

Accessibility Plan

2026-2028

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1. Message from the Chief Administrative Officer (CAO)

At Trans Mountain, accessibility is more than a compliance requirement - it is a core part of our commitment to creating an environment that is inclusive to all persons. We believe that every employee, stakeholder, and community member should have the opportunity to participate fully and without barriers.

This Accessibility Plan reflects our dedication to creating an environment where accessibility is embedded in everything we do - from our physical spaces and digital systems to our communications, employment, and procurement practices. It builds on the progress we have made and sets out clear actions for the next three years to strengthen accessibility across our organization.

We recognize that accessibility is a shared responsibility. Success depends on collaboration across all levels of our organization, and we are committed to listening, learning, and acting on feedback from persons with disabilities and other stakeholders. Together, we will continue to advance toward a workplace and community that is inclusive and accessible.

Jennifer Pierce
Chief Administrative Officer
Trans Mountain Corporation

2. General

2.1 Introduction

The *Accessible Canada Act* (ACA) came into force in 2019 with the goal of building a barrier-free Canada by 2040. It requires organizations to identify, remove, and prevent barriers to accessibility.

Trans Mountain is committed to creating an environment that is inclusive to all persons. Our first Accessibility Plan was published in 2022, followed by annual Progress Reports in 2023 and 2024. Previous Accessibility Plans and Progress Reports can be accessed at transmountain.com/accessibility

With this second Accessibility Plan, we are taking the next step to embed accessibility more deeply into our culture and strengthen the progress we have already made. We will continue fostering an inclusive and accessible environment for our employees and community members, while upholding the requirements of the ACA. Guided by this commitment, we will continue to integrate accessibility into our company policies, procedures, and programs while identifying and removing barriers to accessibility.

2.2 About Trans Mountain Corporation

Trans Mountain Corporation (Trans Mountain) 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 over 700 employees working in our Calgary head office and regional offices along the pipeline system in Alberta, British Columbia and Washington state.

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

2.3 Contact Information

Trans Mountain welcomes feedback on this Accessibility Plan. You may request this report in an alternative format or information about our accessibility feedback process by contacting our Senior Advisor of Inclusion, Diversity, Equity & Accessibility (IDEA) at info@TransMountain.com.

A receipt of feedback will be provided in the same format that it is received so long as the feedback is not submitted anonymously. To provide feedback or request an alternative format, please contact:

Attention: Senior Advisor of Inclusion, Diversity, Equity & Accessibility (IDEA)

Address:

300 5th Avenue SW

Suite 2700

Calgary, AB T2P 5J2

Telephone number: 1.866.514.6700

Email address: info@TransMountain.com

For more information on our feedback process, please refer to [Our Feedback Process](#) section.

Alternate formats of this Accessibility Plan are available upon request. Please contact Trans Mountain for information and support.

3. Progress on Accessibility

Since publishing our first Accessibility Plan in 2022, Trans Mountain has continued to take steps toward creating a more accessible and inclusive organization. We have focused on improving accessibility in our physical spaces, digital systems, communications, and processes, while strengthening our understanding of stakeholder needs. These efforts reflect our commitment to identifying and removing barriers and embedding accessibility into our culture and operations.

A summary of accessibility achievements can be found throughout this Plan under each priority area.

4. Consultations

To shape this Accessibility Plan Progress Report, we listened to voices across Trans Mountain and sought expert guidance from accessibility consultants. We conducted an employee survey and reviewed insights from employees who identified as having a disability. We also hosted virtual events to invite open dialogue on accessibility, and encouraged employees to reach out with feedback, ideas, or concerns. In addition, we worked closely with pillar leads for each area of this Accessibility Plan to review progress and identify opportunities for improvement. These conversations and collaborations reflect our commitment to building an inclusive workplace where accessibility is a shared responsibility.

5. Areas Described Under the Act

There are seven priority areas described under Section 5 of the *Accessible Canada Act*. These areas include:

1. Employment
2. The Built Environment
3. Information and Communication Technologies (ICT)
4. Communication, other than ICT
5. The Procurement of Goods, Services and Facilities
6. The Design and Delivery of Programs and Services
7. Transportation

Trans Mountain has included an additional priority area, **Culture**, to this Accessibility Plan to draw additional attention to the importance of this factor in the success of accessibility at the organizational level.

