



GENERAL

Executive Summary

Atlantic Towing published its first **Accessibility Plan** [AtlanticTowingAccessibility](#) in 2023. Atlantic Towing is required to publish a progress report in 2024 and 2025. In 2026, it will publish an updated plan that builds on the first three years.

This report presents the progress made by the organization to implement its 2023 to 2026 Accessibility Plan.

Overall, the implementation of our Accessibility Plan is progressing satisfactorily. Our initial plan identified 10 barriers, with specific associated actions across the seven priority areas.

As identified in our Accessibility Plan, we acknowledge that we are at the beginning of our accessibility journey. Due to the industries in which we operate, our representation of employees identifying as a person with a disability remains low, which impacts our ability to robustly consult with this population of employees. This first year of our plan was focused on foundational elements such as educating ourselves, leadership teams and employees on accessibility and expanding our understanding of the range and variety of accessibility improvements. By focusing on these foundational elements, we will become a more inclusive environment for persons with disabilities to come forward with feedback that will form our future accessibility actions.

A summary of initial opportunities include:

- Building commitment to 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, where possible.
- 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 Description 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.

Consultations & Feedback

In line with the Accessible Canada Act, our consultation process took the following forms:

- Annual Employee Engagement survey administered in September 2024
- Diversity, Equity & Inclusion Committee Meetings – monthly
- Accessibility Survey – March 2025

Our annual Employee Engagement survey was conducted in September 2024. This organization-wide survey collects anonymous feedback from employees. The survey measures overall employee engagement results and further breaks down results over 12 categories and along with Diversity and Inclusion Indices.

Respondents can select amongst several demographic factors, including identifying as a person with a disability. The results for Atlantic Towing were an Overall Engagement Score of 83%, and 83% for Diversity & Inclusion Index.

In 2024, a new approach to voluntary self-identification was introduced providing Atlantic Towing employees with an opportunity to share what makes them unique and how they identify. Self-identification helps foster inclusivity and Atlantic Towing acknowledges that the better we understand the make-up of our workforce, the better we can spot opportunities and address workplace needs. Self-identification is completely voluntary and highly confidential. Responses are confidentially collected behind a restricted reporting structure in our Enterprise Human Resources Shared Service. No names are disclosed, and data is only reported in aggregate. While our initial response rate was low, as expected, an annual reminder will be sent, and communication campaigns will encourage participation.

On a monthly basis, our DEI Committee meets and shares feedback and opportunities. Furthermore, the Accessibility sub-committee drives accessibility initiatives and education across Atlantic Towing.



Finally, we distributed a survey to all employees specifically targeted towards accessibility initiatives. Those disclosing a disability reported having communication and physical disabilities. While not specifically identified as a person with a disability, other respondents provided general feedback around supporting persons with cognitive, mental, learning, and sensory disabilities at work. The survey was sent to all employees by email. This is the most direct way to reach our audience. Leaders also reinforced completion of the surveys.

Here is a summary of the feedback that we received.

Respondents were asked about their general experience, positive & negative, of accessibility at Atlantic Towing. Of those responding, regardless of whether they identified as a person with a disability, 10% reported a positive experience, 77% were neutral or not applicable and the remaining 12.5% reported a negative experience.

Respondents were also asked about barriers that they have personally experienced. The barriers identified include:

- Physical access – accessible parking and ramps are lacking or limited
- Accessibility policies and practices misaligned
- Stigma around mental health / hidden disabilities
- Industry governed requirements for medical examinations

Further feedback regarding accessibility at the organization included:

- Concern about being labeled after disclosure
- Concern about level of support / accommodation available after disclosure
- Concern about feeling judged when raising accessibility –related issues, especially for invisible disabilities

Since we have posted our Accessibility Plan and communicated methods for feedback, we have received no additional feedback.

Consultation results will be shared, along with the progress report, to employees of the organization. These actions and any feedback and comments received will also be taken into consideration when updating our Accessibility Plan.

