

Accessibility Plan 3 Year Plan Effective June 1, 2023

AUTHORIZATION

Title: Accessibility Plan
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Approver: John Groothius, President, EFC Developments.
Signature:

VERSION HISTORY

Version	Date	Description	Prepared By	Approved By
01	May 2023	Accessibility Plan	Jennifer Chute	Ryan Albizzati
02	December 2023	Amendments as identified by the Canadian Transportation Agency's Cautionary Notice Dated December 1, 2023	Jennifer Chute	Ryan Albizzati
03	January 2024	<p>Amendments as suggested by the Canadian Transportation Agency's email received January 12, 2024.</p> <p>Rebranded as commitment by all 4 companies.</p> <p>John Groothius is President overseeing Accessibility across the EFC group of companies.</p>	Jennifer Chute	John Groothius

AMMENDMENT RECORD SHEET

Revision No. 03		
Affected Section	Change	Date
1. General	1.2 Updated section title to Purpose, Commitment & Feedback Process, and added section titles to clearly define each.	01/15/2024
11. Consultations	<p>Updated this sentence:</p> <p>Since the Version 01 Plan, an Accessibility Committee has been formed and meetings have been attended in 2023 and scheduled for 2024.</p>	01/15/2024
Authorization	Changed from Ryan Albizzati, President of EFC Aviation to John Groothius, President of EFC Developments. Also rebranded to include all 4 companies.	01/15/2024



Accessibility Plan 3 Year Plan Effective June 1, 2023

1. GENERAL

1.1. Accessibility Statement

Executive Flight Centre Aviation Ltd., Executive Flight Centre Developments (2020) Ltd., Executive Flight Centre Group Ltd., and Aviation Ground Fueling Technologies (2020) Ltd. ('The EFC Group of Companies') is committed to ensuring our operating environments are barrier-free, accessible, and inclusive for employees and visitors of all abilities. We are committed to meeting the needs of people who face accessibility barriers at all locations. We will achieve this by identifying, removing, and preventing barriers and by meeting the requirements of The Accessible Canada Act (ACA) and the Accessible Canada Regulations (regulations).

1.2. Purpose, Commitment & Feedback Process

Purpose: The purpose of this plan is to outline the strategic direction the EFC Group of Companies will be working towards at all locations to improve accessibility and to prevent and remove barriers that may affect people with disabilities. This plan will be effective as of June 01, 2023, for a period of three (3) years until June 01, 2026.

Commitment: This plan will be continually reviewed and renewed to reflect each improvement being implemented.

Feedback Process: As we are continuously improving, we encourage and welcome feedback on our plan. To provide feedback and/or request an alternate format of the accessibility plan or an alternate format of the description of the feedback process, please contact us directly per the following. Feedback can be submitted anonymously in confidence. Acknowledgement of receipt of feedback, other than anonymous, will be provided in the same manner in which it was received.

Contact: Human Resources Manager
By Mail: Executive Flight Centre Group Ltd.
 200, 680 Palmer Rd NE
 Calgary, AB T2E 7R3
Phone: 403-291-2825
Fax: 888-688-5634
Email: hr@efcgroup.ca
Website: <https://www.efcaviation.ca/>

Accessibility Plan 3 Year Plan Effective June 1, 2023

1.3. Accessibility Principles

The EFC Group of Companies has developed an accessibility plan in alignment with the following principles.

- All persons must be treated with dignity regardless of their disabilities.
- All persons must have the same opportunity to make for themselves the lives that they are able and wish to have regardless of their disabilities.
- All persons must have barrier-free access to full and equal participation in society, regardless of their disabilities.
- All persons must have meaningful options and be free to make their own choices, with support if they desire, regardless of their disabilities.
- Laws, policies, programs, services, and structures must consider the disabilities of persons, the different ways that persons interact with their environments and the multiple and intersecting forms of marginalization and discrimination faced by persons.
- Persons with disabilities must be involved in the development and design of laws, policies, programs, services, and structures.
- The development and revision of accessibility standards and the making of regulations must be done with the objective of achieving the highest level of accessibility for persons with disabilities.

