

Accessibility Plan 3 Year Plan Effective June 1, 2026



AUTHORIZATION

Title: Accessibility Plan
Document Number: EFC-HRD- Accessibility Plan-V04-2026
Version: 04
Approver: Ryan Albizzati, CEO
Signature:

VERSION HISTORY

Version	Date	Description	Prepared By	Approved By
01	May 2023	Accessibility Plan	Jennifer Chute	Ryan Albizzati
02	December 2023	Amendments as identified by the Canadian Transportation Agency's Cautionary Notice Dated December 1, 2023	Jennifer Chute	Ryan Albizzati
03	January 2024	Amendments as suggested by the Canadian Transportation Agency's email received January 12, 2024. Rebranded as commitment by all 4 companies. John Groothius is President overseeing Accessibility across the EFC group of companies.	Jennifer Chute	John Groothius
04	June 2026	New 3 Year Accessibility Plan	Jennifer Chute	Ryan Albizzati

AMMENDMENT RECORD SHEET

Revision No. 04		
Affected Section	Change	Date
All	Updated to new 3 Year Accessibility Plan	06/01/2026
Authorization	Changed to Ryan Albizzati, CEO of EFC Group.	06/01/2026
All	Rebranded to 1 company only due to organizational restructuring and amalgamation effective January 1, 2026.	06/01/2026

1. GENERAL

1.1. Accessibility Statement

Executive Flight Centre Group Ltd. (“EFC”) and its affiliated companies are committed to ensuring our operating environments are barrier-free, accessible, and inclusive for employees and visitors of all abilities. We are committed to meeting the needs of people who face accessibility barriers at all locations. We will achieve this by identifying, removing, and preventing barriers and by meeting the requirements of The Accessible Canada Act (ACA) and the Accessible Canada Regulations (regulations).

1.2. Purpose, Commitment & Feedback Process

Purpose:

The purpose of this plan is to outline the strategic direction EFC will continue working towards at all locations to improve accessibility and to prevent and remove barriers that may affect people with disabilities. This new plan will be effective as of June 01, 2026, for a period of three (3) years until June 01, 2029.

Commitment:

This plan will be continually reviewed and renewed to reflect each improvement being implemented.

Feedback Process:

As we are continuously improving, we encourage and welcome feedback on our plan.

To provide feedback and/or request an alternate format of the accessibility plan or an alternate format of the description of the feedback process, please contact us directly per the following. Feedback can be submitted anonymously in confidence.

Acknowledgement of receipt of feedback, other than anonymous, will be provided in the same manner in which it was received. Feedback received will be reviewed, categorized, and incorporated into accessibility priorities, operational improvements, and future planning cycles, where appropriate.

Contact: Human Resources Manager
By Mail: Executive Flight Centre Group Ltd.
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Phone: 403-291-2825
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1.3. Accessibility Principles

EFC has developed an accessibility plan in alignment with the following principles.

- All persons must be treated with dignity regardless of their disabilities.
- All persons must have the same opportunity to make for themselves the lives that they are able and wish to have regardless of their disabilities.
- All persons must have barrier-free access to full and equal participation in society, regardless of their disabilities.
- All persons must have meaningful options and be free to make their own choices, with support if they desire, regardless of their disabilities.
- Laws, policies, programs, services, and structures must consider the disabilities of persons, the different ways that persons interact with their environments and the multiple and intersecting forms of marginalization and discrimination faced by persons.
- Persons with disabilities must be involved in the development and design of laws, policies, programs, services, and structures.
- The development and revision of accessibility standards and the making of regulations must be done with the objective of achieving the highest level of accessibility for persons with disabilities.

1.4. Accessibility Goals

EFC is committed to identifying and removing barriers, and the prevention of new barriers, in the following areas at all locations:

- 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

2. EMPLOYMENT

EFC is committed to being an equal opportunity employer and to advancing employment equity, diversity, and accessibility across our workforce. This includes identifying, removing, and preventing barriers to employment for persons with disabilities throughout the employee lifecycle, from recruitment and onboarding to training, career development, and retention.

Through our Employment Equity Program, EFC promotes proactive employment practices to support fair treatment and equitable representation of the four designated groups at all occupational levels, while recognizing the unique safety-sensitive and operational requirements of the aviation industry.

EFC also recognizes the importance of psychological health and safety in the workplace and will be informed by the principles of CSA Z1003: Psychological Health and Safety in the Workplace. This includes promoting psychologically safe environments, reducing stigma related to mental health, and considering workplace factors that may contribute to psychological stress or harm. EFC will take a proactive approach to fostering a culture where employees feel safe to raise concerns, request support, and access accommodation without fear of reprisal.

