



GLOBAL
CONTAINER
TERMINALS



GLOBAL CONTAINER TERMINALS

Accessibility Plan

Accessibility Plan

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GENERAL

About Global Container Terminals Canada

With two terminals located in the Port of Vancouver, Global Container Terminals Canada (GCT Canada) is a leader in terminal innovation and consistent performance on the West Coast. GCT Canada offers first-class service, backed by leading on-dock rail footage, proven surge capacity, and more than a century of experience in marine transportation. Committed to the growth of the Vancouver gateway, GCT Canada has built strategic relationships with key supply chain partners to offer customers the velocity and flexibility to succeed in today's competitive, ever-adapting market.

As one of Canada's largest maritime employers, GCT Canada has always focused on establishing sustainable and efficient operations that benefit our neighbours, workforce, and customers. For over a century, we have built the Vancouver gateway, pioneered new technologies, and achieved greater levels of efficiency, with the goals of improving workplace safety, improving our service levels, and facilitating a sustainable quality of life in our local communities.

GCT Canada has been operating on the West Coast since 1907 and is responsible for running both GCT Vanterm and GCT Deltaport, Canada's largest container terminal. Beyond operating these facilities, GCT Canada has also played a major role in developing Canada's Pacific Gateway.

We pride ourselves on our innovative approach to marine shipping and continue to explore and implement processes and technology that increase efficiency and decrease environmental and community impact as articulated in our [Global Commitment](#). Our high standards, customer focus, and leadership in safety, innovation, and automation have led to stable, long-term relationships with the majority of the world's largest carriers.

Requirements

As a federally regulated company in the transportation sector, GCT Canada is governed by the [Accessible Canada Act](#) (ACA).

The ACA is a federal law enacted by the Canadian government in 2019 to make Canada barrier-free by January 1, 2040. It aims to promote and ensure equal access and inclusion for persons with disabilities. The ACA applies to all federally regulated entities, including companies, organizations, and government agencies.

A barrier, as defined by the ACA, is anything that prevents persons with disabilities from fully and equally participating in Canadian society.

Per the ACA, all federally regulated entities must:

- Prepare and publish an initial Accessibility Plan
- Establish an accessibility feedback process

- Report annually on the progress towards the plan and address any feedback received

Our Accessibility Plan must be reviewed in its entirety and published every three years.

Overall, the Accessible Canada Act represents a significant step towards creating a more inclusive and accessible society for all Canadians, including those with disabilities. By complying with these requirements, GCT Canada can help ensure that we are providing equal access and opportunities to all members of society.

Executive Summary

GCT Canada values diversity, equity, and inclusion (DEI) in the workplace and, over the last several years, we have taken a proactive approach to integrating DEI principles and best practices to promote greater accessibility for underrepresented and marginalized groups, including individuals with disabilities. In 2021-2022 we conducted a DEI audit that assessed employee and leadership perceptions of DEI at GCT Canada and identified and prioritized opportunities for DEI advancements within the organization. Since then, we have taken steps to begin forming a DEI Committee to promote and advance DEI at GCT Canada. Table 1 (below) provides a summary of each Priority Area and our accessibility commitments.

Table 1.

Executive Summary: GCT Canada's Accessibility Plan 2023-2026.

Priority Area	Commitments
Employment	Commitment 1: GCT Canada will implement additional candidate attraction and recruitment strategies that promote employment opportunities and growth for individuals with disabilities and other underrepresented groups.
	Commitment 2: Provide a safe, welcoming, and barrier-free environment for employees with disabilities.
	Commitment 3: Ensure that all employee training and development opportunities are accessible for all GCT Canada employees
	Commitment 4: Launch an employee communication campaign starting in 2023 to inform them of new accessibility policies and services available to all employees. Communications will include awareness of disability definitions and common barriers to accessibility.
Built Environment	Commitment 1: Take meaningful steps to create a workplace environment that ensures all employees have safe and unobstructed access that is free from physical barriers.
Information & Communication Technologies (ICT)	Commitment 1: Deepen our understanding of barriers that exist in our ICT systems, ensure plans are in place to remove barriers where possible, and enhance our standards of accessible and enabling technologies and tools.
Communications (other than ICT)	Commitment 1: Identify barriers that prevent inclusive communication norms at GCT Canada and address these opportunities to improve how information is communicated and employees are engaged.

