

## ACCESSIBILITY POLICY

De Jong Enterprises Inc. & Parkview Customs Brokerage are firmly dedicated to promoting equitable access and participation for individuals with disabilities. Our companies are devoted to treating persons with disabilities in ways that respect their dignity and independence, and we firmly believe in fostering an inclusive environment. We are committed to addressing the challenges of accessibility barriers and ensuring that the needs of all individuals are met. To achieve this, we pledge to comply with the guidelines established in the *Accessible Canada Act* (the Act).

### POLICY

De Jong Enterprises Inc. & Parkview Customs Brokerage are dedicated to ensuring equal access in all aspects of our organizations for individuals with disabilities and fulfilling the requirements outlined in Part 3 of the Act. To achieve this, we will implement the following measures:

- The formation of an accessibility committee,
- The development of an accessibility plan, and
- The establishment of a comprehensive feedback mechanism.

De Jong Enterprises Inc. & Parkview Customs Brokerage also commits to:

- A comprehensive review of all programs, services, and new initiatives, ensuring they are fully accessible to all individuals; and
- Ensuring effective communication with persons with disabilities by providing accessible information and communication support tailored to the unique needs and circumstances of each individual.

As a private sector organization with 10-99 employees, De Jong Enterprises Inc. & Parkview Customs Brokerage will ensure that this accessibility plan is published on or before June 1, 2024. Subsequently, De Jong Enterprises Inc. & Parkview Customs Brokerage will publish and update this policy every three years.

Upon request De Jong Enterprises Inc. & Parkview Customs Brokerage will provide this policy in alternate formats, with the exception of braille and audio formats, within 20 days of the request. A request for this policy in either Braille or an audio format must be fulfilled within 45 days of the request.

### **Accessibility Committee**

De Jong Enterprises Inc. & Parkview Customs Brokerage recognize the importance of ensuring that accessibility committees represent the diversity of Canadians, including persons with disabilities and Indigenous representation, as outlined in the Act.

Where feasible,

- at least 50% of committee members will comprise
  - persons with disabilities or
  - represent disability-serving organizations.
- membership may also include individuals from both within and outside the organization to provide a range of perspectives and expertise.

## Accessibility Plan

The implementation of De Jong Enterprises Inc. & Parkview Customs Brokerage's accessibility plan will adhere to the following guiding principles:

- Every individual must be treated with dignity, respect, and equality.
- Every individual must have the same opportunity to lead the life they desire and are capable of.
- Every individual must be able to fully and equally participate in the company.
- Every individual must have meaningful choices and the freedom to make their own decisions, with appropriate support if necessary.
- All policies must consider and address the various barriers and forms of discrimination that exist.
- Persons with disabilities must be actively involved in the development and design of policies, programs, services, and structures.
- Accessibility standards and regulations must be created to achieve the highest level of accessibility for all individuals.

To fulfill its commitment to accessibility, De Jong Enterprises Inc. & Parkview Customs Brokerage will undertake the following actions:

1. **Prepare and publish accessibility plans:** The company and the accessibility committee will create accessibility plans that identify, remove, and prevent barriers in our policies, programs, practices, and services, with priority given to the most critical areas. These plans will be updated every three years or as necessary, and persons with disabilities will be consulted during the creation and update process. This plan will also cover key areas of accessibility, employment, built environment, technology, service, and culture.
2. **Set up a feedback process:** The company will establish a mechanism to receive and address feedback on accessibility to ensure that individuals with disabilities can voice their concerns or suggestions.
3. **Prepare and publish progress reports:** The company will regularly prepare and publish progress reports describing the actions taken to implement their accessibility plans. These reports will include information on feedback received and how it was taken into consideration. People with disabilities will also be consulted during the preparation of these reports.

The Accessibility Commissioner must be notified within 48 hours of the publication of these plans, processes, and reports.

## Employment

De Jong Enterprises Inc. & Parkview Customs Brokerage acknowledges that persons with disabilities represent a significant portion of the Canadian workforce. In support of this, De Jong Enterprises Inc. & Parkview Customs Brokerage are committed to enhancing the recruitment, retention, and promotion of employees with disabilities. The following initiatives have been identified to create a workplace that is inclusive and welcoming to job seekers with disabilities.