2.1. Barriers

EFC has identified the following employment-related barriers that may impact persons with disabilities:

- Recruitment and selection biases, including reliance on traditional job qualifications and assessment methods, may contribute to the underrepresentation of persons with disabilities in certain occupational groups.
- The absence of a centralized approach for identifying modified or alternate work tasks may limit the ability of site leaders, Safety, and HR to support timely and effective accommodations, particularly in safety-sensitive or operational roles.
- Onboarding, training, and learning materials are not always available in accessible or alternative formats to support diverse learning and accessibility needs.
- Limited awareness and confidence among leaders and hiring managers regarding inclusive hiring, accommodation in safety-sensitive roles, and supporting employees with visible and non-visible disabilities.
- Job design and work arrangements may not consistently reflect opportunities for flexibility, task modification, or alternative duties where operationally feasible.
- Workplace factors such as workload, fatigue, operational pressures, and high-risk environments may negatively impact psychological health; however, related risks, including stress, burnout, and mental health stigma are not consistently identified, monitored, or addressed through a structured approach.
- Employees may not consistently feel safe or supported in disclosing mental health needs or requesting accommodations.

2.2. Goals

Year One

- Strengthen accommodation processes by clarifying roles, responsibilities, and decision-making pathways between site leaders, Safety, and Human Resources.
- Develop initial tools and resources, including a framework for identifying modified or alternate work tasks, to support timely and consistent accommodations in operational and safety-sensitive roles.
- Increase awareness and understanding among site leaders and supervisors regarding accommodation supports, processes, and confidentiality while actively promoting psychological safety, so employees feel respected, supported, and safe to raise needs early.
- Provide leadership training focused on accommodation processes, collaboration with Safety and HR, and fostering psychologically safe and inclusive work environments.
- Maintain partnerships with community organizations and government-recognized employment service providers to support inclusive recruitment and retention.
- Begin identifying workplace factors that may impact psychological health (e.g., workload, fatigue, operational stressors) in consultation with employees and relevant internal partners.
- Review workforce representation data to identify gaps for persons with disabilities within specific occupational groups and establish preliminary benchmarks to inform future actions.

Year Two

- Provide targeted training for recruiters, hiring managers, and People Leaders on inclusive and accessible hiring practices, bias awareness, accommodations within safety-sensitive and operational roles, and psychological health and safety awareness.
- Review and update recruitment and selection processes to use accessible application and assessment methods, clearly identify bona fide occupational requirements, and promote employment opportunities to persons with disabilities.
- Update interview guides and evaluation tools to support fair, consistent, and inclusive candidate assessment.
- Begin reviewing job descriptions to ensure physical, cognitive, and sensory requirements are clearly justified, role-related, and not unnecessarily exclusionary.
- Expand the use of modified and alternate work task options to support job flexibility, return-to-work, and retention where operationally feasible.
- Develop a more structured approach to recognizing and addressing psychological risks in the workplace, including consideration of fatigue, high-stress environments, and operational demands.
- Increase awareness among employees and leaders about mental health supports, reducing stigma, and encouraging early access to accommodation and assistance.

Year Three

- Ensure accommodation requests are assessed, implemented, and reviewed within reasonable and clearly communicated timeframes.
- Embed accessibility and psychological health considerations into onboarding, training, and career development by:
 - Providing training in accessible and alternative formats upon request
 - Designing learning systems, platforms, tools, and content with accessibility in mind
 - Consulting persons with disabilities to identify and address diverse learning needs (e.g., vision, hearing, mobility, cognitive, speech, and mental health)
 - Integrate accessibility and psychological health and safety considerations into job design, workforce planning, performance management, and talent development practices.
 - Establish a consistent approach to monitoring and responding to workplace factors that may impact psychological health, in alignment with CSA Z1003 principles and organizational safety practices.
 - Monitor and evaluate progress against Employment Equity and accessibility goals using workforce data, employee feedback, and other relevant indicators, and use results to support continuous improvement.

3. BUILT ENVIRONMENT

EFC is committed to identifying, removing, and preventing barriers in the built environments it operates to support safe, equitable, and accessible participation for employees, contractors, passengers, and visitors. CSA B651: *Accessible Design for the Built Environment* will be applied as the minimum standard for new construction, major renovations, and accessibility improvements within EFC control.

CSA B651 serves as the primary benchmark guiding the assessment, design, construction, and ongoing management of EFC facilities. It will be used to identify barriers, inform accessibility audits, and support compliance with the Accessible Canada Act (ACA) and applicable transportation regulations. The standard will also guide collaboration with landlords, partners, and service providers in shared environments.

For facilities owned and operated by EFC, the organization will proactively assess spaces against CSA B651 criteria to identify barriers related to mobility, sensory access, wayfinding, usability, and emergency egress. Accessibility considerations will be integrated into planning, maintenance, renovations, relocations, and new construction to prevent the introduction of new barriers.

