



Accessibility Plan

STATEMENT OF COMMITMENT

Thomson Terminals Limited (“TTL”) is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence.

TTL is committed to fulfilling our requirements under the accessibility laws; Accessibility for Ontarians with Disabilities Act, 2005 (“AODA”) and the integrated Accessibility Standards Regulation (“IAS Regulation”) of AODA and Human Rights as it pertains to AODA.

ACCESSIBILITY INITIATIVES AND STRATEGIES

This accessibility plan outlines initiatives we are taking to meet those requirements and to improve opportunities for people with disabilities. TTL strives to meet the needs of its employees and customers with disabilities and is working hard to remove and prevent barriers to accessibility where possible.

This Accessibility Plan covers 2023 to 2028. This plan is reviewed by senior management at least once every 5 years. The Accessibility Plan is reviewed by Senior Management and updated as required. This plan was last reviewed and updated on April 2024.

Our accessibility plan is publicly posted on our facility Health & Safety Boards and on our company website – Link: www.thomsongroup.com

TTL will provide this document in an accessible format, upon request, as outlined on page 10 of this document.



CUSTOMER SERVICE ACCESSIBILITY

TTL is committed to compliance with the Accessibility Standards to Customer Service Regulation under AODA and providing people with disabilities the opportunity to access our facilities where possible. Our goal is to provide an accessible environment that is barrier-free wherever possible for our employees, job applicants, clients, suppliers, contractors and visitors entering our facilities.

Past Achievements to Remove and Prevent Barriers:

November 2023 - TTL revised and implemented its internal Accessibility Policy which outlines the purpose of AODA and our Customer Service Policy/Standards and implemented Accessibility training for all existing employees:

- The policies describe what we do to meet requirements of the regulation and serve as rules that guide our organization's everyday practices when communicating, interacting and serving people with disabilities.
- TTL implemented Accessible Customer Service and AODA training for all employees in our organization who provide services on TTL's behalf.

Actions Planned:

Ongoing – All employees will continue to be trained on applicable AODA customer service accessible laws, related human rights laws and TTL's internal related policies:

- as soon as practicable after being hired at time of Onboarding/Orientation
- whenever there are any changes/updates to our Accessible Customer Service policy
- additional pertinent accessibility training will also continue to be provided to all management and those who participate in the development and approval of TTL's policies
- TTL will continue to utilize the AccessForward Training modules tools and resources in various formats - online text/handout versions to train employees
- TTL will maintain a record of the training provided



INFORMATION AND COMMUNICATION

TTL is committed to communicating with an employee or customer etc. with a disability in a manner that takes into account their disability. We will work together to develop a program to best meet their needs where possible.

Past Achievements to Remove and Prevent Barriers:

November 2023

TTL reviewed and updated its workplace Accessibility Policy and practices to ensure compliance in the Accessibility Information and Communication Standards regulation as outlined below;

Accessible Formats

TTL provides or arranges provisions of accessible formats and communication supports for persons with disabilities wherever possible upon request and in a timely manner.

- TTL consults with persons making the request to determine the suitability of an accessible format or communication support.
 - Documents can be provided in alternate formats such as;
 - Reading written information to a person directly via telephone
 - Electronically sent by email from head office
 - Mailing to the customer via Canada Post
 - Printing enlarged at head office and mailed to customer
 - This includes information pertinent to;
 - candidates, clients and visitors when accessing our facilities

Feedback Processes

Feedback processes/methods are communicated and are made available on our website and internal communication boards. Persons with disabilities can submit feedback to advise if they are experiencing any difficulties obtaining our services.

- Feedback received is reviewed within a reasonable period of time period and TTL takes all appropriate steps to address any issues raised where possible.
- They can provide feedback in the following ways;
 - In-person at: 100 Iron Street, Toronto, ON M9W 5L9
 - By Telephone by calling: 416-240-4582
 - By email to: OFurtado@thomsongroup.com
 - By Mail to: Human Resources 100 Iron Street, Toronto, ON M9W 5L9



Emergency Procedure Information

TTL is committed to providing its customers, visitors and employees with publicly available emergency response information in an accessible format and/or with appropriate communication support, upon request.

