



Canada – Accessibility Plan

**PRIMEFLIGHT AVIATION SERVICES & ITS NETWORK OF
COMPANIES**

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1. GENERAL

1.1. OUR MISSION

Our mission is to create value for all stakeholders through our unwavering commitment to positively IMPACT our customers, employees, the environment, and the communities we serve.

We are committed to the inclusion of employees, customers and others of diverse abilities, and to treating everyone in a way that allows them to maintain their dignity and independence.

We have prepared our Plan as contemplated by the Accessible Canada Act and taking our obligations under the Canada Transportation Act into account. We will be guided by these in the implementation of our Plan.

1.2. OUR COMMITMENT

PrimeFlight Canada acknowledges its responsibility and is thoroughly committed to complete compliance with the Canadian Human Rights Act (“CHRA”), Employment Equity Act (“EEA”), Accessible Canada Act (“ACA”), and other federal, provincial, and local laws designed to ensure accessibility and accommodation for persons with disabilities.

PrimeFlight Canada does not discriminate in employment against qualified individuals on the basis of a disability and understands its obligation to make reasonable accommodation for individuals with physical or mental impairments that qualify as a disability under applicable legislation unless the accommodation would impose an undue hardship on the Company.

1.3. SOME OF THE THINGS WE’VE DONE AND WILL CONTINUE TO DO

We have acted on our commitment to accessibility for many years. Our own achievements include:

We work with international, industry or accessibility organizations, airline and airport operators, and safety regulators to develop safe solutions that reduce barriers to air travel.

We aim to help improve and promote consistent standards, which is a key part of improving accessibility in air travel.

1.4. ABOUT THE AIR TRANSPORTATION SYSTEM

Air travel requires the close collaboration of multiple stakeholders, including airport authorities, airlines, ground and baggage handlers, customs and security agencies, and aircraft manufacturers. Each plays a critical role in the complex global ecosystem that makes up air travel. Companies like PrimeFlight Aviation Services are among many such participants who must work together to deliver end-to-end dignified and safe air travel.

Improved accessibility therefore often requires industry-wide changes and broad collaboration. Their feasibility and timing are dependent on many factors, including operational or financial considerations and safety regulations, some of which are outside the control of any single participant in our industry. These may include design, manufacturing or supply chain issues, safety considerations, testing and other regulatory requirements, and technological limitations.

Our employees must also work in this ecosystem performing a broad range of physically and cognitively demanding tasks.

2. PLANNING

2.1. PLAN DEVELOPMENT

PrimeFlight Canada's plan was developed according to regulatory requirements and based on information from other industry leaders.

2.2. WHAT WE WILL DO NEXT

We are committed to ongoing consultations during the reporting cycle and to actively seeking feedback from the public, our customers, various organizations, and our employees to establish priority areas.

This will include;

- Consultations with the Diverse Abilities ERG and other ERGs within PrimeFlight.
- Strengthening existing partnerships with community-based organizations focused on building an inclusive labour force and promoting workplace accessibility.
- Enhancing our customer feedback channels and metrics, and actively soliciting feedback to elevate the customer experience.

We will publish annual reports under the Accessible Canada Act which will include updates on our Plan and our progress towards achieving our accessibility goals.

3. KEY AREAS

Our Plan reflects barriers experienced by persons with disabilities identified as part of our consultations with industry leaders and details the strategies and actions we will take to identify, prevent and remove them, or to assess what needs to be done to meet that goal. These will unfold in three phases:

- Ongoing
- Near-term actions
- Long-term actions

4. DESIGN & DELIVERY OF PROGRAMS AND SERVICES

Our customers' journeys involve many phases, such as booking a reservation, getting from the check-in counter through the airport to the gate, getting on and off the aircraft, and traveling on the aircraft.

PrimeFlight has several policies and processes in place to facilitate our customers' journeys throughout these phases, supported by significant accessibility training for our employees.

4.1. IDENTIFIED BARRIERS

Customers

Need for additional training for our employees to enhance certain services, including their delivery, such as boarding and deplaning assistance, safe handling of mobility aids, and individualized briefings to customers managing vision or hearing issues.

Employees

Importance of making information accessible during each phase of the employment journey, from candidacy, to hire, and throughout the employment relationship.

Opportunities to improve awareness of barriers during the employment process, to create a better understanding of the value of workplace accommodations, and to adapt programs and services to employees with diverse needs.

4.2. ACTIONS AND TIMELINES

4.2.1.1. ONGOING

- Significant initial and recurrent accessibility training to our customer-facing employees.
- Accessibility training to all employees who make decisions or develop policies or procedures related to accessibility.
- Training and support to management employees on workplace accommodations.

