

General

This plan is intended to meet the requirements of the Accessibility Canada Act (ACA) and the associated Accessible Canada Regulations (ACR), including Accessibility Ontario Disability Act (AODA). This plan applies to the provision of all standards covered by the Acts and Regulations for people with disabilities that fall within the scope of Canadian Base Operators, work, and our federal and provincial requirements under the Acts.

This plan outlines the specific steps to be taken to facilitate reasonable accommodation of employees and customers with disabilities and to ensure full accessibility to required information and services, in accordance with applicable legislation. The management of emergency response for employees and customers with disabilities is also described.

Principles

CBO is committed to carry out this act in recognition of, and 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.
- 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; and
- 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.

Authority

This plan is issued under the authority of the Canada Director, Business Human Resources, Applicable Legislation

- Accessible Canada Act (S.C. 2019, c. 10)
- Accessible Canada Regulations: SOR/2021-241
- Accessible Ontario Disabilities Act
- Accessible Manitoba Disabilities Act

Definitions

Accessible Formats – include but not limited to large print, recorded audio and electronic formats, braille, and other formats usable by persons with disabilities.

Communication Supports – include but not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communication.

Disability – means any impairment, including a 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, in interaction with a barrier, hinders a person’s full and equal participation in society.

Information – includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and conveys meaning.

Mobility Aid – a device used to facilitate the transport, in a seated position, of a person with a disability.

Mobility Assistive Device – a cane, walker, or similar aid.

Performance Management – activities related to assessing and improving employee performance, productivity, and effectiveness with the goal of facilitating employee success.

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.

Acronyms

AODA – Accessibility for Ontario with Disabilities’ Act

Commitment & Focus

Canadian Base Operators, is committed to providing its policies, programs, practices and services in relation to the identification and the removal of barriers and prevention of new barriers in:

Employment:

(a) **Barrier** – we don’t currently have training updated to Federal Requirements; our training is specific to the AODA. CBO will review and update training as required to meet all federal and provincial requirements by December 31, 2024.

The built environment, other than passenger vehicles, and terminals, n is committed to ensuring accessibility in our facilities, creating an inclusive environment for all individuals, including those with disabilities. We recognize the importance of removing barriers and providing equal access to our facilities. Through change management and proactive risk management we ensure compliance with applicable accessibility standards considering:

- Steps, stairs, ramps and elevators (boarding and deplaning)

- Narrow doorways and corridors
- Accessible restrooms
- Signage and wayfinding
- Lighting and acoustics
- Assistive technology
- Seating and furniture (seating accommodations)

Facilities are regularly inspected with consideration for accessibility and inclusivity providing opportunity to address identified barriers. Through these efforts, we strive to ensure that all individuals can access and enjoy our facilities, promoting inclusivity and equal opportunities for all.

Information and Communication technologies, radio, telephone, and computer.- Canadian Base Operators uses Microsoft Office 365, which provides best in class apps and powerful cloud services with accessibility built in, This includes features for impairments with vision, hearing, neurodiversity, learning, mobility and mental health.

Communication, other than information and communication technologies.

- (a)**Barrier** - Hand signals are required and often the only way to communicate with Aircraft. CBO will follow the most stringent rule applicable as per Transport Canada Aviation Requirements.

The procurement of goods, services, and facilities. – No Barriers identified.

Design and delivery of programs and services.

- (a)**Barrier** - CBO does have a policy on Customer Service, CBO-POL-015 – Accessibility and Service Policy. This Policy has not been reviewed or revised since 2022. CBO will review with persons of disabilities when updating the policy to make sure it reflects their needs. To be reviewed by December 31, 2024.

Consultation

Canadian Base Operators does not provide goods or services to the public, and access to our locations is generally restricted to the public. As a Company CBO has been actively managing an internal Accessibility & Customer Service plan for all work performed in Ontario since 2016. In our efforts to consult persons with disabilities at our workplace, we were able to identify 1 person with disabilities, the disability being identified as attention deficit hyperactivity disorder (ADHD).

For CBO to best support our efforts in identifying, removing, and prevent barriers, we consulted with Disability Expert from Black & McDonald, Corporate HR Services. This department manages the

Group Benefits, and Employee Family Assistance programs for over 6000 employees. This consult occurred May 23rd, 2024, and final debrief has been received for action forward.

Accessibility requirements will be reviewed at a minimum of quarterly at all sites Health and Safety Meeting where an open platform is available for all work sites and their representatives to discuss and bring forward any identified barriers. CBO will continue to consult its workforce whether anyone identifies with a disability.