Procurement of Goods, Services, and Facilities	Commitment 1: Working with people with disabilities to provide training to all employees who are customer-facing to ensure knowledge of accommodation and communication standards for accessibility and provide best practices for how to communicate with people with disabilities by 2026.
Design & Delivery of Services	Commitment 1: Identify opportunities to advance accessibility in the design and delivery of GCT Canada’s programs and services.
	Commitment 2: Ensure that our team members receive training and standard procedure training to support their interactions with people with disabilities.
Transportation	Commitment 1: Meet the accessibility needs of employees and select members of the public including customers, special interest groups, and community groups.

Accessibility Statement

GCT Canada aims to operate our Head office, GCT Deltaport, and GCT Vanterm as a barrier-free, accessible environment for employees and customers.

We are committed to progressing as a more accessible workplace for all, where participation and opportunities are equally accessible and barrier-free, regardless of abilities.

Accessibility Committee

The Accessibility Committee will be established as a sub-committee within a broader Diversity & Inclusion Committee. In order to facilitate the development of our Accessibility Plan, we have established a temporary working group. This group includes:

1. **Jennifer Kim**
Director, HR
2. **Sasha Mirza**
Advisor, HR
3. **Derek Razzell**
Director, Safety, Security & Environment
4. **Jennifer Perih,**
Manager, Corporate Affairs
5. **Denise Trent**
Interim Manager, Corporate Affairs

Feedback

GCT Canada is committed to providing an open and transparent feedback process. For more information, to provide feedback, or to request alternative formats of this Plan, please contact GCT Canada through one of the following methods:

- **Email:** accessibilityfeedback@globalterminals.com
- **Direct mail:**
GCT Canada Accessibility Feedback
400 – 2925 Virtual Way
Vancouver, BC, Canada V5M 4X5
- **Telephone:** 604 267 5355

Alternative Formats

GCT Canada's Accessibility Plan is available in the following formats:

- Print
- Large Print
- Electronic
- Audio

A Braille copy of GCT Canada's Accessibility Plan may be requested by email at accessibilityfeedback@globalterminals.com or by phone at 604 267 5355.

PRIORITY AREAS

Area 1: Employment

Our Accessibility Goal

GCT Canada aims to cultivate a work environment that embraces and supports diversity, equity, and inclusion in all aspects of our employment practices.

Current Level of Accessibility

GCT Canada has proactively advanced inclusive practices for all minority groups through their hiring policies and practices, as well as leadership training opportunities. In 2021-2022, we performed a diversity, equity, and inclusion (DEI) audit to identify areas of improvement and have since:

- Updated our website to include an Equal Opportunity Employer Statement and pronoun inclusivity during recruitment.
- Organized and implemented an employee survey and focus groups with the purpose of gathering feedback from employees based on DEI topics.
- Established a Women in Leadership group led by GCT Canada's CFO, which meets a few times annually.
- Launched a youth scholarship for Tsawwassen First Nation with ongoing efforts to organize similar initiatives.
- Introduced Blue Ocean Brain to our team for DEI courses and ongoing educational opportunities.
- Sponsored a group of female employees to attend the 2022 and 2023 Art of Leadership for Women events.

Additionally, the GCT Canada Operations team has begun a project to assess the accessibility of all employee training materials. They published the first draft of GCT Canada's *Accessible Document Reference Sheet* in November 2022.

Actions

Commitment 1: GCT Canada will implement additional candidate attraction and recruitment strategies that promote employment opportunities and growth for individuals with disabilities and other underrepresented groups by:

- Expanding on the inclusive principles in our Workplace Harassment and Violence Prevention Policy and Anti-Discrimination Guidelines and promoting these policies and principles on the GCT Canada careers page and job advertisements by December 2023.
- Conducting an Accessibility Assessment of all systems involved in the candidate application process, including job ads and interview questions, by December 2023.

- Expanding our candidate outreach program to include job boards geared towards underrepresented groups, including job boards that support people with disabilities and use universal design principles, by December 2023.
- Fostering continued relations with Tsawwassen First Nations, including a youth scholarship program and employment opportunities.

