

2024 ACCESSIBILITY PLAN

Walker's/Capital Group of Companies Limited
June 2024

Table of Contents

1. General	2
Executive Summary	2
Overview of Organization	2
Accessibility Statement of Commitment	2
How Information Was Gathered	3
Feedback Process	3
Alternative Formats	3
2. Areas Described Under the Accessible Canada Act	5
The Built Environment	5
Employment	6
Information and Communication Technologies (ICT)	7
Communication Other than ICT	9
Procurement of Goods, Services and Facilities	10
Design and Delivery of Programs and Services	10
Transportation	10
3. Training & Policy Development	10
Training Provisions	10
Training Schedule	11
Record of Training	11
Policy Development	11
4. Compliance Reporting	11
5. Communication & Public Awareness	11
6. Timeline	12
7. Definitions	12
Accessible, Accessibility, Accommodation, Barrier, Disability	12

1. General

Executive Summary

As a federally regulated employer, Walker's/Capital Group of Companies Limited ("Walker's/Capital Group of Companies", "Walker's/Capital Group", "WCG") is governed by the Accessible Canada Act and Regulations, with the goal of making Canada barrier-free by January 2040. This involves identifying, removing, and preventing any barriers for people with disabilities that arise because of where or how they work.

A smaller company with staff and facilities distributed over four locations, Walker's/Capital Group of Companies is using a multi-layered framework comprising the core management team with representatives at each location, an ongoing and open feedback process reaching employees and customers/external stakeholders, as well as input from additional relevant external sources to enable collaborative work across the company to develop, monitor and continually improve our Accessibility Plan as we identify, remove, and prevent barriers for persons with disabilities and to monitor progress to address legislated requirements.

Overview of Organization

Incorporated in 1996 and headquartered in Kingston, ON, Walker's/Capital Group of Companies provides household, commercial, and institutional relocation and related services to customers moving locally, within Canada, and around the world; additionally, WCG provides office installation services to commercial clients. Walker's/Capital Group of Companies is a member of United Van Lines Canada - one of Canada's Best Managed Companies, the Canadian Association of Movers, Installnet, and our local Chambers of Commerce. Our commitment to quality, safety and sustainability is rooted in our family values and our care for employees, partners, and customers, and the communities where they work and live.

Accessibility Statement of Commitment

Walker's/Capital Group of Companies is committed to ensuring equal access and participation for people with disabilities. We are committed to treating all people in a way that allows them to maintain their dignity and independence. We will do so by removing and preventing barriers to accessibility and by meeting our accessibility requirements under the Accessible Canada Act and Regulations and in alignment with our business practices, capabilities and values.

We will always consider the seven guiding principles during the decision-making process in the development of our accessibility plan as outlined in Section 6 of the Accessible Canada Act:

1. all persons must be treated with dignity regardless of their disabilities;
2. all persons must have the same opportunity to make for themselves the lives that they are able and wish to have regardless of their disabilities;
3. all persons must have barrier-free access to full and equal participation in society, regardless of their disabilities;
4. all persons must have meaningful options and be free to make their own choices, with support if they desire, regardless of their disabilities;
5. laws, policies, programs, services and structures must take into account the disabilities of persons, the different ways that persons interact with their environments and the multiple and intersecting forms of marginalization and discrimination faced by persons;

6. persons with disabilities must be involved in the development and design of laws, policies, programs, services and structures; and
7. the development and revision of accessibility standards and the making of regulations must be done with the objective of achieving the highest level of accessibility for persons with disabilities.

How Information Was Gathered

A small group of stakeholders within Walker's/Capital Group was appointed to understand the Accessible Canada Act and Regulations and how their respective areas of the business need to comply. A list of barriers in each of their areas was subsequently compiled.

The four locations assessed (Kingston, Trenton, Deep River, and Ottawa ON) include various settings such as offices, warehouses, yards (including parking areas), and various common spaces (e.g. washrooms, dispatch areas, locker rooms). External consultants, e.g. [Abilities to Work](#), may be engaged as we progress through the accessibility process to help identify, prevent, and overcome barriers. This report identifies barriers and indicates solutions at a level that treats our locations and operations more collectively. A refinement of assessment and required actions is anticipated as we take further actions to reduce then remove identified barriers.

All employees were offered the opportunity to provide input and to be a part of ongoing input as Walker's/Capital Group works towards becoming barrier-free. Public stakeholders were solicited for feedback and input as well.

Feedback Process

To request the Walker's/Capital Group Accessibility Plan in an alternate format (print, large print, braille or audio) or to provide feedback on our Accessibility Plan, please contact:

Human Resources/Accessibility Working Group, Walker's/Capital Group of Companies Limited
email: aca@walkerscapitalgroup.ca; telephone: 613-546-3621x231

We welcome inquiries and feedback on the barriers experienced when dealing with Walker's/Capital Group or feedback that will help to inform our future accessibility action plans. Feedback and inquiries will be reviewed with relevant members of the Walker's/Capital Group team in a timeframe consistent with the requirements under the Accessible Canada Act and Regulations. All questions and feedback will be acknowledged in the same format it was received.

