



ATLANTIC TOWING

ACCESSIBILITY PLAN



June 1, 2023



GENERAL

Executive Summary

The purpose of the Accessible Canada Act is to make Canada barrier-free by January 1, 2040. This involves identifying, removing, and preventing barriers in federal jurisdiction in several priority areas. A *barrier* is anything that keeps a person with a disability from participating fully and equally in society.

A *disability* is any physical, mental, intellectual, cognitive, learning, communication or sensory impairment or functional limitation. Federally regulated entities are required to produce a plan to address any barriers or limitations they find in these priority areas:

- Employment
- Built Environment
- Information and communication technology
- Communication, other than information and communication technology
- Procuring goods, services, and facilities
- Designing and delivering programs and services
- Transportation

Atlantic Towing is committed to creating a more inclusive environment for employees. We not only want to meet the basic legislative requirements, but we also want to experience the full benefits of a diverse and inclusive workforce. Opening access to all is imperative to our continued growth and competitiveness as an employer in the marine transport industry. Improved accessibility is not only important for persons with disabilities but will benefit all employees.

We know creating a barrier-free environment takes time and we are dedicated to the ongoing identification, removal, and prevention of barriers. Atlantic Towing will build on our current efforts through the development of our initial Accessibility Plan as required under the Accessible Canada Act.

This Accessibility Plan will guide our organization in meeting our accessibility commitments and in building an accessible environment. We also recognize that for many of our roles, particularly Seafarers, the feasible accommodations are reduced. These roles are physically demanding by nature, but we are expanding our understanding of the range



and variety of accessibility improvements and reasonable accommodation options available to persons with all types of disabilities.

To address gaps in these areas, it is important to recognize and understand the experiences of people with disabilities. Our initial plan was developed in consultation with employees who identify as having a disability via employee surveys, working with consultants with disabilities, and reviewing our internal operations. In addition, we consulted with an external organization with expertise in accessibility in the development of this plan. Because Atlantic Towing currently has a smaller representative sample of employees who identify as a person with a disability, these consultations extended to employees who may not have a disability but are close to someone who has a disability and/or an interest in contributing to an accessible environment.

A summary of initial opportunities include:

- Building commitment on creating a more accessible environment through understanding and education throughout the organization.
- Improving how we attract persons with disabilities to jobs in our company and the marine sector through a review of our recruitment processes.
- Expanding the range and options for accommodation, especially for Seafarers.
- Improving the accessibility of company-wide communications and our websites.
- Being better prepared to provide information in accessible formats when requested.
- Improving the knowledge and leveraging the capabilities of accessibility features in current and future IT equipment, programs, and systems.
- Initiating processes to review the accessibility of facilities, procurement procedures, company programs, new initiatives, and on-going services.

Feedback Process and Contact Information

Atlantic Towing welcomes feedback on our Accessibility Plan from the public, employees, and stakeholders. This feedback is valuable to us as it helps us break down accessibility barriers and build on our commitment to accessibility and inclusion.

If you have an inquiry, feedback or you are experiencing a barrier to accessibility and want to help improve our accessibility, please contact us using one of the contact methods below.



Contact: HR Director

Mailing Address: 2nd floor, 300 Union St, Saint John, NB E2L 4M3

Email: tlinclusion@jdirving.com

Telephone: 506 632-7777

Website: www.atlantictowing.com

We will acknowledge receipt of your feedback and follow up, upon request, with you directly. You can also use these channels to request this plan in alternate formats.

Statement of Commitment

At Atlantic Towing, we are committed to making our organization more accessible for persons with disabilities. As we build our understanding of barriers to accessibility, this plan will guide our path forward. We will work with senior leaders, employees, and external partners to reduce barriers faced by people with disabilities.

Atlantic Towing's Diversity, Equity and Inclusion strategy is led by the vision statement as follows: *We Deliver Inclusivity*. We believe that diversity drives innovation and through innovation and integrity, we can create a workplace that recognizes each other's unique abilities and differences and their positive effects on our business.

Our Diversity, Equity and Inclusion Committee advises on the development and implementation of initiatives to support employment equity. The strategy is built upon five pillars which include: communication, recruitment, training & development, workplace culture & accessibility. The plan specifies deliverables for the short and long term, governance, measures and results.