5.1 Culture

The culture priority area focuses on building a positive organizational culture of accessibility and inclusion at Trans Mountain. This means improving awareness and understanding of barriers, empowering leaders at all levels of the organization to lead by example and recognizing the intersectional aspects of accessibility that connect with other parts of diversity and inclusion.

Accessibility Achievements

Since our last Accessibility Plan in 2022, we have achieved a number of actions in support of an accessible culture, including:

- Embedding accessibility into the Inclusion, Diversity, Equity & Accessibility (IDEA) portfolio and publishing internal and external statements of commitment.
- Committing to ongoing learning by partnering with external accessibility experts (e.g., Prospect Human Services, Canadian Centre for Diversity & Inclusion, BDO) and actively participating in external events to deepen our understanding of emerging practices in accessibility.
- Hosting company-wide events focused on disability inclusion, including an introductory event on neurodivergence to address stigma and promote neuroinclusive practices, as well as events for Disability Employment Awareness Month, National AccessAbility Week, and International Day of Persons with Disabilities.
- Gathering engagement data from employees, including insights specific to employees with disabilities to inform future strategies.

Barriers to Accessibility

- Limited internal expertise and accessibility champions and varying understanding of accessibility throughout the organization may lead to inconsistent accessibility efforts.
- Limited channels for employees to share about their lived experiences with disabilities.

Our Commitment

Trans Mountain will nurture a culture of accessibility by aligning senior leaders on accessibility priorities, launching an executive-sponsored committee focused on wellness and belonging with diverse representation of employees, and creating an internal resource hub to build awareness. We will deepen inclusion through campaigns, training, and storytelling that normalizes conversations about disability. We will regularly review progress, refresh resources, and consult employees to ensure we continue to remove barriers and foster an accessible workplace culture.

Actions to Improve Accessibility (Culture)

Year 1 — 2026: Foundations

In 2026, Trans Mountain will:

- Host a conversation with senior leaders to build a consistent understanding of accessibility and the organization's commitment.
- Launch an executive-sponsored Committee focused on wellness and belonging, aiming for diverse representation of lived experience including employees with disability.
- Launch an internal resource hub with learning materials on accessibility and disability to build awareness across the organization.
- Continue hosting organization-wide events throughout the year focused on disability inclusion.

Year 2 — 2027: Integration

In 2027, Trans Mountain will:

- Continue hosting accessibility-themed events and share lived experiences of employees with disabilities through internal campaigns to normalize conversations about disabilities.
- Incorporate methods for employees to update their workforce survey information to ensure that we are capturing the diversity of our workforce to the best of our ability.
- Embed concepts of inclusive leadership into current leadership training opportunities, equipping them to support a diverse workforce and foster accessibility in everyday decision-making.

- Continue promoting the resource hub and measure engagement with learning materials on accessibility.
- Understand workforce needs and potential accessibility barriers as part of demographic data from next employee engagement survey.

Year 3 — 2028: Evaluation

In 2028, Trans Mountain will:

- Refresh accessibility resources based on feedback and evolving standards.
- Continue required consultations with employees with disabilities and share progress updates with the company based on feedback and the actions in this plan.
- Identify actions taken and new opportunities as we shape our 2028 Accessibility Plan.

5.2 Employment

The employment priority area covers the entire employment lifecycle at Trans Mountain. It includes every stage of the employee experience, starting with recruitment and onboarding, continuing through training, career development, and day-to-day work. By looking at the full lifecycle, Trans Mountain works to ensure that employees have a barrier-free experience at every stage of their career.

Accessibility Achievements

Since our last Accessibility Plan in 2022, we have achieved a number of actions in support of accessible employment, including:

- Aligning accommodation policies with employment accessibility standards, introducing a third-party adjudication process to ensure fairness and safety, and delivering a mental health workshop for leaders to strengthen support for employees.
- Engaging accessibility experts to review our application process, creating site-access handouts for candidates, and introducing a process to ask new hires for feedback on their recruitment experience.
- Improving accessibility of employee training by introducing closed captioning, voiceovers, increased font sizes, and accessible color contrasts, with continual updates.