In the effort to assure compliance, CBO will review the plan with our clients as required and consider if any accessibility issues exist in common areas that might be used by the client's visitors, or others, specifically with a focus on physical disability, and work with the client to assure corrections are made for accessibility by September 2026.

Current Practices and Considerations

Service Animals

CBO welcomes people with disabilities who are accompanied by a trained, accredited service animal. A service animal, including service animals in training, may accompany a client or visitor or any third party with a disability to all parts of our premises that are open to the public. CBO ensures that employees are properly trained in how to interact with people with disabilities, who are accompanied by a service animal. Employees shall not touch, feed or speak to a service animal.

If an animal cannot be easily identified as a service animal, employees may ask the person to provide documentation from a health care professional to confirm the need for the service animal.

Where a service animal is excluded by law from the premises, the reason why the animal is excluded shall be explained to the person with a disability. Additionally, there may be circumstances where allowing a service animal to accompany a person with a disability on CBO premises might compromise the health and safety of another person. A common example would be allowing a guide near a person with a severe allergy to dogs. In such circumstances, CBO will consider all relevant information to come up with a solution that meets the needs of both parties.

Support Persons

CBO welcomes people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person is allowed to enter CBO premises with their support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to their support person while on CBO premises. Fees will not be charged for support persons.

Employees shall direct all communication to the person directly and not to the support person, unless instructed to do so by the person with the disability. Any confidential information such as tax information, personal information etc. that is discussed in the presence of the support person shall be identified as such prior to the information being released, and the person with the disability

shall determine if the information can be released in the presence of the support person. In some incidences where the confidentiality is important because of the nature of the information being discussed, the support person may be required to sign a confidentiality agreement.

In some cases, CBO may require a person with a disability to be accompanied by a support person for health or safety reasons. Before this decision is made, CBO will:

- consult with the person with the disability to fully understand their needs.
- fully consider the health and safety impacts, based on available facts and evidence.
- determine that there is no other reasonable way to protect the health and safety of the person with the disability or others on the premises.

Assistive Devices

CBO welcomes people with disabilities who use assistive devices. CBO is familiar with the various assistive devices used by people with disabilities and shall be flexible in facilitating their use by people with disabilities to access our services. A person with disability may use an assistive device such as, but not limited to:

- wheelchairs.
- Walkers.
- white canes used by people with vision impairment.
- note taking devices.
- portable magnifiers.
- recording machines.
- assistive listening devices'
- personal oxygen tanks and devices for gasping.

When interacting with a person with disability who may use one or more assistive devices, CBO will ensure the person is permitted to enter the premises with the device and to use the device to access services. Potential barriers to the use of assistive devices will be eliminated, where possible.

Accessible Communication

CBO and its employees shall communicate with people with disabilities in ways that consider each person's particular disability. Accessible communication shall be provided at no cost to the individual. CBO will notify the public about the availability of accessible formats and communication.

Should CBO be requested to provide a person with a disability a document or information, CBO will take into consideration the communication needs of the person with a disability and provide the

information in a format that is agreed upon. If one form or method of communication cannot be used, they may be able to use another form or method, or a combination.

When communicating with a person with a disability, employees must confirm with them that they understand the information being presented.

CBO shall provide upon request a copy of the Accessible Information and Customer Service Policy and Procedure to any person, and in an accessible form suitable for the person requesting the information.

CBO will ensure that its internet and intranet websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level A or higher, except where this is impracticable.

Workplace Emergency Response Information

CBO will provide individualized workplace emergency response information to employees with disabilities if their disability makes it necessary and CBO is aware of the need. This information will be provided as soon as practicable after becoming aware of the need for accommodation. With the employee's consent, CBO will ensure the information is shared with anyone designated to help the employee in an emergency.

Necessary information will be obtained from the Employee Information Worksheet for Accommodated Emergency Response. Human resources, together with the employee's Manager/Supervisor, will review the information collected and will provide individualized emergency response as required.

This information will be reviewed when the employee moves to a different location in the organization, when the employee's overall accommodation needs or plans are reviewed, and when CBO reviews its general emergency response procedures.

Accessibility Plan

Canadian Base Operators will establish, implement, maintain, and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers. The Accessibility Plan will be posted on the Canadian Base Operators website and in the workplace; will also be provided in an accessible format upon request.