In leased or shared facilities, where structural modifications may fall under the responsibility of the property owner, EFC will:

- Communicate accessibility requirements

Accessibility Plan

3 Year Plan Effective June 1, 2026



- Share identified barriers and recommended improvements
- Advocate for timely remediation
- Track responses and outcomes

Barriers identified through employee feedback, assessments, or operational reviews will be escalated and monitored in collaboration with property owners and partners.

Across all environments, EFC will:

- Assess built environments using CSA B651 criteria
- Identify barriers through reporting systems and accessibility audits
- Prioritize improvements based on risk, frequency of use, and impact
- Integrate accessibility requirements into procurement, design, and contractor specifications
- Ensure alignment with aviation safety and operational requirements
- Engage persons with disabilities to inform priorities and validate solutions

This approach establishes a consistent, measurable, and standards-based framework to improve accessibility across all EFC environments.

3.1. Barriers

EFC has identified the following built-environment barriers that may impact employees, contractors, passengers, and visitors with disabilities:

- Access to some administrative and operational areas is limited due to upper-floor locations without step-free or elevator access, and accessibility features vary across sites.
- Entrances, doors, and interior circulation routes do not consistently meet accessibility standards, including the availability of automatic door operators, sufficient clear widths, and barrier-free pathways.
- Wayfinding supports, including tactile signage, Braille, high-contrast signage, and consistent navigation cues, are not consistently implemented across locations.
- Accessible parking, exterior paths of travel, curb cuts, and weather-protected routes are not consistently available or compliant with accessibility standards.
- Washrooms and common areas (e.g., kitchens, meeting rooms, waiting areas) are not consistently accessible or do not include universal design features.
- Workstations, service counters, kiosks, equipment, and tools are not always designed or adjustable to meet accessibility requirements, particularly for individuals using mobility devices or with reach limitations.
- Emergency systems and procedures do not consistently include both visual and audible alerts, accessible evacuation routes, refuge areas, or individualized emergency response planning.
- Environmental conditions such as lighting, glare, acoustics, and noise levels may create barriers for individuals with sensory or cognitive disabilities.
- Accessibility considerations are not consistently incorporated early in design, renovation, or relocation projects, increasing the risk of introducing new barriers.

- In leased or shared facilities, EFC has limited control over physical modifications, and processes for addressing accessibility issues require greater consistency.
- Consultation with persons with disabilities is not always systematically integrated into built-environment planning and prioritization.

3.2. Goals

Year One

- Ensure the new Head Office location meets accessibility requirements for entrances, vertical circulation, washrooms, common areas, parking, and exterior paths of travel prior to occupancy.
- Integrate accessibility requirements into the Head Office relocation process, including:
 - Step-free access and elevator access
 - Barrier-free entrances and circulation routes
 - Accessible and universal washrooms
 - Compliant parking and exterior routes
 - Tactile, high-contrast, and consistent signage
- Review and update emergency systems and procedures at the new Head Office to include both audible and visual alarms and clearly defined assistance roles.
- Establish a formal process for identifying, documenting, and tracking built-environment accessibility concerns using a standardized audit approach aligned with CSA B651.
- Begin engaging persons with disabilities to inform accessibility priorities and validate built-environment improvements.

Year Two

- Conduct accessibility audits of all EFC locations against CSA B651 criteria to identify compliance gaps.
- Prioritize built-environment improvements based on risk, frequency of use, employee and passenger impact, and operational feasibility.
- Improve accessibility of workstations, service counters, equipment, tools, and common areas by increasing availability of adjustable and universally designed features.
- Address environmental accessibility barriers, including lighting, glare, acoustics, noise, and visual contrast.
- Strengthen coordination with landlords and facility owners by communicating CSA B651-based requirements, tracking responses, and advocating for improvements.
- Continue consultation with persons with disabilities to validate audit findings and inform prioritization.

Year Three

- Implement prioritized built-environment improvements aligned with CSA B651 standards, where EFC has control or influence.
- Embed CSA B651 requirements into:
 - Facilities planning and capital projects
 - Renovations and relocations
 - Lease negotiations and site selection
 - Procurement and contractor specifications
- Ensure all new or renovated spaces under EFC control incorporate:
 - Barrier-free entrances and accessible vertical circulation
 - Compliant circulation routes with adequate clearances
 - Accessible and universal washrooms
 - Integrated accessible seating and waiting areas
 - Accessible service counters and interaction points
 - Tactile, Braille, and high-contrast wayfinding systems
 - Emergency systems with both visual and audible alerts
- Establish an ongoing program of accessibility audits, monitoring, and continuous improvement aligned with CSA B651.
- Emergency planning and facility design will consider inclusive evacuation and response requirements, including accessible alerts, assistance protocols, and safe egress for persons with disabilities, informed by CSA Z1600 principles.
- Review progress, audit results, and feedback to inform future accessibility planning cycles and prevent the introduction of new barriers.

