

Accessibility Plan (2026–2029)

EXECUTIVE SUMMARY

The purpose of the Accessible Canada Act is to make Canada barrier-free by January 1, 2040. This involves identifying, removing, and preventing barriers in federal jurisdiction in several priority areas. A *barrier* is anything that keeps a person with a disability from participating fully and equally in society. A *disability* is any physical, mental, intellectual, cognitive, learning, communication or sensory impairment or functional limitation.

Harbour Development is committed to creating a more inclusive environment for employees. We not only want to meet legislative requirements, but we also want to experience the full benefits of a diverse and inclusive workforce. Improved accessibility is important for Persons with disabilities and will benefit all employees.

Harbour Development published its first Accessibility Plan in 2023 under the Accessible Canada Act. This 2026 Accessibility Plan builds on progress achieved during the first three years of implementation, informed by annual progress reporting and consultation with employees, including Persons with disabilities.

We recognize that for many of our roles, particularly safety-sensitive roles such as seafarers, feasible accommodations may be more limited due to the operational environment and the physically demanding nature of the work. We are continuing to expand our understanding of the range and variety of accessibility improvements and reasonable accommodation options.

Consultation confirmed that the barriers identified in the 2023 Plan remain relevant. Where barriers have not been fully removed, they are carried forward in this Plan with refined and prioritized actions informed by consultation feedback.

A summary of the ongoing opportunities and priorities includes:

- Building commitment on creating a more accessible environment through understanding and education throughout the organization.
- Improving how we attract Persons with disabilities to jobs in our company and the industry through a review of our recruitment processes.
- Expanding the range and options for accommodation, especially for safety-sensitive roles, including seafarers.
- Improving the accessibility of company-wide communications and our websites.

- Being better prepared to provide information in accessible formats when requested.
- Improving knowledge and leveraging the capabilities of accessibility features in current and future IT equipment, programs, and systems.
- Initiating processes to review the accessibility of facilities, procurement procedures, company programs, new initiatives, and ongoing services.

GENERAL

Plan period: 2026–2029

Publication date: June 2026

Harbour Development welcomes feedback on our Accessibility Plan from the public, employees, and stakeholders. This feedback is valuable to us as it helps us break down accessibility barriers and build on our commitment to accessibility and inclusion.

If you have an inquiry, feedback or you are experiencing a barrier to accessibility and want to help improve our accessibility, please contact us using one of the contact methods below.

Contact: HR Director

Mailing Address: 2nd floor, 300 Union St, Saint John, NB E2L 4M3

Email: tlinclusion@jdirving.com

Telephone: 506 632-7777

Website: <https://www.harbourdev.com/>

We will acknowledge receipt of your feedback and follow up, upon request, with you directly. You can also use these channels to request this plan in alternate formats.

CONSULTATIONS

In 2026, Harbour Development conducted an Accessibility Survey as a formal consultation mechanism under the Accessible Canada Act. Since 2023, this has been conducted annually using a safe, confidential survey administration tool. Participation was open to all employees, including Persons with disabilities, those with lived or supporting experience of disability, and individuals wishing to provide general accessibility feedback. Key themes identified in these surveys include physical access barriers, accommodation clarity, industry-related constraints, psychological safety, and along with examples of positive support. Survey results directly informed the priorities and actions outlined in this Plan.

In addition to this survey, Harbour Development conducts an Annual Engagement Survey. While not specific to Accessibility, the results are comprehensive of the employee

experience and provide important insights to employment and accessibility matters from Persons with disabilities.

Finally, the Belonging & Inclusion Committee exists to create awareness of and pursue the breakdown of barriers to success that exist for marginalized groups. Various initiatives support employees in their DEI learning journey, recognizing that everyone has a part to play in fostering an environment of inclusion that will ensure every person can thrive. The committee meets frequently and topics covered include accessibility initiatives.

