As mentioned in the Panel Report, inequality in representation persists in every corner of the Defence Team: recruitment, retention and career progression are seriously hampered by systemic discrimination.⁴
3. High retention rates can be an indicator of positive general morale and contribute to operational effectiveness. DND/CAF statistics demonstrate that Indigenous Peoples, visible minorities, women, and persons with disabilities have much lower retention rates than white men.⁵
4. Research and Analysis is to build on the findings in the Panel Report around retention and to conduct research on the impacts that Systemic Barriers have on the retention of Indigenous, Black, and other racialized CAF members.
5. Research and Analysis will contribute to the Anti-Racism Implementation Plan themes by engaging and building on ongoing research to raise awareness and knowledge about Racial Discrimination and Racial Harassment, to enhance data collection, and to better understand the Systemic Barriers that impact the retention of Indigenous, Black, and other racialized peoples.

OBJECTIVES

6. To collect and capture the perceptions of Indigenous, Black, and other racialized CAF members and the perceptions of the white CAF population, all in relation to Racism,

⁴ *Supra* note 2 at v.

⁵ *Supra* note 2 at 16.

Systemic Racism, Racial Discrimination and Racial Harassment within the CAF. The collection of those perceptions must account for how Racial Discrimination and Racial Harassment is experienced differently among Indigenous, Black, and other racialized CAF members.

7. To identify Systemic Barriers that impact the retention of Indigenous, Black, and other racialized CAF members.
8. Based on the results of the research, to provide recommendations designed to increase the retention of Indigenous, Black and other racialized members, based on the results of the research, and to strengthen the CAF equity plan.

ROLES AND RESPONSIBILITIES

9. **Lead Organization**: Director General Military Personnel Research and Analysis (“**DGMPRA**”) is identified as the Lead Organization to undertake Research and Analysis. The role of DGMPRA includes: coordinating the review of social science research projects in DND/CAF and delivering an internal program of social scientific research.
10. The Lead Organization will seek researchers who are Indigenous, Black and other racialized persons, and who are experienced with conducting Research and Analysis on Racial Discrimination and Racial Harassment.
11. The Lead Organization will ensure that the Participatory Action Research is an equitable, culturally humble and trauma informed process and will formulate a comprehensive and relevant research plan. All research inquiries should, where feasible, consider the multi-level analysis of cultures, subcultures, and climates within the CAF, consistent with the Multi-Level Analysis Framework. Recommendations for future research are critical and will highlight the ongoing, learning nature of creating a more inclusive organizational culture.
12. **External Subject Matter Experts**: In consultation with the Coordinating Committee, CPCC will retain a minimum of three external Subject Matter Experts who have lived

experience and/or who are grounded in either Critical Race Theory or in Indigenous ways and knowledge. These Subject Matter Experts will use their expert voices to provide a support and information function to assist with the Research and Analysis.

13. Contracts with Subject Matter Experts will be arranged and established in accordance with Government of Canada contracting rules and guidelines.

CONSULTATIONS

14. Chief, Professional Conduct and Culture and the Coordinating Committee will develop a critical path and compile a list of individuals and entities who would be consulted on both the research plan and the research findings. The lived experience of Indigenous, Black, and other racialized persons will be prioritized during the consultations. The Defence Advisory Groups should be included as much as is reasonably possible.

DEFINITIONS

15. **“Multi-level Analysis Framework”** means the level of analysis used in research to better understand the influences at the different levels of context. They are: micro, meso, and macro. Micro level analysis focuses on those interactions of individuals or very small groups. Meso level of analysis focused on the groups and institutions. Macro level analysis is used to focus on societies at large.
16. **“Participatory Action Research”** means a research approach that emphasizes participation and action. The process seeks to understand the issue being studied and the context within by trying to change it collaboratively with key communities that will be impacted by the study.
17. **“Racial Lens”** means a commitment to research that adopts the multitude of approaches and frameworks by social scientists in the study of Racial Discrimination and Racial Harassment that considers the lived experiences of various groups.

