



Algoma Central Corporation Accessibility Plan

General

Executive Summary

The *Accessible Canada Act* which was adopted in 2019, is a federal law aimed at finding, removing and preventing barriers facing people with disabilities. As a federally regulated organization, Algoma is considered a regulated entity under the Act and must comply with the requirements including consulting with people with disabilities and publishing an accessibility plan, our feedback process and progress reports. This document outlines Algoma's Accessibility Plan and our process for consulting employees and receiving feedback. When preparing the Plan, Algoma took into account the following principles as outlined in the Act:

- (a)** all persons must be treated with dignity regardless of their disabilities;
- (b)** 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;
- (c)** all persons must have barrier-free access to full and equal participation in society, regardless of their disabilities;
- (d)** all persons must have meaningful options and be free to make their own choices, with support if they desire, regardless of their disabilities;
- (e)** laws, policies, programs, services and structures must take into account 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;
- (f)** persons with disabilities must be involved in the development and design of laws, policies, programs, services and structures; and
- (g)** 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.

Accessibility Statement

Algoma values its diverse workforce which includes persons with disabilities. We continue to promote a diverse and inclusive organization driven by our vision of being

the Marine Carrier of Choice and our values of Integrity, Sustainability, Teamwork, Ownership and Passion.

As part of being the Marine Carrier of Choice, Algoma and its leadership takes seriously the responsibility of understanding and trying to remove barriers that can impact the experience of persons with disabilities whether physical or sensory in nature. Algoma is committed to working to remove those barriers to improve accessibility.

Feedback and Alternate Formats

Algoma welcomes feedback on any accessibility related items. The Vice President of Human Resources is the designated contact to receive this feedback on behalf of Algoma. The designated person will inform and involve other departments as required based on the feedback received. The designated person can also be contacted for requests for the plan in alternate formats.

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This plan is also available in alternate formats upon request: print, large print, audio and electronic format.

Key Areas

The Built Environment

Algoma's head office where the majority of our shore based employees work is located in an owned building in St. Catharines. In addition, we have an owned warehouse facility where a few employees work in Port Colborne. These buildings offer accessible entrances, parking and elevators as well as accessibility features inside the bathrooms.

We are aware that the doors to access the washrooms in these buildings are not automated. This barrier is due to older infrastructure that was constructed prior to the current accessibility standards. As these facilities are upgraded or replaced, accessibility requirements are reviewed to try to mitigate or eliminate existing barriers.

The other built environment where the majority of Algoma's employees work is on a marine vessel. All vessels are maintained to stringent Transport Canada Marine Safety regulations and safety standards. Vessels are inspected by Class Societies that are all International Association of Class Society (IACS) members on behalf of Transport Canada, to ensure compliance with all maritime regulations and codes. The Company's Safety Management System is audited to verify compliance with the International Safety Management Code on all vessels and our offices independently by Class Society, Lloyd's Register.

Our vessels carry cargo not people other than employees who work on each vessel. Under Transport Canada requirements, seafarers must have a valid Marine Medical Certificate to work on a vessel to ensure they can perform routine and emergency duties safely and aren't at risk of needing immediate medical care which isn't available if the vessel is underway. When assessing a seafarer's fitness for duty a Transport Canada certified doctor must ensure that individual meets certain vision, hearing and physical capability standards. This requirement is a substantial barrier to hiring persons with disabilities and as a result, the built environment of a vessel is less relevant because persons with disabilities who would require accessible facilities aren't able to get the medical clearance to work on a vessel.

Actions, Timelines and Responsibilities

Algoma's VP Finance who is also in charge of facilities is responsible for ensuring an accessibility review is conducted whenever a facility undergoes a substantial renovation/remodel or when looking to purchase a facility.

By the end of 2024, Algoma will conduct a review of its buildings against current accessibility standards to identify any gaps. This review will provide Algoma with a clear understanding of the current state of its infrastructure and what improvements are needed to bring them up to the current accessibility standard.

The Design and Delivery of Programs and Services

Algoma delivers product to private customer facilities who would have their own accessibility plans and requirements. We do not provide products or services on an individual basis or to the general public. Therefore, the design and delivery of program and services relates primarily to Algoma's employees.

Algoma has a policy committee that consists of representatives from each of the bargaining units that represents the majority of Algoma's employees, our shipboard crew. The purpose of this committee is to help Algoma ensure a safe working environment by reviewing safety programs and standards as well as risks and to develop prevention and mitigation methods to address those risks.