1.4. Accessibility Goals

The EFC Group of Companies is committed to identifying and removing barriers, and the prevention of new barriers, in the following areas at all locations:

- Employment
- The built environment
- Information and communication technologies (ICT)
- Communication, other than ICT
- The procurement of goods, services, and facilities
- The design and delivery of programs and services
- Transportation



Accessibility Plan 3 Year Plan Effective June 1, 2023

2. EMPLOYMENT

The EFC Group of Companies take pride in being equal opportunity employers committed to the principles of employment equity and diversity in our workforce. This includes accessible workplaces. Our Employment Equity Program promotes proactive employment practices that help ensure all employees are treated fairly within our organization, including equitable representation of the four designated groups at all occupational levels.

2.1. Barriers

- Biases in the hiring process may lead persons with disabilities (PwD) to be underrepresented at the EFC Group of Companies.
- The Accommodation Policy and Accommodation Request Form require updating and roll out to staff.
- Not all employee onboarding and training is in the right format to support PwD.

2.2. Goals

Year One

- Release update to Accommodation Policy and Accommodation Request Form to all staff.
- Provide flexible work arrangements where possible.
- Build partnerships with community organizations to promote employment at the EFC Group of Companies for all abilities.
- Review employee representation, identifying gaps in specific occupational groups, and creating targets.

Year Two

- Provide recruiter training on hiring PwD.
- Review and update recruiting processes to include a recruitment strategy promoting employment to PwD.
- Update interview evaluation and interview processes.

Year Three

- Provide accommodation to employees within a reasonable timeframe.
- Ensure all training is accessible to PwD, by providing training in alternative formats to accommodate alternative learning needs, designing learning systems, platforms, tools,

Accessibility Plan

3 Year Plan Effective June 1, 2023

and content in collaboration with PwD to ensure their specific needs are met; and consulting with PwD to identify specific training needs, including language training, within all types of disabilities (e.g., vision, hearing, mobility, cognitive, speech, etc.).

- Follow Employment Equity Plan.

3. BUILT ENVIRONMENT

The built environment of our operations that are owned and operated by the EFC Group of Companies will identify areas of opportunity to reduce and remove any barriers to employment and access for all employees and visitors. The built environments in which the EFC Group of Companies operates out of will ensure all operations work towards full accessibility with the space owners to ensure that any barriers are removed and prevent new barriers from developing. Spaces that the EFC Group of Companies leases will be the responsibility of the owners to execute, however the EFC Group of Companies will ensure to notify the owners of items of concern within reasonable time if identified through our reporting system.

3.1. Barriers

- YYC Head office is on second floor with no wheelchair access.
- Some offices in YYC, YEG and other charter sites may be on the second floor and not accessible.
- Not all locations have buttons to open doors automatically.
- Not all locations have accessible parking.
- Not all locations have fire alarms with horn and strobe (flashing) lights.
- Not all locations have accessible washrooms.
- No designated employees to assist those with disabilities during an emergency.
- Not all locations have braille signage available.
- Not all workstations, common areas, equipment, and supplies are accessible.

3.2. Goals

Year One

- Designate employees to assist persons with disabilities in emergency situations.
- Review emergency and business continuity planning procedures.
- Identify a 3rd party group to perform physical universal design audit in 2024.

Accessibility Plan

3 Year Plan Effective June 1, 2023

- 3rd party to complete physical design audit by May 30, 2024, and identify barriers at all sites including hardware and software infrastructure.

Year Two

- Determine available budgets to be applied to meeting accessibility standards.
- Identify high priority renovations to conform with accessibility standards.
- Notify building owners of fire alarms without horn and strobe lights.
- Review and identify areas in need of improvement per above, in consultation with PwD.

