



SULTRAN LTD. & PACIFIC COAST TERMINALS LTD.

Accessibility Plan

2024-2027

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GENERAL

Introduction: About Sultran LTD & Pacific Coast Terminals LTD

Sultran, Ltd. And Pacific Coast Terminals, Ltd. (“Sultran/PCT”), established in 1977, provides end-to-end transportation logistics for sulphur and other bulk commodities moved by rail from Western Canada to the Port of Vancouver for export. With 13 shareholders, including Canada’s major oil and gas producers, Sultran/PCT handles up to 10 million metric tons of bulk commodities annually, valued at over C\$3 billion.

Divided into two segments, Transportation & Logistics and Terminals, Sultran/PCT operates extensively in moving sulphur from inland sites in Western Canada to the Port of Vancouver for export. They boast a dominant position in the sulphur market, handling 65% of Canada's production, facilitated by exclusive agreements for sulphur exports via Pacific Coast Terminals (PCT) and Vancouver Wharves (VW). Their fleet of 1,316 railcars ensures efficient transportation.

Beyond sulphur, Sultran/PCT also deals with other bulk commodities, including potash, canola oil, and ethylene glycol. Notably, the company anticipates growth in these sectors due to increasing global demand and plans for expansion by Canadian producers. PCT is currently augmenting its capacity to accommodate the rising demand for ethylene glycol, indicative of Sultran/PCT's proactive approach to meeting market needs and sustaining growth.

Requirements

As a federally regulated company in the transportation sector, Sultran/PCT is governed by the [Accessible Canada Act](#) (ACA).

The ACA is a federal law enacted by the Canadian government in 2019 to promote and ensure equal access and inclusion for persons with disabilities. The ACA applies to all federally regulated entities, including companies, organizations, and government agencies.

Per the ACA, all federally regulated entities must:

- Prepare and publish an initial Accessibility Plan
- Establish an accessibility feedback process
- Report annually on the progress towards the plan and address any feedback received

Our Accessibility Plan must be reviewed in its entirety and published every three years.

The Accessible Canada Act marks a significant advancement in creating a more inclusive and accessible society for all Canadians, including those with disabilities. Through compliance with regulations set by the ACA, Sultran/PCT will help ensure that we are providing equal access and opportunities to all members of society. We welcome this chance to assess and modify our business practices to support accessibility through a barrier-free workplace.

Executive Summary

We are dedicated to contributing to a barrier-free Canada where every individual, including those with disabilities, can thrive and access equal employment opportunities. We are committed to actively identifying, preventing, and eliminating obstacles faced by individuals with disabilities. Our Accessibility Plan demonstrates our commitment and was created by thoroughly assessing barriers in each of the following Priority Areas specified under the ACA and by consulting with the British Columbia Centre for Accessibility, an organization that represents persons with disabilities:

- Employment
- Built Environment

- Information & Communication Technology (ICT)
- Communication (other than ICT)
- Procurement of Goods, Services, & Facilities
- Design & Delivery of Programs & Services
- Transportation

Our commitments intend to create a workplace that is more accessible and inclusive, especially for individuals who are often excluded from full participation in workplaces across Canada due to unaddressed barriers. Table 1 (below) provides a summary of our accessibility commitments under each Priority Area.

Table 1.

Executive Summary: Sultran/PCT's Accessibility Plan.

Priority Area	Commitments
Employment	Commitment 1: Emphasize our ability and willingness to provide accommodations during the recruitment and onboarding process
	Commitment 2: Further our commitment to reducing bias in all employment practices and career progression opportunities by ensuring a thorough understanding and non-biased approach to performance management through training
Built Environment	Commitment 1: Enhance accessibility wherever possible at the Pacific Coast Terminals location by using our planned renovation to integrate accessible design to remove barriers
	Commitment 2: Further our commitment to Health & Safety by ensuring all employees and guests have access to safety and security information throughout Pacific Coast Terminals in Port Moody
	Commitment 3: Identify areas for improvements at our Calgary Headquarters
Information & Communication Technology (ICT)	Commitment 1: Ensure employees are aware of accessibility features available to them through the various internal ICT systems and tools
	Commitment 2: Increase accessibility in our ICT systems in consultation with professionals with lived experience of disabilities
Communication (other than ICT)	Commitment 1: Incorporate principles of accessible design into our formal communication and brand standards
Procurement of Goods, Services, & Facilities	Commitment 1: Ensure good accessibility governance by updating the formal Procurement Policy to integrate accessibility standards into the procurement process
Design & Delivery of Programs & Services	Commitment 1: Provide guidance and support related to removing barriers in customer engagement through the delivery of programs and services
Transportation	Commitment 1: Implement a plan to extend Sultran/PCT's accommodation request process to visitors who require accessible transportation options and ensure options are available on an as-needed basis.

