GLOBAL CONTAINER TERMINALS



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Accessibility Plan

Accessibility Plan 2026-2029

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GENERAL

About Global Container Terminals

With two terminals located in the Port of Vancouver, Global Container Terminals ("GCT") is a leader in terminal innovation and consistent performance on the West Coast. GCT 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 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.

GCT 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 has also played a major role in developing Canada's Pacific Gateway. GCT focuses on sustainable and efficient operations that benefit our customers, workplace, and the communities in which we operate.

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 ethical 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 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 can help ensure we are providing equal access and opportunities to all members of society.

Executive Summary

GCT is committed to building a more accessible, inclusive, and barrier-free workplace for employees, customers, visitors, and external stakeholders. Guided by the Accessible Canada Act, this Accessibility Plan outlines GCT's commitments from 2026 to 2029 across seven priority areas: employment, the built environment, information and communication technologies, communication, procurement, service delivery, and transportation.

Building on progress made through accessibility reviews, employee feedback, updated policies, and inclusive workplace practices, GCT will continue identifying, removing, and preventing barriers while strengthening accountability, awareness, and consistency across the organization.

Table 1 below summarizes each priority area and GCT's accessibility commitments.

Table 1.
Executive Summary: GCT's Accessibility Plan 2026-2029

Priority Area	Commitments
Employment	**Commitment 1:** Build accessibility considerations into employment processes
	Commitment 2: Support accessibility in recruitment, onboarding, and training
	Commitment 3: Continue identifying and addressing accessibility barriers across the employee experience
	Commitment 4: Promote awareness of accessible and inclusive workplace practices
Built Environment	**Commitment 1:** Improve accessibility across GCT's physical spaces
	Commitment 2: Improve signage and wayfinding at our sites
	Commitment 3: Support awareness and usability of accessibility features at our sites
Information & Communication Technologies (ICT)	**Commitment 1:** Build accessibility into GCT's digital systems, content, and platforms
	Commitment 2: Strengthen employee knowledge and consistency in accessible digital practices
Communications (other than ICT)	**Commitment 1:** Make communication clearer, more accessible, and easier to understand
	Commitment 2: Provide a clear and consistent process for requesting communication supports
	Commitment 3: Build accessibility into meetings, training sessions, and day-to-day communication

	Commitment 4: Strengthen employee knowledge and consistency in accessible communication practices
Procurement of Goods, Services, & Facilities	**Commitment 1:** Build accessibility into GCT's procurement processes and purchasing decisions
	Commitment 2: Strengthen how accessibility is considered in digital procurement
	Commitment 3: Provide employees with guidance and training on accessible procurement practices
	Commitment 4: Improve consistency and accountability in accessible procurement
Design & Delivery of Services	**Commitment 1:** Build accessibility more consistently into customer service practices
	Commitment 2: Strengthen employee knowledge and consistency in accessible digital practices
	Commitment 3: Support accessible service delivery through practical tools and guidance
Transportation	**Commitment 1:** Improve how transportation and site access information is shared at GCT

Accessibility Statement

GCT aims to operate our three locations (Head Office, GCT Deltaport, and GCT Vanterm) as barrier-free, and accessible environments 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 subcommittee within a broader Diversity & Inclusion Committee. To facilitate the development of our Accessibility Plan, we have established a temporary working group. This group includes:

1. ***Jennifer Kim***
   Vice President, Human Resources
2. ***Sasha Mirza***
   Human Resources Business Partner
3. ***Derek Razzell***
   Director, Safety, Security & Environment
4. ***Jennifer Perih***
   Manager, Corporate Affairs

Feedback

GCT 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 through one of the following methods:

- **Email**: accessibilityfeedback@globalterminals.com
- **Direct mail**:
  GCT Accessibility Feedback
  400 – 2925 Virtual Way
  Vancouver, BC, Canada V5M 4X5
- **Telephone**: (604) 267-5200 – Ask to speak with HR