Year Three

- Complete required renovations to conform with accessibility standards.
- When new leases or buildings are considered, accessibility will be taken into consideration.
- For new buildings, we will ensure the following is available:
 - Fire alarms with strobes and speakers.
 - Ramps with handrails where necessary.
 - Accessible washrooms where required.
 - Updated signage where required to include braille.
 - Enough space between aisle ways and workstations.

4. INFORMATION AND COMMUNICATIONS TECHNOLOGIES (ICT)

To reduce barriers in Information and Communications Technologies (ICT), the EFC Group of Companies is committed to addressing the following items:

4.1. Barriers

- Accessible contact information to be provided in all instances where a phone number is offered on the website and print materials.
- Not all Executive Flight Centre Aviation Ltd. terminals have working visual screens for traveller announcements.
- Online application system used to apply at the EFC Group of Companies may not interface with systems that will increase accessibility to a wide variety of sensory needs.

Accessibility Plan 3 Year Plan Effective June 1, 2023

4.2. Goals

Year One

- Ensure an email address is readily available where contact phone numbers are provided on the website.
- Consult with contractor or website planner to review the EFC Group of Companies websites to ensure accessibility.
- IT audit of recruitment and internal infrastructure for accessibility.

Year Two

- Determine available budgets to be applied to meeting accessibility standards.
- Identify high priority IT projects to conform with accessibility standards.

Year Three

- Complete IT projects to conform with accessibility standards.
- Executive Flight Centre Aviation Ltd. will ensure all enabled audio and visual formats for recorded public announcements concerning departure delays, gate assignments, or schedule changes are in good working order at all applicable charter/FBO locations.

5. COMMUNICATION, OTHER THAN ICT

The EFC Group of Companies has outlined the following priorities to reduce and prevent barriers in communication, other than Information and Communication Technologies.

5.1. Barriers

- Communication training required to all leadership and staff who may interact with the public.
- Not all staff and leaders trained on diversity and inclusion.
- Information may not be in an accessible format.
- Not all staff trained on how to make public announcements effectively.
- Communication products shared in the workplace are not always accessible.

Accessibility Plan 3 Year Plan Effective June 1, 2023

5.2. Goals

Year One

- Human Resources to source awareness and communication training for leaders and front-line staff.
- Public announcements to be made in good quality, plain language and spoken slowly with clear enunciation.

Year Two

- Human Resources to roll out training to leaders and front-line staff.
- The EFC Group of Companies will continue to research new methods to communicate information in a variety of different ways (e.g., signage improvements, etc.).
- Identify leadership champions who will have accountability for supporting diversity initiatives.

Year Three

- The EFC Group of Companies will make information available in an accessible format or provide communication support to people with disabilities in a way that considers their disability.
- Consult with PwD to ensure all internal and external communication products meet accessibility standards.

6. PROCUREMENT OF GOODS, SERVICES AND FACILITIES

To reduce and prevent barriers in the procurement of goods, services, and facilities, the EFC Group of Companies has outlined the following steps that will be taken.

6.1. Barriers

- Unknown

6.2. Goals

Year One

- Establish a working group to elevate accessibility considerations in the procurement for goods, services, or facilities.

Accessibility Plan 3 Year Plan Effective June 1, 2023

- Working group to complete review of processes in need of improvement and identify barriers.

Year Two

- Incorporate accessibility into procurement and contracting documents, templates, and guidance.

Year Three

- Monitor for continuous improvement.

7. DESIGN AND DELIVERY OF PROGRAMS AND SERVICES

The EFC Group of Companies is committed to continuous improvement and will ensure our programs and services offered to all employees and visitors are inclusive of those of all abilities. We will take the following steps to identify and remove barriers. We will also work to prevent new barriers from developing with regards to the designs and delivery of programs services.

7.1. Barriers

- No current committee in place to review programs and services.

7.2. Goals

Year One

- Establish an Accessibility Advisory Committee to review information regarding the development, implementation, and delivery of new programs and services.

Year Two

- Advisory committee to determine tracking of intended outcomes of the Accessibility Plan.
- Initiate a review process for all programs and services and specific documentation that is guest-facing. This review will include feedback from our Accessibility Advisory Committee.