Feedback

Sultran/PCT is committed to providing a receptive and transparent feedback process, including the option to provide feedback anonymously.

We have a designated person and established feedback process to receive and address any feedback you may have for us about accessibility:

- Contact: People and Culture Advisor
- By telephone: +1 (403) 265-1486
- By e-mail: HRAdmin@Sultran/PCT.com
- By regular mail:

Attn: People and Culture Advisor
600 Bow Valley Square 2
205 - 5th Avenue SW
Calgary, Alberta, Canada T2P 2V7

By using this contact information, employees, customers, and members of the public can send us:

- A request to receive this plan in an alternative format (see *Alternative Formats*)
- A request to receive the description of our accessibility feedback process
- Your feedback on accessibility

Alternative Formats

Sultran/PCT's Accessibility Plan and a description of our accessibility feedback process will be made available in the following alternative formats, including:

- Print
- Large print
- Electronic format
- Braille
- Audio format
- Other formats compatible with adaptive technology that are intended to assist persons with disabilities

Requests for print, large print, and electronic formats will be fulfilled within 20 days from the date of your request and requests for Braille and audio formats will be fulfilled within 45 days.

Alternative formats of Sultran/PCT's Accessibility Plan can be requested by email at HRAdmin@Sultran.com or by phone at +1 (604) 931-9253 or anonymously through www.pct.ca/regulatory

For more information, we encourage you to visit our website: Sultran.com or PCT.ca.

PRIORITY AREAS

Area 1: Employment

OUR ACCESSIBILITY GOAL

Sultran/PCT aims to foster an inclusive and equitable workplace environment where all employees, including those with disabilities or requiring accommodations, have equal access to opportunities for recruitment, onboarding, career progression, and professional development. This will be achieved through the implementation of clear accommodation policies, ongoing training on diversity, equity, and inclusion, and the promotion of respectful workplace culture, ultimately ensuring that all employees can thrive and contribute to the company's success.

CURRENT LEVEL OF ACCESSIBILITY

Sultran/PCT believes in providing employees with flexibility and autonomy to perform their roles. Our current HR practices aim to support employees in creating balance and growth at work.

- Sultran/PCT aims to reduce and remove bias in all our recruitment practices by providing standardized interview questions and processes that focus on the candidates' experience and ability to perform.
- Sultran/PCT has a well-established Bullying & Harassment Policy and is in the process of developing and publishing a Respectful Workplace Policy.
- Employees are provided with a robust benefits plan that includes paramedical services, short- and long-term disability coverage, an employee assistance program, additional medical services including Elite Diagnostic Imaging, and a healthy lifestyle spending account to provide employees additional benefits and support to suit their lifestyle and needs.
- Employees have access to flexible work arrangements including part-time work and job sharing.
- Sultran/PCT's professional development program is designed to consider diverse needs, growth objectives, and timelines of each employee through in-house and external professional development opportunities.

ACTIONS

Commitment 1: Emphasize our ability and willingness to provide accommodations during the recruitment and onboarding process by:

- Develop and implement an Accommodation Policy and request process in recruitment (i.e., application, interview, and assessment processes), onboarding, and training to make sure that the accommodation request option is explicitly available to candidates and employees by December 2024.

Commitment 2: Further our commitment to reducing bias in all employment practices and career progression opportunities by ensuring a thorough understanding and non-biased approach to performance management through training by:

- Finalizing and publish Sultran/PCT's Respectful Workplace Policy internally and include a link to the policy on all job ads as part of their equal employment opportunity statement by December 2024.
- Researching and creating a plan to provide training for managers and employees with a focus on Diversity, Equity and Inclusion that engages people with lived experience to inform on accessibility and the removal of barriers in the workplace by December 2026.
- Developing a campaign that promotes and encourages all employees to develop and build their careers at Sultran/PCT starting in 2026.

Area 2: Built Environment

OUR ACCESSIBILITY GOAL

Our goal is to create accessible physical spaces across all of Sultran/PCT's locations, fostering inclusivity and ensuring equitable access for employees, visitors, and guests. This goal will be achieved through the integration of accessible design principles, wherever possible, in all renovation and construction projects, the implementation of safety and security measures that consider the needs of individuals with disabilities and sensitivities, and the ongoing commitment to identify and address accessibility barriers in existing facilities. By prioritizing accessibility in the built environment, we aim to create welcoming spaces that empower everyone to participate fully in our workplace and community without compromising the safety of our workforce.

CURRENT LEVEL OF ACCESSIBILITY

At Pacific Coast Terminals, accessibility is a work in progress. Wheelchair parking is available at key locations, but common areas lack consistent accessibility features. For example, accessible washrooms are available in the main building, but not in work areas. We have plans in place to improve accessibility with an upcoming renovation project and want to continue to identify barriers in the built environment that cause undue barriers for employees and visitors.