- Emergency Response procedures and information are publically posted at the facilities on the Health and Safety Communication boards.
- Employees are trained on emergency response/evacuation procedures at Orientation time and yearly as part of health and safety training. Fire drills are done on an annual basis.
- Managers/Supervisors are instructed to help people with a disability to evacuate safely according to their required accommodation.

Accessible Websites and Web Content

TTL's website and web content currently being updated conforms to the Web Content Accessibility Guidelines (WCAG 2.0) Level AA.

Actions Planned:

Ongoing - Accessible Formats

TTL will continue to update accessible/barrier-free formats where possible.

May 2024 - Feedback Processes

A written internal procedure will be in place to ensure that all feedback received from persons with disabilities are analyzed for improvements in our services.

- Feedback received pertaining to services and goods provided for persons with a disability will be shared with the appropriate management team for review.

Ongoing - Emergency Procedure

New emergency procedures, plans and public safety information will be made available in an accessible format and/or with appropriate communication support, upon request.

- All emergency evacuations will continued to be reviewed by the appropriate departments for potential improvements to procedures.

April 2024 - Accessible Websites and Web Content

The company website has been updated to enhance the user experience, ease of use and navigation.

- TTL is committed to continue working with its web developer to ensure that all new website content within its control conforms to WCAG 2.0 Level AA.



EMPLOYMENT

TTL is committed to fair and accessible employment practices.

Past Achievements to Remove and Prevent Barriers

November 2023

TTL reviewed and updated its workplace Accessibility, Accommodations, Return to Work policies and practices to ensure compliance in the Accessibility to Employment Standards regulation as outlined below.

Informing Employees of Supports

Employees are made aware upon hire of accessibility employment practices and how the organization will support them if they have a disability or should they acquire a disability in their course of employment as outlined in our Accommodation policy/process where possible.

Accessible Recruitment Process

TTL advises on the job postings/ads that accommodation is available upon request for applicants who require it to participate in the hiring process.

- TTL will consult with the requesting applicant in determining the suitability of an accessible format or communication support.

Accessible Formats and Communication Supports

Once hired, employees may request accessible formats and communication supports.

- TTL consults with employees to determine their accessibility needs and how best to accommodate them.

Documented Individual Accommodation Plans

TTL has developed an Accommodation Policy and it outlines a written accommodation process. A supplementary document/form template has also been developed as a guide to document an Individual Accommodation Plan for each employee with a disability requiring accommodation.

- TTL provides this policy/information to employees about accommodation and return-to-work assistance if applicable.
- If there is a need for accommodation, individualized workplace emergency response information will also be provided to the employee as soon as practicable.
- Accommodation is a shared responsibility between employees requesting accommodation and TTL.
- Not all accommodations are possible.



Workplace Emergency Response Information

TTL reviews and assesses individualized emergency plans to ensure accessibility issues are addressed in case of emergency. The individual workplace emergency response information is provided as soon as practicable after TTL becomes aware of the need for the accommodation due to the employee's disability.

- TTL information will be reviewed on an ongoing and regular basis and;
 - when the employee moves to a different location in the organization.
 - when the employee's overall accommodation needs or plan is reviewed
 - when TTL reviews the organization's emergency response policies.

Performance Management, Career Development, and Redeployment

TTL does not have a formal performance management, career development and/or Redeployment program, however, when employees with disabilities are changing positions and being redeployed to alternate site or position, they will be provided applicable accessibility formats and individual accommodation plan pertaining to their new role or site.

Return to Work Process

TTL has developed a process in our Early and Safe Return to Work Policy and Program outlined in our Health & Safety Program that supports employees who have been absent due to a disability and require disability-related accommodations when they return to work.

- The return to work process is documented using medical Functions Ability documents, and outlines the modified duties/steps that will be taken to facilitate an employee's return to work.

Actions Planned:

Ongoing: Informing Employees of Supports

TTL will continue to review its' accessibility employment practices and methods to inform people with disabilities of the available supports to ensure their success.

Ongoing: Accessible Recruitment Process

Hiring Managers will continue to be trained on all the Accessibility Policies and on the internal Recruitment processes and are aware to offer and arrange accommodation formats, supports to assist applicants with a disability through the interview, selection and hiring process wherever possible.