EMPLOYMENT

Harbour Development recognizes that employment-related barriers can be created by policies, practices, culture, and the operational realities of the industry. Consultation in 2026 reinforced that the **Employment** barriers identified in the 2023 Plan remain relevant and are carried forward below. Where work is underway or complete, actions have been refined to strengthen consistency, clarify roles, and improve awareness of available supports.

Key barriers

Barrier #1: Our recruitment process does not pro-actively offer accessible options for candidates and employees resulting in our inability to attract Persons with disabilities.

Barrier #2: The accessibility infrastructure for employees seeking reasonable accommodations is unclear.

Actions (2026–2029)

Barrier #1 – Recruitment and hiring

- 1) **Continue improving accessible recruitment practices:** Maintain the accessibility statement in job postings and ensure interview invitations clearly explain how candidates can request accommodation.
- 2) **Strengthen job postings using bona fide requirements:** Further improve job postings to ensure language is non-discriminatory and clearly describes the essential physical and cognitive requirements of roles (bona fide job requirements), using plain language.
- 3) **Review recruitment and selection for accessibility barriers:** Periodically review recruitment, selection, and onboarding practices to identify and remove barriers, including selection tools, assessments, and candidate communications.
- 4) **Build capability of those involved in the hiring process:** Continue educating hiring managers and recruiters on accessibility and on providing barrier-free hiring, selection, and accommodation processes.
- 5) **Benchmark and implement leading practices:** Scan the environment within and outside the industry to identify feasible improvements.

Barrier #2 – Accommodation education, clarity and supports

- 6) **Understand unmet accommodation needs:** Use consultation feedback and available

data to better understand unmet needs and recurring accommodation themes (including for non-visible disabilities).

7) **Clarify and document the accommodation pathway:** Create and publish a plain-language process (who to contact, roles/responsibilities, expected timelines, and available supports), with supporting manager job aids.

8) **Continue to partner with our Disability Management Team to expand options:** Through ongoing communication and a thorough understanding of the roles, identify and explore an even wider range and variety of potential accommodations where feasible, for all roles.

9) **Increase awareness and trust in the process for all stakeholders:** Reinforce confidentiality expectations and encourage early disclosure/requesting support through ongoing communications and building confidence and understanding in the leadership team through education.

BUILT ENVIRONMENT

Consultation in 2026 reinforced that the **Built Environment** barrier identified in the 2023 Plan remains relevant and is carried forward below. Actions have been refined to prioritize a phased approach, focus on high-impact improvements, and strengthen consultation with employees and operational partners.

Key barrier

Barrier #3: Some spaces within the office and facilities we operate may limit the mobility of employees and visitors with disabilities.

Actions (2026–2029)

1) **Conduct phased accessibility scans:** Continue a phased review of offices, facilities, and commonly used work areas to identify mobility barriers (e.g., access points, routes, washrooms, parking, signage) and prioritize remediation.

2) **Establish an intake and tracking approach:** Implement a simple mechanism to log identified built-environment barriers, prioritize them (risk/impact/feasibility), and track actions through to completion.

3) **Engage operational partners:** Where Harbour Development operates in shared or partner spaces, collaborate with building/operational partners to address feasible accessibility improvements.

4) **Communicate improvements and how to request support:** Share updates on improvements made and how employees/visitors can raise built-environment accessibility concerns (including alternate format requests and feedback channels).

5) **Pro-actively plan for accessibility in renovations & new builds:** Equip Project Leads with an accessibility toolkit.

INFORMATION AND COMMUNICATION TECHNOLOGIES (ICT)

Consultation in 2026 reinforced that the **Information and Communication Technologies (ICT)** barrier identified in the 2023 Plan remains relevant and is carried forward below. Actions have been refined to ensure important accessibility information reaches employees who have limited email access and to strengthen the accessibility of tools, systems, and digital communications used across the employee population.

Key barrier

Barrier #4: Employees without easy access to email can miss company communications and may be unaware of policies, processes and benefits available to them related to accessibility and accommodations.