Our Calgary office is equipped with elevators, ramps, and comprehensive ergonomic reviews for new employees to ensure inclusive access. Accommodations are readily available for employees with disabilities to support safe and effective work. Policies and procedures are in place for assisting individuals with disabilities in emergencies, and employees are encouraged to communicate accommodation needs for emergencies.

Many of our employees work from home as well as in the office. To provide employees with a safe and accessible work environment for their home office, Sultran/PCT provides all employees the option of having a full ergonomic assessment of their home office space.

ACTIONS

Commitment 1: Enhance accessibility wherever possible at the Pacific Coast Terminals location by:

- Removing scented complementary toiletries in the washroom facilities with unscented products by December 2024.
- Implement accessible design within the parameters of our existing renovation project, targeted to be completed in Spring 2025, while maintaining a priority on safety throughout the terminal.
- Investing in installing high-contrast, tactile signage throughout the office space at Pacific Coast Terminal as part of the upcoming site renovation by June 2025.

Commitment 2: Further our commitment to Health & Safety by ensuring all employees and guests have access to safety and security information throughout Pacific Coast Terminals in Port Moody by:

- Identifying, budgeting, and planning training opportunities for floor/area wardens to support people with all types of disabilities in the case of an emergency by June 2027.

Commitment 3: Identify areas for improvements at our Calgary Headquarters by:

- Conducting an accessibility audit of the Calgary office building in collaboration with the owner of the building to identify possible renovation and timelines for upgrades by December 2024.
- Upon the expiration of the current office lease in 2027, ensure that prospective future office spaces in Calgary comply with Alberta's building standards for accessibility. Priority will be given to selecting spaces that maximize accessibility and compliance with the province's accessible building standards.

Area 3: Information and Communication Technologies (ICT)

OUR ACCESSIBILITY GOAL

One way to achieve our accessibility goals is to remove barriers to ICT. To do so, we will identify, and address barriers found in our ICT systems, such as on our websites, networks, proprietary software systems, computer systems, and other technologies used in at Sultran/PCT to conduct our day-to-day business.

CURRENT LEVEL OF ACCESSIBILITY

The accessibility of Information Communication Technologies (ICT) at Sultran/PCT varies. Standard software tools such as MS Office Suite, IBM Maximo, Humi, HubSpot, and Sage Accounting which integrate accessibility features are our most used communication tools. We are also developing a new employee intranet site, aiming for accessibility upon its launch in 2024. However, the customer business site and proprietary software tools (Business Web and Orion) currently lack accessibility features.

ACTIONS

Commitment 1: Ensure employees are aware of accessibility features available to them through the various internal ICT systems and tools by:

- Ensuring that digital and information technology accommodations are explicitly included as part of Sultran/PCT's new Accommodation Policy and Request Process being published by December 2024.
- Conduct an audit of Sultran/PCT's existing ICT systems and tools, where available, to determine the current level of accessibility available to employees within each program by June 2025.
- Creating an "Accessibility Tools" guide for employees to be shared during onboarding and orientation by December 2025.

Commitment 2: Increase accessibility in our ICT systems in consultation with professionals with lived experience of disabilities by:

- Launching new websites for Sultran and PCT using WCAG 2.1 AA standards and current web development technologies by December 2024.
- Incorporating WCAG 2.1 AA standards into the design of our new employee intranet and Orion by June 2026, wherever possible.

Area 4: Communication, other than ICT

OUR ACCESSIBILITY GOAL

Using accessible design and plain language, Sultran/PCT's goal is for all company communications to be accessible and inclusive, fostering equal understanding and participation for individuals of all abilities. We aim to break down communication barriers and create a more equitable experience for employees, contractors, customers, union workers, and members of the public.

CURRENT LEVEL OF ACCESSIBILITY

Given the nature of Sultran/PCT's business, communication often requires a high level of technical language; however, whenever possible, we aim to use simple language and provide detailed explanations of technical terms. Sultran/PCT currently uses ICT systems for most of our communications, very little of the business, services, and day-to-day interactions are done without the assistance of ICT.

ACTIONS

Commitment 1: Incorporate principles of accessible design into our formal communication and brand standards by:

- Review Sultran/PCT's Communication and Brand Guidelines to identify areas where improvements can be made in the use of plain language and accessible design by June 2025.
- Providing employees, union workers, and customers with the opportunity to request accommodations related to communications and training materials by June 2025.

Area 5: Procurement of Goods, Services, and Facilities

OUR ACCESSIBILITY GOAL

Sultran/PCT's goal is to establish inclusive procurement practices that promote accessible governance from our vendors and prioritize accessibility and barrier-free options when purchasing.