4. INFORMATION AND COMMUNICATIONS TECHNOLOGIES (ICT)

EFC recognizes that accessible Information and Communication Technologies (ICT) are essential to ensuring equitable access to employment, training, operational information, and public-facing services. EFC is committed to identifying, removing, and preventing barriers in its ICT systems and digital platforms while recognizing the use of third-party and industry-specific systems common in aviation operations.

EFC will align its public-facing websites, digital platforms, and applicable internal systems with Web Content Accessibility Guidelines (WCAG) 2.1 Level AA, and where feasible, WCAG 2.2 Level AA, as the recognized international standard for digital accessibility.

4.1. Barriers

EFC has identified the following ICT-related barriers that may impact employees, candidates, and members of the public with disabilities:

- Not all terminals or operational locations consistently support accessible audio and visual public announcements, including working visual displays for travellers.
- The online recruitment and application system may not fully support accessibility tools needed by individuals with diverse sensory, cognitive, or mobility needs.
- Internal systems, including training platforms, learning management systems, and employee portals, may not consistently meet accessibility standards or offer alternative formats.
- Third-party or industry-specific software used for operations, scheduling, training, or communications may have limited accessibility features and restricted customization options.
- Digital content (e.g., documents, PDFs, videos, presentations, and internal communications) is not always created or maintained in accessible formats.
- Limited consistency in applying accessibility standards during procurement, upgrades, or system changes, increasing the risk of introducing new ICT barriers.
- Awareness and understanding of digital accessibility requirements among system owners, content creators, and managers may be inconsistent.
- Consultation with persons with disabilities is not always integrated into the evaluation or prioritization of ICT improvements.

4.2. Goals

Year One

- Conduct an accessibility review of EFC's public-facing website against WCAG 2.1 Level AA criteria, in consultation with a qualified accessibility professional, to identify barriers and improvement opportunities.
- Complete an internal ICT accessibility assessment covering:
 - Recruitment and applicant tracking systems
 - Training and learning management platforms
 - Employee portals and internal communication tools
 - Public announcement systems where applicable
- Establish internal guidance for accessible digital content creation, including basic standards for documents, presentations, and multimedia.
- Begin engaging persons with disabilities to inform ICT accessibility priorities and user experience considerations.
- Confirm that audio and visual public announcement systems at applicable charter and FBO locations are operational and identify gaps requiring remediation.

Year Two

- Prioritize ICT improvements based on accessibility risk, frequency of use, employee and public impact, and operational feasibility.
- Identify and confirm available budgets to support ICT accessibility improvements and upgrades.

- Work with vendors and service providers to address accessibility gaps in third-party systems where feasible or implement alternative access solutions when full compliance is not possible.
- Update procurement and system upgrade practices to include accessibility considerations when evaluating new software, platforms, or technology upgrades.
- Provide targeted awareness and guidance to system owners, content creators, and managers on accessible ICT practices.

Year Three

- Implement prioritized improvements to achieve alignment with WCAG 2.1 Level AA requirements for digital content and systems within EFC's control.
- Ensure that all enabled audio and visual formats for recorded or live public announcements (including departure delays, gate assignments, or schedule changes) are consistently operational at applicable locations.
- Embed accessibility checks into routine ICT maintenance, upgrades, and content management processes.
- Establish an ongoing approach to monitoring ICT accessibility, addressing newly identified barriers, and responding to user feedback.
- Review progress and lessons learned to support continuous improvement and inform future accessibility planning.

5. COMMUNICATION, OTHER THAN ICT

EFC is committed to ensuring that information is communicated in ways that are accessible, inclusive, and respectful of the diverse needs of employees, candidates, visitors, and customers. This includes non-digital forms of communication such as verbal, printed, in-person, and emergency communications. Emergency communications will consider diverse accessibility needs, including alternative formats, clear instructions, and additional support where required.

5.1. Barriers

EFC has identified the following communication-related barriers, other than ICT, that may impact persons with disabilities:

- Verbal communication, including briefings, safety instructions, and workplace announcements, may not consistently consider the needs of individuals with hearing, cognitive, or speech-related disabilities.
- Printed materials (e.g., policies, signage, training handouts, emergency instructions) may not always be available in accessible or alternative formats, such as large print, plain language, or braille.
- In-person communication practices may rely on assumptions about hearing, vision, comprehension, or verbal response, which can create barriers for individuals with visible and non-visible disabilities.

