



Since 1998

C and C Transportation Group

Multi-Year Accessibility Plan & Policy

C and C Enterprises (CANADA) 1329481 Ontario Inc.

The Accessibility for Ontarians with Disabilities Act, 2015 (AODA) is an Ontario Provincial Act with the purpose of developing, implementing and enforcing accessibility standards in order to achieve accessibility for people with disabilities and others with accessibility needs. The AODA mandates five standards in the following areas:

- Customer Service
- Employment
- Information and Communications
- Design of Public Spaces
- Transportation

In a modern world where diversity and inclusion are critical to societal and business success, C and C Transportation Group has voluntarily extended its obligations to meet the requirements of this Act to other Canadian jurisdictions in which the Company operates, i.e. BC and Quebec. The following describes how C & C is meeting these obligations.

I. STATEMENT OF COMMITMENT

C and C Transportation Group is a federally regulated organization offering transportation solutions utilizing high quality infrastructure, modern facilities and proven results to meet and exceed the expectations of its customers.

We know that the percentage of Canadians with a disability is increasing and even more people have accessibility needs. Disabilities can be sensory, physical or cognitive, visible or invisible. No matter what the need, we at C&C Group are committed to serving our clients and treating our employees in a way that respects dignity and independence. We endeavor to communicate and provide our services in a manner that is inclusive to everyone and which takes people's accessibility needs into account in all of our activities.

C&C Group is committed to creating an inclusive environment where barriers will not prevent anyone from interacting effectively with us. We are also committed to ensuring that all accessibility requirements are adhered to in a rigorous fashion. Any policy of C&C Group that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

II. GENERAL DEFINITIONS

Accessible Formats: include, but are not limited to, accessible electronic formats, Braille, text transcripts, large print, recorded audio, colour contrasts, and other formats accessible to persons with disabilities.

Assistive Device: a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that people bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

Barrier: as defined by the Ontarians with Disabilities Act, 2001, anything that prevents a person with a disability from fully participating in all aspects of society because of his/her disability. This includes:

- physical barriers,
- architectural barriers,
- informational or communications barriers,
- attitudinal barriers,
- policy, practice or procedure barriers.

Communication Supports: include but are not limited to sign language, plain language, closed captioning and other communication supports that facilitate effective communications.

Disability: a key feature of the AODA is its definition of “disability”. Under the AODA, the definition of “disability” is the same as the definition in the Ontario Human Rights Code [2], i.e. any degree of physical disability, infirmity, malformation or disfigurement including, but not limited to:

- diabetes mellitus;
- epilepsy;
- a brain injury;
- any degree of paralysis;
- amputation;
- lack of physical coordination;
- blindness or visual impediment;
- deafness or hearing impediment;
- muteness or speech impediment;
- physical reliance of a guide dog or other animal, or on a wheelchair or other remedial appliance or device;
- a condition of mental impairment or a developmental disability;
- a learning disability or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- a mental disorder;
- an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety & Insurance Act, 1997.

Support Persons: any person, whether a paid professional, volunteer, family member or friend, who accompanies a person with a disability to help with communications, mobility, personal care or medical needs while accessing our goods and services.

III. MEETING THE REQUIREMENTS

1. Training

We know that training provides people the tools and resources they need to serve our customers effectively. Training also helps our employees develop their skills. C&C Group desires that its employees can develop, grow and serve our customers in the best way possible.

To that end, C&C Group training meets all requirements of the AODA in the areas of Customer Service, the Integrated Accessibility Standards Regulation and the Ontario Human Rights Code. Training has been delivered to all employees who deal with customers, the public or third parties on our behalf as well as to people involved in the development of policies, plans, practices and procedures related to the provision of our goods and services.

Training is also included as part of onboarding for new employees. C&C Group commits to ensuring that all employees are aware of their rights and responsibilities to create an inclusive environment with and for people with accessibility needs.