Through our diversity, equity and inclusion strategy and this accessibility plan we are:

- building an inclusive and diverse workforce that respects everyone,
- encouraging employees to self-identify as members of employment equity groups to make sure that we have accurate data,
- encouraging employees to participate on our committees including our Accessibility Sub-Committee,
- using a zero-tolerance approach for disrespectful behaviour and a rigorous investigation process that's in line with our Safe & Respectful Workplace Policy.



Reporting Our Plan

As required by the Accessible Canada Act, we will publish a status report every year that measures progress against our commitments. We will also review and update our Accessibility Plan every three years. Progress Reports and updates to our Accessibility Plan will be shaped by consultation with persons with disabilities. We will consult internally with our employees and partner with external organizations that serve people with disabilities.

ADDRESSING AREAS IDENTIFIED IN THE ACCESSIBLE CANADA ACT

This initial Accessibility Plan is the beginning of our journey toward a more accessible environment. Organizational commitment regarding all areas of accessibility is critical to taking this first step and we must educate our leaders on accessibility and their responsibilities under the *Accessible Canada Act*. We recognize that barriers exist in our organization. Furthermore, accessibility considerations are not embedded into our processes and practices. We will develop a mechanism for ongoing consultation of employees with disabilities to better understand where barriers exist. Finally, we will monitor our progress. We strive for increased representation of persons with disabilities, and we will ensure oversight and delivery on the accessibility actions that we have set out to achieve.

Employment

The "employment" area ensures that candidates and employees with disabilities and those who experience barriers are supported throughout the entire employment lifecycle.

Barrier #1: Our recruitment process does not pro-actively offer accessible options for candidates and employees resulting in our inability to attract persons with disabilities.

Actions:

- Review of recruitment and hiring practices to identify barriers to accessibility in our processes and accommodate people with disabilities.
- Through our job postings, increase visibility to Canadians with disabilities of the various jobs available in the marine sector, highlighting our commitment to their inclusion in our workforce.
- Educate hiring managers on accessibility and how they can ensure a barrier-free hiring, selection and accommodation process.



- Benchmark current recruitment, selection and onboarding practices against leading accessibility practices in other companies in our sector and different industries.

Barrier #2: The accessibility infrastructure for employees seeking reasonable accommodations is unclear.

Actions:

- Understand unmet accommodations that our employees experience.
- Review and refine processes for accommodations so that employees feel that they can ask for support when they need it.
- Expand our understanding of the range of accommodation options available and used by other organizations.
- Develop a framework that helps managers understand their responsibilities in the accommodation process that guides them in supporting their employees and implementing suitable workplace adjustments.
- Partner with our Disability Management partners to assess and identify options for a wider range and variety of potential accommodations.

Built Environment

The "built environment" area ensures that workspaces and the work environment are accessible for all.

Barrier #3: Some spaces within the office and facilities we operate may limit the mobility of employees and visitors with disabilities.

Actions:

- Using a phased approach and with consultation, we will scan our environment for barriers to accessibility.
- When possible, we will work with our industry partners to improve spaces where our employees conduct work.

Information and Communication Technologies (ICT)

"Information and communication technologies" are various technological tools used to send, store, create, share or exchange information.

Barrier #4: Employees without easy access to email can miss company communications and may be unaware of policies, processes and benefits available to them related to accessibility and accommodations.



Actions:

- The nature of the marine industry means that our employees can work in remote areas and with limited time and/or access to email communications. We will provide company communications in a variety of methods, including meetings, conversations, and postings in areas where employees gather to ensure that important updates are received in a timely manner.
- As we develop our infrastructure for accommodation requests, we will distribute new policies and processes using communications methods that reach our entire employee population.

Barrier #5: Company websites are not fully accessible.

Actions:

- When websites are created or updated, test to ensure WCAG 2.1 compliance.
- Review current websites and make corrections to high priority areas.
- Establish processes and oversight to monitor website accessibility on a regular basis and correct identified issues.

Communication Other Than ICT

This area requires that organizations provide barrier free access for the public, clients and employees to all the communications that Atlantic Towing produces for this audience.

Barrier #6: Company communications often contain graphs, charts and images that may not be accessible for those who are blind or low vision.

Actions:

- Develop and promote best practices for clear and effective email and the use of plain language.
- Provide training documents with options available for persons with disabilities (e.g., making items larger on a screen, activating reader on MS Word, activating closed captioning on MS Teams, etc.)
- Educate content creators on best practices for ensuring that email and documents interact with adaptive technology such as providing image descriptions for graphs and charts.