- Emergency and safety communications may not consistently accommodate diverse communication needs, particularly for individuals who require additional time, alternative formats, or personal support.
- Employees and leaders may have limited awareness or confidence in how to communicate effectively and respectfully with persons with disabilities or how to arrange communication supports.
- Processes for requesting and providing communication supports (such as interpreters or alternate formats) may not be consistently understood or applied.
- Consultation with persons with disabilities is not always integrated into the evaluation or improvement of communication practices.

5.2. Goals

Year One

- Increase awareness among leaders and front-line employees about inclusive communication practices and respectful interactions with persons with disabilities.
- Review commonly used non-digital communication materials (e.g., policies, safety instructions, onboarding materials) to identify opportunities to improve clarity and accessibility.
- Establish guidance on providing information in alternative or accessible formats upon request and communicate this guidance to employees.
- Review emergency and safety communication approaches to ensure they consider the needs of persons with disabilities, including during drills and real-time events.
- Begin engaging persons with disabilities to inform communication priorities and improvement opportunities.

Year Two

- Improve the consistency of accessible communication practices across sites and departments, particularly for onboarding, training, safety briefings, and operational communications.
- Expand availability of alternative communication formats for key materials, where reasonable and appropriate.
- Clarify roles and processes for arranging communication supports (e.g., note-taking support, interpretation, plain-language explanations) when required.
- Incorporate inclusive communication considerations into training for People Leaders, site leaders, and supervisors.
- Consult with persons with disabilities to review progress and refine communication approaches.

Year Three

- Embed accessible communication principles into standard operating practices, including onboarding, training delivery, safety communications, and employee engagement.

- Ensure communication needs are considered proactively when planning new initiatives, operational changes, or emergency procedures.
- Integrate lessons learned into policies, procedures, and leadership practices to prevent the introduction of new communication barriers.
- Monitor feedback related to communication accessibility and use it to support continuous improvement in future planning cycles.

6. PROCUREMENT OF GOODS, SERVICES AND FACILITIES

EFC recognizes that procurement practices play a critical role in identifying, removing, and preventing barriers to accessibility. Decisions related to the purchase of goods, services, technology, and facilities have long-term impacts on employees, customers, and visitors. EFC is committed to integrating accessibility considerations into procurement processes to support inclusive outcomes and prevent the introduction of new barriers.

Accessible Design for the Built Environment will be incorporated, where applicable, into procurement criteria, specifications, and evaluation processes for facilities, design services, and construction-related contracts. Accessibility requirements will be communicated to vendors, and non-compliance may be addressed through contract management processes where applicable.

6.1. Barriers

EFC has identified the following procurement-related barriers that may impact accessibility:

- Accessibility considerations have not been consistently or systematically incorporated into procurement and contracting processes for goods, services, technology, or facilities.
- Procurement documentation, including templates, evaluation criteria, and contracts, may not consistently identify accessibility requirements or expectations.
- Limited awareness among employees involved in procurement regarding accessibility obligations and how to assess accessibility during purchasing decisions.
- Reliance on third-party vendors, landlords, and service providers may introduce accessibility barriers when accessibility requirements are not clearly defined or monitored.
- Accessibility is not always considered early in procurement planning, system selection, or facility decisions, increasing the risk of acquiring inaccessible products or services.
- Limited consultation with persons with disabilities when identifying accessibility needs related to procured goods, services, or facilities.

6.2. Goals

Year One

- Establish a cross-functional working group, including representatives from Procurement, Facilities, IT, Human Resources, and Safety, to support the integration of accessibility considerations into procurement practices.
- Review existing procurement processes, templates, and decision-making tools to identify where accessibility requirements are missing or inconsistently applied.
- Increase awareness among employees involved in procurement about accessibility obligations and the role of procurement in removing and preventing barriers.
- Begin engaging persons with disabilities, where appropriate, to inform accessibility considerations related to significant procurement decisions.

Year Two

- Update procurement and contracting documents, templates, and guidance to include accessibility considerations appropriate to the goods, services, or facilities being procured.
- Incorporate accessibility criteria, where applicable, into vendor evaluations, requests for proposals, and contracting discussions.
- Work with vendors, service providers, landlords, and partners to communicate accessibility expectations and address identified accessibility risks.
- Align procurement practices with accessibility considerations identified in other areas of the accessibility plan (e.g., ICT, built environment, communication).

Year Three

- Embed accessibility considerations into routine procurement planning and approval processes to reduce the risk of introducing new barriers.
- Monitor procurement practices to assess how effectively accessibility requirements are being applied and addressed by vendors and service providers.
- Use lessons learned, feedback, and identified gaps to refine procurement practices and support continuous improvement.
- Review and update procurement-related accessibility processes to inform future accessibility planning cycles.

7. DESIGN AND DELIVERY OF PROGRAMS AND SERVICES

EFC is committed to ensuring that the design and delivery of its programs and services are inclusive and accessible to employees, customers, and visitors of all abilities. This includes operational, safety, training, and customer-facing programs and services delivered across EFC-owned, leased, and shared environments.