C&C Group's AODA training covers:

- An overview of the AODA and its regulations
- All requirements of the Customer Service Standard including: 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; what to do if a person with a disability is having difficulty accessing C&C Group's goods and services
- Requirements related to information and communications including: the elements of accessible websites, types of accessible formats, colour contrast and accessibility, developing accessible documents
- Requirements of the Employment Standard and C&C Group policy, including: recruitment, assessment and selection, accessible formats and communications, workplace emergency response information, documented individual accommodation plans, return to work, performance management, career development, advancement and reassignment
- The Ontario Human Rights Code as it relates to people with disabilities customer.

2. Best Practices

At C&C Group we understand that the AODA standards represent the minimum requirements for all public and private sector organizations in Ontario. As an employer of choice, we take great pride in extending this Plan and all its contents to other jurisdictions in which we operate. We believe that this policy and our best practices enable us to deliver high quality services to every customer.

3. Procurement

As required, we will endeavor to incorporate accessibility provisions into our procurement practices. We understand that when accessibility is used as one of the criteria for purchasing decisions, the outcome will be products and services that are universally accessible to everyone. Where applicable, our procurement practices may outline the desired accessibility elements to be met. Examples where accessible procurement may be relevant may include computer purchases, software, office equipment, and leasing space or purchase of heavy equipment.

IV. CUSTOMER SERVICE POLICY (Posted in the Reception area of all C&C Group's locations)

C&C Enterprises (Canada) Inc.1329841 is committed to excellence in ensuring that we serve customers/visitors with disabilities and provide them with access to our goods and services, in the same manner as all guests - consistent with the principles of independence, dignity, integration and equal opportunity.

1. Providing Goods and Service to People with Disabilities

We are committed to excellence in serving all customers/visitors including people with disabilities. We will carry out our functions and responsibilities in the following areas:

- implement policies, practices and procedures to service customers/visitors with disabilities
- use best possible efforts to ensure that our policies, practices, and procedures are consistent with the core principles of independence, dignity, integration and equal opportunity
- ensure training is ongoing and that these policies, practices and procedures with respect to serving customers/visitors with disabilities are trained during employee orientation

2. Communication

Any communication between C&C Group and its' customers/visitors or the public will be conducted in a manner that considers an individual's disability. An understanding shall be reached on how it is best to communicate with a person with a disability on a case by case basis. This may include, but will not be limited to, the following methods:

- verbal communication
- written communication
- digital communication (e-mail or text)
- hand gestures

We will train all employees who communicate with customers/visitors on how to interact and communicate with people with various types of disabilities.

3. Telephone Communication

The C&C Group team is committed to providing accessible telephone communication. All staff are expected to communicate with all customers/visitors by speaking clearly, directly and using plain language. When available and appropriate, technological aides will be used to assist with communication. When clear and precise communication over the telephone is not possible, alternative arrangements will be made.

4. Assistive Devices

We are committed to serving people with disabilities who use assistive devices to obtain, use, or benefit from our services. At no time will anyone using an assistive device be denied access to their device while visiting the premises of C&C Group unless there is a pre-existing law prohibiting the use of the device.

5. Use of Service Animals

We are committed to welcoming people with disabilities who are accompanied by a service animal in all areas of our premises that are open to the public except, where the animal is otherwise excluded by law. We will also ensure that all employees and others dealing with the public are properly trained in how to interact with people with disabilities who are accompanied by a service animal. Use of Assistance Animals and Support Persons the Company welcomes individuals with disabilities accompanied by an assistance animal or support person. We will ensure that employees are adequately

trained on how to interact with individuals with disabilities accompanied by an assistance animal or support person.

6. Support Persons

We are committed to welcoming people with disabilities who are accompanied by a support person. If a customer/visitor with a disability is accompanied by a support person, we will ensure that s/he always has access to the support person while on our premises. In situations where confidential information might be discussed, consent will be obtained from the customer/visitor, prior to any conversation.

7. Notice of Temporary Disruption

We will provide customers/visitors with notice in the event of a planned or unexpected disruption at our premises as it relates to facilities or services. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available. When we are aware of the disruption, we will communicate it by posting at entrance points, washroom doors or the nearest accessible entrance to the service disruption.

