

# Mill Creek

## 2024–26 Accessibility Plan

### General

#### Executive summary

At Mill Creek Motor Freight Ltd. (hereinafter Mill Creek), our commitment to accessibility is rooted in our values, which guide us to include everyone. Our efforts to achieve accessibility are deeply connected to, and mutually reinforced by:

- Mill Creek’s priorities, including ongoing work in support of equity, diversity, and inclusion.
- legislation, such as the *Canadian Human Rights Act*, the *Canadian Charter of Rights and Freedoms*, the *Canadian Labour Code*, and the *Employment Equity Act*

We recognize that accessibility is an ongoing and central element of being an inclusive organization. That’s why the plan we’ve developed to continue improving our accessibility builds on our inclusive mindset and practices.

Through the plan’s development we identified barriers and actions to improve accessibility in six of the seven priority areas under the *Accessible Canada Act*. We have also looked to leading practices from other organizations and consulted with Trucking HR Canada to help identify other opportunities for improvement.

While this is Mill Creek’s first formal accessibility plan, it builds on previous investments and successes. These include:

- improvements to the accessibility of our website and technology platforms and learning opportunities.
- the increased focus on mental health awareness, and support as well as mental health first aid training for key leaders.
- restructuring of physical workspace to remove the need to have permanent workstations on the upper floor.

Change takes time, and this plan will guide us in our efforts to improve accessibility over the next three years.

## Our accessibility vision statement

Mill Creek Motor Freight Ltd. is accessible to all employees and Canadians, including persons with disabilities. We value the contributions individuals with disabilities bring to our culture, workplace, and communities.

## Your input

Our commitment to inclusion and accessibility incorporates a feedback process so that employees and members of the public can share their ideas and input with us. To provide feedback on accessibility, use one of the contact methods below. If you require support while providing feedback, let us know, and we will do our best to meet your needs. If you provide your contact information, we are committed to responding to your feedback in a timely manner and in the format that we receive it. You may also choose to provide feedback anonymously.

Contact: Human Resources  
101 Earl Thompson Rd, Ayr ON  
[KTGHR@Kriskagroup.com](mailto:KTGHR@Kriskagroup.com)  
800-265-7868 x3686

## Reporting on our plan

As required by the *Accessible Canada Act*, we will publish a status report every year that shows our progress against our commitments. We will review and update our accessibility plan **every three** years. We will also measure our overall progress and how the plan influences the culture and experiences of our organization.

The *Accessible Canada Act* includes seven principles.

- Everyone must be treated with dignity.
- Everyone must have the same opportunity to make for themselves the life they are able and wish to have.
- Everyone must be able to participate fully and equally in society.
- Everyone must have meaningful options and be free to make their own choices, with support if they desire.
- Laws, policies, programs, services, and structures must take into account the ways that different kinds of barriers and discrimination intersect.
- Persons with disabilities must be involved in the development and design of laws, policies, programs, services, and structures.
- Accessibility standards and regulations must be made with the goal of achieving the highest level of accessibility.

# Addressing areas identified in the *Accessible Canada Act*

Mill Creek identified barriers in six of the seven areas identified in the Act, as well as actions to address them.

## 1. Employment

Accessibility must be ensured at every stage of employment. This means accommodations must be made available to candidates and employees upon request and accessibility should be embedded into policies, processes, and practices, including:

- recruitment
- employee onboarding
- professional development
- business travel
- short- and long-term disability leaves
- return-to-work processes
- redeployment

### Desired outcomes

- Mill Creek attracts qualified candidates with disabilities according to their availability on the labour market for our occupations and reaches our corporate representation goal for employees with disabilities in our workforce.
- Employees with disabilities report being treated with respect at a level that matches those of all employees.

### Barrier 1

Our current number of job applicants and employees hired with disabilities is lower than labour market availability.

### Actions

- Enhance the careers section of our website to increase visibility of Mill Creek jobs among Canadians with disabilities and signal our commitment to their inclusion in our workforce.
- Educate hiring managers on accessibility and how they can ensure a barrier-free hiring, selection, and accommodation process.
- Benchmark current recruitment, selection, and onboarding practices against leading accessibility practices.

## 2. Built environment

The built environment comprises human-made structures, features and facilities—it's the physical environments where people live and work.

## Desired outcomes

- Mill Creek building is easy for employees and visitors with disabilities to access.

### Barrier 2

Office space on the 2<sup>nd</sup> floor that is not accessible today.

### Actions

- We have adequate space on the main floor to accommodate the staff and took steps to re-configure the main floor seating plan to ensure that all officer personnel have working space without the need to utilize the upper floor area for permanent workstations.
- We recently added a fully functional meeting room on the main floor to ensure attendance at group meetings can be done in-person without the need to access the stairs to reach the main conference room on the upper floor.
- We continue to encourage and accommodate the use of Zoom and Teams to allow all team members to participate in meetings & formal conversations without the need to physically attend.

## 3. Information and communication technologies

Information and communication technologies are various technological tools and resources used to transmit, store, create, share, or exchange information.

### Desired outcomes

- An increase in available self-serve technology and accessibility features enhances in-person and hybrid meeting experiences and participation.
- Employees, customers, and facilitators are more fully able to participate in training, conferences, and other events.
- Persons with a disability have full access to use our technology.

