

Trans Mountain Accessibility Plan

December 2022

Table of Contents

1.0	Message from the President & CEO, Dawn Farrell.....	3
2.0	General	4
	Introduction.....	4
	Contact information	4
	Consultations.....	4
3.0	Priority Areas.....	5
	Employment	5
	Built environment.....	9
	Information and communication technologies (ICT).....	10
	Communications other than information and communication technologies	11
	Procurement of goods, services and facilities	12
	Design and delivery of programs and services	12
	Transportation	13
4.0	Feedback	13

1.0 Message from the President & CEO, Dawn Farrell

Trans Mountain is committed to creating an environment that is inclusive to all persons. We understand the importance of fostering an accessible and welcoming environment for our employees, customers, community members and regulators. As an organization, we respect and uphold the requirements outlined in the Accessible Canada Act (ACT). Because of our dedication to accessibility, we will integrate accessibility legislation into our company policies, procedures, and programs.

We're pleased to publish our first Accessibility Plan. The Plan documents the work we are already doing as a company. It will serve as a foundation for subsequent initiatives which will further enhance accessibility.

Accessibility is not a one-time goal. It is an ongoing effort. Our multi-year commitment outlines the approach and actions that Trans Mountain will put in place to improve opportunities for people with disabilities. It also allows us to consider ways to be more inclusive in the future.

We are excited to undertake a more comprehensive approach to accessibility. It is underpinned by our commitment to enhance the workplace for all individuals to contribute and thrive.

Dawn Farrell
President & CEO

2.0 General

Introduction

Trans Mountain Corporation is a federal Crown corporation headquartered in Calgary, Alberta. We operate Canada's only pipeline system transporting oil products to the West Coast. We have a permanent workforce of approximately 500 employees working in our Calgary head office and regional offices along the pipeline system in Alberta and British Columbia and Washington state

Trans Mountain Corporation is a wholly owned subsidiary of Canada Development Investment Corporation (CDEV). We are governed by an independent Board of Directors. We are accountable to Parliament through CDEV.

Contact information

To receive this document in an accessible format that works better for you, please contact:

Address:

300 5th Avenue SW
Suite 2700
Calgary, AB T2P 5J2

Telephone number: 1.866.514.6700

Email address: info@transmountain.com

Consultations

For the 2022 Plan, we consulted with employees at our headquarters in Calgary, Alberta. We conducted a focus group to learn more about their experiences within the different phases in the employee lifecycle. It provided us with a strong cross-section of perspectives from employees with lived experience of disability and those who identify as allies.

Interviews were conducted with ten individuals representing a range of jobs and departments. Participants shared what they see is being done to remove barriers to accessibility. These employees also highlighted barriers that remain and steps the company could consider taking to reduce or remove barriers.

In 2023, Trans Mountain will continue to consult with persons with disabilities, allies, and other stakeholders. The outcomes of these consultations will be provided in our accessibility progress report in 2023.

3.0 Priority Areas

The seven priority areas described under Section 5 of the *Accessible Canada Act (ACA)* include:

- employment
- the built environment
- information and communication technologies (ICT)
- communication, other than ICT
- the procurement of goods, services and facilities
- the design and delivery of programs and services
- transportation

This Accessibility Plan is focused primarily on the employment priority area with a preliminary analysis conducted on the remaining priority areas. A comprehensive review will be undertaken in 2023 of all priority areas.

Employment

Trans Mountain is committed to providing fair employment opportunities to all. Our goal is to have a diverse and inclusive workplace built on a foundation of understanding and openness. It is important to us to raise awareness about accessibility for persons with disabilities. We are working to remove barriers to accessibility throughout the employee lifecycle. We are also working to uncover biases and behaviours in our workplace that do not align with our goals and values. We are providing opportunities for our employees and contractors to learn about themselves and learn from each other.

Diversity, equity, and inclusion (DEI) is a company-wide priority for 2023. The Accessibility Plan will help us reach our goal of inclusivity.

ACTIONS CURRENTLY BEING TAKEN

DEI learning opportunities

Trans Mountain offers opportunities for employees to learn about DEI topics. This includes events such as Trans Mountain Diversity Days and unconscious bias training. We also offer workshops such as “Grit, Resilience and Joy” and “Impacts of Seasonal Affective Disorder”. In 2021, Dr. Steve L. Robbins hosted sessions for our workforce. Dr. Robbins is a distinguished keynote speaker and specialist in human behaviour, diversity, and inclusion. He uses science-based research to assist everyone in identifying biases and harnessing the power of leveraging our differences. Also in 2021, Trans Mountain offered mandatory training on Harassment and Violence Prevention for all employees. This training offered appropriate content for executives, leaders, and individual contributors.

These kinds of events help us learn what it means to bring one’s whole self to our workplace.