- Providing ergonomic assessments to support employees requiring workplace adjustments, including employees with an identified disability.

Barriers to Accessibility

- Room to improve consistency and transparency in the process for accommodation requests, and to increase awareness of accommodation processes for employees and the role of people leaders in supporting accommodation requests.
- Need to strengthen our understanding of best practices for providing accommodations to candidates while maintaining an efficient recruitment process and determining what support we can offer.
- Employee training materials are not yet fully accessible for all users, with gaps in features such as closed captions, screen-reader compatibility, and overall inclusive design.

Our Commitment

Trans Mountain is committed to creating an inclusive and accessible employment experience by exploring barriers in areas such as recruitment, training and day-to-day work. We will strengthen policies and processes in alignment with accessibility standards, implement tracking and feedback systems to identify and address accessibility barriers where possible, and provide training for employees and people leaders on accommodation processes. Our goal is to ensure that employees and qualified candidates have access to opportunities and required resources.

Actions to Improve Accessibility (Employment)

Year 1 — 2026: Foundations

In 2026, Trans Mountain will:

- Review and update the accommodation policy based on employment accessibility standards ([CAN/ASC-1.1:2024 REV-2025](#)) to support compliance and inclusive practices.
- Track candidate accommodation requests across the recruitment cycle, including request type, timing, fulfillment, and outcomes, to better understand candidate needs and ensure consistent support.

- Provide learning opportunities on inclusive design principles for staff who create internal training content.
- Introduce a survey of high-use training courses to collect feedback from employees on training delivery.

Year 2 — 2027: Integration

In 2027, Trans Mountain will:

- Ensure regular follow-ups with employees on approved accommodation requests to understand if their accessibility needs are still being met, and that employees understand how to reach out for support when needed.
- Identify ways to deliver training for hiring leaders on inclusive practices during application, interview, and onboarding stages.
- Continue to add inclusive design elements into existing and new training modules (e.g., closed captioning, voice over) based on accessibility standards.

Year 3 — 2028: Evaluation

In 2028, Trans Mountain will:

- Review employee feedback on accommodations, implement improvements where appropriate, and identify any additional barriers based on employment accessibility standards ([CAN/ASC-1.1:2024 REV-2025](#)).
- Conduct a review of recruitment policies and processes to identify additional barriers and update practices based on feedback and employment accessibility standards ([CAN/ASC-1.1:2024 REV-2025](#)).
- Explore accessibility audit tools for training software and continue to seek feedback from employees on accessibility of training materials.

5.3 Built Environment

This area refers to the physical spaces that employees, clients, and visitors use when engaging with Trans Mountain. This includes entrances, workstations, meeting rooms, signage, washrooms, and lighting.

Accessibility Achievements

Trans Mountain installed accessible door buttons and expanded braille signage in Calgary offices, added mobility-supporting features in Kamloops facilities, and communicated available accessibility supports such as ergonomic equipment and service animal registration to employees. We also initiated building accessibility audits with a third-party expert for Calgary and Burnaby offices.

Barriers to Accessibility

- Facilities improvement plan based on buildings accessibility audits.
- Explore potential training opportunities for best practices in built environment accessibility.

Our Commitment

Trans Mountain will advance accessibility in our built environment by completing building audits, reviewing audit findings, and prioritizing facilities improvements that remove barriers in our physical spaces. We will regularly communicate facilities improvements to our staff and investigate best practices for physical accessibility in workplaces.

