

Accessible Canada Act Accessibility Progress Report Trans-Northern Pipelines Inc.

As mandated under the Accessible Canada Act Regulations, the following report, prepared by Trans-Northern Pipelines Inc. (TNPI), describes what phases of our accessibility program have been completed since June of 2024, and defines the organization's road map over the next twelve months. Working under the guidance of Canadian Accessibility Professionals, (CAP), TNPI has implemented a comprehensive accessibility program, and we have made great strides in meeting or exceeding the requirements of the Federal accessibility legislation. In accordance with Subsections 15 and 16 of the Accessible Canada Regulations, this progress report will be published on our website at <https://tnpi.ca>, and notice of this action will be communicated to the Accessibility Commissioner. Additionally, as with any of our published accessibility documentation, this report will be made available in alternate formats upon request.

General

Communication Vehicles and Contact Information

In accordance with the Regulations, TNPI has established a process for employees, representatives, stakeholders, and members of the public to contact our organization regarding our accessibility programs and initiatives. Inquiries relative to accessibility at TNPI may involve such requests or topics as:

- Providing feedback to TNPI regarding any of our accessibility plans, policies, programs, goods, services or facilities;
- Continuing a conversation regarding previously submitted feedback related to accessibility at TNPI;
- Requesting alternate formats of communications related to our accessibility initiatives which are otherwise available to the same stakeholder group as the party making the request; and
- Any other questions or requests relative to our accessibility programs and initiatives designated under Section 5 of the Accessible Canada Act.

Feedback and/or questions related to TNPI's accessibility programs, goods, services, or facilities may be directed to:

Email: accessibility@tnpi.ca

Mail: 45 Vogell Road, Suite 310, Richmond Hill, ON L4B 3P6

Phone: (905) 770-3353

Please Note: Our Accessibility Plan, Accessibility Feedback Form and a copy of this progress report can be found on our website at: <https://tnpi.ca>

Achievements and Goals

This section identifies how we have evolved our accessibility program since 2024, and details of how we will continue to embrace true accessibility into the culture of TNPI moving forward. The information is organized according to each required heading under Section 5 of the Accessible Canada Act.

(A) Employment

- An internal Accessibility Policies, Practices and Procedures document has been established. This document has been distributed to all internal stakeholders as part of TNPI's internal accessibility initiatives. Employees and representatives receiving the policy documentation have acknowledged understanding of said policies, and how they pertain to their roles and functions within the organization. This policy documentation will continue to be available to all internal stakeholders via our electronic internal document system and new hires.
- Internal representatives, including new hires, have completed an accessibility training program in 2024, that encompasses an understanding of TNPI's Accessibility Plan and Policy, TNPI's Accessibility Customer Service Policy, Practices and Procedures, along with training on Accessibility. New Hires will continue to receive training on accessibility when onboarded into the organization. Furthermore, all internal representatives will receive ongoing training and information throughout 2025 to help further enhance their awareness of accessibility.
- All job postings will continue to include reference to TNPI's commitment to providing equal opportunities to all candidates and to meeting the needs of persons with disabilities. Applicants are advised to formally request any necessary accommodation to participate fully in the recruitment process either during the application stage or upon being invited to continue in the process.
- Candidates invited to participate in the interview process will continue to be advised that if they require an accommodation, Human Resources will work with them to meet their needs wherever possible and in a reasonable manner.
- An internal workplace accommodation request process is in place whereby employees can contact HR for accommodation. TNPI will work with their disability case management specialists at Genex Services of Canada to support this process, by liaising with the employee and TNPI to establish Individual Accommodation Plans to support the need for an accommodation plan and safe return to work.

(B) The Built Environment

- As part of the overall development of our comprehensive Accessibility Policies, Practices and Procedures, (both internal and external), Canadian Accessibility Professionals (CAP) completed an accessibility assessment for our corporate spaces in Richmond Hill and Mississauga Ontario, as well as Calgary, Alberta.
- Potential and existing barriers were identified and noted in an assessment report.
- These potential and existing barriers were taken into account when creating the finalized versions of the Policies, Practices and Procedures.

- Although the majority of TNPI's corporate operations will continue to be remote, in line with our Flexible Work Model, any future considerations regarding our corporate spaces will continue to address the barriers identified by CAP on a prioritized scale. TNPI may also rely on CAP during the planning or execution of any future improvements to the physical corporate spaces under the control of TNPI.