Diversity and Inclusion Committee

Trans Mountain's Diversity and Inclusion Committee is comprised of 13 members. These members represent designated groups across many of our locations and areas of business. The Committee meets formally twice per year with ad hoc meetings throughout the year. It helps inform our employment equity goals, programs, policies, communication, and training.

Policies

Trans Mountain has many policies that directly support our vision of providing an equitable, diverse, safe and harassment-free workplace. The policies are easily accessible to all employees on our company intranet. Policies that support accessibility include:

- Diversity and Inclusion Policy
- Respectful Workplace Policy
- Harassment and Violence Prevention Policy

Accommodations

Human Resources and our disability consultant help to ensure that employees requiring accommodation have appropriate working environments. This includes considering accommodation requests from employees with ongoing, episodic and temporary accommodation needs related to disability.

Flexible Work Policy

Trans Mountain believes having a flexible work environment is an important element for diversity and inclusion. We understand the importance of flexibility in employment for individuals with varying needs. In 2021, Trans Mountain developed a Flexible Work Policy that outlines flexible work arrangements ranging from in-office to fully remote. The policy provides information and guidelines to support a new way of working. We provided guidance and resources for leaders on how to support employees in remote work and in-office work settings. The guidance document highlighted how to be attuned to worker needs, feelings of isolation and mental health. In addition to this, Human Resources facilitated virtual round table sessions for leaders. Support for leaders to effectively manage various remote arrangements and varying employee needs are expected to continue.

Recruitment and hiring practices

Trans Mountain has worked to promote diversity, equity, and inclusion during recruitment and hiring. We are learning about and employing practices for recruiting and hiring employees from equity-seeking groups. Practices include:

- Working with communities and agencies to share job postings, including an Alberta-based organization that represents job seekers with disabilities
- Providing interview questions in advance
- Gearing our questions to consider "soft skills"
- Partnering with the Employment Training Team to help applicants with applicable skills gain experience

We have revised our job postings to encourage applications from individuals from equity-seeking groups. Trans Mountain has also been flexible in offering remote options for interviews. This makes the application process more accessible for candidates.

Once employees have been hired, Trans Mountain has a well-documented accommodation process and policy for employees. One-on-one assistance from Human Resources is readily available to employees who may need additional support on any matter or program related to their employment.

Self identification

Trans Mountain continues to take measures to understand the barriers faced by persons with disabilities. In 2021, we implemented a new Applicant Tracking System that has enhanced functionality for both applicants and the company. Specifically, candidates seeking employment can voluntarily identify as a member of a designated group on their candidate profile. This information informs a supportive interview and selection process.

We develop an annual employment equity report detailing representation of designated groups. This includes rates of hiring, promotions, and terminations. The report also outlines our efforts around policy review, and training and awareness initiatives, and retention and termination.

Trans Mountain uses exit interviews as a source of information about employees' experiences at work. We ask specific questions in exit discussions to seek to understand any barriers that exist.

Support available

Trans Mountain provides Employee and Family Assistance Program (EFAP) to all employees. This third-party network of expert professionals is accessible 24 hours a day, seven days a week. It provides confidential support on a range of issues from financial and mental health, to parenting and addictions.

BARRIERS

Trans Mountain has received feedback from employees about barriers to accessibility within our company. During consultations, employees highlighted the following barriers to accessibility related to employment:

- People with disabilities may feel reluctant to self identify on the voluntary Workforce Survey Form. Our representation in this group remains low.
- Employees mentioned that the application process at Trans Mountain involves many steps. This can create barriers for candidates.
- Trans Mountain strives to improve employee representation across all equity-seeking groups. We currently do not have any programs dedicated to recruiting and hiring persons with disabilities.
- Accommodations can be provided during the interview stage. We communicate this to all job applicants. Very few candidates reach out to receive these accommodations. Some candidates may not understand what accommodations can be provided.

FUTURE CONSIDERATIONS

To address the barriers above, Trans Mountain is planning to take the following actions.

Expanding our understanding

In 2023, we will conduct further consultations with Trans Mountain employees. By consulting with a larger pool of employees for feedback, we will gain an increased understanding of barriers to accessibility. We will also begin analyzing diversity data that we receive in 2022. This will provide us with a clearer understanding of the way our employees self-identify. Coupled with feedback, we can then do more to identify employment barriers for different equity-seeking groups.

Application process review

Trans Mountain wants to ensure that all aspects of the employee experience are free of barriers. We recognize that this starts with the recruitment and application process. Trans Mountain will work to conduct a thorough review of the employee application process. This will identify where barriers can be removed and how the process overall can be simplified. We will also be working to create better documentation to guide candidates through this process. This will help avoid confusion.