4.2.2. NEAR-TERM

Customers

- Assess current equipment and available options to help with transferring customers with disabilities to/from aircraft seats in customer aircraft.
- Reinforce awareness and continued implementation of our internal accessibility policies.
- Identify and empower accessibility champions within PrimeFlight departments.
- Assess ways to promote employee awareness regarding accessibility.

Employees

- Provide tailored unconscious bias training to all internal recruiters.
- Streamline workplace accommodation requests through appropriate channels.
- Mandatory training on the workplace accommodation process to all management employees.

4.2.3. LONG TERM

Customers

- Enhanced training to customer-facing employees, management, and enhanced hands-on training to employees providing physical assistance and safe handling of mobility aids.
- Improve the transfer of customers with disabilities to/from aircraft seats in customer aircraft and the safe transportation of their mobility aids.
- Analyze accessibility compliance results and assess for potential policy improvements.

Employees

- Implement recurrent workplace accommodation training for employees.
- Promote awareness of existing policies and procedures.

5. TRANSPORTATION

PrimeFlight has a wide variety of accessibility-related interactions with our customers throughout their journey. They review information on airline websites, book reservations, engage at the check-in counter and the gate, get on and off one or more aircraft, and travel with potentially multiple airlines.

5.1. IDENTIFIED BARRIERS

- Efficiency and comfort of mobility and guidance assistance through airports.
- Facilitating advance, dignified and safe boarding for customers with disabilities, including quicker and simpler transfers from mobility aids to and from aircraft seats.
- Safely transporting mobility aids.
- Standardizing acceptance process of service dogs, including owner-trained service dogs.

5.2. ACTIONS AND TIMELINES

5.2.1. ONGOING

- Continue to implement practices to improve the safe handling of mobility aids during transportation by keeping them fixed and isolated from baggage wherever possible.

5.2.2. NEAR-TERM

- Assess and analyze improvements to the process for resolution of damaged/delayed mobility aids.
- Implement, where feasible, new guidance published by IATA's Mobility Aids Action Group for airlines and handling agents on the safe and coordinated transport of mobility aids and improve the travel experience for customers traveling with mobility aids.

5.2.3. LONG TERM

- Engage with airport authorities to improve facilities and comfort of waiting areas before security at Canadian airports.
- Engage with airport authorities to assess the establishment of waiting areas after security at Canadian airports.
- Assess how to reduce wait times and number of transfers during mobility and guidance assistance at airports.
- Enhance customer independence while still receiving assistance based on their needs and preferences.
- Improve, where feasible, the efficiency and availability of preboarding processes and transfer methods for customers with disabilities.

6. BUILT ENVIRONMENT

PrimeFlight's built environment is wide-ranging, including office buildings, aircraft hangars, and airport terminals.

6.1. IDENTIFIED BARRIERS

Customers

- Mobility and guidance assistance through airports.
- Additional accessibility features to help independently and comfortably navigate through the airport, particularly over long distances, or to manage sensory/information overload.

Employees

- Not all owned or operated spaces and built environments meet recent accessibility standards due to the age and/or design of buildings/environment.

6.2. ACTIONS AND TIMELINES

6.2.1. ONGOING

Engage with airport authorities and other stakeholders to ensure that adequate mobility and guidance assistance is provided through the airport segment of the customer's journey.

6.2.2. NEAR-TERM

Customers

- Engage and work with airport authorities, CATSA and CBSA to assess and develop possible improvements to the process of receiving mobility or guidance assistance in the airports.
- Engage and work with airport authorities to explore possible enhancements to independent navigation.

- Engage and work with airport authorities to ensure availability of service dog relief areas after security.
- Engage and work with airport authorities to identify possible tailored spaces that can accommodate customers with disabilities related to sensory/information processing.

Employees

- Improve employee awareness about existing emergency procedures to assist employees with disabilities and include specific sections for employees with disabilities.

6.2.3. LONG TERM

Customers

- Assess and analyze possible built environment changes that would improve assistance through airports, in consultation with airport authorities, CATSA and CBSA.

Employees

- Conduct built environment audits.
- Establish and prioritise a list of built environment improvements.
- Assess the availability of emergency procedures in accessible formats and how to provide or improve them.

7. EMPLOYMENT

As of December 31, 2024, Prime Flight Aviation Services Canada had 689 employees.

PrimeFlight is committed to diversity, equity and inclusion and aims to create a healthy, accessible, and rewarding work environment which highlights and respects employees' unique contributions to our company's success. Key policies are interwoven to ensure a workplace where employees are confident that they have the right to equal treatment and a harassment-free environment.

7.1. IDENTIFIED BARRIERS

- Uneven awareness of workplace accommodation processes.
- Uneven communication to candidates about our commitment around appropriate accommodations.
- Incomplete job descriptions about our responsibilities or requirements to allow reasonable accommodations and how to seek one.
- Training formats that could be improved.