Barrier #5: Web accessibility compliance must be sustained as websites evolve; while we are now consistently achieving WCAG 2.2 conformance, ongoing changes can introduce new issues if monitoring and prompt remediation are not maintained.

Actions (2026–2029)

Barrier #4: Access to Company communications

- 1) **Use multiple channels to reach all employees:** Continue providing company communications in a variety of methods (e.g., leader toolkits, crew/shift meetings, postings in common areas, and other operationally appropriate channels) to ensure important updates are received in a timely manner.
- 2) **Ensure accommodation information is broadly accessible:** When accommodation policies/processes are updated or clarified, distribute them using channels that reach employees without regular email access, and ensure leaders can answer “how do I get help?” questions consistently.
- 3) **Strengthen accessibility of digital tools:** As systems are upgraded or introduced, consider accessibility requirements and available features (e.g., captions, screen reader compatibility, font/contrast options) and promote training resources so employees can use them.

Barrier #5: Web accessibility compliance

Actions (2026–2029)

- 1) **Maintain accessibility testing during changes:** When websites are created or updated, test to ensure WCAG 2.2 compliance (including key user journeys and templates).
- 2) **Continue timely remediation:** Maintain regular audits and promptly resolve identified accessibility issues, prioritizing high-impact and high-risk items.
- 3) **Strengthen ongoing monitoring:** Maintain a documented audit schedule and approach (frequency, scope, and tracking) to verify continued WCAG 2.2 compliance over time.
- 4) **Confirm ownership and escalation:** Maintain clear ownership for web accessibility

oversight and a defined process to escalate, prioritize, and track fixes with internal teams and external vendors, as applicable.

COMMUNICATION OTHER THAN ICT

Consultation in 2026 reinforced that the **Communication Other Than ICT** barriers identified in the 2023 Plan remain relevant and are carried forward below. Actions have been refined to strengthen plain-language practices, increase awareness of accessible communication techniques, and ensure timely access to alternate formats when requested.

Key barriers

Barrier #6: Accessibility standards for documents and visuals exist, but inconsistent awareness and application among decentralized content creators can result in communications that are not fully accessible for people who are blind or have low vision.

Barrier #7: Harbour Development can provide alternate formats upon request; however, requests are infrequent and awareness of how to request alternate formats may not be consistent, which could delay access if a request arises.

Actions (2026–2029)

Barrier #6 – Accessible content design

- 1) **Promote plain-language and accessible formatting:** Continue to develop and share best practices for clear communication (plain language, readable formatting, and avoiding unnecessary complexity).
- 2) **Build capability for accessible documents:** Provide and maintain practical job aids on accessibility features and options (e.g., adjusting display settings, using built-in accessibility features in Microsoft tools, captions).
- 3) **Improve accessibility of visuals:** Educate content creators on adding meaningful descriptions for images, graphs, and charts and on structuring documents to support adaptive technology.

Barrier #7 – Alternate formats and timeliness

- 4) **Prepare common resources in accessible formats:** Identify frequently issued communications and prepare accessible versions so they are ready to distribute upon request.
- 5) **Formalize an alternate-format request process:** Document how to request alternate formats, who coordinates responses, and service expectations aligned to Accessible Canada Regulations timelines.
- 6) **Increase awareness of how to request formats:** Periodically remind employees and stakeholders of the feedback channels and how to request alternate formats.

PROCUREMENT OF GOODS, SERVICES AND FACILITIES

Consultation in 2026 reinforced that the **Procurement of Goods, Services and Facilities** barrier identified in the 2023 Plan remains relevant and is carried forward below. Actions have been refined to embed accessibility earlier in purchasing decisions and to strengthen consistency through templates and checks.

Key barrier

Barrier #8: The Company's procurement procedures and practices do not take into consideration accessibility requirements.

