

## Accessibility Policies and Accessibility Plan (the "Accessibility Plan")

### **General**

#### Introduction

This Accessibility Plan is in compliance with the Accessible Canada Regulations: SOR/2021-241 under the *Accessible Canada Act* ("**ACA**").

The Accessible Canada Regulations under the ACA require that Unifi Aviation Canada Inc ("Unifi") establish, implement, maintain and document its accessibility plan (the "Accessibility Plan"). The Accessibility Plan outlines Unifi's strategy for preventing and removing barriers for persons with disabilities and meets our obligations under the Accessible Canada Regulations and the ACA.

The Accessibility Plan will be publicly available, including in an accessible format upon request. The Accessibility Plan will be reviewed and updated, if applicable, at least once every three years.

## **Application**

The Accessibility Plan applies to all employees, as defined in the Accessible Canada Regulations, as well as the customers of Unifi in Canada.

#### **Our Commitment**

In fulfilling our mission, Unifi strives to treat all individuals in a manner that allows them to maintain their dignity and independence. Unifi promotes integration and equal opportunity and is committed to meeting the needs of people with disabilities in a timely manner. We will seek to achieve this by preventing and removing barriers to accessibility and by meeting accessibility requirements under the ACA. This Accessibility Plan sets out Unifi's policy on how we will achieve accessibility in all areas of Unifi's operations.

The following accessibility strategies set out the requirements that are applicable to Unifi:

- **1.** Employment
- **2.** The Built Environment
- 3. Information and Communication Technologies
- 4. Communication, Other than Information and Communication Technologies
- **5.** The Procurement of Goods, Services and Facilities (not applicable)
- **6.** The Design and Delivery of Programs and Services
- **7.** Transportation (not applicable)

### **Feedback**

Unifi has a designated accessibility representative. The representative is designated to receive feedback relating to accessibility and accessibility barriers on behalf of Unifi.

Unifi's **Designated Accessibility Representative** is as follows:

### Serena Rai Human Resources Business Partner

You can provide feedback and/or communicate with Unifi and the Designated Accessibility Representative in any of the following manners:

Mail: Unit 200(B) – 1601 Airport Road NE, Calgary, AB T2E 4Y9, Canada

**Telephone:** [404-927-2228]

**E-mail:** Serena.rai@unifiservice.com

### **Consultation**

As part of developing Unifi's Accessibility Plan, Unifi engaged in consultations with its employees. In particular, Unifi sought feedback from persons with disabilities regarding its operations in order to identify remove, and prevent accessibility barriers.

Unifi conducted an online survey for its employees. The survey provided a platform for employees to openly share their feedback with regards to accessibility in the workplace and provided valuableinsight into employee concerns pertaining to accessibility in the workplace. Upon analyzing the results, discussions and 1:1 feedback sessions with employees were held to better understand their needs and experiences.

Although the consultations did not identify any major barriers, the consultations did illustrate that Unifi could improve certain processes including collaborating on policies that support disability inclusion and equitable work environments. In addition, offering training and awareness modules to educate the staff on best practices for inclusion to foster a culture of understanding. In response to this feedback, processes and procedures have been established with channels for continuous input and improvement to raise concerns regarding accessibility by reaching out to the management Human Resource Business Partners, Office Administrator, for guidance or by contacting our third-party vendor, and managing leave of absenceprocesses. Various communication channels are made available which include email, text messaging, On The Job application and close-captioned TV capability.

### **Areas Described Under Section 5 of the ACA**

The following sets out how Unifi is committed to complying with the ACA:

### 1. Employment

Unifi is committed to fair and accessible employment practices in all stages of the employment cycle that will respect the dignity and independence of current and prospective employees with disabilities.

### **Current Level of Accessibility in the Area of Employment:**

Our current level of accessibility in our employment practices is a cornerstone of inclusivity. Accessibility plays a vital role in ensuring equal opportunities for individuals with disabilities across various roles, as a leader in aviation ground handling services with below wing positions to include ground crew such as ramp and dispatch roles. We pride ourselves on ensuring equal opportunities for individuals with disabilities to thrive in the workplace, where their skills and abilities match the qualifications to perform jobs within the industry. We continue to make strides in accessibility, implementing accommodations such as flexible work arrangements, tech modifications, and specialized training programs associated with the airport infrastructure and its stringent regulations. Paramount to the operation, Unifi is committed to safeguarding our employees, customers, and the environment by promoting a work culture where employee safety is never compromised for any other business priority.

### **Barriers in Employment as Identified by Consultation Participants:**

No barriers were identified relating to accessibility.

## **Accessibility Goals in the Area of Employment:**

Ensuring accessibility in employment is a crucial step toward fostering a workforce where individuals with disabilities can fully participate, contribute, and thrive. Unifi commits to continual review of hiring practices and providing accommodations that empower all qualified employees to participate in the process.