8. Training

C&C Group is committed to providing training to employees on how to serve customers/visitors with disabilities. This training is conducted with anyone who interacts with the public or develops policies, practices, and procedures on behalf of C&C Group.

9. Sensitivity to Scented Products:

Due to health issues related to exposure to scented products such as perfumes and colognes, employees and visitors are requested to be considerate of using such products within the Company's premises. Employees and visitors should be aware that they may be asked to refrain from using such products if necessary to accommodate individuals with environmental sensitivities.

10. Feedback Process

The goal of C&C Group is to meet customer/visitor expectations while serving customers/visitors with disabilities. Questions regarding this Accessible Customer Service Policy or comments regarding how well expectations are being met are welcome and appreciated. Feedback can be provided in-person, face-to-face, or via telephone, letter or email to C&C Group Director, Human Resources at (613) 833-1917 or info@candctransportation.ca anyone who has submitted feedback via any of these

methods will receive a response and/or acknowledgement from C&C Group's Director, Human Resources within 48 hours of receiving the feedback. This will be done using the customer/visitor with disabilities' preferred method of communication (if this information has been provided to us) or in the method that is most appropriate taking the specific disability into consideration. Appropriate AODA documentation, including policies, standards and procedures will be made available if requested.

V. EMPLOYMENT POLICY

C&C Group is committed to fair employment practices and believes in an accessible and inclusive workplace where all employees are encouraged to excel without being hampered by barriers. For the purpose of the Employment Policy, the definition of employee refers to all paid employees regardless of employee classification. Further, C&C Group recognizes that both Ontario Human Rights Code policies and the AODA have specific requirements related to employment accommodation. While there is close alignment between the two pieces of legislation, they are not the same. This policy is specific to AODA Employment Standard requirements.

1. Recruitment, Assessment and Selection

During the recruitment process, C&C Group notifies job applicants and the public about its commitment to accommodate those with disabilities and advises that accommodation is available upon request. If a selected applicant requests accommodation, C&C Group will consult with the applicant and provide or arrange for the provision of suitable accommodation in a manner that considers the applicant's accessibility needs due to disability.

Recruitment ads will always include a statement that C&C Group is an inclusive workplace and welcomes all qualified applicants to apply. Successful applicants and employees will be notified of C&C Group's policies regarding accommodating employees with disabilities as soon as possible after their employment begins and whenever a change in policy takes place.

2. Accessible Formats and Communication Supports

As part of an approved accommodation plan, accessible formats and communication supports may be provided. Appropriate formats will be provided in consultation with the individual. The final decision of what to provide rests with C&C Group.

3. Workplace Emergency Response Information

C&C Group is committed to maintaining a safe workplace for all employees. Individual and documented emergency and evacuation plans are provided to any employee with accessibility needs as well as to any person designated to assist the employee, with the consent of that employee, and shall review the individualized workplace response information upon the following events:

- when the employee moves to a new location in the workplace;
- when the employee's overall accommodation needs are reviewed; and
- Upon review of C&C Group's general Fire/Emergency Evacuation policies.

C&C Group is also committed to providing customers/visitors with publicly available emergency and evacuation information in an accessible way upon request.

4. Documented Individual Accommodation Plans

Any employee requesting accommodation will have a documented plan that will be reviewed and updated regularly. An individualized plan will consider the nature and severity of the disability, the nature of the work and the workplace environment. It will also include any emergency-related information, accessible formats, communications support and any other accommodations a person needs to perform the essential duties of their job.

5. Return to Work Process

A documented, individual accommodation plan will be established to support employees who return to work after being absent due to a disability. Note: if an individual's illness or injury is covered by the Workplace Safety and Insurance Act, then the Act's return to work process applies.

6. Performance Management, Career Advancement and Reassignment

An employee's accommodation needs will be taken into effect during the performance management process, when determining advancement opportunities and when a reassignment is being contemplated. With respect to performance management, we will consider whether we need to make adjustment to help them succeed. With respect to

career advancement and reassignment, we will consider what accommodations employees with disabilities may need to learn new skills or take on more responsibilities in their current position. We will also consider what we could do to help employees with disabilities succeed in other positions with C&C Group when they change jobs.