Ongoing: Accessible Formats and Communication Supports

TTL will continue to work closely with individuals with disabilities in seeking accessibility accommodation and seeking for alternate accessible formats and communication that will support their specific needs wherever possible.

- TTL will continue to review its available formats.



April 2024: Individual Documented Employee Accommodation Plans

TTL is updating our existing Accommodation policies to include a written process/steps to identify and meet employee accommodations as per their needs wherever possible. We developed an Individual Accommodation Plan Process and Form. The policies and processes will be reviewed on a regular basis and procedures will be updated to facilitate the process, as required.

April 2024: Workplace Emergency Response Information

Employees with disabilities who have shared their disability with TTL management will be provided with individualized workplace emergency response information.

TTL is updating its Accessibility Policy to include important procedures regarding providing individualized Workplace Emergency Response Information to staff.

TTL is also developing a document “Providing Accessible Emergency Information to Staff” that includes a checklist and forms for information gathering to help us determine staff individual needs in an emergency and help prepare for emergency situations. These documents will include that TTL reviews the individual workplace emergency response information,

- a) when the employee moves to a different location in the organization;
- b) when the employee’s overall accommodation needs or plans are reviewed; and
- c) when the company reviews its general emergency response policies

June 2024: Performance Management, Career Development, and Redeployment

TTL will work on a formal performance management, career development and redeployment process that continues to take into consideration equal access and accommodation for employees with disabilities when they are changing positions or being redeployed to alternate site.

April 2024: Return to Work Process

TTL has developed a written Return to Work Process and Plan document that will be applied flexibly to accommodate employees with disabilities. TTL will use the Individual Accommodation Plan(s) and pertinent assessments as part of this process.



TRAINING

Past Achievements to Remove and Prevent Barriers

November 2023 - Implemented new Accessibility Training to our employees utilizing AccessForward website modules;

- Accessible Customer Service Training for employees that provide services using online resources/tools e.g. AccessForward website
- Implemented training for all staff on Ontario Human Rights Code as it relates to people with disabilities using the resources on the website
- Implemented training on the human rights code - Working Together – The Code and the AODA
- Implemented Work Related Accessibility training to staff that is relative to their work responsibilities
- Training is offered after the employee joins the organization and on an ongoing basis whenever there are policy changes
- TTL maintains training records

Actions Planned:

Ongoing: TTL is committed to provide continuous accessibility training opportunities for all employees pertinent to their role in order for us to provide exceptional service to people with disabilities



DESIGN OF PUBLIC SPACES

TTL will consider barriers to accessibility when considering any new redevelopments as per the Accessibility laws.

Past Achievements to Remove and Prevent Barriers:

There has been no construction or recent developments implemented since 2017.

Action Planned:

Ongoing - Maintenance Planning

Regular Preventative Maintenance and inspections are performed of the facilities to ensure safe accessibility.

- Manager of Building Services will inform the appropriate site operational team of any upcoming redevelopments.
- Building Services will ensure procedures for handling any temporary disruptions when accessible part of the public spaces are not useable by putting up a sign explaining the disruption and outlining an alternative when facilities or services that people with disabilities usually use are temporarily unavailable.



COMPLIANCE

In order to remain compliant with the applicable accessibility laws, TTL will continue to provide goods services and facilities in a way that respects the dignity and independence of people with disabilities. We will continue to look for ways to prevent and remove barriers to accessibilities and meeting our accessibility requirements wherever possible.

This accessibility plan has outlined the steps that TTL has taken and listed planned actions to meet those requirements and improve opportunities for all people with disabilities.

TTL completed its last Accessibility Compliance report for Ontario in 2023

TTL will provide this document in an accessible format or with communication support, on request. We will consult the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and, at no additional cost.

- This document can be provided in alternate formats such as;
 - Reading written information to a person directly via telephone
 - Electronically send by email from head office
 - Mailing to the customer via Canada Post
 - Printing enlarged at head office and mail to customer

Accessible formats of this document are available upon request by contacting Human Resources:

By Telephone: 416-240-0897

By Email to: OFurtado@thomsongroup.com