

AVMAX ACCESSIBILITY PLAN

2024

Avmax Group Inc.
Avmax Aviation Services Inc.
Avmax Aircraft Leasing Inc.

Accessible Canada Act
Accessible Canada Regulations

GENERAL

The *Accessible Canada Act* (the “**Act**”) defines a **barrier** as:

"Anything – including anything physical, architectural, technological or attitudinal, anything that is based on information or communications or anything that is the result of a policy or a practice – that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation."

The ACA defines a **disability** as:

"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."

The Canadian federal government has committed to a barrier-free Canada by 2040 and has, through the Act and the Accessible Canada Regulations (the “**Regulations**”) mandated that federally-regulated entities comply with this commitment. As a federally-regulated entity, Avmax is committed to doing its part to achieve a barrier-free workplace in compliance with the Act and the Regulations, and this accessibility plan (the “**Plan**”) has been developed as part of Avmax’s compliance process.

Avmax has approximately 250 Canadian employees spread across five locations in Calgary, Alberta, plus locations in Winnipeg, Manitoba, and Vancouver, British Columbia.

This plan has been prepared in order to report on Avmax’s efforts to identify potential barriers, remove or mitigate those barriers, and prevent new barriers from arising.

How Employees, Clients and Members of the Public Can Contact Avmax

Employees, clients and members of the public can contact Avmax to request a copy of this plan, seek information on our feedback process, and provide feedback through any of the means identified below.

- hr@avmax.com
- legal@avmax.com
- Dwayne Dupuis, Senior Vice President, Human Resources and Corporate Services, dwayne.dupuis@avmax.com or
- Bruce Nysetvold, Senior Legal Counsel, bruce.nysetvold@avmax.com

Avmax has also established a confidential whistleblower hotline administered by a third party that can be accessed at:

- 1-866-921-6714
- Avmax.group@integritycounts.ca,
- <https://www.integritycounts.ca/org/Avmax.Group>

How Avmax Has Consulted With Persons With Disabilities

The Act and Regulations require Avmax to consult with persons with disabilities in developing this plan. To this end, Avmax identified two employees with self-declared disabilities and sought input and feedback on this plan and on Avmax's efforts to identify, remove, and prevent barriers. The consultation process resulted in improved communication and understanding by Avmax of the challenges faced by staff who experience barriers in the workplace, and the clarification of needs of persons with disabilities and how Avmax has responded, and continues to respond, to those needs.

Identifying Barriers at Avmax

The Act and Regulations require that Avmax identify, remove, and prevent new barriers in:

- Employment
- The built environment
- Information and communication technologies
- The procurement of goods, services and facilities
- The design and delivery of programs and services and
- Transportation

In 2016, Avmax rolled out an Employment Equity Plan (the "**EE Plan**") which broadly addressed employment equity issues at Avmax. The EE Plan calls for ongoing compliance monitoring and requires Avmax to periodically refresh the plan. Integral to the EE plan was a recognition of the need for an accessibility plan, which Avmax immediately began to formulate.

Later in 2016 Avmax rolled out its accessibility plan (the "**Accessibility Plan**") which identified various barriers and the steps Avmax planned to take to address those barriers. The Accessibility Plan identified barriers in employment, the built environment, and the delivery of programs and services. The Accessibility Plan has been followed, and most of the accessibility issues identified in it have been addressed. Avmax is actively engaged in

addressing the remaining accessibility issues. The Accessibility Plan is available to Avmax employees on Avmax's global network drive.

Every five years, Avmax administers an Employment Equity Census Survey (the "**Survey**") and asks all employees to participate. The Survey asks staff whether or not they consider themselves to be a person with a disability, and provides numerous examples of potential disabilities to encourage participation. Avmax's Human Resources group tracks the responses, and addresses any disabilities that require accommodations. In addition, all new hires are asked to complete the Survey and all results feed into the Accessibility Plan.

Employment

Most of the potential barriers to employment at Avmax have already been addressed. As part of Avmax's recruitment and onboarding processes, Avmax explicitly asks candidates and new hires if they require accommodations for disabilities. Avmax addresses such disabilities through things such as enhanced lighting, standing desks, selection of workspaces in appropriate and accessible locations, use of speech-to-text and text-to-speech applications, and so forth. Avmax seeks to foster an environment where staff with disabilities feel empowered to request accommodations for their needs.

Avmax has an accommodation policy (the "**Accommodation Policy**") that is part of the Employee Handbook, and is available to all employees on the Avmax network drive.

The Built Environment

As part of Avmax's Accessibility Plan, Avmax identified several examples of barriers in the built environment. Further to the Accessibility Plan, Avmax has

- increased handicapped parking stalls at facilities where they were inadequate
- made changes to washrooms to facilitate access by wheelchair users
- installed better lighting for both safety and to assist the visually impaired
- changed out doorknobs to facilitate access for people with limited grip-strength or muscle control

The Accessibility Plan is an evergreen document that requires review every three years. By its terms, the Accessibility Plan requires Avmax to determine if any new barriers have arisen since the last review, and to remove or mitigate those barriers as soon as practicable.

Information and Communication Technologies

Avmax has identified several potential barriers in information technology and communications. Avmax has implemented various technologies to facilitate

communications with persons facing these barriers. For example, Avmax has rolled out Microsoft Teams, which allows people to participate fully in individual and group meeting scenarios from remote locations (to address staff mobility issues and issues that may arise from physical access limitations), and which includes real-time speech-to-text capabilities (to address deafness and hard of hearing barriers).