Alternative Formats

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

- Print
- Large Print
- Electronic
- Audio

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

PRIORITY AREAS

Area 1: Employment

Our Accessibility Goal

GCT 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 has taken steps to support diversity, equity, and inclusion (DEI) for underrepresented groups, including persons with disabilities, through its hiring practices, workplace policies, and employee development programs. Between 2023–2026, GCT completed a DEI audit to identify opportunities to further strengthen accessibility across the organization. Areas of progress include:

- **Inclusive Recruitment & Outreach:** Updated recruitment policies and practices to support more inclusive hiring, completed a recruitment accessibility assessment, expanded outreach to underrepresented communities, and continued partnerships with Tsawwassen First Nation through scholarships and employment initiatives. Accessibility considerations are increasingly being incorporated throughout the recruitment process to support equitable access to employment opportunities.
- **Workplace Accessibility & Accommodations:** Introduced a formal Accommodation Policy and standardized accommodation process, provided mandatory unconscious bias training for managers, continued discussions with unions regarding accommodations, and committed to including accessibility considerations in emergency response planning. GCT continues to support employees through its Duty to Accommodate obligations and is working to further strengthen consistency in accommodation practices across the organization.
- **Accessible Training & Development:** Published accessible document guidelines, began incorporating accessible design into new training programs, continued using closed captioning in virtual materials, and made sign language interpretation available upon request. GCT continues to review onboarding, training, and employee development practices to support a more accessible and inclusive employee experience.
- **Communication & Awareness:** Launched and continue to maintain an internal communication campaign to promote accessibility policies, available services, and awareness of disability-related barriers in the workplace. This ongoing communication helps build awareness and reinforce accessibility as a shared organizational responsibility.
- **Embedding Accessibility into Processes:** The DEI audit highlighted opportunities to further integrate accessibility considerations across all stages of the employee lifecycle. GCT continues to build accessibility into organizational processes and identify opportunities to proactively reduce barriers and improve the employee experience.

Actions

Commitment 1: Build accessibility considerations into employment processes by:

- Review onboarding, recruitment, and training processes to identify accessibility considerations and opportunities for improvement by December 2026.
- Incorporate accessibility considerations into employment processes where appropriate (e.g., onboarding materials, document formats, accommodation information) starting in June 2027.
- Continue to consider accessibility when updating employment materials and processes moving forward.

Commitment 2: Support accessibility in recruitment, onboarding, and training by:

- Review onboarding materials and employee resources to support accessibility and ease of understanding by June 2027.
- Include information about accommodations and alternative application methods within recruitment and interview processes, where appropriate, by June 2027.
- Provide employees with information about available workplace support and accommodation processes during onboarding.

Commitment 3: Continue identifying and addressing accessibility barriers across the employee experience by:

- Review additional areas of the employee experience (e.g., career development, employee communications, workplace processes) to identify accessibility considerations and barriers by December 2027.
- Prioritize accessibility improvements based on impact, feasibility, and organizational priorities through 2028–2029.
- Use feedback and review findings to help inform future accessibility improvements across employment practices.

Commitment 4: Promote awareness of accessible and inclusive workplace practices by:

- Provide employees and People Leaders with access to training, resources, and practical guidance related to accessibility and inclusive practices starting June 2027.
- Clarify accessibility-related roles and responsibilities across teams over time to support consistent practices.
- Share accessibility-related guidance and resources periodically to encourage awareness and consistent application of accessible practices.

Area 2: Built Environment

Our Accessibility Goal

GCT 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's facilities are primarily accessible to employees, with limited public access under approved conditions. Many terminal roles include physical and safety-related requirements; however, accommodation needs are reviewed and supported wherever possible while maintaining operational and safety standards. Ergonomic assessments have been completed in office areas, and accessible features such as adjustable desks and ergonomic workstations have been incorporated into newer spaces. GCT continues to build on this foundation by identifying opportunities to improve accessibility across its facilities and work environments. To support accessibility, GCT continues to:

- **Remove Physical Barriers:** Worked with accessibility experts to review signage and begin developing a signage standard across all three locations. GCT also assessed opportunities for accessibility upgrades, including automatic doors, ramps, accessible second-level access at Vanterm, upgraded showers at Deltaport, accessible parking, additional seating, and accessible transportation options for employees, customers, and community members.
- **Create More Accessible Workspaces:** Continued investing in technology and workspace improvements that support accessibility, including remote-operated cranes, elevator access in updated workspaces, and ergonomic sit-stand desks. The introduction of remote-operated cranes has also expanded accessible job opportunities for some frontline employees.
- **Improve Navigation & Accessibility Features:** Accessible features are in place across several facilities, and GCT continues working to improve consistency and ease of use across sites. Opportunities have been identified to further enhance pathways, shared spaces, signage, and overall navigation to support employees and visitors moving through spaces safely and comfortably. Establishing signage standards to support consistent, accessible signage across all three locations starting in 2026. GCT recognizes the importance of clear, consistent signage in helping reduce barriers and improve navigation across the built environment.
- **Ongoing Accessibility Improvements:** Accessibility considerations continue to be included in workplace upgrades, planning, and future improvements. GCT recognizes the importance of ongoing accessibility reviews to help identify barriers early and support continuous improvement across the built environment.

Actions

Commitment 1: Improve accessibility across GCT's physical spaces by:

- Reviewing key areas of the site (e.g., entrances, pathways, workspaces, washrooms, shared facilities) to identify accessibility barriers and practical improvements by December 2026.
- Addressing priority accessibility improvements over time (e.g., paths of travel, access points, walkway obstacles) based on feasibility, operational requirements, and organizational priorities through 2028–2029.
- Continuing to consider accessibility in future site updates, maintenance activities, and space planning projects where appropriate.

Commitment 2: Improve signage and wayfinding throughout the site by:

- Reviewing current signage and wayfinding to identify gaps (e.g., inconsistent signage, unclear accessible routes, missing labels) by December 2026.
- Updating signage and wayfinding features where appropriate to support navigation of accessible routes, entrances, and facilities by December 2027.
- Continuing to review wayfinding needs as spaces, operations, and site configurations evolve.

Commitment 3: Support awareness and usability of accessibility features across the site by:

- Identifying existing accessibility features across the site (e.g., accessible entrances, routes, shared facilities) by June 2027.
- Updating or adding visual markers and site information where it is feasible to help employees and visitors locate accessibility features by December 2027.
- Reviewing accessibility features periodically to identify opportunities for consistency and improvement across locations.

Area 3: Information and Communication Technologies (ICT)

Our Accessibility Goal

GCT 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

GCT uses a wide range of information and communication technology (ICT) systems to support day-to-day operations, including Microsoft Office, Human Resources Information Systems, Learning Management Systems, desk and asset management systems, and Terminal Operations Systems. As accessibility was not previously a formal consideration in system selection, these tools currently offer varying levels of accessibility.

Since 2023, GCT has taken steps to better understand accessibility across its ICT systems and establish a more consistent approach to identifying barriers and opportunities for improvement. Actions taken to improve accessibility include:

- **Accessibility Assessments:** Developed and completed an Accessibility Assessment Matrix using an industry-recognized digital assessment tool to evaluate commonly used ICT systems and identify opportunities to improve accessibility features and support.
- **System Reviews & Audits:** Began a broader review of ICT systems to better understand current accessibility levels, identify gaps, and support future accessibility improvements and enabling technologies.
- **Built a More Consistent Approach:** Established a more structured process for reviewing ICT accessibility across systems, helping improve visibility into accessibility needs and supporting more consistent planning and decision-making over time.
- **Support Ongoing Improvements:** With a broader understanding of current system accessibility, GCT is better positioned to prioritize and implement accessibility improvements across its technology environment over time.

Actions

Commitment 1: Build accessibility into GCT's digital systems, content, and platforms by:

- Developing accessible content guidelines and templates for commonly used digital materials (e.g., documents, presentations, forms, internal communications) by June 2027.
- Applying recognized accessibility standards (e.g., WCAG, CAN/ASC-EN 301 549) to any new and updated digital systems, employee-facing platforms, and digital content by December 2028.
- Including accessibility considerations in ongoing digital updates, design, and content publishing processes moving forward.