- Inclusive hiring practices prioritize diversity of skills and abilities to eliminate any potential discriminatory barriers.
- Workplace accommodations, such as assistive technology, flexible work arrangements/schedules, and adaptive workspaces.
- Career advancement opportunities that ensure employees with disabilities have equal access to promotions, training, and leadership roles.

## Planned Action to Achieve Accessibility Goals:

## (a) Recruitment

Unifi is committed to fair and accessible employment recruiting practices that attract and retain employees with disabilities. Unifi will ensure all candidates have a chance to apply, interview and secure employment through accessible job postings and recruitment channels.

### Unifi will do the following:

## (i) Recruitment General

Unifi will notify employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process.

Unifi will continue to be promoted as an equal-opportunity employer, welcoming and encouraging applications from all qualified individuals. We are committed to creating a diverse, inclusive, and accessible work environment.

### This will include:

- educate and elevate leader skills through awareness programs and training to foster understanding and support of a diverse workforce.
- review and, as necessary, modification of existing recruitment policies, procedures and processes.
- specifying that accommodation is available for applicants with disabilities, on Unifi's website and on job postings; and
- provide realistic job preview for interested applicants.

## (ii) Recruitment, Assessment and Selection

Unifi will notify job applicants, when they are individually selected to participate in an assessment or selection process and inform them that accommodations are available upon request in relation to the materials or processes to be used in the assessment/selection process. This will include:

- a review and, as necessary, modification of existing recruitment policies, procedures and processes.
- inclusion of the availability of accommodation notices as part of the script in the scheduling of an interview and/or assessment; and
- if a selected applicant requests an accommodation, a consultation with the applicant and arrangement for provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to the disability; and
- provide accommodations throughout the hiring process for alternative application methods and interview formats.

## (iii) Notice to Successful Applicants

When making offers of employment, Unifi will notify the successful applicant of its policies for accommodating employees with disabilities. This will include:

- provide a realistic job preview, as needed
- a review and, as necessary, modification of existing recruitment policies, procedures and processes; and
- inclusion of notification of Unifi's policies on accommodating employees with disabilities in offer of employment letters.

### **Anticipated Compliance Date: Ongoing**

# b. Informing Employees of Supports and General Provision of Accessible Formats and Communications Supports

Unifi will inform all employees of policies that support employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability. This will include:

- informing current employees and new hires of Unifi's policies supporting employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's needs due to disability.
- providing information as soon as practicable after the new employee begins employment, specifically in the orientation process.
- keeping employees up to date on changes to existing policies on job accommodations with respect to disabilities.
- where an employee with a disability so requests it, Unifi will provide or arrange for provision of suitable accessible formats and communications supports for:
  - o information that is needed in order to perform the employee's job.
  - information that is generally available to employees in the workplace;
    and
- in meeting the obligations to provide the information that is set out above,
  Unifi will consult with the requesting employee in determining the suitability of an accessible format or communication support.

## **Anticipated Compliance Date:** Ongoing

### c. Documented Individual Accommodation Plans/Return to Work Process

Unifi will incorporate new accessibility requirements under the Accessible Canada Regulations to ensure that barriers in accommodation and return to work processes are eliminated and corporate policies surrounding accommodation and return to work are followed, where applicable.

Unifi's existing policies and practices include steps that Unifi will take to accommodate employees with disabilities and to facilitate employees' return to work after absence due to disability.

Unifi will review and assess existing policies to ensure that they include steps that Unifi will take to accommodate employees with disabilities and to facilitate employees' return to work after absence due to disability. Unifi will also ensure that they include a process for the development of documented individual accommodation plans for employees with disabilities, if such plans are required.

Unifi will ensure that the process for the development of documented individual accommodation plans includes the following elements:

- information regarding the manner in which the employee requesting accommodation can participate in the development of the plan.
- information regarding the means by which the employee is assessed on an individual basis.
- information regarding the manner in which Unifi can request an evaluation by an outside medical or other expert, at Unifi's expense, to assist Unifi in determining if and how accommodation can be achieved.
- information regarding the manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan;
- steps to protect the privacy of the employee's personal information.
- information regarding the frequency with which individual accommodation plans will be reviewed and updated and the manner in which this will be done.
- the reasons for a denial if an individual accommodation plan is denied.
- information regarding the means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs.
- the following will be included if individual accommodation plans are established:
  - any information regarding accessible formats and communication supports that have been provided for or arranged, in order to provide the employee with:
    - information that is needed in order to perform the employee's job.

- information that is generally available to employees in the workplace; and
- identify any other accommodation that is to be provided to the employee.