Objective	Short-Term Action	Medium-Term Action	Long-Term Action
Analyze and benchmark hiring, promotion, and retention rates for employees with disabilities.	<ul style="list-style-type: none"> <li>Continue quarterly analysis of employment equity data of our workforce to identify underrepresented occupational groups.</li> </ul>		
Make accessibility considerations part of the hiring and onboarding process	<ul style="list-style-type: none"> <li>Cover duty to accommodate and accommodation process for new employees during onboarding (rights and obligations).</li> </ul>	<ul style="list-style-type: none"> <li>Create a process to check in with new employees who self-identified with a disability at 1, 3, and 6 months post-hire to ensure their needs are met. Managers will be informed if additional tools are required.</li> </ul>	

### Built Environment

De Jong Enterprises Inc. & Parkview Customs Brokerage strives to make their work locations barrier-free for the full participation of employees with disabilities. The organization will ensure that all buildings meet the accessibility codes and standards. New barriers have been identified during consultations for the Accessibility Plan, which will soon conclude after five years of removing barriers and ensuring compliance.

Objective	Short Term Action	Medium Term Action	Long Term Action
Assess the feasibility of an accessible boardroom for employees with hearing disabilities.		<ul style="list-style-type: none"> <li>Assess the feasibility of an accessible boardroom for employees with hearing disabilities.</li> </ul>	
Explore the possibility of wider doors for mobility devices.		<ul style="list-style-type: none"> <li>Study door size for large wheelchairs.</li> </ul>	

### Culture, Education, and Awareness

De Jong Enterprises Inc. & Parkview Customs Brokerage recognizes the importance of a positive workplace culture and its impact on employee performance, job satisfaction, and engagement. The

companies are committed to creating a healthy and equitable workplace environment where employees are valued and have access to equitable employment opportunities and will establish a safe space where employees can freely express and advocate for themselves. To foster an inclusive and accessible workplace, the companies will focus on addressing awareness and attitudinal barriers through the following:

Objectives	Short-Term Actions	Medium-Term Actions	Long-Term Actions
Ensure all employees have accessibility knowledge and tools	<ul style="list-style-type: none"> <li>Post policies and procedures</li> <li>Expand Managers' toolkit</li> </ul>	<ul style="list-style-type: none"> <li>Provide a "library" of tools</li> </ul>	
Strengthen understanding of accessibility, empathy and respect for employees with disabilities	<ul style="list-style-type: none"> <li>Educate about invisible disabilities</li> </ul>	<ul style="list-style-type: none"> <li>Communicate quarterly on accessibility matters</li> </ul>	
Ensure events and meetings are accessible	<ul style="list-style-type: none"> <li>Prepare guidelines for accessible events/meetings</li> </ul>		

### Technologies

Making information and communication technologies accessible is crucial to enable everyone to interact with technology effectively. To achieve this, we must ensure accessibility for users with disabilities, injuries, or ergonomic needs. This will ensure equal participation and contributions to fulfilling the organization's mission. The following initiatives are proposed to achieve this at De Jong Enterprises Inc. & Parkview Customs Brokerage.

Objective	Short-term Action	Medium-term Action	Long-term Action
Ensure new systems meet accessibility and security standards. Integrate accessibility into the review process.			<ul style="list-style-type: none"> <li>Train technicians in accessibility, job accommodations, and adaptive technology,</li> <li>Provide hands-on support and accessibility evaluations for</li> </ul>

			applications and websites. <ul style="list-style-type: none"> <li>• Offer accessibility boot camps for application developers.</li> </ul>
Make software accessible		<ul style="list-style-type: none"> <li>• Ensure all software is WCAG 2.0 compliant and compatible with assistive technologies.</li> </ul>	
Update existing software for accessibility.		<ul style="list-style-type: none"> <li>• Consider accessibility gaps in current user-facing technologies when prioritizing software updates or replacements.</li> </ul>	

### Communication

Clear and direct communication benefits all audiences, and to achieve this, it's important to consider that people communicate in different ways, such as speech, writing, sign language, and pictures. To remove communication barriers and create a more inclusive environment, the following initiatives have been identified:

Objective	Short-term Action	Medium-term Action	Long-term Action
Use plain language in communications.		<ul style="list-style-type: none"> <li>• Launch a plain-language awareness campaign.</li> </ul>	
Make all communication accessible by default, both internal and external.	<ul style="list-style-type: none"> <li>• Include accessible document creation in onboarding and improve templates for briefing notes, presentations, agendas and other documents.</li> </ul>	<ul style="list-style-type: none"> <li>• Promote WCAG 2.0 compliant communication practices and provide training and support for creating accessible content.</li> <li>• Train current employees and provide tools and guidance for creating accessible internal and external documents.</li> </ul>	
Accessible intranet and internet sites.			<ul style="list-style-type: none"> <li>• Make intranet and internet sites accessible for all information posted.</li> </ul>

Services

De Jong Enterprises Inc. & Parkview Customs Brokerage are committed to ensuring barrier-free procurement by identifying and removing accessibility barriers in procurement requirements. To ensure inclusive and accessible services, accessibility criteria must be included in procurement requirements, and deliverables must incorporate accessibility features.

