



GENERAL

Executive Summary

Atlantic Towing published its first **Accessibility Plan** [accessibility-plan_atlantic-towing_2023_pdf.pdf \(atlantictowing.com\)](#) 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 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 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 2023
- Diversity, Equity & Inclusion Pulse check – July 2023
- Diversity, Equity & Inclusion Committee Meetings – monthly
- Accessibility Survey – April 2024

Our annual Employee Engagement survey was administered in September 2023. 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 75%, and 75% for Diversity & Inclusion Category.

As part of our 2023, Diversity, Equity & Inclusion (DEI) Strategy, we administered a DEI pulse check to measure our progress specific to this area. Across the Transportation & Logistics Division, the respondents reported 87.8% favorability in the Diversity & Inclusion Category.

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.



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, whether or not they identified as a person with a disability, 75% reported a positive experience, 12.5% 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:

- High noise levels of some electronic equipment
- Lack of a quiet area
- Some entries are not wheelchair accessible
- Some work areas are not fully accessible
- Accessible parking spaces are lacking or limited

Further feedback regarding accessibility at the organization included:

- Due to the nature of the work, people feel reluctant to admit or ask for help, if they have a disability.
- Focus on making the environment more accessible for persons with disabilities such as Attention Deficit/Hyperactivity Disorder and autism.
- Provide individual washrooms allowing for more privacy
- More attention on physical safety, particularly climbing in / out of vessels

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 all employees of the organization. These actions and any feedback and comments received will also be taken into consideration when updating our Accessibility Plan.

These consultations were sent to all employees by email. This is the most direct way to reach our audience. Leaders also reinforced completion of the surveys.

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

Atlantic Towing continues to build on our progress towards 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.

Starting with educating our workforce and leaders on the Accessible Canada Act and our obligations under it, our DEI Committee, set an initiative to provide a series of infographics on the seven priority areas identified under the Act. These are ongoing and distributed via email to all employees.



As an organization, we recognize International Day of Persons with Disabilities and National Disability week by providing email communications and links to resources. Additionally, a live webinar titled “Neurodiversity in the Workplace” was offered and attended by over 600 employees of J.D. Irving, Limited. This webinar offered strategies on work optimization and providing opportunities for neurodiverse employees in the workplace. As well as insight on general social norms with the neurodiverse community and how to navigate these interactions. The webinar was led by an autistic and attention deficit/hyperactivity disorder counselor and psychotherapist. This event was one of the most commented on and engaging DEI events that J.D. Irving, Limited has held.

A second webinar, organized by our DEI Committee, invited a speaker from RWA (Ready, Willing and, Able) to speak about misconceptions and opportunities involving persons with disabilities within the workplace, how to reduce barriers and the overall benefits of diversifying the workplace, as well as their role in aiding this process. Over 60 employees from the Transportation & Logistics Division attended, including Atlantic Towing employees.

Both sessions received overwhelmingly favorable responses from attendees on a follow up survey.

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 Equity Achievement Annual Award Ceremony and employer panel discussions on accessibility and other industry specific DEI conferences.

As we embarked on our initiatives, we determined that a cross-functional steering committee, made up of subject matter experts and stakeholders representing the seven priorities would be established. The establishment of our steering committee will provide for more clearly defined ownership, accountabilities, and timelines. Furthermore, we defined the role of our Accessibility sub-committee.

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

Finally, we began 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 pro-actively offer accessible options for candidates and employees resulting in our inability to attract persons with disabilities.



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Actions	Indicator	Status
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 a 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 	Not started

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

Actions	Indicator	Status
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 accommodations 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	<ul style="list-style-type: none"> • Process document and manager guides 	Not started

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.	<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 methods, including meetings, conversations and postings in areas where employees gather to ensure that important updates are received in a timely manner.	<ul style="list-style-type: none"> Use of diverse and new communication methods (ex. Newsletters in accessible formats) 	Ongoing
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 are available in accessible formats and provided in a timely manner.

<i>Actions</i>	<i>Indicator</i>	<i>Status</i>
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	<ul style="list-style-type: none"> Established process to provide accessible 	Complete



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in the <i>Accessible Canada Regulations</i> in formats compatible with adaptive technology meant to help people with disabilities.	formats when requested	
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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 disabilities to provide feedback on our programs, processes, policies and services.	<ul style="list-style-type: none"> Engagement survey results Accessibility Survey results 	Ongoing
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	<ul style="list-style-type: none"> Training materials provided 	Ongoing



develop programs, processes, and procedures.		
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Transportation

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 vessel.

<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 	
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 to come 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

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**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 first year laid a foundation 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.