Actions to Improve Accessibility (Built Environment)

Year 1 — 2026: Foundations

In 2026, Trans Mountain will:

- Complete building accessibility audits dates for Edmonton and Kamloops offices.
- Review findings from initial building accessibility audits in Calgary and Burnaby to prioritize improvements.
- Explore training for facilities team on best practices in built environment accessibility.
- Communicate to staff on accessibility improvements at regional sites

Year 2 — 2027: Integration

In 2027, Trans Mountain will:

- Review findings from initial building accessibility audits in Edmonton and Kamloops to prioritize improvements.
- Implement facilities improvements based on audit findings for Calgary and Burnaby.
- Communicate to staff on accessibility improvements at regional sites

Year 3 — 2028: Evaluation

In 2028, Trans Mountain will:

- Consult field sites to understand opportunities for potential accessibility audits
- Communicate to staff on accessibility improvements at regional sites
- Review updated accessibility requirements to ensure we continue to meet built environment accessibility standards as they are updated (such as [CSA/ASC B651](#)).

5.4 Information and Communication Technologies (ICT)

This area covers the technology that Trans Mountain uses to support employees, clients, and the public in the virtual environment. It includes hardware, software, online platforms, and assistive devices. Accessibility in ICT means making sure that all digital systems are usable by everyone, whether for day-to-day work, collaboration, or accessing services.

Accessibility Achievements

Trans Mountain surveyed third-party IT vendors to assess accessibility features, verified accessibility features in high-usage software, enabled accessibility tools in Microsoft 365 and other commonly used applications, and published a self-service guide to help employees create accessible documents.

Barriers to Accessibility

- Need a process to verify accessibility functions in future third-party applications and systems.
- Limited employee training on leveraging accessibility features in IT systems.
- Need for ongoing accessibility assessments of internal digital platforms.

Our Commitment

Trans Mountain will embed accessibility across our IT systems by delivering employee and role-based training, continuously review IT policies and tools against recognized accessibility standards, and develop improvements plan informed by assessments and user feedback.

Actions to Improve Accessibility (ICT)

Year 1 — 2026: Foundations

In 2026, Trans Mountain will:

- Deliver training for employees on using accessibility features in Microsoft 365.
- Continue reviewing accessibility information for third-party IT vendors.
- Provide role-based training for IT staff on accessibility standards and best practices.

Year 2 — 2027: Integration

In 2027, Trans Mountain will:

- Conduct an employee survey on the accessibility of high-usage IT systems and targeted training where needed
- Develop a review process to align ICT policies and tools with the ICT accessibility standards ([CAN/ASC - EN 301 549:2024](#)).
- Create a digital accessibility improvement plan based on system assessment findings.

Year 3 — 2028: Evaluation

In 2028, Trans Mountain will:

- Assess alignment with ICT accessibility requirements in anticipation of future regulations.
- Report improvements in ICT accessibility and publish updated resources for employees.
- Explore accessibility audit tools for software and continue implementing employee feedback, where possible.

5.5 Communication other than ICT

This area looks at Trans Mountain's internal and external communications such as websites, reports, publications, and printed materials. Accessibility in this area means ensuring that information is easy to access, available in different formats when needed, and clear for a wide range of audiences.

Accessibility Achievements

Trans Mountain created accessible brand guidelines and templates that were shared with the organization, enhanced its external website with features such as keyboard navigation and alt text, and continues to offer alternate document formats for stakeholders. Trans Mountain's internal communications, including the intranet, was standardized to improve visual accessibility, and a feedback mechanism was introduced for employees to share accessibility concerns.

Barriers to Accessibility

- Need for role-specific training for employees in the Communications team on applying and promoting accessibility best practices.
- Need for standardization of communication practices throughout the organization.
- Need for further accessibility enhancements on the external website, such as improved navigation.

Our Commitment

Trans Mountain will embed accessibility in all communications by training key teams, implementing accessible design guidelines, creating and acting on feedback channels, and regularly reviewing policies to remove barriers in how we communicate.

Actions to Improve Accessibility (Communication)

Year 1 — 2026: Foundations

In 2026, Trans Mountain will:

- Deliver role-based accessibility training to communications team members, including plain language and inclusive design principles.

- Create and share an accessible communications checklist for internal and external content, including automated closed captioning and transcripts for virtual company-wide events.
- Integrate accessibility feedback channels on the intranet and website, including an employee survey with accessibility questions, to capture user input.

Year 2 — 2027: Integration

In 2027, Trans Mountain will:

- Review and update Communications policies and strategies to align with emerging accessibility standards.
- Incorporate accessibility requirements into event planning guidelines.
- Expand accessibility feedback mechanisms and track improvements.