Planning and Reporting

This plan will be published for 3+ yrs.; with received feedback on the second year CBO will publish a progress report on the ongoing Accessibility plan and implementation at our worksites. The report will include information and any feedback received. Year three will have a 2nd progress report, and year four will be a review and updated, published version of our Accessibility plan. All progress reports will also be published and made available from our website.

Employee Training

Canadian Base Operators will train all employees on the provision of accessible standards to people with disabilities, as well as all individuals who participate in the development of policies, practices, and procedures governing information and communications.

Training will include the following elements:

- an overview of applicable legislation.
- CBO accessible customer service plan.
- how to interact and communicate with people with various types of disabilities.
- how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person.
- how to use equipment or devices available on CBO premises or otherwise provided by us that may help with the provision of services to a person with disability.
- what to do if a person with a disability is having difficulty in accessing CBO services.

Employees will also be trained on an ongoing basis when changes are made to these policies, practices and procedures.

Notice of Temporary Disruption

CBO is aware that temporary disruptions of services (e.g., elevators, accessibility devices) and programs may occur due to reasons that may or may not be within CBO control or knowledge. CBO will make all reasonable attempts to minimize disruptions and their durations. For planned disruptions, CBO will provide advance notice of the disruption to the public, including information about the reason for the disruption, its anticipated duration and a description of alternative facilities or services.

The notice will be made available and will be updated via website, telephone recording or temporary signage.

Feedback Process

An individual who interacted with Canadian Base Operators who wishes to provide feedback on the way we interacted with them regarding his or her disability can offer their feedback in the following ways: **Attn to – Human Resource Manager – Canadian Base Operators, Inc.**

- e-mail and telephone, (re-directed to the appropriate CBO respondent).
 - **Phone: 1-705-446-9019**
 - **Email: info@canadianbaseoperators.com**
- via the CBO website (“Contact Us” section).
 - www.canadianbaseoperators.com
- in writing, (re-directed to the appropriate CBO respondent).
 - Mailing Address:
**Unit 10, 10 Greco Court NW
Collingwood, ONT L9Y 4M2**

- in person to CBO staff.

All feedback will be reviewed by the Human Resources Manager, and replies must be provided within 15 business days. In the event a complaint was received, the response shall specify the corrective actions to be taken by CBO.

You can use the contact information listed above to request a copy of our accessibility plan and our feedback process description in these alternate formats: print, large print, Braille, audio, or an electronic format that is compatible with adaptive technology that is intended to assist persons with disabilities. We will provide the format you ask for as soon as practicable. Braille and audio formats may take up to 45 days. Print, large print and electronic formats may take up to twenty days.

Employees can provide feedback in the same description as identified above, and CBO also takes additional measures to assure feedback is received from our employees in all aspects of their employment. Examples are:

- Annual Employee Surveys
- Bi-Annual Performance Reviews
- Employee involvement in the development of Safe Work Procedures and standard operating procedures.

Employees are responsible for:

- Being knowledgeable and complying with this policy and related policies.
- Informing their Supervisor/Manager when a fellow employee, the public or applicants selected for recruitment purposes requests an accommodation.
- Disclosing to their Supervisor/Manager or Human Resources if they require accommodation and/or an individual accommodation plan.
- Providing medical accommodation information from their health care provider as requested relevant to their restrictions, to allow CBO to properly meet its obligations.
- Participating in the development of an individual accommodation plan.
- Informing Supervisor/Manager and/or HR if accommodation needs change.

Supervisors/ Managers are responsible for:

- Being knowledgeable and complying with all related legislation.
- Assisting in the creation, development, monitoring and reviewing of individual accommodation plans as required.
- Dedicating resources to the implementation of the Company's policy and for regularly reviewing its effectiveness.

The Human Resources department is responsible for:

- Being knowledgeable and complying with all related legislation.
- Establishing effective procedures to ensure compliance with the policy standard.



- Informing applicants of the Company's accommodation methods and ensuring applicants are aware CBO will accommodate an applicant's disability during the recruitment/telephone screening process.
- Assisting in the creation, development, monitoring and reviewing all individual accommodation plans as required.

We are Committed to developing customer service policies that respect and promote the dignity and independence of people with disabilities. Therefor no changes will be made to this policy before considering and consulting with people with disabilities. Any policy of CBO that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

Progress Report #1 Available Summer 2025

Progress Report #2 Available Summer 2026

1 Date	Revision #	Description of Change
May 22, 2024	01	Update and include the Canadian Accessibility Act with the AODA, making this applicable to all CBO employees.

For copies of public information, including Accessibility related policies (alternate formats available), please contact:

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