Recruiting and hiring persons with disabilities

We will consider how recruitment programs could be developed specifically for persons with disabilities and evaluate job postings from the perspective of applicants who have disabilities. We will work to build relationships with more organizations who can promote work opportunities to their communities and seek their input to improve our hiring practices.

Supporting job candidates

Trans Mountain wants candidates to feel supported throughout the application process. We will work to clearly document and communicate accommodations. This will include a more expansive description of accommodations that are available and improve the process for applicants to request accommodation. Further, a feedback process will be utilized to obtain input from candidates in order to improve accessibility in the application process.

Self identification

We will continue to raise awareness about the self identification process on the Workplace Survey Form. We understand that we must also ensure that we have a workplace culture where people feel safe to share information related to experiencing disability. This will be a part of our ongoing efforts of communication and education.

Broader employee life cycle

Trans Mountain will first focus on improving accessibility in the hiring process. We will then turn our attention towards other parts of the employee lifecycle. This will ensure that accessibility is considered beyond hiring in areas such as career development and promotion.

Built environment

Trans Mountain is a quickly growing company. Our headquarters are in Calgary, Alberta. We also have regional offices along the pipeline system in Alberta, British Columbia, and Washington state. We are responsible for ensuring that the built environment is accessible and safe for our employees. Our goal is to be proactive in the built environment. We are working to remove barriers in our workplaces and are keeping accessibility in mind as we develop and design new workplaces. We want to enable everyone to:

- Approach our buildings
- Enter our buildings
- Function successfully in the work environments
- Use all facilities and amenities at Trans Mountain
- Safely exit facilities in an emergency

We are aware that, due to the nature of our work, not all work environments at Trans Mountain can be safely accessible to all. We will work to better understand and communicate about barriers within our work environments.

ACTIONS BEING TAKEN

Trans Mountain routinely conducts accessibility audits of our physical locations. In each location assessed, Trans Mountain identified accessibility barriers related to:

- Outdoor paths
- Parking areas and parking stalls
- Ramps and steps
- Doors, frames, and hardware
- Corridors and aisles
- Travel distance to exits
- Washrooms
- Kitchens
- Signage
- Lighting

After each audit, Trans Mountain took steps to remove identified barriers and adhere to all accessibility building codes.

Trans Mountain has also ensured accessibility in the built environment in the following ways:

- We follow furniture standards to make sure that all office furniture is accessible. This includes making sure that everyone has an ergonomic chair. All employees can also request an ergonomic assessment.
- We have building evacuation plans that consider the needs of all employees. This includes having strobe lights and auditory cues to help with evacuation. Comprehensive

evacuation plans are posted online and easy to access. We also have a buddy system for employees with mobility impairments to support them during emergencies.

- Every Trans Mountain facility has accessible parking spaces.

FUTURE CONSIDERATIONS

Making the built environment at Trans Mountain accessible for persons with disabilities has been a focus. We know that we can still be more proactive in this area. We can aim for universal design in all aspects of the built environment when applicable and safe to do so.

In 2023, we will be reaching out to Trans Mountain employees with disabilities. We want to understand their experiences and perceptions regarding accessibility in the built environment. Once we understand people's experiences, we will formulate a plan for removing barriers that they experience and notice.

We are already aware that we need to complete new building accessibility audits in the coming years. The last accessibility audits were completed in 2018. Building codes often change and we need to stay up to date to be inclusive and safe. We will also be exploring the potential to extend our building audits to locations beyond Edmonton and Calgary, such as Kamloops and Burnaby.

Information and communication technologies (ICT)

Information and communication technologies (ICT) underpins much of the work we do at Trans Mountain. It is a part of the infrastructure that allows us to do our jobs. Trans Mountain is a quickly growing company. Our goal is to ensure that our systems and software are accessible and easy to use for all users. This will allow us to be efficient and effective as we onboard and train employees and contractors. It will also help us to better interact with and support communities. We understand the importance of barrier free technology. As new technology is brought into our company, accessibility will be a key consideration.

ACTIONS BEING TAKEN

Trans Mountain is taking steps to provide inclusive systems and software. We are doing this already by ensuring accessibility features are enabled within Microsoft applications for all employees. We also work to provide laptops, headphones, monitors and other tools to assist employees with accessibility needs.

In our key business applications environment, we are currently implementing a third-party system for Land, External Communications & Stakeholder Management. The application is built with accessibility features that comply with Canada and international standards such as the Americans with Disabilities Act (ADA) and Web Content Accessibility Guidelines (WCAG).

Our Enterprise Resource Planning (ERP) system used for Finance, Supply Chain, and Maintenance Management also provides accessibility features. This includes the ability to change colour preferences, change screen size, navigate using only a keyboard, and being screen responsive. The mobile application add-on implemented for equipment maintenance

management is designed to be screen responsive as well as accommodate individuals with colour blindness. Our company Intranet is screen responsive.