OVERVIEW OF PROGRESS - ADDRESSING AREAS IDENTIFIED IN THE *ACCESSIBLE CANADA ACT*



Atlantic Towing continues to build on our progress towards a more accessible environment. We continue to reach towards our goal of increased representation of persons with disabilities and ensuring oversight and delivery on the accessibility actions that we have set out to achieve.

Educating our workforce and leaders on the Accessible Canada Act and our obligations under it is a priority.

To recognize National Accessibility Week and raise awareness of the need for accessibility and inclusion for all, a virtual event was hosted by the T&L Diversity, Equity & Inclusion Committee called “Ready, Willing, and Able.”

An email communication was shared recognizing the day of disability awareness, sharing facts, education, and resources. In addition, a live webinar by CCDI was offered regarding “Removing Barriers to Accessibility and Inclusion”, in the form of a panel event.

To increase awareness and understanding of workplace barriers, an infographic was developed and shared, focusing on identifying and removing bias.

Our Human Resources team have invested in accessibility training through attending numerous learning opportunities (webinar & conferences) to expand knowledge on accessibility. Some examples include the Canadian Congress on Disability Inclusion, the Canada Labour Code Annual Conference offerings, Employment and Social Development Canada offerings and employer panel discussions on accessibility and other industry specific DEI conferences.

To encourage persons with disabilities to apply for our employment opportunities, we include an accessibility statement to our job postings encouraging applicants to contact us should they require accommodation.

In 2024, a new career opportunities website was introduced, including a consistent format for job postings and a streamlined application process for applicants.

Furthermore, as part of the launch of a new applicant tracking system, all recruiters were provided with mandatory training on recruitment and interviewing best practices and ensuring a discrimination-free selection process.

A benchmarking exercise was conducted to review accessibility practices of a number of companies. Companies operating in similar industries along with companies leading in accessibility were reviewed.

We continued our practice of regularly auditing the company website to ensure WCAG compliance and incorporate improvements as necessary.



To monitor our progress, metrics and indicators to measure and track our progress are under development for each action. These are described in the following sections along with status updates.

Employment

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

<i>Actions</i>	<i>Indicator</i>	<i>Status</i>
Review of recruitment and hiring practices to identify barriers to accessibility in our processes and accommodate people with disabilities.	<ul style="list-style-type: none"> Barriers identified & actioned Employees self-identifying as having a disability 	Ongoing
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.	<ul style="list-style-type: none"> Accessibility Statement added to job postings 	Completed
Educate hiring managers on accessibility and how they can ensure barrier-free hiring, selection and accommodation process.	<ul style="list-style-type: none"> Education sessions, communications, resources offered Development of inclusive hiring guidelines Managers attending Accessibility Training 	Ongoing
Benchmark current recruitment, selection and onboarding practices against leading accessibility practices in other companies in our sector and different industries.	<ul style="list-style-type: none"> Identification of applicable benchmarks Actions prioritized and implemented 	Ongoing

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

<i>Actions</i>	<i>Indicator</i>	<i>Status</i>
Understand unmet accommodations that our employees experience.	<ul style="list-style-type: none"> Survey feedback Number / type of accommodation requests 	Ongoing



Review and refine processes for accommodation so that employees feel that they can ask for support when they need it.	<ul style="list-style-type: none"> Accommodation requests Average time to get accommodation in place 	Ongoing
Expand our understanding of the range of accommodation options available and used by other organizations.	<ul style="list-style-type: none"> Benchmarking activities 	Not started
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.	<ul style="list-style-type: none"> Process document and manager guides 	Not started
Partner with our Disability Management partners to assess and identify options for a wider range and variety of potential accommodation.	<ul style="list-style-type: none"> Number / types of accommodations 	Ongoing

Built Environment

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

<i>Actions</i>	<i>Indicator</i>	<i>Status</i>
Using a phased approach and with consultation, we will scan our environment for barriers to accessibility	<ul style="list-style-type: none"> Improvements made / barriers identified and actioned 	Ongoing
When possible, we will work with our industry partners to improve spaces where our employees conduct work.	<ul style="list-style-type: none"> TBD 	Not started

Information and Communication Technologies (ICT)

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.