Commitment 2: Provide a safe, welcoming, and barrier-free environment for employees with disabilities by:

- Creating a formal accommodation policy and process by June 2024 that promotes equitable access to physical workspaces, training opportunities, and career growth.
- Ensuring managers are receiving unconscious bias and sensitivity training by making it a requirement for all managers starting in 2024.
- Starting discussions in 2024 with the unions and employer associations to ensure accommodations are being met for union employees in a timely and effective manner that promotes equal access.
- Incorporating information on accessibility into GCT Canada's Emergency Response Plan by June 2026.

Commitment 3: Ensure that all employee training and development opportunities are accessible for all GCT Canada employees by:

- Publishing the second draft of GCT Canada's *Accessible Document Reference Sheet* by December 2023.
- Consulting with people with disabilities to include accessible design and alternative training methods in the development of all new training programs starting in 2024.
- Including close captioning on all E-learning materials and providing sign language interpretation for in-person training, when requested, by June 2026.

Commitment 4: Launch an employee communication campaign starting in 2023 to inform them of new accessibility policies and services available to all employees. Communications will include awareness of disability definitions and common barriers to accessibility.

Area 2: Built Environment

Our Accessibility Goal

GCT Canada wants to make sure that our employees and stakeholders can access our facilities without hindrance while ensuring high safety standards. To do so, we must prioritize feasible upgrades that improve accessibility by gaining a deeper understanding of the present capacity for change within our facilities and the roles performed.

Current Level of Accessibility

GCT Canada's facilities are solely accessible to employees. In rare cases, members of the public are permitted to enter with prior approval and knowledge of safety procedures. We recognize that there are inherent barriers for many of the jobs performed by GCT Canada employees that are associated

with bona fide occupational requirements established for safety reasons. With that said, GCT Canada will review accommodation needs for employees and, when possible, provide accommodation as long as there is alignment with safety standards and procedures.

In 2018, GCT Canada completed an ergonomic assessment of all office areas and has prioritized and actioned efforts to ensure that our team has access to safe and ergonomic workstations wherever possible. Additionally, we incorporated ergonomic design when we opened a new head office in January 2023, including adjustable tables and ergonomic chairs. We recognize that there are inconsistencies in the degree of accessibility in our built environments across locations. Specifically, spaces designed for office workers have higher levels of accessibility compared to those for labourers.

Actions

Commitment 1: Take meaningful steps to create a workplace environment that ensures all employees have safe and unobstructed access that is free from physical barriers by:

- Consulting with a vendor with knowledge regarding accessible design to assess signage at terminal and office locations to develop a signage standard and plan to upgrade by December 2026.
- Establishing a signage standard based on the consultation, including approved vendor(s), for signage across all three locations starting in 2026.
- Determining feasibility, priority, and budget for the following accessibility features by 2026:
 - Automatic doors into all office locations
 - Ramps to all one-story prefabricated buildings at port locations
 - Accessible entrances to the second level at our GCT Vanterm location
 - Accessible upgrade to showers at our GCT Deltaport location
- Determining feasibility, priority, and budget for acquiring a transportation option that provides accessible travel services for employees, customers, external stakeholders, and community groups around our terminals by 2026.

Area 3: Information and Communication Technologies (ICT)

Our Accessibility Goal

GCT Canada seeks to ensure that all employees, including employees with disabilities, have access to enabling technologies and tools to support their full participation free from barriers to engagement and information transmission.

Current Level of Accessibility

Accessibility has not been an integral consideration guiding GCT Canada's selection of existing ICT systems. GCT Canada utilizes a wide variety of ICT communication tools including internal business systems (Microsoft Office), Human Resources Information Systems, Learning Management Systems, Desk Management Systems, Asset Management Systems, and Terminal Operations Systems. These systems have varying levels of accessibility that require further probing and assessment.

Actions

Commitment 1: Deepen our understanding of barriers that exist in our ICT systems, ensure plans are in place to remove barriers where possible and enhance our standards of accessibility and enabling technologies and tools by:

- Creating an Accessibility Assessment Matrix to understand the existing accessibility features of our commonly used systems by reaching out to the system providers for information about available features of what is available for each program starting in 2024.
- Using the Assessment Matrix to complete an audit of all ICT systems used by GCT Canada to determine current levels of accessibility and identify areas for advancement starting our third quarter of 2025.
- Establishing, where possible, a prioritized plan for accessibility features in alignment with ICT programs that are most commonly used across the business by 2026.
- Turning on available accessibility functions and training the team on accessibility functions available on our most commonly used software by 2026.
- Creating a feasibility report for the replacement or upgrade of systems identified as not meeting accessibility standards by June 2026.