### Barrier 3

The Current IT team is not well-versed in the accessibility technological tools and does not know how to assist persons with disabilities in the workplace.

## Actions

- Train IT employees to increase their accessibility knowledge and learn how to adapt services and improve interactions with persons with disabilities.
- Deliver and promote end-user training on accessibility features on all various programs.
- Develop and promote guidance and training documents for persons with disabilities (making items larger on a screen, activate reader in windows, activating closed caption on Zoom etc.).
- Develop accessibility guidance and checklists and documents for employees that are building or procuring information technology.

## Barrier 4

The requirement for individuals to request that accessibility features be turned on or activated limits the ability of employees with disabilities to use them.

## Actions

- Develop standards for the application of simultaneous interpretation, translation and captioning functions for key Mill Creek meetings, media engagements and conferences, when appropriate.
- Raise awareness of accessibility features for in-person and hybrid meeting technologies.
- Ensure that Mill Creek websites continue to meet web accessibility requirements.

## 4. Communication (other than information and communication technologies)

The communication priority area recognizes that people give, receive, and understand communication in different ways. An organization is expected to take these differences into account and provide its communications in various accessible formats for people who require them. Some examples of communication products include signs, wayfinding, documents, forms, bills, and receipts that are not technologically based.

## Desired outcomes

- Mill Creek ensures the accessibility of key documents, internally and externally, for people who request them in an alternative format.
- Mill Creek responds to requests for key resources or publicly available documents in an accessible format in the same amount of time as for other document requests, or as directed by applicable legislation.

## **Barrier 5**

Mill Creek standard document templates and formats for its files, reports and presentations do not always meet the accessibility needs of their users.

### **Actions**

- Embed accessibility into Mill Creek internal and external corporate communications products and templates.
- Develop or share resources for employees on how to make documents and communications accessible.

## **Barrier 6**

Mill Creek does not have a uniform process to ensure alternate formats, such as braille or captioned audio, for the information and communications it issues to employees and Canadians.

### **Actions**

- Identify service providers and develop contracts or agreements to create alternate formats, where appropriate and needed.
- Catalogue and store documents and materials requested in alternative formats.
- Prepare key accessibility resources in alternative formats so that they are ready to be distributed upon request.

## **5. Procurement of goods, services, and facilities**

The *Accessible Canada Act* requires us to consider accessibility requirements for procurement and include accessibility as part of the provision of goods, services, and facilities, where appropriate (e.g., accessible technology, materials, and amenities).

### **Desired outcomes**

- Accessibility becomes a part of our procurement expectations, and goods and services we purchase are accessible from the beginning.

## **Barrier 7**

Accessibility considerations are not fully embedded in Mill Creek procurement framework and tools.

### **Actions**

- Revise the procurement policy to reinforce that accessibility must be considered when procuring goods and services.

## **6. Design and delivery of programs and services**

When designing and delivering Mill Creek's internal and external programs & services, accessibility considerations must be part of the process.

### **Desired outcomes**

- Mill Creek has a strong culture of collaboration with internal stakeholders.

### **Barrier 8**

Currently there is no standard approach for ensuring all programs and services have taken accessibility into account.

### **Actions**

- Leverage the mandatory requirement to consult with persons with disabilities to review and provide feedback on programs, policies, and processes.
- Develop internal accessibility best to ensure they meet these standards.
- Create an accessibility checklist to help ensure key accessibility considerations are considered.

## **7. Transportation**

This area of focus in the Accessibility Canada Act covered the transport of people and goods. Vehicles that are used by organizations and regulated by the federal government must take into consideration barriers to operation and provide accommodation to the employee operating the vehicles as needed.

### **Barrier 9**

Driving a tractor trailer is our largest job classification. Many persons with disabilities face barriers to do this job. Looking for accommodations, and alternate roles for those that can no longer physically do the job.

### **Actions**

- Engage industry experts to identify barriers and actions we can take to accommodate and modify our primary job.
- Identify aids to assist with common repetitive motion or motor disabilities that are common for drivers (ie. steps to decrease climbing into cab, additional grab handle to enter vehicle, automatic tractors etc.).
- Continue to find jobs, outside of driving, for individuals who cannot drive or need to come off the road due to developing a disability.

## Our consultation process: “Nothing about us without us”

Mill Creek remains committed to building an accessible culture and environment where everyone—including people with disabilities—can participate and grow professionally. Our accessibility plan was developed in consultation with members our health and safety committee, human resources, associates who have identified as a person with disability.

- We conducted a survey with our benefits provider.
- We invited employees with disabilities to share feedback.
- We have requested feedback and consultation from our Health and Safety team, which consists of employees from across departments and locations.

We also looked at outside sources and feedback from external stakeholders. These include:

- Peers in our industry
- Trucking Human Resources Canada

We will continue to consult with our employees and key partners, including those with disabilities, to ensure that we realize the change we’ve set out to achieve.

### Appendix: Definitions

**Accessibility:** The degree of ease that something (e.g., device, service, physical environment, and information) can be accessed, used and enjoyed by persons with disabilities. The term implies conscious planning, design, or effort to make sure something is barrier-free to persons with disabilities. Accessibility also benefits the general population by making things more usable and practical for everyone, including older people and families with small children.

**Barrier:** The *Accessible Canada 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.”

**Disability:** The *Accessible Canada Act* 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, interaction with a barrier, hinders a person’s full and equal participation in society.”