EFC will take a proactive approach to identifying, removing, and preventing barriers by integrating accessibility considerations throughout the planning, development, implementation, and review of programs and services.

7.1. Barriers

EFC has identified the following barriers related to the design and delivery of programs and services:

- There is no consistent governance structure or formal process to review programs and services for accessibility impacts prior to implementation.
- Accessibility considerations may not be consistently integrated into the design and delivery of new or existing programs and services, increasing the risk of unintended barriers.
- Guest-facing and employee-facing programs, services, and supporting materials may not always be designed with diverse accessibility needs in mind.
- Feedback from persons with disabilities is not consistently incorporated into the evaluation or improvement of programs and services.
- Outcomes and effectiveness of accessibility actions within programs and services are not consistently tracked or measured.

7.2. Goals

Year One

- Establish an Accessibility Advisory Committee with representation from relevant business areas to support accessibility considerations in the design and delivery of programs and services.
- Define the mandate, roles, and responsibilities of the Accessibility Advisory Committee, including how accessibility feedback will inform program and service decisions.
- Begin integrating accessibility considerations into the planning and design of new or significantly updated programs and services.
- Identify priority programs and services, including those that are guest-facing or operationally significant, for initial accessibility review.

Year Two

- Develop and implement a structured review process to assess existing programs and services for accessibility considerations and potential barriers.
- Involve the Accessibility Advisory Committee and consult persons with disabilities to gather feedback and inform improvements to priority programs and services.
- Establish methods to track and measure the effectiveness of accessibility-related actions within programs and services.
- Apply lessons learned from reviews to improve guidance, tools, and practices for program and service design.

Year Three

- Embed accessibility considerations into standard processes for the design, implementation, and evaluation of programs and services.
- Use feedback, outcome tracking, and committee input to support continuous improvement and prevent new barriers from being introduced.
- Monitor progress and integrate accessibility planning into future program and service initiatives, changes, or expansions.
- Review and refine governance and review processes to inform future accessibility planning cycles.

8. TRANSPORTATION

Accessible transportation is a critical component of the aviation industry. EFC is committed to working collaboratively with airport authorities, service partners, and transportation providers to support accessible and inclusive transportation experiences for employees, customers, and visitors. This includes transportation related to fleet vehicles, ground handling, customer assistance, and access to EFC locations where transportation options are limited.

EFC will take steps to identify, remove, and prevent transportation-related barriers within its control while working with partners where shared responsibility applies. EFC distinguishes between areas within its direct control and those requiring coordination with external partners and will take all reasonable steps within its authority to address accessibility barriers.

8.1. Barriers

EFC has identified the following transportation-related barriers that may impact persons with disabilities:

- EFC operates a fleet of vehicles and equipment for operational purposes that do not currently include built-in accessibility features; accessibility needs are addressed on an individual accommodation basis where required.
- Availability and consistency of mobility aids (such as wheelchairs and other assistive devices) may vary across locations.
- Not all EFC locations are accessible by public or alternative transportation options, which may limit access for employees, customers, or visitors with disabilities.
- In safety-sensitive and operational environments, transportation and mobility support may require coordination across multiple teams or third-party partners.
- Roles, responsibilities, and expectations related to accessible transportation assistance may not be consistently understood or applied across sites.

8.2. Goals

Year One

- Ensure employees are aware of their responsibilities to assist passengers and visitors with disabilities upon request, including assistance with baggage, wheelchairs, and on-site transportation, in coordination with applicable partners and airport authorities.
- Review transportation-related assistance practices to confirm alignment with accessibility expectations, safety requirements, and service standards.
- Assess current inventory of mobility aids and transportation support equipment across locations to identify gaps or inconsistencies.
- Clarify internal roles and escalation pathways for addressing transportation-related accessibility needs at each site.

Year Two

- Confirm and, where feasible, improve the availability and condition of wheelchairs and other mobility aids across all EFC locations, in coordination with Fleet and site leadership.
- Strengthen coordination with airport partners, landlords, and service providers to support consistent accessible transportation experiences across sites.
- Assess transportation access challenges for employees at locations with limited public transit availability and explore reasonable mitigation options where operationally feasible.
- Incorporate accessibility considerations into planning discussions related to fleet use, ground transportation, and customer service operations.

Year Three

- Consider accessibility features and adaptability when evaluating new fleet acquisitions or replacements, where operationally and financially feasible.
- Embed transportation-related accessibility considerations into standard operating procedures, training, and service expectations.
- Monitor transportation-related accessibility feedback and incidents to support continuous improvement.
- Use lessons learned to inform future accessibility planning and collaboration with transportation and airport partners.