In addition to the policy committee that aims to provide a safe work environment, due to the diverse nature of Algoma's employee group, Algoma developed a Diversity, Equity and Inclusion Roadmap. The Roadmap includes a number of focus areas and actions aimed at fostering diversity and inclusion in our workplace for all employees including persons with disabilities. The Roadmap was created in early 2023 and will play an important part in guiding our DEI activities in the coming years helping Algoma make positive steps to social and workplace inclusion and participation.

Delivery of employee based programs including communication, training, support programs, job and employee information and so forth are offered in various formats

including in-person, virtual, print and electronic. When requested, alternate formats are considered on an as needed basis.

As part of the support programs offered to employees, Algoma offers an Employee Family and Assistance Program which provides confidential support on a variety of topics including physical/mental health, wellness and diversity at no cost to the employees. The support is offered in a variety of methods including print, electronic, voice, text and in person.

To gauge employee's needs, Algoma conducts an employee survey every couple of years. The survey addresses belonging and inclusivity which are an important component of providing persons with disabilities a supportive environment. However, in prior surveys, the questions were more generic in nature. To better understand our employee experiences and needs the survey we rolled out in spring 2023 had more extension questions and the opportunity for free form comment. This feedback was used as part of the consultation process. Algoma also wants to find more direct ways of understanding the working experience of persons with disabilities at Algoma and how we can better support these employees.

Algoma has an experienced team dedicated to health and wellness whose core responsibilities are managing our disability management program, early and safe return to work planning, helping employee navigate the medical landscape, and promoting health and wellness resources to employees. The team works with our employees and their medical practitioners to determine their accommodation needs and with managers to remove job specific barriers and create modified work opportunities. The team's activities are key to the workplace accommodation process.

Actions, Timelines and Responsibilities

Algoma's employee survey was updated to include questions that specifically gauge an employee's perceptions and experiences related to diversity, equity and inclusion. The results were used to form part of the consultation process in developing this plan but will be further analyzed over the coming year once the DEI Council is in place to identify areas for improvement and whether or not there are shared needs related to certain groups such as persons with disabilities.

To further understand the needs of our employees and ensure we put the right programs and processes in place to address those needs, in 2023, Algoma will create a DEI Council. The intent will be to have a Council that is a diverse group representing a cross section of our employees including persons with disabilities. The group will help us assess survey outcomes, develop the appropriate programs and processes to respond to those needs as well as help communicate to employees and bring their voice back to the working group and Algoma's leadership. The Council will have the support of Algoma's Executives and be sponsored by a Sr. Leader, the VP of Human Resources to ensure the importance of the Council is evident and the group receives the appropriate support and resources.

Starting in 2023, all of Algoma's job postings will include a statement that affirms our commitment to inclusivity of qualified applicants and providing reasonable accommodation to persons with disabilities. In addition, before resumes are shared with hiring managers, the documents will be redacted to remove any details that are not specific to a person's experience and education including dates, hobbies, address, names and so forth to ensure bias is removed from the screening process.

Information and communication technologies (ICT)

Algoma uses a variety of communication technology for various purposes.

We utilize Microsoft Teams as our main communication platform within our office locations i.e. voice and chat as well as our online meeting platform. Microsoft Teams has a variety of accessible features including live captions, being able to record a meeting so participants can replay it, adding text to visuals, voice control, transcriptions, and an accessibility checker. These features allow people with different abilities to fully participate and contribute in meetings and discussions. While Microsoft Teams has many accessibility features, a possible barrier is the lack of formal training on those features to make employees aware they are available and how to use them.

In addition, upon request we have adapted technologies or installed accessible equipment to assist employees in being able to utilize communication technology. Items such as sit stand equipment for monitors, hands-free headsets and volume adapters are all items we have incorporated to enhance the employee experience and remove barriers.

One area of communication technology that could have improved accessibility features especially since it is a resource for both internal and external audiences is our company website. The platform is an older platform that has not undergone any significant updates in many years.

Other frequently used technologies programs that are installed/utilized on our vessels include electronic chart display and information systems (ECDIS), loading and unloading cargo programs, fuel monitoring systems and so forth. Since these programs are often specific to the marine industry the accessibility features appear to be minimal as they are not as progressed in implementing these features as other more broadly used software and technologies are. This does create a barrier for persons with disabilities but as noted, the Canadian marine industry is limited in being able to offer opportunities to persons with disabilities as a result of the Transport Canada fitness requirement in place due to the nature of the work and safety requirements of the industry.

