



The Accessible Canada Act

Accessibility Plan 2023

Manitoulin Group of Companies

Including:

Jet Transport Ltd.

Lakehead Freightways Inc.

Manitoulin Transport Inc.

Northwest Transport Ltd.



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General

Summary

The Organization is committed to building a culture of inclusivity and accessibility. Not only is this part of our company culture, but opening access to all is imperative to our continued growth and high level of competitiveness in the trucking industry. We will contribute to a barrier-free Canada for everyone by building an accessibility framework that will support you as well as the public we serve, to have the best experience possible with our services, products, and facilities.

We know creating a barrier-free environment takes time and we are dedicated to the ongoing identification, removal, and prevention of barriers. The Organization 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 accessibility-confident culture in the years to come.

To address gaps in these areas, it is important to recognize and understand the needs of those with disabilities. For this reason, this plan is being developed in consultation with staff who identify as having a disability via the onboarding process. In addition, external organizations that serve people with disabilities were consulted in the development of this plan.

A summary of initial observation and opportunities include:

- Improving the attraction of persons with disabilities to career opportunities
- Being prepared to provide information in accessible formats when requested.
- Reviewing application and technology design standards of current and future IT equipment and applications to ensure compatibility with accessibility features.
- Initiating a process where there is a “through an accessibility lens” approach to the design and assessment of facilities, procurement procedures, company programs, new initiatives, and on-going services.

This Accessibility plan, applies to the following

Input and Feedback

The Organization welcomes feedback on our Accessibility Plan from the public and from anyone associated with the business. This feedback is valuable to help break down accessibility barriers and build on our commitment to accessibility. If you have an inquiry or feedback, please use one of the contact methods below. We will respond to all feedback in a timely manner. If you require support while providing feedback, let us know and we will do our best to accommodate your needs.

Contact: Human Resources Department
Mailing address: 154 ON - 540B, Gore Bay ON, P0P 1H0
Email: jaddison@monarchr.ca
Phone: 1-888-892-0030 Website: <https://manitoulingroup.com/>



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Statement of Commitment

The Organization is committed to ensuring our organization and the services we provide are accessible to all, including persons with disabilities. All Canadians have the right to benefit from our services equally and those who work with us have the right to perform their jobs free of barriers. Our Accessibility journey will be developed by consultation with persons with disabilities.

Reporting Our Plan

As required by the Accessible Canada Act, we will publish a progress report every year that measures our progress against our commitments. We will review and update our Accessibility Plan every three years.

Addressing Areas Identified in the Accessible Canada Act (ACA)

Talent Acquisition - The Organization pledges its support to all of its business partners with regard to the acquisition of talent in support of the business. All candidates and incumbents with disabilities and those who experience barriers shall be supported throughout the entirety of their employment lifecycle.

The Organization has identified the following barriers that may be present:

Barrier #1: *The organization continues to experience competition for talent and is currently not attracting a high volume of qualified candidates from underrepresented populations such as persons with disabilities.*

Action:

- Support the extension of job posting reach to those with disabilities and affiliated communities.
- Support job posting documentation to follow accessibility best practices and readability and be prepared to provide information in accessible formats when requested.
- Support the Development of recruiting and employment procedures for applicants with disabilities.
- Support the Education to hiring managers throughout the Organization on accessibility and how they can ensure a barrier-free hiring, selection, and accommodation process.

Barrier #2: *Improve awareness opportunities for candidates to request reasonable accommodations during the recruitment process.*

Action:

- Support language in job postings that show accommodations are available for roles that do not have a bona fide occupational requirement for applicants with disabilities and establish a process for receiving accommodation requests.
- Support the Education of candidates and incumbents about the availability of accommodations for applicants with disabilities in recruitment and selection processes.



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▪Support the recruitment effort to include accessibility commitments and offerings to careers pages so candidates can envision themselves working in an environment with available accommodations.

Build Environment - The “build” environment area ensures that workspaces and the work environment are accessible for all.