Year 3 — 2028: Evaluation

In 2028, Trans Mountain will:

- Conduct a comprehensive review of communications practices to ensure alignment with any published accessibility standards.
- Report measurable improvements in accessible communications, including website usability and employee adoption of guidelines.

5.6 The Design and Delivery of Programs and Services

The design and delivery of programs and services priority area addresses that Trans Mountain's programs and services are accessible to all employees and community members. This includes proactively considering accessibility while programs and services are being developed to prevent barriers.

Accessibility Achievements

Trans Mountain continues to build understanding of external stakeholder accessibility needs to inform planning for future improvements. In addition, we have added an accessibility link to the footer of our external website, making it easier for stakeholders to find information about our accessibility commitments and resources.

Barriers to Accessibility

- Need to better understand barriers experienced by external stakeholders

Actions to Improve Accessibility (Programs & Services)

Over the next three years, Trans Mountain will continue to deepen our understanding of accessibility barriers experienced by external stakeholders to inform future accessibility plans and alignment with accessibility standards.

5.7 The Procurement of Goods, Services, and Facilities

The procurement of goods, services and facilities priority area relates to all goods and services purchased or leased by Trans Mountain including the overall evaluation process leading up to their procurement.

Accessibility Achievements

Trans Mountain has made progress in improving accessibility in procurement. We collected feedback from consultants to improve the accessibility of our procurement documents and are exploring ways to integrate accessibility considerations into our vendor selection process. We have also identified a designated contact within procurement to consider accessibility in procurement practices.

Barriers to Accessibility

- Procurement team members need accessibility training to better understand how to remove barriers in procurement processes.
- Accessibility issues in procurement templates do not currently trigger a review.
- Accessibility commitments of suppliers are not considered in our vendor selection process.

Our Commitment

Building on our progress, Trans Mountain is committed to making procurement processes accessible. We will do this by training our procurement team to identify and remove barriers, reviewing templates for accessibility based on feedback, and

incorporating accessibility criteria into competitive bids while asking vendors to demonstrate their accessibility commitments.

Actions to Improve Accessibility (Procurement)

Year 1 — 2026: Foundations

In 2026, Trans Mountain will:

- Deliver role-based accessibility training to procurement team members that includes best practices in procurement and third-party resources.
- Engage the procurement team after training to gather ideas for enhancing accessibility in procurement processes and identifying areas to remove barriers to accessibility.
- Compile, document, and formally review internal accessibility recommendations to guide improvements for 2027 and beyond.

Year 2 — 2027: Integration

In 2027, Trans Mountain will:

- Assess the need for the establishment of a process for reporting on third-party accessibility practices and commitments.
- Apply actionable recommendations and improvements that increase accessibility in our procurement practices as determined in 2026.

Year 3 — 2028: Evaluation

In 2028, Trans Mountain will:

- Conduct a comprehensive review of procurement policies to ensure alignment with procurement accessibility standards, including [CAN-ASC-4.1](#), which is currently in draft and expected to be published in 2027.
- Conduct a review of accessibility improvements achieved in our procurement practices and identify remaining barriers.

5.8 Transportation

Trans Mountain reviewed our policies, practices, and procedures related to transportation and travel. We have determined that there are no clearly defined barriers in transportation at this time. In our prior consultations with persons with disabilities, no

feedback related to transportation was received during consultations or through our ongoing feedback process.

Over the next three years, we will continue to look to understand accessibility practices within transportation as it relates to our organization. We will also continue to seek specific feedback from persons with disabilities on transportation-related barriers through consultations and feedback

6. Reporting and Implementation

This Accessibility Plan is an important step for Trans Mountain in creating a more accessible and inclusive workplace, but it cannot stand on its own. Throughout this Plan we have outlined our commitments to addressing barriers within the organization, and we are dedicated to putting those commitments into action.

The *Accessible Canada Act (ACA)* requires organizations to publish annual progress reports. These reports will track how Trans Mountain is implementing the actions described in this Plan and show where we are making progress. Building on the momentum of our first Plan, we are committed to advancing accessibility for persons with disabilities.