7.2. ACTIONS AND TIMELINES

7.2.1. ONGOING

- De-stigmatizing disability in the workplace:
- Unconscious bias training for PrimeFlight talent recruiters.
- Training on micro-aggressions and allyship for all employees.

7.2.2. NEAR-TERM

- Launch a new mandatory Workplace Accommodation training module for management employees explaining the Employee Accommodation Policy and the roles and responsibilities of all stakeholders.
- Develop department and team-specific accommodation processes so that the process remains consistent, yet relevant to each department/team.

7.2.3. LONG TERM

- Work to promote accessibility as integral to the employment experience from job application, hire, career development, to end of employment.
- Promote de-stigmatization of disability such that decisions, policies, and procedures integrate accessibility as the normal course of business.
- Visit work locations to provide in-person training on the accommodation process.
- Develop workplace accommodation training for front-line employees.
- Assess how to provide accessible training across multiple locations, training types, and formats.

8. INFORMATION AND COMMUNICATION TECHNOLOGIES (ICT)

8.1. IDENTIFIED BARRIERS

Customers

- Airline websites and apps are sometimes not easily usable by customers who call on assistive technology or who are neurodivergent.
- Airline baggage tags can be difficult to read for customers managing vision issues.
- Airport baggage carousel information is not always accessible.

8.2. ACTIONS AND TIMELINES

8.2.1. ONGOING

Customers

- Engage with airlines and terminal operators to improve communication systems.

8.2.2. NEAR-TERM

Customers

- Engage with airlines and terminal operators to improve communication systems.

8.2.1. LONG TERM

Customers

- Engage with airlines and terminal operators to improve communication systems.

9. COMMUNICATION (OTHER THAN ICT)

9.1. IDENTIFIED BARRIERS

Customers

- Not all agents sufficiently aware of accessibility policies and service offerings for customers with disabilities.

Employees

- Sign language, captioning and accessibility tools are not available for meetings and events.

9.2. ACTIONS AND TIMELINES

9.2.1. ONGOING

Customers

- Continue to provide guidance and accommodations through our Medical Assistance Desk, a long-standing service specialized in assisting customers with disabilities.
- Continue communications that take into account the disability of customers with disabilities in a variety of ways, including through accessibility services on our website, our Medical Assistance Desk, providing alternate forms of documents, and making accessible gate and boarding announcements.

Employees

Automated closed captions are enabled for employee meetings held on Microsoft Teams and Zoom. Air Canada provides sign language interpreters during interviews, training, and meetings, on request.

9.2.2. NEAR-TERM

Customers

- Engage with airlines and terminal operators to determine methods of communication improvement.

Employees

- Examine how to make meetings, townhalls, and employee events more accessible.
- Develop a toolkit for how to hold accessible and inclusive meetings.

9.2.3. LONG TERM

Customers

- Engage with airlines and terminal operators to determine methods of communication improvement.

Employees

- Assess how to make communication with employees more accessible.
- Assess the feasibility of providing sign language training for teams where employees who are deaf or managing hearing issues work.

10. PROCUREMENT OF GOODS, SERVICES AND FACILITIES

PrimeFlight has multiple suppliers, for everything from aircraft cleaning supplies to equipment maintenance.

We seek to ensure our procurement practices address accessibility procurement barriers and encourage the use of suppliers who are part of our supplier diversity program. We communicate our accessibility expectations and requirements to new and existing suppliers.

10.1. IDENTIFIED BARRIERS

Existing procurement practices and suppliers may not consistently meet accessibility requirements.

10.2. ACTIONS AND TIMELINES

10.2.1. ONGOING

- Continue to evaluate current procurement policies, processes, and tools to improve accessibility.

- Continue to embed digital accessibility requirements in requests for proposals and contracts.

10.2.2. NEAR-TERM

- Identify suppliers who can provide accessibility services (for example, plain language writers/editors/translators, Braille, digital, audio, captioning, descriptive video, and sign language interpretation).
- Assess and analyze new opportunities to embed accessibility requirements in requests for proposals and contracts.

10.2.3. LONG TERM

- Engage with airport authorities, security, and customs in Canada to identify opportunities for synergies in accessible sourcing.

11. CONCLUSION

PrimeFlight Canada is committed to removing barriers and advancing accessibility in travel throughout airport terminals and employment. We are committed to delivering on the goals set out in our Plan, to collaborating with all stakeholders within the aviation ecosystem towards a more accessible air travel experience, and to listening to our customers and employees.

We will publish an updated Accessibility Plan every three years and communicate updates on our progress every year until then.

12. CONTACT US

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