Area 4: Communication, other than ICT

Our Accessibility Goal

GCT Canada's goal is to make certain that our communication norms satisfy or surpass accessibility best practices and enable everyone at GCT Canada, including persons with disabilities, to engage and participate fully in an inclusive work environment where they are empowered to succeed.

Current Level of Accessibility

Accessibility has not been made a priority in the development of communication standards and plans at GCT Canada.

Actions

Commitment 1: Identify barriers that prevent inclusive communication norms at GCT Canada and address these opportunities to improve how information is communicated and employees are engaged by:

- Developing a process for employees to request accommodations including access to screen readers in advance of training sessions, meetings, etc. by December 2023.
- Establishing a best-practices guide for the development and dissemination of key communications to ensure accessibility (e.g., plain language, formatting, alt-text for images, etc.) by June 2024.

- Using accommodation requests (both for the built environment and communications) to establish standard practices (e.g., large print versions of all printed training materials) by June 2026.

Area 5: Procurement of Goods, Services, and Facilities

Our Accessibility Goal

GCT Canada endorses accessibility for all Canadians and understands that the procurement process is an important mechanism through which we can hold ourselves and our vendors accountable for establishing accessible practices. Where possible, GCT Canada will be intentional about obtaining the services of vendors (1) owned and operated by people with disabilities or another minority group, (2) that provide goods and services with accessible design, and/or (3) have established accessibility goals to remove barriers for employees, customers, and other key stakeholders.

Current Level of Accessibility

GCT Canada has recently conducted an Environmental, Social, and Governance (ESG) survey of all our vendors and has developed guiding principles that focus on engaging local and Indigenous vendors wherever possible. Accessibility is not currently a central consideration in the procurement of goods, services, and facilities at GCT Canada; however, we are already in the process of reviewing our Request for Proposal (RFP) criteria and are creating an assessment matrix that will include accessibility.

Actions

Commitment 1: Ensure that GCT Canada's Procurement Practices continue to promote best practices in procurement, including accessibility practices, to promote accessibility and provide a barrier-free experience for our vendors, regardless of ability, while offering accommodations as required by:

- Starting in 2024, using our existing annual survey with vendors on their Environmental, Social, and Governance (ESG) practices to inquire about:
 - Accessibility within their relevant services, and
 - Any accommodations they may need to work with GCT Canada.
- Including accessibility in our vendor matrix criteria, which is already underway, to create accountability for the procurement of goods, services, and facilities to ensure accessibility is being considered by June 2024.
- Updating GCT Canada's current purchasing principles related to ESG and DEI to include accessibility guidelines and requirements to be considered at the start of the procurement process by June 2026.
- Providing training to those involved in procurement starting in 2026.
- Researching best practices for establishing a standard to ensure vendor accountability for all ESG practices, including accessibility, by June 2026.

Area 6: Design and Delivery of Programs and Services

Our Accessibility Goal

GCT Canada works with global shipping lines and supply chain partners to provide terminal operation services. This includes ship berthing and connections to and from the terminals to major freeways, national railways, and major international trade routes. Our goal is to provide customers and external stakeholders with barrier-free access to our services through the design and delivery of these services.

Current Level of Accessibility

Accessibility had not been formally considered in the design and delivery of programs and services.

Actions

Commitment 1: Identify opportunities to advance accessibility in the design and delivery of GCT Canada's programs and services by:

- Conducting a preliminary assessment of all customer and public-facing systems and services to determine current levels of accessibility to all systems and identify areas for improvement by June 2024.
- Working with people with disabilities to provide training to all employees who are customer-facing to ensure knowledge of accommodation and communication standards for accessibility and provide best practices for how to communicate with people with disabilities by 2026.
- Determining feasibility, priority, and budget for updating customer and public-facing systems and services by 2026.

Commitment 2: Ensure that our team members receive best-practice training and standard procedure training to support their interactions with people with disabilities by:

- Establishing and communicating expectations to our customer-facing employees about the services available for customers with disabilities by December 2023.
- Developing a training plan that addresses accessibility in operational support and customer engagement by June 2024.
- Collaborating with our employer association to review and identify opportunities for improved training of unionized workers by June 2026.