Unifi will ensure that the return-to-work process is as set out in its existing policies outlines:

- the steps Unifi will take to facilitate the employee's return to work after a disability-related absence.
- the development of a written individualized return to work plan for such employees; and
- the use of individual accommodation plans, as discussed above, in the returnto-work process.
- coordination and collaboration with Acclaim Leave Management to facilitate leaves to include medical, accommodation, and legislative leaves.

## **Anticipated Compliance Date: Ongoing**

### d. Performance Management, Career Development and Redeployment

Unifi will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans:

- when using its performance management process with respect to employees with disabilities.
- when providing career development and advancement to employees with disabilities; and
- when redeploying employees with disabilities.

### Unifi will:

- review, assess and, as necessary, modify existing policies, procedures and practices to ensure compliance with the Accessible Canada Regulations and ACA.
- take the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account when:
  - assessing performance.
  - o managing career development and advancement; and
  - redeployment is required.
- review, assess and, as necessary, include in performance management workshops, accessibility criteria.
- take into account the accessibility needs of employees with disabilities when providing career development and advancement to its employees with

- disabilities, including notification of the ability to provide accommodations on internal job postings; and
- take into account the accessibility needs of employees with disabilities when redeploying employees, including review and, as necessary, modification of employee transfer checklist.
- take into account the line of service, shift bids/schedules, physical demands/requirements of the job for an accommodation/accessibility to successfully perform the role.

## **Anticipated Compliance Date:** Ongoing

### 2. The Built Environment

Unifi is committed to removing barriers in public spaces and buildings that will uphold the dignity and independence of persons with disabilities.

## **Current Level of Accessibility in the Area of the Built Environment:**

Unifi provides and promotes accessibility on its physical premises. Unifi continues to review its Built Environment and continues to consider if any further improvements to the accessibility of its Built Environment can be made.

## Barriers in the Built Environment as Identified by Consultation Participants:

No barriers were identified.

### **Accessibility Goals in the Area of the Built Environment:**

Unifi will continue to meet its built environment obligations under the ACA.

### **Planned Action to Achieve Accessibility Goals:**

While Unifi has no current plans to engage in new construction or significant redevelopment of its facilities at present, Unifi will meet the ACA for all built environment obligations should any such construction take place in the future.

Unifi will put procedures in place to prevent service disruption to its accessible parts of public spaces. In the event of a service disruption, Unifi will notify the public of the service disruption and alternatives available.

Unifi will email its employees, post on bulletin boards, utilize internal Apps, use dispatch services, collaborate with the Union to broadcast using all communication channels

Anticipated Compliance Date: Recurring and ongoing

## 3. <u>Information and Communication Technologies</u>

Unifi is committed to making company information and communications accessible to persons with disabilities.

## Current Level of Accessibility in the Area of Information and Communication Technologies:

Unifi offers its employees multiple channels of communication when sharing information. We recognize the vital role that communication plays in an accessible environment. As part of our commitment to accessibility, we strive to leverage innovative solutions to ensure effective communication for all individuals.

## Barriers in Information and Communication Technologies as Identified by Consultation Participants:

Participants expressed the need for different modes of learning.

### Accessibility Goals in the Area of Information and Communication Technologies:

- Development of information channels such as in-house Apps, Website, emails, bulletin boards, Town Hall meetings, text messages, capability for enlarged fonts, close-captioned TV, etc.,
- Consider emerging technology to enhance accessibility within the workplace operations, customer interactions, as part of our overall service delivery

### Planned Action to Achieve Accessibility Goals:

Unifi will incorporate new accessibility requirements under the information and communication standards to ensure that its information and communications systems and platforms are accessible and are provided, upon request, in accessible formats that meet the needs of persons with disabilities.

## (a) Feedback, Accessible Formats and Communication Supports

#### Unifi will:

- ensure that existing and new processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request and in a timely manner;
- more broadly, as a general principle where accessible formats and communication supports for persons with disabilities are requested:

- provide or arrange for the provision of such accessible formats and communication supports;
- consult with the person making the request to determine the suitability of the accessible format or communication support;
- provide or arrange for the provision of accessible formats and communication supports in a timely manner that takes into account the person's accessibility needs due to disability, and at a cost no more than the regular cost charged to other persons; and
- notify the public about the availability of accessible formats and communication supports.

### **Anticipated Compliance Date:** Ongoing

## (b) Accessible Websites and Web Content

Unifi will work toward making any Canadian-based websites and web content conform with the World Wide Consortium Web Content Accessibility Guidelines (WCAG 2.0) Level AA. Furthermore, Unifi will take reasonable steps to ensure that all new Canadian-based websites controlled by Unifi, and web content on those sites, will conform with the World Wide Consortium Web Content Accessibility Guidelines (WCAG 2.0) Level AA, except where meeting the requirement is not practicable.