(C) Information and Communication Technologies (ICT)

- As part of the overall launch of our accessibility program, TNPI enlisted the services of Canadian Accessibility Professionals (CAP) to complete an accessibility assessment for the company's website at <https://tnpi.ca>. CAP's web accessibility experts used a variety of testing methods to determine the current state of all pages of the website relative to Web Content Accessibility Guidelines (WCAG) 2.1, Level AA.
- Similar to the assessment of the physical environments, all potential and existing barriers were clearly identified in an assessment report, and solutions and strategies to meet WCAG conformance were noted.
- In December 2024, TNPI launched an upgraded website that complies with WCAG 2.1, Level AA. The overall look and design of the website has been updated, leveraging the full functionality of screen sizes for a seamless experience for both desktop and mobile devices including downloadable PDFs. Navigation and content have also been updated to optimize the user experience.
- Going forward, our communications team will continue to rely on assessment reports to address any accessibility barriers and make the content published by TNPI as accessible as possible.
- CAP will remain available to TNPI to support any accessibility strategies relative to Information and Communication Technologies in the future, including internal and external communications.
- (C.1) Communication, Other Than ICT
- The formalized internal Policies, Practices and Procedures documentation, in conjunction with the accessibility training for employees, provides detailed procedures on ensuring all communications with internal and external stakeholders take accessibility into account. This means understanding how to effectively work with another party to communicate in a way most meaningful and effective for all parties involved, considering any and all accessibility needs during the process.
- TNPI is committed to satisfying requests for information in alternate formats where applicable, and where no undue hardship is created on the organization, in accordance with the timelines set forth in the Accessible Canada Regulations. Canadian Accessibility Professionals will remain available to TNPI to provide support in these areas if needed.

(D) The Procurement of Goods, Services and Facilities

- TNPI will seek the advice of people with disabilities, including any relevant stakeholders and Canadian Accessibility Professionals when appropriate, to guide processes related to the procurement of goods, services and/or facilities. Examples could include third-party software providers, digital content creators, acquisition of physical facilities, provision of alternate communication supports, etc.

(E) The Design and Delivery of Programs and Services

- TNPI, in concert with CAP, developed and published a comprehensive Accessibility Plan. The Plan is designed to meet or exceed the requirements of the Accessible Canada Act and the Accessible Canada Regulations.
- The Plan has been published on TNPI's website at <https://tnpi.ca> and is in conformance with WCAG 2.1, Level AA.
- TNPI will continue to consult with people with disabilities when designing and/or delivering new programs or initiatives, where appropriate.
- Accessibility will be a consideration when designing and delivering external information and education sessions involving community projects, safety initiatives, public education, etc. TNPI has met, and will continue to meet, all requirements pertaining to the ACA regarding updating the Accessibility Plan and delivering progress reports.

(F) Transportation

- At present, this section of the regulations does not apply to TNPI. However, if accessible transportation does become relevant in the future, TNPI will ensure that safety and accessibility are priorities.

Consultations

Since 2022, Trans-Northern Pipelines has employed the services of Canadian Accessibility Professionals. CAP is a team of accessibility experts, all of whom are persons living with different disabilities. They have been guiding organizations large and small down the path of true accessibility since 2009. CAP will continue to be available to TNPI to support all accessibility initiatives moving forward. If future additional consultations are deemed necessary involving internal or external stakeholders with disabilities, then all accessibility considerations will be taken into account in order to obtain the most relevant and effective feedback.

Feedback

A formal feedback process has been in place since June 1, 2023. To this point, TNPI has not received any feedback through any available communication vehicles, including the feedback form available on our website at <https://tnpi.ca>. As detailed above, there are several methods which any representative, employee or member of the public can submit feedback to TNPI regarding any of our accessibility documentation, goods, services, facilities, or employment initiatives.

Our dedicated personnel will continue to monitor all platforms which may be utilized to communicate feedback relative to TNPI's accessibility programs and services. In addition, Canadian Accessibility Professionals will continue to be available to support TNPI if required with regard to addressing any feedback received or implementing new strategies to remove barriers relative to direct or indirect feedback.