Alternative Formats

You can request [alternative formats](#) of this Accessibility Plan by contacting: aca@walkerscapitalgroup.ca. An electronic version of this Accessibility Plan can be downloaded immediately from our website.

Walker's/Capital Group will provide alternative formats as soon as possible. We commit to providing them as soon as possible and not exceeding these timelines:

- Print & Large print (larger text), Electronic: 20 days
- Braille (a system of raised dots that people who are blind or with low vision can read with

- their fingers): 45 days
- Audio (a recording of someone reading the text out loud): 45 days

2. Areas Described Under the Accessible Canada Act

The Built Environment

Walker's/Capital Group is a multi-faceted service business in the transportation and warehousing sector, responsible for planning, resourcing, coordinating, and facilitating/executing the movement (receipt and delivery) of household/institutional/commercial/office customers' goods and effects locally, intra- and inter-provincially, and internationally. Walker's/Capital Group operates at four locations in Ontario - three of which are owned, and one of which is leased, including offices, warehouses, and yards.

All Walker's/Capital Group locations should be accessible for employees, drivers, owner-operators, customers, suppliers/partners as appropriate and the public.

Barriers:

Parking Areas and Ramps

- Not all Walker's/Capital Group locations have designated accessible parking spaces, and those locations with designated spaces do not meet all the accessible parking standards.

Entrances, Corridors, Ramps

- Several locations have ramps, entrances, internal doorways, and corridors that are not fully accessible. Some locations require signage, grip flooring, automatic door openers, small ramps, or other minor adjustments. Others require renovations to accommodate larger and barrier-free spaces.

Common Areas

- Lighting improvements are required in some areas of our facilities. On review, a number of common areas in the Walker's/Capital Group network – including washroom and lunchroom facilities – are not accessible (e.g. do not have grab bars, lower toilet seats, sinks, and counter areas).

Signage

- Signage at Walker's/Capital Group locations varies and must be evaluated and updated to meet accessibility needs.

Environmental

- By removing snow and ice in a timely manner, we can ensure all individuals are best able to access Walker's/Capital Group's locations.

Next steps:

Build an action plan and project scope with timelines to remove the above-noted barriers. Prioritize projects based on anticipated need, frequency of use, and intrusion of barrier in daily experience of users. Continue to evaluate, identify, remove, and prevent other barriers within the Built Environment.

Employment

Walker's/Capital Group will ensure that people with disabilities have opportunities to participate in all aspects of employment to the fullest extent possible.

Barriers:

Recruitment

Recruitment processes that ensure people with disabilities experience no adverse impact in the process.

- **Role Requirements** – Review role requirements to ensure all physical, cognitive and sensory elements are identified and where accommodations are evident, clearly outline and communicate to candidates.
- **Candidate Experience** Review language in job postings and application processes for reading comprehension level and jargon and to ensure people with disabilities are represented in job postings. Implement plain language approaches to written communication wherever possible.
- **Application Process** - Pressure test job application requirements to determine a barrier-free way to review experience and applicant skills with job requirements and development of barrier-free interview questions and rating scale.
- **Interview Accommodation** – Review current practices to provide accommodation for interviews. Include a statement on job postings and subsequent communications indicating the company's willingness to accommodate.

Workplace and Ergonomics

Ensure that the needs of people with disabilities is a part of workplace set up and that the tools and resources that exist for all employees are to meet ergonomic needs.

- **Workplace set-up** – Review current workplace design by location type and evaluate where physical tools, supports and resources are required to meet the needs of people with disabilities.

Training

Training and Development design, content and deployment includes a DEI perspective as one of its key foundational principles.

- **People Leader Competence** - Mandatory training to improve knowledge around disabilities and barriers and to drive a culture of inclusion. Included is the Accommodation process and coaching tools for People Leaders and all employees to allow for open conversation about barriers and needs.
- **Development and Deployment of Training** – Review training delivery methods to ensure they meet the needs of people with disabilities.
- **Awareness of issues critical to People with Disabilities** – Establish training to increase awareness with our employees, drivers, owner operators, customers and

partners to support a culture of inclusion with particular focus on the needs of those with disabilities.

Inclusion of People with Disabilities

Support culture of inclusion at WCG by including input from people with disabilities in our organization in policy and program design.

- **Platform/Process to hear from people with disabilities** – Leveraging employee feedback and external consultation, ensure that the voices of people with disabilities are represented in policies, practices and programs that affect our team members. Maintain ongoing feedback opportunities to inform and direct the action items stemming from this plan.