CURRENT LEVEL OF ACCESSIBILITY

Sultran/PCT's current Procurement Policy does not account for accessibility governance, best practices, or accessible design.

ACTIONS

Commitment 1: Ensure good accessibility governance by updating the formal Procurement Policy to integrate accessibility standards into the procurement process by:

- Developing and publishing a new Procurement Policy that prioritizes the selection of goods, services, and facilities that offer barrier-free options or promote accessibility by June 2025.
- Providing all employees responsible for procurement with training on the new policy and how to identify accessible design by December 2025.

Area 6: Design and Delivery of Programs and Services

OUR ACCESSIBILITY GOAL

We aim to enhance our customer service and program design and delivery by fostering and providing our staff with the knowledge and skills to address the diverse needs of our customers and their employees.

CURRENT LEVEL OF ACCESSIBILITY

Sultran/PCT customers are largely established partner businesses offering them fully integrated supply management solutions that cover all aspects of product transport, storage, inventory management, and marine loading.

Accessibility in the design and delivery of programs and services is currently lacking in some respects. Service orders are accepted in various formats, including phone, email, online platforms like MS Teams the customer business site, and in-person or written form. However, there's a gap in employee training regarding meeting the accessibility needs of our customers. While services are provided flexibly based on client communication, there's no formalized training to ensure accessibility considerations are consistently addressed.

ACTIONS

Commitment 1: Provide guidance and support related to removing barriers in customer engagement through the delivery of programs and services by:

- Work with HR to include customer-facing employees in the Diversity, Equity and Inclusion training plan by December 2026 (see Employment: Commitment 2).

Area 7: Transportation

OUR ACCESSIBILITY GOAL

Our goal is to ensure that all visitors and guests to the Pacific Coast Terminals and other sites where we operate, can be safely transported between and on location.

CURRENT LEVEL OF ACCESSIBILITY

Sultran/PCT does not transport members of the public, but we provide transportation for visitors to move around the terminal and between different sites. The vehicles we currently have are not outfitted with accessible features or lifts.

ACTIONS

Commitment 1: Implement a plan to extend Sultran/PCT's accommodation request process to visitors who require accessible transportation options and ensure options are available on an as-needed basis by June 2027.

CONSULTATIONS

Summary

The concept of “[Nothing About Us Without Us](#)” supports the notion that persons with disabilities must be involved in the ideation of Sultran/PCT’s plan to support us in identifying opportunities to progress accessibility in our policies and procedures and the built environment. We consulted with the British Columbia Centre for Ability (BCCFA) in the development of our Accessibility Plan.

Consultation Process

We provided the BC CFA with a draft of our Plan as a Word document for their review. We followed this with a live session on April 24, 2024 to discuss the impact and significance of our goals towards creating an accessible workplace and experience for our employees, customers, and the public.

The session was hosted virtually via Zoom and the consultation team from BCCFA was asked in advance about any accommodation that would be needed for the session.

During the session, participants had the option to turn on closed captioning. Each priority area of the Plan was discussed and accompanied by a PowerPoint presentation for everyone to see.

Results

During the session, we reviewed each of Sultran/PCT’s Accessibility Commitments and gathered feedback from the BCCFA. Overall, the BCCFA found the Plan to be clear and logical and that it shows a commitment to making a positive impact on the community through accessibility measures.

Most of the Commitments and corresponding action plans provide a coherent and logical progression. However, the BCCFA identified a couple of key areas where further elaboration on the actions was needed to provide a clear and meaningful commitment. This was incorporated throughout the Plan by:

- Providing more explicit details for certain action items to ensure they are fully understood and written in plain language.
- Making explicit our commitment to continue working with people with disabilities to ensure that the actions we are taking are moving in the right direction.

Future Consultations

Future versions of Sultran/PCT’s Accessibility Plan will emphasize conducting a more comprehensive consultation process to fully align with the concept of “Nothing About Us Without Us”. Our goal is to engage broader mechanisms for consultation of organizations, employees, and customers through testimonials and storytelling, feedback surveys, and facilitated consultative sessions. We recognize that the more robust our consultation phase is in future republications of our plan, the more likely it is that barriers will be identified and meaningful progress on accessibility, and DEI, will be achieved.

CONCLUSION

Sultran/PCT is dedicated to fostering an inclusive environment where every individual is able to fully participate in all facets of our organization without barriers, including persons with disabilities. We firmly believe that implementing the initiatives outlined in our Accessibility Plan will enhance the experience of persons with disabilities who engage with us, including our employees and customers.

Our commitment to accessibility is an evolving journey. We are steadfast in our resolve to collaborate with individuals with disabilities to continuously refine and expand our Accessibility Plan, ensuring that we contribute effectively to the realization of a barrier-free Canada.



Accessibility Plan