9. TRAINING GOALS

EFC is committed to promoting employee contribution, growth, and inclusive workplace practices. Training is a key enabler of accessibility and plays a critical role in building awareness, reducing bias, and supporting consistent, respectful interactions with employees, customers, and visitors with disabilities.

Accessibility Plan

3 Year Plan Effective June 1, 2026



EFC will design and implement training and learning initiatives to strengthen understanding of accessibility responsibilities and inclusive practices across the organization.

Year One

- Human Resources will conduct an assessment to identify accessibility-related training needs for leadership, front-line staff, recruiters, and People Leaders, including:
 - Disability awareness and inclusive communication
 - Bias awareness and inclusive hiring practices
 - Accommodation processes and expectations
 - Accessibility legislation and organizational responsibilities
- Develop a multi-year training plan outlining audiences, delivery methods, and priorities.
- Identify or develop internal and external training resources to support accessibility learning.
- Integrate accessibility awareness into onboarding materials and leadership communications where feasible.

Year Two

- Roll out accessibility-related training to leadership, front-line staff, recruiters, and People Leaders, using formats appropriate to operational and safety-sensitive roles.
- Include practical scenarios and role-specific guidance to support application of learning in day-to-day work.
- Incorporate accessibility and inclusion topics into existing leadership and people management training where appropriate.
- Gather feedback from participants to inform continuous improvement of training content and delivery.

Year Three

- Reinforce key accessibility concepts and expectations through ongoing communications, including staff meetings, internal newsletters, and operational briefings.
- Support learning through mentorship, knowledge-sharing, or developmental opportunities that promote inclusive leadership and employee growth.
- Refresh training content as needed based on feedback, changes in legislation, or organizational priorities.
- Embed accessibility awareness into ongoing learning practices to support long-term cultural change and prevent the introduction of new barriers.

10. PROVISIONS OF CTA ACCESSIBILITY-RELATED REGULATIONS

EFC is required to comply with the Accessible Transportation for Persons with Disabilities Regulations (ATPDR), made under the Accessible Canada Act. These regulations establish mandatory accessibility requirements for federally regulated transportation service providers and terminal operators.

The provisions outlined below continue to apply during the current three-year accessibility plan period and inform EFC's approach to training, operations, communications, service delivery, and continuous improvement.

For a detailed outline of the provisions applicable to EFC, please refer to the following:

Part 1: Requirements Applicable to Transportation Service Providers:

- Provision 3: Application
- Provision 4: General Information – alternative formats
- Provision 5: Information to be published
- Provision 6: Communication
- Provision 7: Telephone System
- Provision 8: Website
- Provision 9: Website – requirements
- Provision 10: Public announcements
- Provision 15: Personnel Training for the Assistance of Persons with Disabilities
- Provision 16: Interactions with public
- Provision 17: Physical assistance
- Provision 18: Handling mobility aids
- Provision 19: Using or assisting with special equipment
- Provision 20: Initial training and supervision
- Provision 21: Refresher training
- Provision 22: Duty to inform personnel
- Provision 23: Preparation of training programs

Part 4 – Division 1: Service Requirements Applicable to Terminal Operators:

- Provision 212: Application
- Provision 213: Non-application – certain terminals
- Provision 214: Prohibition – no charge for required services
- Provision 215: Communication of information
- Provision 216: Assistance for persons with disabilities
- Provision 217: Service provider for ground transportation, rental vehicles

Part 4 – Division 2: Technical Requirements Applicable to Terminal Operators

- Provision 218: Application
- Provision 219: Non-application – certain areas or facilities
- Provision 220: Pre-existing terminals
- Provision 221: Duty of terminal operator
- Provision 222: Terminal – requirements
- Provision 223: Lift, ramp, or stairs – requirements
- Provision 224: No level boarding – airports
- Provision 225: Wheelchairs
- Provision 226: Seats
- Provision 227: Designated relief area
- Provision 229: Obstruction due to repairs or maintenance
- Provision 230: Non-accessible path of travel
- Provision 231: Maintenance

Compliance with these provisions is supported through EFC’s policies, training programs, operational procedures, and ongoing accessibility planning.

11. CONSULTATIONS

Consultation and Engagement

Engagement and consultation with persons with disabilities and representatives of the accessibility community are central to EFC’s approach to identifying, removing, and preventing barriers. Meaningful consultation has informed both the development of EFC’s initial Accessibility Plan and the continued refinement of this three-year plan.

In developing the current Accessibility Plan, EFC engaged a broad range of internal and external stakeholders, including individuals with lived experience of disability, to identify barriers and inform priorities across all areas of accessibility. Participants included employees (including those who self-identified as persons with disabilities), leaders, the Employment Equity Committee, the Accessibility Committee, Human Resources, and the Senior Leadership Team.

