Irving Aviation

Interim Accessibility Plan

June 1, 2024

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Introduction

Irving Oil Limited (Fixed Based Operations) and Irving Aviation Services Limited (collectively referred to as "**Irving Aviation**") support a culture of diversity, equity, and inclusion. Irving Aviation is committed to developing a barrier-free workplace that allows for full participation of all individuals, including persons with disabilities.

Irving Aviation's Accessibility Plan considers the following principles, as set out in the Accessible Canada Act.

- 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 take into account 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.

Interim Accessibility Plan

This is an Interim Accessibility Plan to which the Irving Aviation Accessibility Plan will be provided on or before October 1, 2024.

Irving Aviation will follow a diligent and thorough process in our Duty to Consult persons with disabilities, followed by the analysis of those consultations, and the incorporation of such findings and analysis in our final plan. We will explore all avenues of incorporating accessibility wherever necessary in our operations. We take our obligations under the *Accessible Canada Act* seriously and want to ensure its principles are adequately reflected in our plan through careful and thoughtful consideration.

Hence, Irving Aviation is publishing this Interim Accessibility Plan, with the plan of publishing the final version of its Accessibility Plan (the "Irving Aviation Accessibility Plan") by October 1, 2024.

Overview

Our Operations

The operations subject to the Irving Aviation Accessibility Plan are three Fixed Based Operations ("**FBO**") being:

- Irving Aviation Gander FBO,
- Irving Aviation Goose Bay FBO, and
- Irving Aviation St. John's FBO.

Shared Planning and Reporting Documents

Irving Oil Limited (Fixed Based Operations) and Irving Aviation Services Limited share similar policies, programs, practices and services for its clients, employees and others who deal with us. Therefore, Irving Aviation is working to publish the Irving Aviation Accessibility Plan.

Accessibility Plan

The Irving Aviation Accessibility Plan will act as a roadmap to create and maintain impactful accessibility. The Irving Aviation Accessibility Plan will be prepared in accordance with the *Accessible Canada Act*, its principles and regulations, as applicable to Irving Aviation.

The Irving Aviation Accessibility Plan will reflect Irving Aviation's policies, programs, practices and services in relation to the identification and removal of barriers, and the prevention of new barriers in the following seven key areas:

- a) employment;
- b) the built environment;
- c) information and communication technologies ("ICT");
- d) communication, other than ICT;
- e) the procurement of goods, services, and facilities;
- f) the design and delivery of programs and services; and
- g) transportation.

The Irving Aviation Accessibility Plan will explore the actions being taken to identify, remove and prevent barriers by outlining short- and long-term commitments to further improve accessibility now and into the future. The Irving Aviation Accessibility Plan is anticipated to be finalized on October 1, 2024, and updated every three years from June 1, 2024, inclusive of progress reports or as otherwise advised by the Canadian Human Rights Commission and its regulations.

General

Designated Receiver of Feedback

We are open to all feedback as it relates to the Irving Aviation Accessibility Plan, and will be establishing an appropriate means to capture feedback from the public through Irving Aviation's Jet Fuel Compliance Specialist.

Progress Reports

Progress reports will be prepared by June in 2025 and 2026 and we will develop and publish an updated Irving Aviation Accessibility Plan for June in 2027.

Alternative Formats

The Irving Aviation Accessibility Plan will be made available in certain alternate formats to any person who requests it (using the contact information below).

Contact Information

To provide feedback on:

- How Irving Aviation is implementing the Irving Aviation Accessibility Plan,
- The barriers that Irving Aviation's employees encounter, and
- The barriers other people who deal with Irving Aviation encounter,

and/or request an alternative format of the Irving Aviation Accessibility Plan, Feedback Process Description, or future Progress Reports, we encourage the use of e-form for efficient record keeping purposes, or by whatever means is most accessible to you.

Please find the <u>feedback e-form linked here</u> or you may copy/paste this URL into your web browser: https://forms.office.com/r/xTLghqs559

You may also use the following contact information:

E-mail: community@irvingoil.com

Telephone: 1.888.310.1924

Mailing Address:

Attn: the Director, Regulatory Compliance 10 King Square South Saint John, NB E2L 0G3

Seven Key Areas

Understanding that the purpose of the *Accessible Canada Act* is to identify and remove barriers and prevent barriers in seven key areas, Irving Aviation's Accessibility Plan will highlight Irving Aviation's policies, programs, practices and services in relation to these seven key areas.

Definitions from the Accessible Canada Act

"Barrier" means anything – physical, architectural, technological, or attitudinal, anything that is based on information or communications, or anything that is the result of 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 of a functional limitation.

"Disability" means any impairment, including a physical, mental, intellectual, cognitive, learning, communication, or sensory impairment – or a 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.

1. Employment

The Irving Aviation Accessibility Plan will identify and remove barriers, and the prevention of new barriers in the key area of employment.

- Irving Aviation employs less than 40 employees, as of this publication's date.
- We remind candidates that Irving Aviation is committed to supporting a diverse and inclusive work environment.

2. The Built Environment

The Irving Aviation Accessibility Plan will address the identification and removal of barriers, and the prevention of new barriers in the key area of the built environment.

• Irving Aviation has a goal to create a workplace free of physical barriers to improve the environment for all employees.

3. Information and Communication Technologies (ICT)

The Irving Aviation Accessibility Plan will identify and remove barriers, and the prevention of new barriers in the key area of ICT.

- Much of the software used at Irving Aviation is Microsoft Office 365 which provides apps and powerful cloud services with accessibility built in. This includes features for impairments with vision, hearing, neurodiversity, learning, mobility and mental health.
- Irving Aviation is committed to providing a website accessible to the broadest possible audience, regardless of technology or ability. We are continuously working to increase the accessibility and usability of our website.

4. Communication, Other than ICT

The Irving Aviation Accessibility Plan will identify and remove barriers, and the prevention of new barriers in the key area of Communication (other than ICT).

5. The Procurement of Goods, Services, and Facilities

The Irving Aviation Accessibility Plan will identify and remove barriers, and the prevention of new barriers in the key area of the procurement of goods, services, and facilities.

• Irving Aviation will continue to evaluate the effectiveness of our accessibility procurement initiatives and make necessary adjustments, to enhance accessibility in procurement processes and contribute to broader goals of inclusivity and accessibility.

6. The Design and Delivery of Programs and Services

The Irving Aviation Accessibility Plan will identify and remove barriers, and the prevention of new barriers in the key area of the design and delivery of programs and services.

7. Transportation

The Irving Aviation Accessibility Plan will identify and remove barriers, and the prevention of new barriers in the key area of transportation.

• Additional accessibility transportation providers may be procured to better meet the needs of passengers with disabilities.

Consultations

The Irving Aviation Accessibility Plan will make thorough efforts in its duty to consult persons of disabilities in publishing its final Initial Accessibility Plan.

Conclusion

Irving Aviation is committed to providing a barrier-free and inclusive air terminal building for persons of all abilities. As we move forward, we recognize the importance of receiving feedback from all members of our community. We will continue our commitment to ensure that everyone experiences a welcoming, safe, and accessible environment.