Actions (2026–2029)

- 1) **Update procurement procedures:** Incorporate accessibility considerations and checks when buying goods, services, or facilities (where applicable).
- 2) **Embed accessibility in templates:** Include accessibility requirements in procurement templates (e.g., RFP language, evaluation criteria, and vendor attestations) to ensure suppliers consider ACA requirements and applicable standards.
- 3) **Focus on high-impact spend categories:** Prioritize categories where barriers are most likely (e.g., technology, signage/communications, facilities modifications) and define minimum expectations for accessibility.
- 4) **Build awareness for procurement stakeholders:** Provide basic guidance to employees involved in purchasing on when to consider accessibility and where to get support.

DESIGN AND DELIVERY OF PROGRAMS AND SERVICES

Consultation in 2026 reinforced that the **Design and Delivery of Programs and Services** barrier identified in the 2023 Plan remains relevant and is carried forward below. Actions have been refined to embed accessibility earlier in the design of policies, programs, and services and to establish practical tools (guidelines/checklists) to support consistent application.

Key barrier

Barrier #9: Currently there is no standard approach for ensuring all programs, processes and services have taken accessibility into account.

Actions (2026–2029)

- 1) **Continue structured consultation:** Use consultation with persons with disabilities (and allies) to gather feedback on programs, processes, policies, and services and to validate priorities.
- 2) **Develop and promote guidelines:** Create practical guidance on how to apply accessibility considerations during program/policy review and development.
- 3) **Create an accessibility checklist:** Develop and use a checklist to help teams

consistently consider accessibility requirements and common barriers during design, implementation, and review.

4) **Provide role-appropriate training:** Continue providing training and resources on the Accessible Canada Act and Regulations for employees whose roles involve designing programs, processes, and procedures.

5) **Use “what we heard / what we changed” reporting:** Incorporate a short summary of consultation themes and resulting changes in relevant program updates to strengthen transparency.

TRANSPORTATION

Consultation in 2026 reinforced that the **Transportation** barrier identified in the 2023 Plan remains relevant and is carried forward below, particularly given the physical demands of roles and the operational environment. Actions have been refined to emphasize awareness, realistic accommodation options, and reducing attitudinal barriers that can prevent employees from seeking support.

Key barrier

Barrier #10: The nature of the industry and the highly physical and safety-sensitive job requirements can create challenges for those requiring accommodations. The Company is currently limited in the options that it provides for employees that experience challenges and concerns with operating equipment and performing operational duties.

Actions (2026–2029)

1) **Continue building awareness:** Provide ongoing education for leaders and employees on supporting people with visible and invisible disabilities, with practical examples relevant to safety-sensitive roles.

2) **Expand accommodation thinking:** Challenge and expand the range and variety of accommodations considered, recognizing that incremental changes can have meaningful impact.

3) **Reduce attitudinal barriers:** Continue efforts to reduce stigma and reluctance to disclose or request accommodation, reinforcing confidentiality, respectful workplace expectations, and early support-seeking.

4) **Clarify regulated constraints and options:** Where requirements are governed by medical/fitness or safety standards, clarify what is regulated versus what can be adapted through work design, equipment, scheduling, training, or alternative duties (when feasible).

FORWARD-LOOKING REGULATORY CONSIDERATIONS

Harbour Development is monitoring forthcoming regulatory amendments, including Digital Technologies Accessibility scheduled to come into force in 2027–2028. While not yet mandatory, these requirements will be considered during this planning cycle as appropriate.

GOVERNANCE, MONITORING AND MEASUREMENT

Progress will be monitored through defined indicators including resolution of identified facility issues, completion of accessibility awareness activities, and ongoing consultation feedback loops ("what we heard / what we changed").

CONCLUSION

This Plan reflects Harbour Development's commitment to continuous improvement, transparency, and compliance with the Accessible Canada Act. It provides a clear and credible roadmap for the 2026–2029 cycle and a foundation for ongoing dialogue with employees and stakeholders.

We will learn and listen to ensure that we are taking meaningful steps to identify, remove and prevent barriers.