REVIEW PHASES AND DELIVERABLES

Twelve (12) Month Anniversary of the FSA Implementation Date

18. Completion of a problem definition phase which will include a literature review of internal and external research, as well as a review of ongoing research. Completion of a PAR plan with dates and deliverables for research. Consultations conducted on the PAR plan.

Twenty-Four (24) Month Anniversary of the FSA Implementation Date

19. The Lead Organization provides an update on progress and research results, inclusive of any recommendations to be included in the progress report as explained in Schedule A.

Forty-Eight (48) Month Anniversary of the FSA Implementation Date

20. The Lead Organization provides recommendations arising from the implementation of the work under this pillar for inclusion in the final report as explained in Schedule A.
21. Upon the consent of the Parties, these timelines can be amended.

SYSTEMIC RELIEF MEASURES

SCHEDULE C – RESTORATIVE ENGAGEMENT

PURPOSE

1. The Lead Organization for this Restorative Engagement pillar will be CPCC.
2. CPCC will establish Restorative Engagement Processes that are culturally competent, relational in their orientation, and principle based. From the beginning, the Restorative Engagement Processes will be responsive to the diverse needs of Class Members and will prioritize meaningful and empowered involvement throughout the processes of Indigenous, Black and other racialized persons who have experienced Racial Discrimination and Racial Harassment.
3. The Restorative Engagement Processes will be guided by the shared principles of the Systemic Relief Measures and by principles specific to the work of designing and implementing Restorative Engagement Processes. It will also be informed by individuals' lived experiences of Racial Discrimination and Racial Harassment.
4. The design of the Restorative Engagement Processes will be guided by consultations through the Coordinating Committee. It is envisioned that the Restorative Engagement processes will provide both individualized and group offerings to the Class Members and provide creative opportunities for CAF Representatives to respond and acknowledge the impacts of Racial Discrimination and Racial Harassment.
5. CPCC, as the lead implementer of the Restorative Engagement Processes, will maintain functional authority over the design of the processes and remain responsive to feedback as the processes are designed and implemented.
6. These processes will lead to the provision of recommendations about how to address and eliminate Racism, Systemic Racism, Racial Discrimination and Racial Harassment in the CAF, all to fulfill the purpose of the Systemic Relief Measures as explained in Schedule A.
7. These processes will contribute to the Anti-Racism implementation themes explained in Schedule A through strengthening voices by elevating the voices of those with lived

experience and building capacity by engaging leadership to respond and raise their awareness of Racial Discrimination and Racial Harassment.

OBJECTIVES

8. The Restorative Engagement Processes will:
 - (a) Create opportunities where Class Members are supported to share their experiences, knowledge and understanding of Racial Discrimination and Racial Harassment and its causes and impacts.
 - (b) Create opportunities for representatives of the CAF to acknowledge, understand, and learn from Class Members' experiences of Racial Discrimination and Racial Harassment, and to take responsibility, individually and collectively, for its causes and responses.
 - (c) Create opportunities for Class Members and CAF representatives to identify lessons learned and to take action, in real time, to contribute to broader CAF culture evolution efforts.
 - (d) Model, learn about, and build capacity for the use of a principle-based restorative approach as a response to harm, and as a way to build an inclusive and respectful institutional culture now and into the future.

Participation / Eligibility

9. Participation in the Restorative Engagement Processes is voluntary, based on free, informed and ongoing consent. Consent can be withdrawn at any time.
10. All individuals determined to be Class Members will be eligible for participation in the Restorative Engagement Processes, regardless of decisions with respect to the Monetary Assessment Scheme as included within the FSA. Furthermore, Class Members will be informed that participation in the Restorative Engagement Processes does not affect

Monetary Assessment Scheme decisions, nor any decisions about administrative, investigative, disciplinary or criminal matters.