Trans Mountain will consult with persons with disabilities as we establish tracking and reporting methods. These mechanisms will help measure our progress, hold us accountable to our commitments, and encourage us to go beyond what is set out in this Plan.

We also recognize that accessibility is a journey. Trans Mountain will continue to identify barriers and take steps to remove them, with the goal of creating an organization where everyone feels included and supported.

This Plan and subsequent annual progress reports will be published on both our internal and external websites by December 31.

7. Our Feedback Process

Trans Mountain welcomes feedback from employees and the public on barriers to accessibility at Trans Mountain and on this Accessibility Plan. Feedback helps us identify new barriers, improve our actions, and move closer to becoming a barrier-free organization.

How to Provide Feedback

Trans Mountain welcomes feedback on accessibility, especially from persons with disabilities. We are continuously reviewing our current process for receiving feedback about accessibility at Trans Mountain.

Feedback related to barriers to accessibility at Trans Mountain, or the implementation of Trans Mountain's Accessibility Plan can be directed to:

Attention: Senior Advisor of Inclusion, Diversity, Equity & Accessibility (IDEA)

Address:

300 5th Avenue SW

Suite 2700

Calgary, AB T2P 5J2

Telephone number: 1.866.514.6700

Email address: info@TransMountain.com

A receipt of feedback will be provided in the same format that it is received so long as the feedback is not submitted anonymously

Alternate Formats

Requesting this Plan in Alternate Formats

Trans Mountain is committed to making this Accessibility Plan available in formats that meet the needs of all people, including persons with disabilities.

You can request this Plan in the following alternate formats:

- Print
- Large print
- Braille
- Audio
- Electronic formats compatible with screen readers

Alternate Formats Timelines

Alternate formats will be provided within the following timelines:

- Print, large print, and electronic formats will be available within **15 business days** of a request.

- Braille and audio formats will be available within **45 business days** of a request.

Anonymity and Confidentiality

You can submit feedback anonymously or include your contact information. If you include contact information, we will confirm receipt within five business days. Immediate actions resulting from your feedback will be shared with you. Anonymous feedback will not receive a response but will still be reviewed and considered.

Internal Process

All feedback is saved confidentially for analysis and record keeping. We use this feedback to identify, prevent, and address barriers, and to inform our future accessibility planning.

8. Conclusion

Trans Mountain is committed to creating an organization where accessibility is embedded in our culture, systems, and practices. This Accessibility Plan outlines actions across priority areas to identify, remove, and prevent barriers for employees, stakeholders, and community members.

We recognize that accessibility is an ongoing journey, not a one-time initiative. Over the next three years, we will continue to consult with persons with disabilities, monitor progress, and adapt our strategies to align with evolving accessibility standards and stakeholder needs.

Accessibility continues to be a shared responsibility within our organization, and every one of us plays a role in making this commitment a reality.

9. Glossary

Accessibility

Accessibility refers to how services, technology, locations, devices, environments, and products are designed to accommodate persons with disabilities. Accessibility means giving people of all abilities equal opportunities to take part in life activities. The term implies conscious planning, design, and/or effort to make sure something is barrier-free to persons with disabilities. Accessibility also benefits the general population by making everything more usable and practical for all people.

Alternate Formats

Alternative formats refer to print, audio, or video materials that have been modified from their original format. Alternative formats present information in other ways so that everyone has equal access to the information. This can be very beneficial to persons with disabilities. Some common types of alternative formats are audio recordings, captions, braille, descriptive video, and large print. Alternative formats are sometimes referred to as accessible formats

Barrier

The *Accessible Canada Act* defines a **barrier** as:

A “barrier” means anything — including anything physical, architectural, technological or attitudinal, anything that is based on information or communications or anything that is the result of a policy or a practice — that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation. (*obstacle*)

Disability

The *Accessible Canada Act* defines a **disability** as:

Any impairment, including a physical, mental, intellectual, cognitive, learning, communication, or sensory impairment – or functional limitation – whether permanent, temporary, or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person’s full and equal participation in society.