<i>Actions</i>	<i>Indicator</i>	<i>Status</i>
The nature of our 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	<ul style="list-style-type: none"> Use of diverse and new communication methods (ex. Newsletters in accessible formats) 	Ongoing



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.	<ul style="list-style-type: none"> Policy design and revisions 	Not started

Barrier #5: Company websites are not fully accessible.

<i>Actions</i>	<i>Indicator</i>	<i>Status</i>
When websites are created or updated, test to ensure WCAG 2.1 compliance.	<ul style="list-style-type: none"> Percent compliant on WCAG dashboard 	Ongoing
Review current websites and make corrections to high priority areas.	<ul style="list-style-type: none"> Establish audit process 	Complete
Establish processes and oversight to monitor website accessibility on a regular basis and correct identified issues.	<ul style="list-style-type: none"> Adherence to audit schedule 	Ongoing

Communication Other Than ICT

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

<i>Actions</i>	<i>Indicator</i>	<i>Status</i>
Develop and promote best practices for clear and effective email and the use of plain language.	<ul style="list-style-type: none"> Favorable response on Communication category on employee survey 	Ongoing
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.)	<ul style="list-style-type: none"> Guides completed and provided 	Ongoing
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.	<ul style="list-style-type: none"> Training delivered 	Ongoing



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

Actions	Indicator	Status
Prepare standard resources and commonly issued company communication in accessible formats so that they are ready to be distributed upon request.	<ul style="list-style-type: none"> Favorable response on Communication category on employee survey 	Underway
When asked, we commit to providing these accessible formats as soon as possible and within time frames listed in the <i>Accessible Canada Regulations</i> in formats compatible with adaptive technology meant to help people with disabilities.	<ul style="list-style-type: none"> Established process to provide accessible formats when requested 	Complete

Procurement of Goods, Services and Facilities

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

Actions:	Indicators	Status
Update the procurement procedures to include accessibility checks when buying goods and services	<ul style="list-style-type: none"> TBD 	Not started
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.	<ul style="list-style-type: none"> TBD 	Not started

Design and Delivery of Programs and Services

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

Actions	Indicators	Status
Leverage the mandatory requirement to consult with persons with	<ul style="list-style-type: none"> Engagement survey results 	Ongoing



disabilities to provide feedback on our programs, processes, policies and services.	<ul style="list-style-type: none"> • Accessibility Survey results 	
Develop and promote guidelines on how to apply accessibility considerations when reviewing company policies, programs and services.	<ul style="list-style-type: none"> • TBD 	Not started
Create an Accessibility Checklist to help ensure key accessibility considerations are considered.	<ul style="list-style-type: none"> • TBD 	Not started
Provide training on the <i>Accessible Canada Act</i> and <i>Accessible Canada Regulations</i> for those whose role is to develop programs, processes, and procedures.	<ul style="list-style-type: none"> • Training materials provided 	Ongoing

Transportation

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

<i>Actions</i>	<i>Indicator</i>	<i>Status</i>
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.	<ul style="list-style-type: none"> • Training materials provided • Education sessions offered 	Ongoing
Challenge the range and variety of accommodations offered and recognize that even small changes can have huge impact.	<ul style="list-style-type: none"> • Accommodations provided 	Ongoing
Work to reduce attitudinal barriers that discourage employees from coming forward with their disability and therefore limiting their full participation at work.	<ul style="list-style-type: none"> • Training materials provided • Education sessions offered 	Ongoing

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 progress in this second year supported the foundation that we are building for 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.