Commitment 2: Strengthen employee knowledge and consistency in accessible digital practices by:

- Providing accessibility training for employees involved in creating, managing, or publishing digital content (e.g., communications, HR, IT teams) starting June 2027.
- Including practical guidance in training (e.g., accessible formatting, headings, alt text, captions, accessible PDFs) to support day-to-day application.
- Sharing updated guidance and resources regularly to support consistent digital accessibility practices across teams.

Area 4: Communication, other than ICT

Our Accessibility Goal

GCT's goal is to make certain that our communication norms satisfy or surpass accessibility best practices and enable everyone at GCT, 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 had not previously been a primary focus in the development of communication standards and practices at GCT. Over the past two years, the organization has taken meaningful steps to strengthen accessible and inclusive communication across the workplace. Clear standards, practical tools, and formal processes have been introduced to help reduce barriers and support employees of all abilities. Actions taken to improve accessibility include:

- **Accommodation Support for Communication Needs:** Developed and published a formal Accommodation Policy that allows employees to request communication support for meetings, training, events, and other workplace activities. A consistent process is now in place to help employees access the support they need to fully participate.
- **Accessible Communication Standards:** Created and shared an Accessible Communication Guide that outlines standards for plain language, formatting, alt-text, accessible design, and inclusive communication practices across the organization. This guide provides a strong foundation for more consistent and accessible communication across teams.
- **More Inclusive Communication Practices:** Continued improving how information is shared by encouraging the use of plain language, reducing acronyms where possible, and introducing alternative formats such as videos with closed captioning to support accessibility for a wider range of employees.
- **Continuous Improvement & Feedback:** Established an ongoing process to monitor accommodation requests and use employee feedback to strengthen communication practices and accessibility standards over time.

Actions

Commitment 1: Make communication clearer, more accessible, and easier to understand by:

- Reviewing commonly used communication materials and methods (e.g., emails, presentations, meeting materials, verbal communication practices) to identify accessibility gaps by December 2027.
- Updating communication practices to support plain language and clear formatting (e.g., simple language, accessible document structures, reduced use of acronyms) by June 2028.
- Applying accessibility considerations when creating and sharing new or updated communication materials moving forward.

Commitment 2: Provide a clear and consistent process for requesting communication supports by:

- Creating and communicating a simple process for requesting communication supports and accessible formats (e.g., large print, audio formats, interpretation) by June 2027.
- Sharing information about available communication supports through onboarding materials, internal resources, and meeting communications by September 2027.
- Providing communication support in a timely manner and continuing to improve the process based on feedback and usage.

Commitment 3: Build accessibility into meetings, training sessions, and day-to-day communication by:

- Including accessibility steps in meeting and training planning (e.g., sharing materials in advance, confirming support needs, enabling captions where available) by June 2028.
- Providing key information in advance of meetings, training sessions, and company-wide communications, when possible, to support participation.
- Continuing to build accessible communication practices into regular planning and communication processes.

Commitment 4: Strengthen employee knowledge and consistency in accessible communication practices by:

- Providing training and practical guidance on accessible communication practices (e.g., plain language, accessible formatting, communication supports) starting June 2027.
- Sharing tools and resources to support consistent communication practices across teams by December 2027.
- Maintaining records of communication support requests and accessibility training to support compliance and ongoing improvement.

Area 5: Procurement of Goods, Services, and Facilities

Our Accessibility Goal

GCT 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 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

Since 2023, accessibility has become a more integrated part of GCT's procurement practices. Through ongoing ESG and vendor review work, GCT has started embedding accessibility and inclusive business considerations into vendor engagement, evaluation, and purchasing processes. This work is helping strengthen alignment between procurement practices and GCT's broader accessibility and ESG commitments. Key actions have included:

- **Strengthened Vendor Assessments:** Enhanced the annual ESG vendor survey to include questions related to accessibility, duty to accommodate, inclusive employment practices, and whether vendors require accommodations to work with GCT. This supports more informed and values-aligned vendor selection.
- **Integrated Accessibility into Procurement Processes:** Began incorporating accessibility considerations into our ESG Supplier Self-Assessment form, including requiring federally regulated vendors to confirm compliance with the Accessible Canada Act. GCT also continues reviewing additional standards and requirements to support ongoing improvement and accountability.
- **Built Awareness Across Teams:** Provided DEI-related training, including unconscious bias and sensitivity training, to employees involved in procurement to support fair, inclusive, and accessible purchasing decisions.
- **Created More Consistent Practices:** GCT recognizes the importance of applying accessibility considerations more consistently across procurement activities and continues working toward clearer processes, expectations, and shared standards across teams.

Actions

Commitment 1: Build accessibility into GCT's procurement processes and purchasing decisions by:

- Reviewing current procurement processes to identify where accessibility considerations can be added (e.g., planning steps, vendor discussions, purchasing templates) by December 2026.
- Adding simple accessibility prompts and requirements into procurement documents and processes (e.g., checklists, vendor questions, evaluation criteria) by June 2027.

Commitment 2: Strengthen how accessibility is considered in digital procurement by:

- Including accessibility requirements (e.g., CAN/ASC-EN 301 549) in the procurement of new and updated digital products and services (e.g., websites, applications, digital documents, platforms) by June 2028.
- Establishing a process to review and confirm accessibility before purchasing or implementing new or updated digital tools and systems by March 2028.
- Asking vendors to provide information about accessibility features and compatibility as part of procurement and renewal discussions.

Commitment 3: Provide employees with guidance and training on accessible procurement practices by:

- Creating and sharing practical guidance for employees involved in purchasing (e.g., accessibility checklists, vendor questions, basic accessibility considerations) by June 2027.
- Providing digital accessibility training for employees involved in purchasing, managing, or supporting digital tools and systems, starting June 2027.
- Sharing refresher guidance and updates regularly to support consistent application of accessibility requirements.

Commitment 4: Improve consistency and accountability in accessible procurement by:

- Clarifying and documenting roles and responsibilities related to accessible procurement across teams, starting June 2027 and completing this work by December 2027.
- Maintaining records of accessibility training, assessments, and procurement activities related to digital accessibility requirements.
- Reviewing procurement practices regularly to identify opportunities for improvement and support ongoing compliance.

Area 6: Design and Delivery of Programs and Services

Our Accessibility Goal

GCT 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

GCT has continued to strengthen accessibility in the design and delivery of its programs and services. As GCT's services focus on the transportation of goods rather than passenger services, accessibility efforts are primarily focused on commercial customer interactions, including phone, email, website content, and digital service channels. Accessibility considerations are increasingly being incorporated into how information and services are delivered to customers, supply chain partners, and external stakeholders. Accessibility improvements include:

- **Reviewed Customer-Facing Systems:** Completed an assessment of customer and public-facing systems as part of the broader ICT review to better understand current accessibility levels and identify opportunities for improvement. GCT also completed a full redesign of its external website to improve accessibility and overall user experience.
- **Strengthened Accessible Communication Practices:** Provided inclusive communication and DEI training to customer-facing employees, including a company-wide Inclusive Communications session and ongoing learning opportunities to support accessible and respectful interactions.
- **Supported Accessible Customer Service:** Providing accessible communications training for customer-facing employees to help ensure customers and external stakeholders receive accessible, respectful, and inclusive service experiences.

Actions

Commitment 1: Build accessibility considerations more consistently into customer service practices by:

- Reviewing key stages of customer interaction (e.g., initial inquiry, service coordination, issue resolution, follow-up) to identify accessibility considerations and opportunities for improvement by June 2027.
- Reviewing and refining customer service procedures where appropriate to support clear roles, escalation pathways, and responses to accessibility-related requests by June 2028.
- Continuing to review customer feedback and service practices to help identify and address accessibility barriers over time.