In 2022, we undertook a usability review of our custom-built system used for nomination submission, scheduling and distribution management of oil delivery through the pipeline. The recommendations of this review will begin to be implemented in 2023.

FUTURE CONSIDERATIONS

In early 2023, we will hold consultations with Trans Mountain employees to get a better sense of the accessibility barriers people are facing regarding ICT. We will then outline actions we can take to reduce or remove those barriers. We will be particularly interested in learning more about knowledge gaps regarding the use of technologies. This could prompt us to provide additional training and communications about tools and resources.

We recognize the importance of accessibility in our future technology environment. Beginning in 2023, we will ensure that accessibility criteria are considered in our vendor selection process when we evaluate and purchase new applications. We also recognize that our current third-party software we use may not provide accessibility functionality. We will review our application portfolio in 2023. We are adding design requirements within our business reporting platforms to meet the needs of individuals with colour blindness. We will explore turning on accessibility features in the Microsoft Windows Operating System within our custom application portfolio to enhance accessibility for users.

Communications other than information and communication technologies

Trans Mountain has a responsibility to communicate effectively with our employees, communities, and stakeholders. Communication is integral to keeping communities along the pipeline and our employees safe and well informed. Trans Mountain keeps lines of communication open by:

- Providing timely and regular updates through various communication channels and platforms
- Making safety and public awareness presentations
- Participating in and hosting community events and meetings

It is important for communications to go two ways. If there is a concern or emergency, we want to make sure that the information can be shared in a timely and effective manner. It is important to us to provide clear and transparent communications that all people can understand.

We understand that not everyone communicates in the same way. It is crucial for Trans Mountain to communicate in multiple ways. This includes using the languages, platforms, and methods of communication that are useful and meaningful for our employees, customers and neighbours.

ACTIONS BEING TAKEN

Trans Mountain's website is a vehicle for providing information to the public. Our website currently meets Web Content Accessibility Guidelines (WCAG) 2.0 standards. We also use internal tools to periodically audit our website for additional accessibility barriers. We review colour contrast, alternative text, audio translations, and other issues. These findings influence current and future improvements to the website.

The Communications Team has been seeking opportunities to make Trans Mountain communications more accessible. The Team attended an accessibility webinar and completed online accessible communications training. We have been auditing our tools and changing our approaches. We have been incorporating what we have learned. It is very important for people to have the means to communicate with Trans Mountain if they notice any signs of a pipeline emergency. We have a toll-free number that is available 24 hours a day and offers multiple languages of interaction.

FUTURE CONSIDERATIONS

Trans Mountain will be offering consultations in 2023 to gather feedback related to the accessibility of our communications. This will supplement the improvements that we already have planned. It will help us to identify additional barriers to accessibility.

Ensuring the accessibility of the Trans Mountain website is a priority in 2023 and beyond. In the short term, we will continue addressing accessibility barriers that we have already identified. Trans Mountain will be doing an audit of our corporate colours and branding elements to make sure they are fully accessible. We will also begin a project to revamp our website. We will make sure that accessibility is built into the decision-making process when deciding on a vendor to support the website redesign. In the longer term, we have plans to review and improve the accessibility of the Trans Mountain intranet.

We also plan to complete a review of other communications materials for accessibility. We will review our templates, corporate brochures, and other materials. In 2023, we will also consider any knowledge gaps we may have within the Communications Team in making materials fully accessible. We will complete additional training as needed. We are working on developing resources about accessible communications best practices to ensure that team members have a shared understanding of accessibility.

Procurement of goods, services and facilities

Trans Mountain will be undertaking a thorough review of the procurement of goods, services and facilities in 2023.

Design and delivery of programs and services

Trans Mountain will be undertaking a thorough review of the design and delivery of our programs and services in 2023.

Transportation

Trans Mountain's enterprise involves various modes of transportation. We currently do not have a thorough understanding of how accessibility applies to different aspects of transportation at Trans Mountain. In 2023, we will complete a thorough review of our modes of transportation. We will consider if and how accessibility applies in each instance.

4.0 Feedback

Trans Mountain welcomes feedback on accessibility, especially from persons with disabilities. Feedback related to barriers to accessibility at Trans Mountain or the implementation of Trans Mountain's Accessibility Plan can be directed to:

Address:

300 5th Avenue SW
Suite 2700
Calgary, AB T2P 5J2

Telephone number: 1.866.514.6700

Email address: info@transmountain.com

We are currently reviewing our current process for receiving feedback about accessibility at Trans Mountain. We want the process to be simple and effective for users. We will provide updates about our process for receiving and responding to feedback about accessibility in 2023.