11. Class Members do not need to seek restitution under the Monetary Assessment Scheme in order to participate in the Restorative Engagement Processes. However, the claims administration process is the mechanism by which individuals who wish to participate in the Restorative Engagement Processes can indicate their desire to participate. As the Restorative Engagement Processes are a voluntary, opt-in process, interested Class Members must complete a claim form in this manner to be eligible.

Safety and Respect

12. All participants and Restorative Practitioners must be and will be treated with respect, dignity and compassion.
13. The safety of participants and Restorative Practitioners (e.g. physical, emotional, cultural and spiritual) will be of the utmost importance.
14. The CAF will provide top cover to allow for Class Member participation in the Restorative Engagement Processes without fear of reprisal, inclusive of mechanisms through which this will be enforced.

Restorative Practitioners and Support

15. Restorative Practitioners will fulfil a range of roles in the Restorative Engagement Processes to meet the intent of this Schedule C, to meet the diverse needs of participants and the organization, and to contribute to culture evolution.
16. Participants will be encouraged to involve a support person throughout the process if this meets their needs. Participants will also be informed of available counselling and trauma informed support services.

Nature of Engagement

17. This Schedule C reflects the CAF's commitment to better understand Racism, Systemic Racism, Racial Discrimination and Racial Harassment, inclusive of the context in which these harms occur, and to contribute to institutional culture evolution through the shared lived experiences of Class Members in the Restorative Engagement Processes. It will offer Class Members flexibility and multiple, meaningful participation choices, co-created by participants.

18. Class Member participants in the Restorative Engagement Processes will themselves determine:
 - (a) who participates;

 - (b) if and how their experiences will be shared beyond the process in contribution to culture evolution;

 - (c) how and when communication takes place; and

 - (d) the nature, pace and format of their engagement.

19. The Restorative Engagement Processes must be designed to allow for diversity in process options, including individual and/or group engagement sessions.

Confidentiality

20. Participation in, and information shared within, the Restorative Engagement Processes will be kept and treated as confidential within legal limitations, subject to participants' desire to have their experiences recorded and shared beyond the process.

21. Participants will be fully informed about any legal limits to such confidentiality. Class Counsel will be informed regarding the information that will be provided to participants in this regard.

22. Participants who have not yet reported an incident of Racial Discrimination or Racial Harassment will be provided with information and options for doing so. Participants who do not wish to report will be offered options that would allow them to participate without activating a duty to report.

ROLES AND RESPONSIBILITIES

23. Class Members will be informed about the Restorative Engagement Processes as part of the Notice of Settlement. The Administrator of the claims process will inform Class Members about the option of participation in the Restorative Engagement Processes and will refer interested Class Members to CPCC.
24. CPCC will:
 - (a) Lead the development and implementation of the overall Restorative Engagement Processes from a principle based, culturally competent and relational approach and in consultation with Indigenous, Black and other racialized peoples, Class Members, internal and external Stakeholders and Subject Matter Experts.
 - (b) Recruit, assess and manage Restorative Practitioners.
 - (c) Ensure Restorative Practitioners are culturally competent, guided by restorative principles and qualified to meet the intent of this Schedule C, the diverse needs of participants and the organization, and contribute to culture evolution.
 - (d) Contribute to regular updates on the processes for all relevant stakeholders, including establishing a feedback schedule with Class Counsel to ensure consistent and regular feedback on the design of the Restorative Engagement Processes.
 - (e) Create a rigorous and transparent feedback loop to the Coordinating Committee so that those consulted, Class Members, and the CAF are regularly apprised about the processes and about any process developments.

- (f) Ensure all relevant Stakeholders have an understanding of the Restorative Engagement Processes and approach their work with Class Members from a restorative, culturally competent and trauma informed way.
 - (g) Develop an integrated, culturally competent and trauma informed communication strategy and outreach plan with a view to far-reaching internal and external awareness and understanding of the Restorative Engagement Processes and to build credibility, trust, and engagement.
25. CAF and CPCC will, in partnership, recruit, prepare, assess, assign, and coordinate CAF representatives for participation in the Restorative Engagement Processes.