Area 7: Transportation

Our Accessibility Goal

Our goal is to ensure accessible transportation for employees and select members of the public (e.g., those visiting the site) for safe movement about the ports.

Current Level of Accessibility

While GCT Canada is not responsible for the transportation of the general public, from time-to-time GCT Canada will provide transportation around the ports to select members of the public including customers, special interest groups, and community groups.

We provide safe transportation to employees to move about the ports including well-marked pedestrian walkways. The current vehicles available at our port locations include standard pick-up trucks, vans, and minibuses.

Actions

Commitment 1: Meet the accessibility needs of employees and select members of the public including customers, special interest groups, and community groups by:

- Establishing a standardized process that enables customers and visitors to disclose their accessibility needs related to travel around the facility by June 2023.
- Renting buses that are equipped with accessibility features, when needed, for large groups of visitors starting in 2024.
- Establishing a standardized process for understanding and ensuring accessibility requirements are met for visiting tour groups by June 2025.
- Determining the need, feasibility, priority, and budget for modification or purchase of company vehicles to comply with accessible travel standards by June 2025.

CONSULTATIONS

Summary

GCT Canada appreciates the significance of the concept of “[Nothing without Us](#)”, which supports the notion that persons with disabilities must be involved in the ideation of GCT Canada’s Accessibility Plan to meaningfully identify opportunities to progress accessibility in our environment. In the development of our plan, GCT Canada worked alongside the British Columbia Centre for Ability BC (CFA) in the review and development of our Accessibility Plan.

Consultation Process

We provided the BC CFA with a draft of our Plan as a Word document for their review. We followed this with a live session on May 2, 2023, to discuss the actual impact and significance that our goals will have towards creating an accessible workplace and experience for our employees, customers, and the public.

The session was hosted virtually via Zoom and the consultation team from BC CFA was asked in advance about any accommodation that would be needed for the session.

During the session, participants had the option to turn on closed captioning. Each priority area of the Plan was discussed and accompanied by a PowerPoint presentation for everyone to see.

Results

During the session, we reviewed each of GCT Canada’s Accessibility Commitments and gathered feedback from the BC CFA. Overall, the BC CFA found the Plan to be clear and logical, showing a commitment to making a positive impact on the community through accessibility measures.

Most of the Commitments and corresponding action plans provide a coherent and logical progression. However, the BC CFA identified a couple of key areas where further elaboration on the actions was needed to provide a clear and meaningful commitment. This was incorporated throughout the Plan by:

- Correcting our action plans to ensure that they follow chronological order.
- Making explicit our commitment to continue working with people with disabilities to ensure that the actions we are taking are moving us in the right direction.
- Being more specific in identifying the tools, systems, and practices that we will use to reduce and remove barriers.

Future Consultations

In future iterations of GCT Canada’s plan, a primary focus is to conduct a more robust consultation process and align holistically with the principles of “Nothing Without Us”. Our goal is to engage a wider breadth of consultation processes with our employees, customers, and organizations,

including testimonials, feedback surveys, and facilitated learning/consultation sessions to ensure meaningful progress in accessibility is achieved between republication dates.

CONCLUSION

This plan demonstrates GCT Canada's dedication to our ongoing efforts to identify, mitigate, eliminate, and prevent barriers to accessibility in all seven (7) priority areas as outlined by the Accessible Canada Act. Through planning and accountability, GCT Canada will establish a workplace environment that provides employees and customers with equal access to collaboration and advancement opportunities irrespective of their abilities.

We acknowledge that employees, customers, the Canadian public, and, ultimately, our business will benefit from the continued advancement of diversity, equity, and inclusion (DEI) at GCT Canada. We are dedicated to allocating our resources to making meaningful progress on the Commitments detailed in our Accessibility Plan through which a more accessible Canada is possible.

We acknowledge that advancing accessibility is only one part of our DEI journey, and we are committed to creating a workplace that is safe, accessible, and equitable for all marginalized groups, including, but not limited to, Indigenous, Black, racialized, 2SLGBTQ+ people, people with disabilities, and women.



Accessibility Plan