While our primary contact with our community partner, Prospect Human Services, has recently changed, EFC remains committed to strengthening and expanding external partnerships. Efforts to re-establish this collaboration are underway, and requests for connection have been initiated. EFC will continue to pursue opportunities to incorporate external expertise and community perspectives into its accessibility work.

Consultation activities for this plan included multiple opportunities for input. A draft Accessibility Plan was shared with all staff during a ten-day consultation period from May 19 to May 29, 2026. Feedback was collected through an online survey, email

submissions, and written responses. Additional input was obtained through structured discussions with internal committees and external partners.

Earlier engagement included targeted consultation with the Employment Equity and Accessibility Committees from May 7 to May 12, 2026, supported by a feedback form and email submissions. In addition, dedicated consultation meetings were held on February 27, April 15, and May 13, 2026, to review identified barriers, refine priorities, and validate proposed actions and timelines.

Feedback gathered through these processes was reviewed, consolidated, and used to inform updates to the plan, including the refinement of barriers, priorities, and implementation timelines. EFC is committed to ongoing engagement and will continue to incorporate feedback to strengthen accessibility outcomes over the duration of the plan.

Consultation Focus Areas

Feedback during the consultation period focused on:

- Alignment with the principles of the Accessible Canada Act, including respect for dignity, equality of opportunity, barrier-free participation, meaningful choice and autonomy, consideration of intersecting disabilities, involvement of persons with disabilities in decision-making, and progress toward the highest level of accessibility
- Clarity, simplicity, and accessibility of the plan's language
- Alignment with requirements under the Accessible Transportation for Persons with Disabilities Regulations (ATPDR)
- Feasibility of timelines and commitments
- Additional feedback to strengthen the plan

Ongoing Consultation and Collaboration

Consultation will continue throughout the implementation of this Accessibility Plan.

Since the release of Version 01 in 2023:

- An Accessibility Committee has been established and meets quarterly to review progress, emerging barriers, and opportunities for improvement
- EFC has participated in the YYC Airport Authority Accessibility Advisory Committee to support collaboration and the sharing of best practices
- Partnerships with community organizations, including Prospect Human Services and affiliated partners, continue to inform accessible and inclusive practices
- Consultations with affiliated companies and stakeholders have occurred

Ongoing consultation will remain integral to monitoring progress, evaluating outcomes, and informing future accessibility planning cycles.

Accountability

Accountability for implementing accessibility actions is shared across departments, with operational responsibility assigned to relevant business units. Oversight and coordination are provided by Human Resources in partnership with the Accessibility Committee, with overall accountability resting with the Senior Leadership Team. Progress will be monitored on an ongoing basis, supported by formal annual reviews and the preparation of accessibility progress reports in accordance with regulatory requirements. A task list will be created to review completion and track against plan progress. Updates will be shared internally and, where appropriate, publicly.

Conclusion

This Accessibility Plan reflects EFC's ongoing commitment to accessibility, inclusion, and continuous improvement. It supports the long-term objective of a barrier-free Canada by 2040 through sustained action, collaboration, and accountability.

EFC will establish and monitor key accessibility indicators, including completion of accessibility audits, number and type of barriers identified and resolved, progress against accessibility goals, and feedback trends, to support ongoing evaluation and continuous improvement.

12. DEFINITIONS

Accommodation means making necessary adjustments to environments, processes, or ways of working or accessing services to support the accessibility needs of employees and all other individuals engaging with the organization, including job applicants, visitors, passengers, clients, and the public, enabling safe, equitable, and effective participation.

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.

Disability is a broad category of experience that encompasses a wide range and degree of challenges, barriers, and impairments that affect many people and goes far beyond traditional ideas and stereotypes. A disability can be visible or invisible. It can be permanent or temporary. It can also be episodic in nature. A disability and its required accommodations can be permanent or temporary (while a person recovers from an injury etc.) and the employer is required to provide accommodations to the point of undue hardship.

Discrimination means treating someone differently or unfairly because of a personal characteristic or distinction, which, whether intentional or not, has an effect that imposes disadvantages not imposed on others or that withholds or limits access that is given to others. There are 13 prohibited grounds of discrimination under the Canadian Human Rights Act (i.e., based on race, national or ethnic origin, colour, religion, age, sex, sexual orientation, gender identity or expression, marital status, family status, genetic characteristics (including a requirement to undergo a genetic test, or disclose the results of a genetic test), disability or conviction for an offence for which a pardon has been granted or in respect of which a record suspension has been ordered).

Onboarding is the process of integrating an employee with a department and its culture, as well as getting the employee the tools and information needed to become a productive member of the team.

Plain language is a writing technique of organizing information in ways that make sense to the reader. It uses straightforward, concrete, familiar words. Plain language helps the writer adapt what they have to say to the reading abilities of the people who are most likely to read the document.