Actions, Timelines and Responsibilities

Algoma is in the process of revamping our website. The updated website will be developed in accordance with accessibility guidelines incorporating features to ensure

an enhanced and inclusive experience for all stakeholders. The website will be updated by Q1 2024.

By Q1 2024, we will conduct training with our staff on the accessibility features that are available within Microsoft Teams. This will allow employees the opportunity to know what features are available to access or request others utilize as well as how those features work if needed.

Although part of the procurement actions on a broader scale, as of July 2023, when a need is identified to implement new communication information technology, vendors will be asked to provide details on available accessibility features that will then be reviewed and considered by the implementation team when make their assessment on the suitability of applications.

Communication, other than ICT

Communication with both internal and external stakeholders is done via a variety of methods and mediums depending on the intended purpose and/or audience. Upon request employees, applicants, customer and supplier representatives can request communication be in a specific format i.e. email, voice, text, and we do our best to accommodate these individual needs. Along these lines, one barrier that has been identified is a potential lack of awareness and understanding of what individuals may need and what considerations might help a person be able to fully participate in the workplace through enhanced communications.

Algoma has a reporting hotline for employees to report significant concerns or violations. Employees can access the hotline in a variety of ways including phone, mail or online. This allows employees to use the method that they feel most comfortable with.

Another barrier to employees and potential employees who may require communication accommodation is the requirement for the majority of our workforce to pass a Transport Canada Medical assessment which includes minimum visual and hearing requirements for safety reasons. Unfortunately, this is a regulated requirement and not a condition that Algoma can overcome. Therefore, we are limited in what options we can provide employees that would enhance our communication accessibility and allow them to fully participate in the workplace if they do not at least meet Transport Canada's minimum requirements.

Despite this challenge, in general when an employee accessibility need is identified, a review is conducted based on their position, their needs and the available technologies and equipment to determine gaps and what reasonable accommodations are available and can be provided to address those.

Actions, Timelines and Responsibilities

Algoma has implemented a new online training platform. By end of 2024, Algoma will develop a module to provide accessibility awareness training which will include the importance of communication including the considering the needs of the person they are communicating with, such as clear, concise, and plain language, gestures, large print, writing, or various other means including electronic options and the importance of seeking information whether an alternative forms of communication may be required.

Transportation

Algoma employs individuals from across Canada. Since our vessels transit the Great Lakes and St. Lawrence Seaway, many employees have to travel by air and/or ground transportation to join a vessel. As already stated, as a result of vessel based employees needing a Transport Canada Medical Fitness Certificate to be eligible to work onboard a vessel, the accessibility needs of the employees who are eligible to work on our vessels is reduced. However, in the case where an employee has accessibility need we work with our travel provider to find the best option.

We are also encouraged by the requirements of the Accessibility Act covering transportation service providers like the airlines and rail companies and knowing those entities have to address accessibility barriers that might be impacting our employees while travelling to and from work.

Actions, Timelines and Responsibilities

Algoma's Fleet Personnel and Purchasing teams will continue to work with our travel provider when an accessibility need is identified to ensure the individual's needs are considered and best accommodated.

Procurement

Algoma's goal is to consider accessibility requirements whenever relevant when procuring goods, services, and facilities so that the deliverables provide accessibility features that help provide a more inclusive and supportive environment.

We have identified a few barriers that exist in our procurement process. There is a lack of awareness of the need and benefits of including accessibility considerations in the process. Availability of goods or services with accessibility features may be a barrier or the identification and again awareness of the availability of these features may in fact be the barrier. In addition, vendors and service providers often haven't considered accessibility as part of their process.

Actions, Timelines and Responsibilities

By end of 2024 Algoma will develop a process that requires all vendors of relevant products and services to include their accessibility considerations in their proposals. As part of that process, by Q1 2024, Algoma will train its employees who are involved in the procurement of goods and services to be aware of accessibility considerations and

what they should look for when accessing a vendor and reviewing what they have on offer.

Employment

At Algoma we want to be the Marine Carrier of Choice which from an employee and potential employee perspective means being their employer of choice. In order to be the employer of choice, we want to provide an environment where employees can contribute at their full potential through access to meaningful employment opportunities and promotions.

Algoma communicates our support to employees and our commitment to creating an inclusive environment for all in a variety of ways, through our monthly newsletters, our website, our sustainability reports, employee meetings and so forth. However, we tend to do so on a more general basis. In order for persons with disabilities to know exactly how they can be supported, and for them not to believe there are barriers when there may not be, we have to ensure we communicate specific employment related supports and programs that are in place to address accessibility needs.