Barrier #7: Atlantic Towing does not have a consistent process to ensure communication with employees and other stakeholders are available in accessible formats and provided in a timely manner.

Actions:

- Prepare standard resources and commonly issued company communication in accessible formats so that they are ready to be distributed upon request.
- When asked, we commit to providing these accessible formats as soon as possible and within time frames listed in the *Accessible Canada Regulations* in formats compatible with adaptive technology meant to help people with disabilities.

Procurement of Goods, Services and Facilities

The “procuring (buying) goods, services and facilities” area ensures that accessibility is considered at the beginning of the buying process.

Barrier #8: Atlantic Towing’s procurement procedures and practices do not take into consideration accessibility requirements.

Actions:

- Update the procurement procedures to include accessibility checks when buying goods and services.
- Include accessibility considerations into procurement templates (e.g., requests for proposals) so that they inform the selection of external vendors, products and services and confirms that they will abide by the requirements of the *Accessible Canada Act*.

Design and Delivery of Programs and Services

When designing and delivering the Company’s internal and external programs and services, accessibility considerations must be part of the process right from the very start.

Barrier #9: Currently there is no standard approach for ensuring all programs, processes and services have taken accessibility into account.

Actions:

- Leverage the mandatory requirement to consult with persons with disabilities to provide feedback on our programs, processes, policies, and services.
- Develop and promote guidelines on how to apply accessibility considerations when reviewing company policies, programs, and services.



- Create an Accessibility Checklist to help ensure key accessibility considerations are considered.
- Provide training on the *Accessible Canada Act* and *Accessible Canada Regulations* for those whose role is to develop programs, processes, and procedures.

Transportation

This area of focus in the Accessible Canada Act covers the transport of people and goods. Vehicles that are used by organizations and regulated by the federal government must take into consideration barriers to operation and provide reasonable accommodation to the employee operating the vehicles as needed.

Barrier #10: The nature of the industry and the highly physical demanding job requirements jobs can create challenges for those requiring accommodations. Atlantic Towing is currently limited in the options that it provides for employees that experience challenges and concerns with operating vessels and heavy machinery.

Actions:

- Create a starting point for addressing unmet needs by creating awareness and educating leaders on what is required to support the needs of people with visible and invisible disabilities.
- Challenge the range and variety of accommodations offered and recognize that even small changes can have huge impact.
- Work to reduce attitudinal barriers that discourage employees to come forward with their disability and therefore limiting their full participation at work.

CONSULTATIONS

To align with Atlantic Towing's commitment to make our workplace environment accessible to all, we have developed our Accessibility Plan in consultation with our employees, including those with disabilities. We gathered feedback and input from our team members and external organizations in the following ways:

- Compiling feedback on accessibility matters at Atlantic Towing via an employee survey. Survey responses were sent to an external party for compilation.
- Engaging with an external organization with expertise in accessibility and supporting persons with disabilities to understand and seek recommendations for improving accessibility.



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- Consulting with employees who may not have self-identified as a person having a disability but are close to someone who has a disability and/or an interest in contributing to an accessible environment.

We will continue to survey employees, including those with disabilities and measure our progress to ensure that we realize the changes we've set out to achieve.

DEFINITIONS

Accessibility: Refers to the needs of persons with disabilities being intentionally and thoughtfully considered when products, services and facilities are built or modified so they can be used and enjoyed by persons of all abilities.

Barrier: The *Accessible Canada Act* defines a barrier as “anything—including anything physical, architectural, technological or attitudinal, anything that is based on information or communications or anything that is the result of a policy or a practice—that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation.”

Disability: The *Accessible Canada Act* defines a disability as “any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment— or a functional limitation— whether permanent, temporary or episodic in nature, or evident or not, that, interaction with a barrier, hinders a person’s full and equal participation in society.”

CONCLUSION

Continuous Improvement is one of the core values at Atlantic Towing. We have high standards and strive to improve every day in all aspects of our operations. We recognize that we have opportunities for improvement to accessibility. Our actions laid out in this plan mark the beginning of our journey toward a more accessible workplace.

We will learn and listen to ensure that we are taking meaningful steps to identify, remove and prevent barriers.