

# **Canship Ugland Ltd. Accessibility Plan 2023-2026**

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## General

### Executive Summary

As a federally regulated company, Canship Ugland Ltd. must comply with the Accessible Canada Act (ACA), a federal law that aims to identify, remove and prevent barriers facing people with disabilities and comply with the Accessible Canada Regulations (ACR).

In order to address barriers, it is important to recognize and understand the experiences of people with disabilities. Our plan was developed in consultation with employees who identify as having a disability through employee survey and reviewing our internal policies and procedures.

Due to the nature of our business, we currently have a smaller representation of employees who identify as a person with a disability, therefore these consultations also involved employees with shared experiences of someone with a disability and interested in being part of the contributions to creating a barrier free and accessible environment.

### Accessibility Statement

Canship Ugland Ltd. is committed to being a full and fair equal opportunity employer and makes every effort to ensure that its policies, procedures and work environment remove barriers for persons with disabilities.

### Feedback and Contact Information

Canship Ugland Ltd. welcomes feedback on our accessibility plan. If you have an inquiry, please use of the contact methods below. The Executive Administrator is the designated person to receive this feedback on behalf of the company.

Contact: Executive Administrator  
Phone: (709) 782-3333  
Email: [accessibility@canship.com](mailto:accessibility@canship.com)  
Address: 1315 Topsail Road  
P.O. Box 8040, Stn "A"  
St. John's, NL  
A1B 3M7

The designated person can also be contacted to request this plan in alternate formats.

## Key Areas

### The Built Environment

Canship Ugland Ltd.'s head office where our shore-based employees work is located in a leased building in St. John's, NL.

There is accessible parking available for employees and visitors, a ramp to access the entrance to the building, with automated doors. The doors to access the washrooms in the building are not automated. This 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 Canship Ugland Ltd.'s employees work is on a marine vessel. All vessels are maintained to Transport Canada Marine Safety regulations and safety standards.

Vessels are inspected by class societies on behalf of Transport Canada, to ensure compliance with all maritime regulations and codes.

Transport Canada requires that all 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 physician 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.

### Barriers and Actions

The accessible features in our head office are used regularly, therefore an issue would be quickly identified and rectified in a timely manner. In addition, our Occupational Health and Safety workplace monthly inspection form contains checks of these important functions.

By the end of 2024, we will conduct a review of our building against current accessibility standards to identify any gaps. This review will provide us with a clear understanding of the current state of our infrastructure as it pertains to accessibility and what improvements are needed to bring them up to the current standard.

### The Design and Delivery of Programs and Services

Canship Ugland Ltd. has two committees. A policy, health and safety committee and an employment equity committee, made up of representatives from each of the bargaining units that represent the majority of our employee's, our shipboard crew and shore-based staff.

The purpose of these committees is to help ensure a safe working environment by reviewing safety programs and industry standards.

Delivery of employee-based programs including communication and training programs are offered in various formats, including in person, virtual, print and electronic.

When requested, alternate formats are considered on an as needed basis.

To gauge employee's needs, Canship Ugland Ltd conducts employee surveys every 2 years. The survey addresses equity and inclusivity which are an important component of providing persons with disabilities a supportive environment.

Canship Ugland Ltd. works with a third-party company who assists our experienced health, safety, environment and quality (HSEQ) department and human resources department (HR) in executing our disability management program, early and safe return to work planning, assisting employees to 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.

## **Barriers and Actions**

Canship Ugland Ltd.'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 reviewed further in 2024 to identify areas for improvement and whether or not there are shared needs related to certain groups such as persons with disabilities.

We have updated our job postings inclusivity statement for qualified individuals to include providing reasonable accommodation to persons with disabilities.

## **Information and communication technologies (ICT)**

Canship Ugland Ltd. utilizes a variety of communication technology for operations.

Outlook 2016(email) and microsoft teams is our main communication platform within our office location, voice, chat as well as our online meeting platform.

Teams has a variety of accessible features including live captions, being able to record a meeting so participants can reply, 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.

One area of communication technology that could have improved accessibility features especially is our company website.

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 are items we have incorporated to enhance the employee experience and remove barriers.

Other programs that are used on our vessels including, but not limited to; electronic chart display and information systems (ECDIS), loading and unloading cargo programs and fuel monitoring systems.

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.

### **Barriers and Actions**

During 2024, we will conduct training with our office staff on the accessibility features that are available within teams. This will allow employees the opportunity to know what features are available to access.

When current company website is updated, complete testing to ensure WCAG 2.1 compliant.

### **Communication, other than ICT**

Communication with both internal and external parties is done through a variety of means, with the intent of providing the information in a manner that is the best for the intended recipients.

Upon request employees, applicants, customers and suppliers can request communication be in an alternate format and we do our utmost to accommodate these individual needs.

Another barrier to employees and potential employees who may require communication accommodation is the requirement for the majority of our workforce to hold a valid Transport Canada seafarer's medical, which includes minimum visual and hearing requirements for safety reasons. Unfortunately, this is a regulated requirement and not a barrier that the company 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**

Canship Ugland Ltd. has an online training system. We are currently conducting a review of the training programs offered to employees and working with the service provider to include a training module by end of 2024 on accessibility awareness.

## **Transportation**

Canship Ugland Ltd. employs individuals locally and across Canada. Many employees have to travel by air to join a vessel. As already stated, as a result of ship-based employees requiring a Transport Canada Seafarer's Medical 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.

The requirements of the Accessibility Act cover transportation service providers like the airlines who also have to address accessibility barriers that might be impacting our employees while travelling to and from work.

## **Barriers and Actions**

Canship Ugland Ltd.'s human resources department (HR) 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**

Accessibility requirements are included in our stated requirements on our purchase orders for a goods and or service provided.

## **Barriers and Actions**

As part of our review of procurement, by end of 2024 Canship Ugland Ltd. will develop a process that requires all vendors of relevant products and services to include their accessibility considerations in their proposals.

## **Employment**

Canship Ugland Ltd. employs approximately 225 individuals, with 75% unionized across five separate bargaining units. Canship Ugland Ltd. aims to have a diverse workforce and identifies persons with disabilities as one of the five underrepresented groups as a focus in our diversity and inclusion initiatives.

Through our employment equity surveys, we receive information from our employees to determine plans and strategies to address potential barriers. This information helps us review our processes to ensure they are fair and transparent and do not have an adverse impact on any particular group and helps measure our progress.

## **Barriers and Actions**

To further create awareness across our workforce about inclusivity and the need to support persons with disabilities, Canship Ugland Ltd. 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 all staff by end of 2024.

## **Consultations**

Canship Ugland Ltd. conducted an employee survey and included questions relating to diversity, equity and inclusion and what the company is doing well in regards to building an equitable and inclusive environment or any areas of improvement, this included both shipboard and shore staff.

We will continue to survey employees, including those with disabilities as part of measuring our progress to the changes we have committed to.