Commitment 2: Strengthen employee awareness and confidence in accessible customer service by:

- Providing employees who interact with customers and external stakeholders with access to refreshed training, resources, and microlearning opportunities starting June 2027.
- Developing internal guidance and resources for employees related to common accessibility considerations, communication approaches, escalation contacts, and responding to accommodation requests by December 2027.
- Sharing accessibility-related guidance and reminders periodically to reinforce inclusive customer service practices.
- Reviewing and updating guidance materials periodically to reflect evolving processes, operational needs, and common support requests.

Commitment 3: Support accessible communication and request for accommodation by:

- Reviewing customer-facing materials and communication channels to help ensure customers, supply chain partners, and external stakeholders can access information about requesting accessibility-related support by June 2027.
- Providing contact information and general guidance on how accessibility-related requests may be supported during interactions with GCT.
- Reviewing communication materials periodically to support clarity, accessibility, and ease of access over time.

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

GCT does not operate public transportation services, and transportation is not a core function of the organization. Employees, contractors, and visitors typically access GCT sites independently or through external transportation providers. In some cases, transportation is provided within terminal locations for employees, customers, special interest groups, and community visitors. Safe movement throughout the ports remains a priority, including clearly marked pedestrian walkways and controlled vehicle access.

Accessibility is now formally considered when planning transportation-related activities and site visits. Efforts to support accessible transportation include:

- **Standardized Accommodation Processes:** Established a formal accommodation process for employees, customers, and visitors to help ensure accessibility needs can be identified and supported in advance of visiting GCT facilities. Tour request forms now include accommodation-related questions to support more proactive planning.
- **Accessible Transportation Support:** Confirmed that accessible transportation will be arranged when needed, including renting accessible vehicles or buses for visitors and groups. A review determined that renting vehicles provides the most flexible and effective approach for supporting accessibility needs.
- **Ongoing Planning & Review:** Accessibility and sustainability considerations are now included when reviewing transportation options, and accommodation requests continue to be monitored to support safe, inclusive, and accessible site access for all visitors and employees.

Actions

Commitment 1: Improve how transportation and site access information is shared at GCT by:

- Identifying accessible parking spaces, building entrances, drop-off locations, and public transportation options where available by December 2026.
- Creating a standard communication for new hires, candidates, and visitors that outlines how to access GCT's site, including parking, public transportation options, and accessible entrances, by June 2027.
- Providing this information in advance through onboarding materials, visitor instructions, and other site communications by June 2027, and continuing to update it as needed.
- Continuing to refine transportation and site access information based on feedback and operational changes over time.

CONSULTATIONS

Summary

As part of the development of accessibility plans under the **Accessible Canada Act**, the BCMEA, on behalf of waterfront employers, engaged subject matter experts to support the development of an accessibility audit tool. The subject matter experts included **Adaptability Canada**, the **BC Centre for Ability**, and **Meaningful Access Consulting**.

The audit tool is intended to give employers a practical way to review accessibility across the areas covered by the Accessible Canada Act and identify where barriers may exist. It is also intended to help employers look at accessibility in a more consistent way across waterfront workplaces.

Employee feedback was gathered as a second part of the consultation process. Employees across the waterfront were invited to speak confidentially with an independent third party about their experience of accessibility at work. The two parts of the process, subject matter expert input and employee interviews, give employers both a structured assessment tool and direct feedback from employees.

The feedback suggests that employers are not starting from scratch. Employees pointed to supportive managers, responsive leadership, existing Health and Safety or hazard-reporting processes, and accessible features already in place at some sites. At the same time, employees identified areas where accessibility could be clearer, more consistent, and easier to access in practice.

Consultation Process

The consultation process included two components.

First, the BCMEA engaged subject matter experts to develop an accessibility audit tool for employers. The tool was designed to help employers review accessibility across the ACA areas, including employment, the built environment, information and communication technologies, communication, procurement, design and delivery of programs and services, and transportation, where applicable.

Second, employees across the waterfront were invited to participate in confidential interviews. The consultation was open to all waterfront employees. Employees could book an interview by link, QR code, or email, and were informed that accommodations were available upon booking. Interviews were held virtually by Zoom, unless otherwise requested. Information about the consultation was shared by email and printed posters.