Talent Processes

Talent processes that are transparent, consistent and allow for 2-way communication.

- **Clear and Objective Performance Measures** – Ensure that performance measurements and objectives are understood, and that any accommodation is embedded into the success criteria for the individual. Maintaining open/two-way communication to support employee success.

Next steps:

Build an action plan and timelines to remediate these barriers; prioritize areas of greatest need/frequency of use. Continue to identify, remove and prevent additional barriers.

Information and Communication Technologies (ICT)

There are many tools and resources available to support people with disabilities with their use of technology for personal and work purposes. We are continuously evolving to ensure we meet Web Content Accessibility Guidelines standards and overcome any accessibility barriers.

Barriers:

IT Accessibility Features Communication and Education

- **IT Support and Marketing (e.g. websites) service providers may have/have limited experience with supporting and troubleshooting accessibility options.** Review with IT service providers and Marketing service providers to identify opportunities to develop greater knowledge/expertise of accessibility options for users with disabilities.
- **Individuals aren't aware of accessibility features available at Walker's/Capital Group for in- person and remote meeting resources. The need to request accessibility features also limits the ability of employees and guests with disabilities to use them.** Develop internal knowledge, training, and communication around this topic to support seamless integration of features.

Hardware and Equipment

- **Most people do not know about accessibility features and technology available in operations devices. The need to request accessibility features in operations devices and how to request them can limit use, involvement, and contribution.** When accessibility features in Walker's/Capital Group's operations devices are better equipped, well known and available, users will be able to interact with Walker's/Capital Group with technology accessibility features readily available.
- **Existing shared IT infrastructure (e.g. printers) may not be accessible for users with disabilities.** Floor model printers and other equipment may be too high so the control panel may not be accessible. More accessible locations and new equipment that is accessible will eliminate this barrier.

Software and Applications

- **Individuals don't know accessibility features available on internal systems and applications, and the need for individuals to request internal systems accessibility features be turned on is limiting.** When internal applications accessibility features are made available and are more well known by all individuals, they will be better able to utilize the resources.
- **The methods to log an IT or Support request need to support accessibility features.** Existing options rely on limited interface options with limited information available on how to implement available supportive features to enable wider access. This could slow down access to report an urgent or critical issue/incident.
- **Communication tools do not allow enhancement for hearing challenges.** Lack of closed captioning can inhibit the ability to actively participate in communication channels.
- **Lack of clear direction when inputs are required from users in Software.** Software/Applications should be able to provide direction; the instruction should be clear and able to view for the user - with alternatives than text instruction to orally communicate instruction to the user.
- **Software systems should permit alternatives to mouse navigation.** Users may experience accessibility issues with using a mouse as an input device. These users need the ability to navigate software systems with their keyboard input / other accessibility friendly devices.
- **Cloud software with no enhanced interface for visually impaired.** Software providers could provide more robust accommodation of people who require options to interface with systems to allow people with visual impairment to interact with Walker's/Capital Group in a barrier-free environment.
- **AI systems - e.g. grammar checks in Google - may present ability biases in their results.** Users should be informed and vigilant to critically assess the content of AI generated results when using for communication/information.

Next steps:

Build an action plan and timelines to remediate these barriers. Prioritize projects based on anticipated need, frequency of use, intrusion of barrier in daily experience of users. Continue to identify, remove, and prevent additional barriers.

Communication Other than ICT

Barriers

Accessible Walker's/Capital Group's Websites and Intranet Page (ADP)

- The Walker's/Capital Group's websites and customer service channels could benefit from additional accessible technology. While some platforms have existing enhancements, these have not been fully utilized/applied. Customers may be unaware of the accessibility features currently available. It may be difficult for the public and customers to know where and how to find information about the company's accessibility status, including services, locations, employment, etc. For employees, it could also be difficult to know where and how to find information about accessible resources within the company.

Accessibility Features of Software and Equipment

- Much of the company's current software either does not have accessibility features or such features are not well understood by employees. Employees need to be aware of the availability of the resources to make the best use of them and to be empowered to do their best as employees.

Accessibility of Internal Documents and Templates

- Communication of information is not consistently accessible for internal audiences. Some corporate communication channels and documents are developed and shared in inaccessible formats or contain inaccessible elements. Many internal documents and templates are not currently accessible via screen reader.

Accessibility of External Documents and Publications (including Accessibility Plan and Updates)

- The communication of information is not consistently accessible for internal audiences. Walker's/Capital Group will produce the Accessibility Plan in Braille, audio, and large print format within timeframes outlined in the Accessible Canada Act. Other external-facing documents and forms must be assessed to evaluate ways to improve accessibility.