Consultations

26. The needs of Indigenous, Black and other racialized peoples will be central to the design of the Restorative Engagement processes, especially the design of individual and/or group engagement sessions. The inclusion and participation of all groups with roles, responsibilities, and an interest in the Restorative Engagement Processes. is necessary for the process to engage restoratively, to meet the diverse needs of Class Members, and to fulfil the commitments of this Schedule.
27. CPCC intends to hear and acknowledge as many voices as possible and to respect those voices by ensuring they make a meaningful contribution to process design and implementation. CPCC, through the Coordinating Committee, will develop a comprehensive consultation schedule in support of the design and implementation of the Restorative Engagement Processes, creating the space and time necessary to conduct these consultations in a principle based, culturally competent and trauma informed way, and through a rigorous and transparent feedback loop to those consulted.
28. CPCC will engage a small group of Subject Matter Experts to advise on the processes. All feedback from Subject Matter Experts will be considered equally, and there is no hierarchy or primacy of any Subject Matter Experts.

Learning, Planning and Action

29. Along with the other Systemic Relief Measures, the Restorative Engagement Processes must be designed and implemented as an integrated and complementary component of broader culture evolution and thereby represent a conscious link to transformational change for the CAF.
30. A restorative approach will be applied to identifying and sharing what is learned through the Restorative Engagement Processes. Understanding the lived experiences of Class Members, the experiences of CAF representatives, and identifying lessons learned and action required will occur throughout the Restorative Engagement Processes, and be summarized in a final report on the results of the Systemic Relief Measures, following the lifecycle of the processes. The potential of the Restorative Engagement Processes to contribute to culture evolution lies in its capacity to engage those affected and those with leadership responsibility within the CAF directly in the learning.
31. The capturing of lived experiences of Racism, Systemic Racism, Racial Discrimination and Racial Harassment in the CAF is a priority for the Restorative Engagement Processes. With consent, experiences shared through the Restorative Engagement Processes will be retained for the purpose of increasing awareness and understanding and informing future policy and training in the CAF. CPCC will consult on the mode and means of recording, analyzing and reporting on the processes to determine how experiences shared, lessons learned and potential recommendations from the Restorative Engagement Processes will be captured through a trauma informed, culturally competent approach and effectively leveraged for meaningful change in CAF culture.
32. CPCC and CAF will make lessons learned from the Restorative Engagement Processes public and available through a final report, as explained in Schedule A, on the results of the Systemic Relief Measures, and on a consistent basis throughout the design and implementation of the Restorative Engagement Processes.

DEFINITIONS

33. **“Restorative Approach”** means activities that seek to restore, retain and transform trust in addition to addressing repair and prevention.
34. **“Restorative Practitioners”** means individuals who are guided by restorative principles and specially trained and qualified to provide culturally competent and trauma informed Restorative Engagement Processes.
35. **“Restorative Engagement Processes”** means a variety of co-developed processes where interested Class Members, with the support of Restorative Practitioners, will be able to share their experiences of Racial Harassment and Racial Discrimination with CAF representatives and contribute to culture evolution.

REVIEW PHASES AND DELIVERABLES

Six (6) Month Anniversary of the FSA Implementation Date

36. Completion of consultations on process design, and selection of Subject Matter Experts.

Twelve (12) Month Anniversary of the FSA Implementation Date

37. Completion of process design and commence implementation of the Restorative Engagement Processes.

Twenty-Four (24) Month Anniversary of the FSA Implementation Date

38. The Lead Organization provides an update on the processes, inclusive of any recommendations to be included in the progress update as explained in Schedule A.

Forty-Eight (48) Month Anniversary of the FSA Implementation Date

39. The Lead Organization provides recommendations arising from the implementation of the work under this pillar in accordance with this Schedule C, for inclusion in the final report as explained in Schedule A.

40. Upon the consent of the Parties, these timelines may be amended.