Participation was voluntary. Employees were told that their feedback would be anonymized, combined with feedback from other participants, and reported without identifying individual employees or distinguishing their employer.

The interviews focused on employees' experiences of accessibility at work, including what is working well, where barriers may exist, and what would make accessibility more meaningful in practice.

Disability was discussed broadly and included visible and invisible disabilities, physical disabilities, cognitive disabilities, neurodivergence, mental health-related disabilities, chronic conditions, temporary injuries, and recovery from illness or surgery.

Results

Employment
Employment was the area where employees had the most feedback. Several employees described managers or leaders who were supportive and willing to help when concerns were raised. Existing Health and Safety or hazard-reporting processes were also identified as useful channels in some situations.

The main opportunity is to make support easier to find and navigate. Employees may not always know who to contact for ergonomic support, an accommodation request, temporary injury support, return-to-work needs, or other accessibility-related concerns. This can be especially difficult for new employees, hybrid workers, or employees working across more than one location.

Training and onboarding were also raised. Employees noted that long verbal explanations, slide decks, videos, and virtual onboarding sessions do not work equally well for everyone. More accessible options could include shorter sessions, practical demonstrations, written step-by-step guides, checklists, captions, and materials employees can return to later.

Employees also spoke about the need to better recognize invisible disabilities, including ADHD, neurodivergence, learning disabilities, and mental health-related needs. Some feedback also pointed to workplace culture as a barrier. The waterfront was described as physically demanding and, at times, shaped by toughness, hierarchy, confrontation, and seniority. While the industry has clear strengths, including teamwork, resilience, direct communication, and operational expertise, employees may be less likely to ask for support if they feel it will be viewed negatively.

Built Environment
Employees identified some physical access barriers, particularly in older facilities and secure access areas. Examples included heavy self-closing doors, stairs, wet or slippery surfaces, and entry points designed primarily around security requirements. These barriers can be difficult for employees with mobility limitations, employees recovering from surgery, or employees dealing with temporary injuries.

Employees also noted that some accessible features are already in place, including accessible parking, washrooms, ramps, and automatic door openers in some locations. The opportunity is to review whether these features are consistent across sites and whether employees can move through the workplace safely and independently from arrival to departure.

Information and Communication Technologies
Digital tools were generally seen as useful, particularly for virtual meetings and training. However, employees noted that long virtual sessions, slide-heavy training, and passive video content can be difficult for some learning and attention needs.

Employers may want to consider more consistent use of captions, agendas, written follow-up, recordings or transcripts where appropriate, and accessible digital training materials. Clearer expectations around Teams and email may also help employees manage interruptions, response-time expectations, and focus time.

Communication, Other Than Information and Communication Technologies
Employees identified a need for clearer communication about accessibility supports. Information about accommodation, ergonomic support, EAP or counselling resources, and accessibility contacts should be easy to find and written in plain language.

Employees should also continue to hear that accessibility includes more than physical disability. This includes invisible disabilities, temporary and episodic disabilities, neurodivergence, mental health-related disabilities, chronic conditions, and recovery from injury or illness.

Employees appreciated being asked for feedback. Reporting back on accessibility improvements would help show that feedback is being used and would support trust in the process.

Procurement of Goods, Services and Facilities
Procurement did not come up as a standalone issue in the employee interviews. However, several findings have procurement implications. These include ergonomic equipment, accessible doors and access systems, accessible training tools, and counselling or employee support services that can meet a range of needs.

The accessibility audit tool can help employers consider accessibility earlier when purchasing goods, services, systems, and facilities, rather than addressing barriers after decisions have already been made.

Design and Delivery of Programs and Services
No specific barriers were identified in this area during the employee consultation. The feedback received related to employees' workplace experiences rather than customer-facing or client-facing programs and services.

Transportation
No specific transportation-related barriers were identified during the employee consultation. Comments about parking, exterior routes, entrances, and movement through worksites are reflected under the built environment section.

CONCLUSION

This plan demonstrates GCT'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 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. 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, 2SLBGTQ+ people, people with disabilities, and women.