Algoma has extensive training programs from job specific training to leadership training. To foster a more inclusive environment and the potential for barriers, Algoma has identified a gap in our training and the recognition we need to develop and implement a training focused on unconscious bias, macroaggressions and the value of diversity.

Algoma includes assessments as part of our recruitment process. These include a cognitive and behavioural assessments. These assessments can create a potential barrier for persons with disabilities. Although value added in the recruitment process, Algoma needs to consider whether or not the value outweighs the potential barrier they create.

Algoma has a performance management process that evaluates employee performance throughout the year with a comprehensive year-end review. To ensure consistency and prevent bias, Algoma's leadership meets as part of the year end process to review all employee evaluations before they are finalized and then form part of an employee's compensation review. Future opportunities for promotion and development for each staff member are also discussed annually with Algoma's leadership team. When opportunities are identified, Algoma works with the applicable employees to ensure their readiness.

To foster an inclusive environment where our differences are celebrated, Algoma has committed to increasing awareness of the value of diversity at Algoma. At the end of 2022 Algoma began increasing our training and awareness around diversity, equity and inclusion starting with Algoma's leadership. In early 2023, we conducted an awareness training session with our Captains and Chiefs who are our shipboard managers as well as staff. To further raise awareness training on unconscious bias, macroaggressions and the value of diversity will be rolled out to the rest of the workforce.

Actions, Timelines and Responsibilities

Algoma is in the process of developing an employee handbook for shore based staff which should be implemented by Q3 2023. The handbook will include an Accessibility Policy to create better awareness around Algoma's commitment to creating a barrier free workplace and support that is available to persons with disabilities.

To further awareness across our workforce about inclusivity and the need to support persons with disabilities, Algoma will include an overview of any accessibility supports that are in place, our commitment to providing a barrier free workplace and the process to request accommodation in our employee orientation process for shore staff by end of 2023 and by end of 2024 for shipboard crew.

By end of 2024, Algoma will conduct an analysis should to determine the value of our recruitment assessment tools vs the potential barrier these assessments create for persons with disabilities and if the value is significant, then a review will be done to determine what accommodation can be provided or if alternative assessments with accessibility features can be utilized instead.

Once Algoma's DEI Council is established in 2023, following the feedback we received as part of the consultation process, one of the focus areas will be on identifying and mitigating or eliminating biases and barriers in the hiring, development and promotion processes that Algoma has in place to ensure these processes are equitable and in turn opportunities are available to persons with disabilities. If barriers are identified Algoma will develop a further action plan to address them. If no barriers are identified and instead there is a perception of barriers, Algoma will develop an action plan to better communicate our practices to clear up any misconceptions.

By Q1 2024 Algoma will develop an online training module to include in our LMS system on microaggressions, unconscious bias and the value of diversity.

Consultations

Algoma conducted an employee survey and included questions relating to diversity, equity and inclusion. More specifically asking if opportunities are equitable, if managers demonstrate wanted behaviours, what Algoma is doing well regards to building an equitable and inclusive environment and where we need to improve. The response rate was 62% and included both shipboard and shore staff.

One area that was identified in our consultation process was a concern around Algoma's hiring practices being a potential barrier and although not the case, the impression that hiring and promotional decisions are governed by who a person knows vs their skill set. This perception creates a potential barrier for all candidates including persons with disabilities. This feedback was considered in our action plans.

Although not direct feedback, we recognize based on the sentiment expressed in some responses we received during this process that there is a need for greater awareness

training around the value of diversity, equity and inclusion. While most employee comments expressed an appreciation for a diverse workforce and the role Algoma is playing in creating such a workplace, some employees expressed less positive remarks which means there is still work to do in this regard. As such, we have included a number of training items in our action plans.

Aside from the feedback identified above which we have included actions to address, the overall feedback from employees is that Algoma is taking all the right steps to be inclusive and diverse, to create better awareness and to address concerns when brought forward.

In addition to the feedback we received that was considered in developing this Plan, we would like to get additional feedback on Algoma's Accessibility Plan specifically and have sent the Plan directly to a group of employees who through the Employment Equity workforce surveys have identified themselves as being a person with a disability as well as wanting to be involved in any feedback process. If additional feedback is received we will update our plan and action items accordingly.

Planning and Reporting Cycle

Algoma has implemented a three year planning and reporting cycle as follows:

- First year – prepare and publish an accessibility plan
- Second year – prepare and publish a progress report
- Third year – prepare and publish a progress report