7. Review of Job Descriptions

Job descriptions will be reviewed to ensure that stated requirements are necessary, and any barriers are removed.

8. Procedure to Request Accommodation

The purpose of accommodation is to allow a person to perform the essential duties of the job and to allow for equal participation in the workplace. The accommodation process will respect confidentiality and privacy. The accommodation will be collaborative and will involve the requestor. Requests for accommodation will be formalized according to the following process:

- i. Employees who wish to raise a potential accommodation issue must do so by submitting a request for accommodation, preferably in writing, to their immediate manager. The request must describe, in detail, the accommodation sought to address limitations in performing the essential duties of the job.
- ii. When necessary to facilitate the assessment and determination of the accommodation, the employee may be required to participate in the development of the accommodation plan and provide relevant medical information to C&C Group such as a functional capacity evaluation. Medical professionals are not required to submit a diagnosis. The purpose of any medical documentation is to determine the type of accommodation required. Employees seeking accommodation are expected to provide their full cooperation in providing any information or medical assessments relevant to determination of the accommodation request.
- iii. The Director, Human Resources and the President will jointly assess the accommodation issue in light of the information provided and the individual needs of the employee. During the assessment phase, C&C Group reserves the right to require further information, including relevant medical information or opinions that will assist C&C Group in determining whether accommodation can be achieved and how it can be achieved. C&C Group further reserves the right to require the employee to participate in a formal needs assessment by a qualified medical practitioner or other trained professional in order to assist in determining what accommodation is needed, how much it will cost, and how it can be provided. The costs of any assessment required by C&C Group will be borne by the Company. The employee may request the participation of an employee representative in the development of the accommodation plan.

iv. The Director, Human Resources and the President will jointly finalize a decision regarding the accommodation issue. The manager will notify the employee in writing or other format as required by the employee's disability, the decision and the reason(s) for the decision.

v. C&C Group will ensure that the employee's personal information is kept confidential and only disclosed to those necessary in the assessment and development of the accommodation.

VI. INFORMATION AND COMMUNICATIONS POLICY

1. Alternate Formats

At C&C Group, we are "Connected". We make sure we truly understand our customers' challenges. Therefore, ensuring that our customers can communicate with us easily and effectively is critical to our business. We strive to ensure that our communications are inclusive to everyone. This policy relates to print and digital media as well as two-way communication via telephone, email, meetings and presentations. It does not apply to information that is not controlled directly by C&C Group, or information or communications that cannot be converted.

We will ensure that we provide information and communications to our customers and the public in alternate formats upon request and in a timely manner. Depending on the situation this may include, but is not limited to:

- large print
- braille
- audio
- high colour contrast
- text transcription of audio or visual information
- information written in plain language

In determining an appropriate format, we commit to consulting with the requestor.

2. Websites

C&C Group is committed to having accessible websites to ensure that all of our customers and the public will have access to its Company information. C&C Group has already notified C&C Group Headquarters' and Departments of the need to ensure the Company website/content conforms to WCAG 2.0, Level AA by January 1, 2024.

3. Emergency Information

C&C Group is committed to having Fire/Emergency Evacuation Procedures in alternate formats and will provide them upon request.

VII. DESIGN OF PUBLIC SPACES

C&C Group will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to its public spaces, i.e. service-related areas such as service counters, waiting areas and washrooms. C&C Group will notify the public of any service disruption and alternatives available when such renovations/modifications are taking place.

VIII. TRANSPORTATION

Transportation Standards Requirements for accessible transportation apply to persons and/or organizations that offer transportation services to the public or employees, and that are responsible for or provide the following types of services. As such, the following do not apply to C&C Group:

- Conventional transportation
- Specialized transportation
- Public school transportation
- Other transportation services
- Ferry

No applicable

General Requirements for Conventional and Specialized Transportation Service Providers -These sections cover training, accessibility equipment, emergency preparedness and response policies as well as policies relating to support persons and treatment of existing vehicles.