Barrier #3: *Some spaces within the main office and shop locations may limit the mobility.*

Action:

- Conduct a built environment audit to assess all physical barriers that may be present and require correction.
- Identify mobility barriers in all building locations that can only be accessed by stairs and develop plans to correct or find alternate space in buildings that can accommodate a permanent or temporary restriction.
- Add illumination signage in less lit areas to support those with visual impairments to identify important safety signage.
- Facilities and Finance leadership will provision a budget for modifications required to address accessibility deficiencies.

Barrier #4: *Cannot safely dispose of sharps or medical devices in office or yard locations leading to improper handling and transporting items home to dispose of.*

Action:

- Install designated sharps containers in a small number of washrooms with tamper resistant disposal units and educate on how to use them appropriately.

Information and Communication Technologies (ICT) - “Information and Communication Technologies” are various technological tools used to send, store, create, share, or exchange information.

Barrier #5: *Some systems do not support accessibility features and technology teams are not well versed with supporting accessibility technologies.*

Action:

- Review current company websites, intranet and applications and remediate accessibility deficiencies.
- Update and standardize technology style design guides to ensure compatibility with accessibility features and tools.
- Ensure training materials and support are available for persons with disabilities on how to access and use accessibility features such as scaling text and images, enabling text to speech features, and closed captioning on Microsoft Teams.

Barrier #6: *Tools and software used in the company which have accessibility capabilities are not being used in an accessible way.*

Action:

- Educate and communicate opportunities to utilize accessibility features already available to the broader workforce.



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Barrier #7: *Technologies commonly used in meetings, online learning, and collaboration spaces can limit the ability of facilitators and attendees to participate meaningfully.*

Action:

- Add closed captioning to online learning videos and ensure all other accessibility features are available as required.

Communication Other Than Information and Communication Technologies (ICT)

- This area requires that organizations provide barrier free access for the public and clients to all the communications that the Company produces for this audience.

Barrier #8: *The Organization needs a consistent process to ensure alternate formats of communication are available.*

Action:

- Review external website social media video content and identify ways to improve accessibility through alt text and closed captioning.
- Develop process to identify and create accessible options when developing web-based content.
- When requested, the Organization will provide alternate formats within time frames required by the Accessible Canada Regulation which will include print, large print, audio format, braille, or an electronic format that is compatible with adaptive technology.

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 #9: *The Organization’s procurement procedures and practices do not take into consideration accessibility requirements.*

Action:

- Review vendors accessibility capabilities to ensure they can deliver goods and/or services consistent with our current accessibility needs.
- Ensure accessibility needs are considered when purchasing software, equipment, and food items.
- Review digital accessibility needs when receiving Requests for Proposals from external customers.

Design and Delivery of Programs and Services - When designing and delivering the Organization’s internal and external programs and services, accessibility considerations must be part of the process.

Barrier #10: *We do not currently have a standard approach for ensuring all programs, processes, and services have taken accessibility into consideration.*

Action:



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- Comply with mandatory requirements to consult with persons with disabilities by creating a forum to review and provide feedback on all programs, processes, policies to support the development of future programs and services.
- Develop and promote guidelines on how to apply the accessibility lens when reviewing company policies, programs, and services.
- Create accessibility checklists to help ensure key accessibility considerations are made.

Transportation - Transportation for this purpose refers to transportation of people, not goods. The Organization does not coordinate a transportation system, or a fleet of transportation vehicles as defined in the Accessible Canada Act and is not included in the scope of this plan.

Consultations

To align with the Organization's commitment to make the workplace environment accessible to all, we have a plan to develop the initial Accessibility Plan in consultation with leaders of key areas to support the development of identifying barriers, individuals with disabilities through an intended internal survey and self declaration and subsequent follow up conversations we various management leaders

We will continue to survey, including members of the general public, as well as consult with external organizations that have been referenced in this Accessibility Plan and measure progress to ensure we meet the commitments we 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 of 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 anything 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.