### **Anticipated Compliance Date:** January 1, 2026

### 4. Communication, Other than Information and Communication Technologies

Unifi is committed to making company information and communications accessible to deaf persons in Canada.

Communication, other than information and communication technologies ("ICT") includes the use of American Sign Language, Quebec Sign Language and Indigenous sign languages. American Sign Language, Quebec Sign Language and Indigenous sign languages are recognized as the primary languages for communication by deaf persons in Canada.

### **Current Level of Accessibility in the Area of Communication, Other than ICT:**

Unifi provides communication via the intranet, internet and online web applications designed and dedicated to its Canadian employee base, specifically.

## Barriers in Communication, Other than ICT as Identified by Consultation Participants:

No barriers were identified.

## Accessibility Goals in the Area of Communication, Other than ICT:

• Unifi will work towards engaging the services of Third-Party sign language services in cases where the services are needed.

## Planned Action to Achieve Accessibility Goals:

Unifi will incorporate new accessibility requirements under the communication, other than ICT standard to ensure that its information and communications systems and platforms are accessible and are provided, upon request, in accessible formats that meet the needs of deaf persons in Canada.

## (a) Feedback, Accessible Formats and Communication Supports

#### Unifi will:

- ensure that existing and new processes for receiving and responding to feedback are accessible to deaf persons in Canada by providing or arranging for the provision of accessible formats and communication supports, upon request and in a timely manner;
- more broadly, as a general principle where accessible formats and communication supports for deaf persons in Canada are requested:
  - provide or arrange for the provision of such accessible formats and communication supports;
  - consult with the person making the request to determine the suitability of the accessible format or communication support;
  - provide or arrange for the provision of accessible formats and communication supports in a timely manner that takes into account the person's accessibility needs due to disability, and at a cost no more than the regular cost charged to other persons; and
- notify the public about the availability of accessible formats and communication supports.

## **Anticipated Compliance Date:** Ongoing

### The Procurement of Goods, Services and Facilities

**5.** The area of the Procurement of Goods, Services and Facilities is not applicable to Unifi. **The Design and Delivery of Programs and Services** 

Unifi is committed to removing barriers in the design and delivery of programs and services that will uphold the dignity and independence of persons with disabilities. We are also committed to giving people with disabilities the same opportunity to get involved with Unifi and allowing people with disabilities to benefit from Unifi in the same place and in a similar way as other clients.

## Current Level of Accessibility in the Area of the Design and Delivery of Programs and Services:

Unifi programs and services are available through various channels and communication modes.

## Barriers in the Design and Delivery of Programs and Services as Identified by Consultation Participants:

No barriers were identified.

Accessibility Goals in the Area of the Design and Delivery of Programs and Services and Planned Action to Achieve Accessibility Goals:

### (a) Communication

When communicating with people with disabilities, we will do so in ways that take into account their disability. Accordingly, we will train our staff who deliver programs and services on how to interact and communicate with people with various types of disabilities.

## **Anticipated Compliance Date:** Ongoing

### (b) Assistive Devices

People with disabilities are welcome to use their own personal assistive devices (e.g., white cane, wheelchair, hearing and visual aids) in order to access or use Unifi's programs and services. We will train our staff to become familiar with various assistive devices that may be used by volunteers, donors, and clients with disabilities while accessing our services. We will also ensure that staff know how to use assistive devices that are available for clients on our premises.

### **Anticipated Compliance Date:** Ongoing

### (c) Service Animals and Support Persons

People with disabilities who are accompanied by a service animal are welcome on all parts of Unifi's facilities that are open to the public and other third parties and to participate in Unifi's programs. Clients may keep the animal with them unless excluded by law, in which case, we will consider alternative measures to access our services. Our staff and others dealing with the public on our behalf will be trained on how to interact with people with disabilities who are accompanied by a service animal.

Any person with a disability who is accompanied by a support person will be allowed to enter Unifi's facilities 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 our premises or when participating in a Unifi program.

## **Anticipated Compliance Date:** Ongoing

## (d) Notice of Temporary Disruption

In the event of a planned or unexpected disruption in facilities or services usually used by people with disabilities, Unifi will post a notice about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available. The notice will be placed at or near the affected facility or service and/or through other means (e.g., website) where necessary.

Unifi will also use its Crisis Management channels to inform and notify of any business disruptions according to its protocol.

Anticipated Compliance Date: Ongoing.

### 6. <u>Transportation</u>

The area of Transportation is not applicable to Unifi. Unifi is not involved in the transport of persons with disabilities

## **Accessible Formats**

Accessible formats of this document are available upon request. Requests can made to the Designated Accessibility Representative in any of the following manners:

Mail: Unit 200(B) – 1601 Airport Road NE, Calgary, AB T2E 4Y9, Canada

**Telephone:** 404-927-2228

**E-mail:** <u>serena.rai@unifiservice.com</u>