Objective	Short-term Action	Medium-term Action	Long-term Action
Ensure accessibility of the selection and purchase of goods and services	<ul style="list-style-type: none"> <li>Consult with employees with disabilities before choosing procurement furniture for common spaces.</li> </ul>		

**Feedback Mechanism**

De Jong Enterprises Inc. & Parkview Customs Brokerage aim to create a barrier-free workplace for all employees by implementing the plan developed by the company and the accessibility committee under the guidance of this policy and the Act.

Any employee who has concerns or requests regarding accessibility should contact Fllad Kraja/General Manager in charge, e.g., the accessibility committee representative by in person or emailing at [fkraja@dejong.com](mailto:fkraja@dejong.com) or calling at 519-602-2202 ext 261. Also, it is encouraged that this is brought up to our Health and Safety Committee members.

Requests for accessibility accommodation will be discussed between De Jong Enterprises Inc. & Parkview Customs Brokerage and the accessibility committee. Depending on the outcome of the discussion, the accessibility plan will be updated accordingly, and changes shall be communicated to every employee via emails, H&S bulleting board and quarterly employee meetings.

**Planning and Reporting Requirements**

As a federally regulated organization with 10 or more employees, De Jong Enterprises Inc. & Parkview Customs Brokerage is required to begin a planning and reporting cycle by preparing and publishing an initial accessibility plan on or before June 1, 2023.

This planning and reporting cycle will last three calendar years, with the following schedule:

- Year 1: publication of initial accessibility plan
- Years 2 and 3: Progress reports

De Jong Enterprises Inc. & Parkview Customs Brokerage will be required to begin a new publishing and reporting cycle following the completion of the first cycle. This subsequent cycle will begin with an updated accessibility plan followed by two progress reports.

De Jong Enterprises Inc. & Parkview Customs Brokerage will continue these planning and reporting cycles as long as the average number of employees does not fall below 10 in any subsequent year of the planning and reporting cycle.

## **Training**

De Jong Enterprises Inc. & Parkview Customs Brokerage are committed to providing regular accessibility training and education to all employees, ensuring that the training is accessible to everyone and that employees have the necessary tools to become accessibility-confident.

The initiatives include the following:

- Providing mandatory training on unconscious bias, accessibility, barriers, and inclusion to all managers, supervisors, team leaders, executives, and HR professionals,
- Offering training to reduce attitudinal barriers,
- Educating and providing support to managers on employees' performance evaluations,
- Providing training to all employees to improve the work environment for individuals with a disability, and making sign language training available to employees.

## **Review of Policy and Plans**

The accessibility policy and any associating accessibility plans shall be reviewed every three years, or when deemed necessary by De Jong Enterprises Inc. & Parkview Customs Brokerage and the accessibility committee.

## **Posted**

Our commitment to accessibility will be posted and available on the Health & Safety Bulletin Board.

## **Violations**

### Minor Violations

Examples of minor violations include:

- Not publishing an accessibility plan;
- Not having a feedback process;
- Not publishing progress reports; or
- Not consulting persons with disabilities when preparing an accessibility plan or a progress report.

### Serious violations

Examples of serious violations include:

- Not following an order from the Accessibility Commissioner to stop breaking the rules; or
- Not following an order from the Accessibility Commissioner to hand over records and information.

Very Serious Violations

Examples of very serious violations include:

- Lying to the Accessibility Commissioner; or
- Preventing the Accessibility Commissioner from doing their job.

Penalties for Violations

Penalty amounts are calculated based on a number of factors, whereby small businesses and individuals are fined lower amounts and large businesses and organizations are fined larger amounts.

Penalties for violations of the Accessible Canada Act are determined by

- The severity of the violation;
- The frequency of violations;
- The harm done by the violations;
- Whether the organization was acting carelessly;
- Whether the organization benefited from violating the Act; and
- Whether the organization assisted the Accessibility Commissioner with the investigation.

Paying a penalty fee within 15 days will decrease the penalty amount by 10%.

Penalties will be administered in accordance with the following chart.

Classification	1st Violation	2nd Violation	3rd Violation	4th+ Violation
Minor	\$500-\$5,000	\$5,000-\$12,500	\$12,500-\$25,000	\$25,000-\$37,000
Serious	\$5,000-\$12,500	\$12,500-\$25,000	\$25,000-\$50,000	\$50,000-\$75,000
Very Serious	\$12,500-\$25,000	\$25,000-\$50,000	\$50,000-\$75,000	\$75,000-\$125,000