Feedback Related to Accessibility

- Customers, employees, and the public need to have a means to provide feedback related to Accessibility at Walker's/Capital Group, anonymously or otherwise, including at Walker's/Capital Group's facilities, communication, information technology, employment, procurement, design and delivery of programs and services, or transportation. Webforms and in person communication have been used to date (please see Feedback Process section) however WCG is aware that even in this endeavour, there are accessibility concerns (access to the means to provide feedback).

Procurement of Goods, Services and Facilities

People with disabilities may face barriers when inquiring about or engaging with Walker's/Capital Group for the procurement or supply of goods, services and facilities. The desired state is for Walker's/Capital Group to make it standard practice to consider accessibility at the early stages of procurement or supply of all goods, services, and facilities to help prevent barriers. It will also be important for procurement processes to include a statement of expectations from vendors and to ensure accessible equipment and tools are available from suppliers in a timely manner.

Design and Delivery of Programs and Services

The identification of barriers under any of our programs and services for customers and employees fall under other pillars of the Accessible Canada Act and Regulations, such as Employment for employee services and Information and Communication Technologies for both employees and customers. As new programs and services are developed, external partners and internal employees with disabilities will be engaged to review and prevent barriers.

As many of our services are delivered at customer sites (e.g. customers' homes or offices), there is additional assessment indicated here to determine (i) how our staff meet the needs and respect the dignity of persons with disabilities as we engage with them as service providers on their own premises and (ii) how our staff may be supported in environments that are not directly within our control.

Transportation

This "transportation" subheading applies to other federally regulated businesses (such as telecommunications providers) and not only to transportation providers. Walker's/Capital Group does not provide transportation services to the public or to employees. Based on our understanding, accessible transportation does not apply.

3. Training & Policy Development

To support the effective, practical, and ongoing observation of the requirements of the Accessibility Canada Act as we continue to progress with our plan and to remove barriers in the areas outlined in Section 2, training and education of leadership and staff at all levels will be essential.

As a result, training will be provided to:

All employees (including summer staff) that act on behalf of Walker's/Capital Group of Companies.

Training Provisions

As reflected in Ontario Regulation 429/07 and Accessibility Canada Act, regardless of the format, training will cover the following:

- A review of the purpose of the Accessible Canada Act and Accessibility for Ontarians with Disabilities Act, 2005.
- A review of the requirements of the Accessibility Standards for Customer Service, Ontario Regulation 429/07 and Accessibility Canada Act.
- Instructions on how to interact and communicate with people with various types of disabilities.
- Instructions on how to interact with people with disabilities who:
 - Use assistive devices;
 - Require the assistance of a guide dog, service dog or other service animal; or
 - Require the use of a support person
- Instructions on what to do if a person with a disability is having difficulty accessing your services.
- Walker's/Capital Group of Companies' policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

Training Schedule

Walker's/Capital Group will provide training as soon as reasonably possible and in compliance with governing legislation. Revised training will be provided in the event of changes to legislation, procedures and/or practices, and updates to our facilities and systems as may result from the action items stemming from Section 2.

Record of Training

Walker's/Capital Group will keep a record of training that includes the dates training was provided and the number of employees who attended the training.

Policy Development

Company policy will be further developed, as soon as reasonably possible, to reflect the content and processes outlined in this plan, and may be amended from time to time as required in the event of changes to legislation, procedures and/or practices, and updates to our facilities and systems as may result from the action items stemming from Section 2 of this plan.

4. Compliance Reporting

We will maintain records of our accessibility initiatives and compliance efforts as required by the Accessible Canada Act. These records will include training documentation, accessibility audits, feedback received, and any corrective actions taken. We will also provide an annual accessibility report, outlining our progress, challenges, and future goals.

5. Communication & Public Awareness

We will actively communicate our accessibility policies, initiatives, and progress to the public through our website, social media channels, and other relevant platforms. This will help raise awareness and promote a culture of accessibility within our company.

6. Timeline

We will aim to implement this accessibility plan in a timely manner, considering the size of our organization and resources available for this initiative.

7. Definitions

Accessible, Accessibility, Accommodation, Barrier, Disability

Accessible: a place that is easily reached, an environment that is easily navigated, a program or service that can be easily used or obtained, script that is easily understood, technology that is useable for all. This includes areas or aspects of the environment that have been adapted for use by people with disabilities.

Accessibility: a combination of factors that influence a person's ability to function within an environment regardless of disability; equal access to society for everyone.

Accommodation: the modification of a work environment for an employee who is ill, injured, or has a disability so they can perform job functions safely and efficiently.

Barrier: 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.

Disability: any impairment, including a physical, mental, intellectual, cognitive, learning, communication, or sensory impairment—or a functional limitation—whether permanent, temporary, or episodic in nature, evident or not, that, in interaction with a barrier, hinders a person's full and equal participation in society.