Year Three

- Advisory Committee to monitor for continuous improvement.



Accessibility Plan 3 Year Plan Effective June 1, 2023

8. TRANSPORTATION

Accessible transportation is a critical component in the aviation industry. The EFC Group of Companies is committed to working collaboratively along side our partners to ensure that we collectively prioritize accessibility. We will ensure that employees, customers, and guests and their partners are able to experience a barrier-free and inclusive experience.

8.1. Barriers

- The EFC Group of Companies maintains a fleet of vehicles and equipment for specific operational purposes. The fleet currently have no modifications related to accessibility. In cases where an employee requires accessibility features to operate a fleet vehicle, an accommodation would have to be made.
- Unsure if every location has enough wheelchairs and aides available to assist PwD.
- Not all locations are public transit accessible.

8.2. Goals

Year One

- Upon the request of a passenger with a disability, Executive Flight Centre Aviation Ltd. employees must assist the person with their baggage and with a wheelchair and provide transportation and assistance.

Year Two

- Confirm suitable inventory of wheelchairs and aides across all sites with Fleet Manager.

Year Three

- Identify any potential accessibility features available that can be included in new fleet acquisitions.

9. TRAINING GOALS

The EFC Group of Companies is commitment to promoting employee contribution and growth. We will design and implement training and programs to promote awareness and inclusion including the following:

Accessibility Plan 3 Year Plan Effective June 1, 2023

Year One

- Human Resources to identify training needs for leadership and front-line staff including awareness, communication, biases, recruiting, legislation, compliance, expectations, etc.
- Human Resources to create training plan.

Year Two

- Human Resources to roll out training to front-line staff, leadership, and recruiters.

Year Three

- Share information with staff in organizational newsletters and staff meetings.
- Establish mentorship and developmental programs for staff.

10. PROVISIONS OF CTA ACCESSIBILITY-RELATED REGULATIONS

The EFC Group of Companies is required to conform with the Accessible Transportation for **Persons with Disabilities Regulations (ATPDR)**, specifically to Part 1: Requirements Applicable to Transportation Service Providers and Part 4: Requirements Applicable to Terminal Operators. For a more detailed outline of the provisions that we are subject to, please see below.

Part 1: Requirements Applicable to Transportation Service Providers:

- Provision 3: Application
- Provision 4: General Information – alternative formats
- Provision 5: Information to be published
- Provision 6: Communication
- Provision 7: Telephone System
- Provision 8: Website
- Provision 9: Website – requirements
- Provision 10: Public announcements
- Provision 15: Personnel Training for the Assistance of Persons with Disabilities
- Provision 16: Interactions with public
- Provision 17: Physical assistance
- Provision 18: Handling mobility aids
- Provision 19: Using or assisting with special equipment
- Provision 20: Initial training and supervision
- Provision 21: Refresher training

Accessibility Plan 3 Year Plan Effective June 1, 2023

- Provision 22: Duty to inform personnel
- Provision 23: Preparation of training programs

Part 4 – Division 1: Service Requirements Applicable to Terminal Operators:

- Provision 212: Application
- Provision 213: Non-application – certain terminals
- Provision 214: Prohibition – no charge for required services
- Provision 215: Communication of information
- Provision 216: Assistance for persons with disabilities
- Provision 217: Service provider for ground transportation, rental vehicles

Part 4 – Division 2: Technical Requirements Applicable to Terminal Operators

- Provision 218: Application
- Provision 219: Non-application – certain areas or facilities
- Provision 220: Pre-existing terminals
- Provision 221: Duty of terminal operator
- Provision 222: Terminal – requirements
- Provision 223: Lift, ramp, or stairs – requirements
- Provision 224: No level boarding – airports
- Provision 225: Wheelchairs
- Provision 226: Seats
- Provision 227: Designated relief area
- Provision 229: Obstruction due to repairs or maintenance
- Provision 230: Non-accessible path of travel
- Provision 231: Maintenance

11. CONSULTATIONS

Engagement and consultation with representatives of the accessible community including our Employment Equity Committee, Senior Leadership Team, Human Resources and our community ally, Prospect Human Services, was integral to the identification of barriers to accessibility at the EFC Group of Companies and led to the initial development of this Accessibility Plan.