Avmax continues to monitor its staff needs both formally through the Survey and onboarding processes, and informally through a culture of inclusiveness and awareness.

The Procurement of Goods, Services and Facilities

Avmax is actively monitoring its work environment for barriers and this includes all staff engaged in the procurement process. Avmax is also committed to ensuring that goods, services, and facilities procured by Avmax do not create new barriers or conflict with the company's success in identifying and removing or mitigating barriers in the past.

The Design and Delivery of Programs and Services

Avmax is aware of accessibility issues in the design and delivery of programs and services, and seeks to ensure that no barriers exist. Programs and services are provided using media that is accessible by visually impaired or hard-of-hearing employees.

Transportation

Avmax is not involved in the transportation of passengers, so potential barriers in transportation are only incidental to the work of Avmax's own staff. Avmax has ensured that there are sufficient handicapped parking spaces at each of its locations, and is committed to meeting any identified and requested accommodations.

Avmax Policies, Programs, Practices and Services to Eliminate and Prevent Barriers

As noted above, Avmax is actively engaged in identifying, eliminating, mitigating, and preventing barriers. These efforts are demonstrated through the Employment Equity Plan, the Accessibility Plan, the Employment Equity Survey, and the Accommodation Policy (discussed further below).

In addition, Avmax fosters a culture of openness that encourages employees to be open and honest in their identification of barriers, and where Avmax is keen to address those needs through barrier removal and accommodation.

Short-Term Accessibility Goals

Avmax has currently mitigated or removed all identified accessibility barriers. The short-term objective is to monitor potential and developing barriers and to respond promptly when barriers are identified. The Accommodation Policy explicitly outlines the responsibilities of the company, its supervisory personnel, and individual employees and applicants.

Long-Term Accessibility Goals

Avmax is committed to the ongoing identification and elimination or mitigation of barriers, and to maintaining and growing its culture of accessibility. This long-term cultural objective is to foster an environment where all workers and guests are encouraged to provide information and feedback regarding actual barriers and potential barriers, and actively participate with the company in removing or mitigating those barriers.

Available Resources at Avmax

In addition to the information provided herein, Avmax has established an Accommodation Policy which is available to all employees on the Avmax server as part of the Employee Policy Manual. The Accommodation Policy makes it clear that Avmax is obligated to:

- Identify and eliminate barriers
- Regularly review policies and practices
- Advise job applicants of their right to accommodation
- Provide accommodation in a timely, confidential, and sensitive manner

In addition, the Accommodation Policy specifies the roles of supervisors at Avmax:

- Foster an inclusive and accessible work environment
- Identify and eliminate barriers
- Deal with accommodation requests in a timely, confidential, and sensitive manner
- Working with staff to provide for their required accommodation
- Providing assistance and information on accommodation to staff
- Reaching out to people who may need accommodation but cannot or do not articulate the need

The Accommodation Policy also provides instruction to staff on how to seek and receive necessary accommodation, and makes it clear that requests for accommodation will not in any way prejudice an applicant's employment prospects, or an employee's job or advancement prospects.

Accessibility Training

As part of the onboarding process at Avmax, new hires are required to take policy training that includes training on the Employee Handbook, which includes the Accommodation Policy. This training ensures that new hires will be aware of the Accommodation Policy, will understand Avmax's commitment to complying with these obligations, will understand Avmax's obligations, and will be familiar with the role they can play in ensuring that Avmax is a barrier-free environment.

Accessibility and Avmax Culture

Accessibility culture begins at Avmax with the initial interview process. Avmax asks candidates to inform the company if they need accommodations in the interview process, and also makes it clear that a request for accommodation will not be a factor in the hiring decision. This is a benefit both parties: Candidates who may benefit from accommodations (such as wheelchair access) are immediately assured that Avmax is an accessible work environment that will accommodate their disabilities; and Avmax is able to collect information regarding candidates who, *ceteris paribus*, may help the company achieve its employment equity objectives. This culture of accommodation continues during the onboarding process (where employees are required to read the Employee Policy Manual, which includes the Accommodation Policy) and continues throughout the employment relationship with the assurance that Avmax and its supervisory staff are constantly vigilant in the identification and elimination of barriers.

CONSULTATIONS

In preparing this plan during early 2024, Avmax took information from our Employment Equity Census Survey and sought input from Human Resources to identify staff who had self-disclosed any disabilities. A representative from Legal Services sent an email to the identified individuals in which they were told of the need for this Plan and were given a brief summary of the company's needs. They were first asked if they were comfortable providing their input, and if an affirmative reply was received they were asked to describe their disability, what their accessibility experience was like at Avmax, whether there were any remaining barriers, and whether Avmax could do better at addressing their concerns. Given the small size of the Avmax workforce, this plan will not provide any specific details that might disclose the identities of the staff who were consulted. Feedback was reviewed by Human Resources and Legal Services to ensure compliance with the Act and Regulations.

In consulting with staff with accessibility issues, we discovered that some of our barrier elimination efforts were not known or understood. We were able to provide information to address these gaps, and the subsequent feedback was generally appreciated. We also discovered that we could make several small adjustments to specific work environments to eliminate or mitigate remaining accessibility barriers. The learnings from these consultations will form part of Avmax's biennial review of the Accessibility Plan.