A draft of this plan was shared via email to gather feedback over a two-week period from May 16, 2023 to May 30, 2023. Online meetings which included a full review of the plan were held on May 17, 2023, with Prospect Human Services and internal teams.

Accessibility Plan 3 Year Plan Effective June 1, 2023

Feedback of the following questions received during the two-week consultation period aided with finalising the plan.

- Do you think this plan has been developed in accordance with the following principles?
 - All persons must be treated with dignity regardless of their disabilities.
 - All persons must have the same opportunity to make for themselves the lives that they are able and wish to have regardless of their disabilities.
 - All persons must have barrier-free access to full and equal participation in society, regardless of their disabilities.
 - All persons must have meaningful options and be free to make their own choices, with support if they desire, regardless of their disabilities.
 - Laws, policies, programs, services, and structures must consider the disabilities of persons, the different ways that persons interact with their environments and the multiple and intersecting forms of marginalization and discrimination faced by persons.
 - Persons with disabilities must be involved in the development and design of laws, policies, programs, services, and structures.
 - The development and revision of accessibility standards and the making of regulations must be done with the objective of achieving the highest level of accessibility for persons with disabilities.
- Is the plan written in language that is clear, simple, and concise?
- Do the accessibility goals throughout this plan accurately reflect the requirements set out within the provisions of the Accessible Transportation for Persons with Disabilities Regulations (ATPDR)?
- Are the timelines for the accessibility goals reasonable and actionable?
- Do you have any other comments or feedback regarding this plan?

Some of the respected allies we consulted in development of this plan include:

- Employees, leaders, and shareholders
- Employment Equity Committee
- Prospect Human Services

We remain committed to continued consultation and collaboration. Since the Version 01 Plan, an Accessibility Committee has been formed and meetings have been attended in 2023 and



Accessibility Plan 3 Year Plan Effective June 1, 2023

scheduled for 2024. EFC Aviation Ltd. has also joined our airport partner, YYC Airport Authority's, Accessibility Advisory Committee.

CONCLUSION

This Accessibility Plan is part of the ongoing efforts and commitment to the long-term goal of a barrier free Canada by 2040.

12. DEFINITIONS

Accommodation refers to the modification of the workplace or working arrangements to meet the accessibility needs of its employees so that injured employees or employees with permanent requirements for accommodations can stay in the workplace and perform their jobs safely and efficiently.

Barrier means 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 is a broad category of experience that encompasses a wide range and degree of challenges, barriers, and impairments that affect many people and goes far beyond traditional ideas and stereotypes. A disability can be visible or invisible. It can be permanent or temporary. It can also be episodic in nature. A disability and its required accommodations can be permanent or temporary (while a person recovers from an injury etc.) and the employer is required to provide accommodations to the point of undue hardship.

Discrimination means treating someone differently or unfairly because of a personal characteristic or distinction, which, whether intentional or not, has an effect that imposes disadvantages not imposed on others or that withholds or limits access that is given to others. There are 13 prohibited grounds of discrimination under the Canadian Human Rights Act (i.e., based on race, national or ethnic origin, colour, religion, age, sex, sexual orientation, gender identity or expression, marital status, family status, genetic characteristics (including a requirement to undergo a genetic test, or disclose the results of a genetic test), disability or conviction for an offence for which a pardon has been granted or in respect of which a record suspension has been ordered).



Accessibility Plan 3 Year Plan Effective June 1, 2023

Onboarding is the process of integrating an employee with a department and its culture, as well as getting the employee the tools and information needed to become a productive member of the team.

Plain language is a writing technique of organizing information in ways that make sense to the reader. It uses straightforward, concrete, familiar words. Plain language helps the writer adapt what they have to say to the reading abilities of the people who are most likely to read the document.