

## **General**

### **Executive Summary**

I.M.P. Group Limited – Aerospace Division (IMP Aerospace) regards accessibility as intrinsic to its values. IMP Aerospace strives to continuously improve access to its workplace for both existing and new employees, customers, and all visitors to its facilities.

Consultations are held and will continue to be held to address potential improvements to accessibility. Internal policies and procedures, as well as communication tools, are in place to ensure IMP Aerospace meets the highest standard of accessibility for all.

The Accessible Canada Act and the Accessible Canada Regulations are a welcome addition and IMP Aerospace looks forward to this evergreen process and the opportunity to remove and prevent any barriers to accessibility which may exist.

### **Accessibility Statement**

IMP Aerospace is a large federally regulated private sector entity with an average of one hundred or more employees. Our Employment Equity Committee is comprised of representatives from IMP Aerospace management, staff and the Union in order to ensure a balance of views and opinions. The Employment Equity committee meets monthly to address equality in the workplace. These meetings include discussions in respect of persons with disabilities as one of the four designated groups and addresses issues surrounding any barriers to accessibility. Recommendations on employment equity issues are captured in meeting minutes and submitted for review and action.

In addition, IMP Aerospace has adopted internal policies which assist employees with accessibility needs and flexible working arrangements are available.

IMP Aerospace values diversity as well as inclusiveness and supports a work environment where all individuals, including those with varying abilities, are treated with dignity and respect. This culture extends not only to IMP Aerospace's employees but also to its customers and all visitors.

## I.M.P. Group Limited – Aerospace Division - Accessibility Plan

### **Inquiries, Feedback and Alternative Formats**

Any requests for IMP Aerospace's accessibility plan in an alternate format, and/or for any feedback or inquiries regarding the plan please contact:

- email to: [accessibility@impaerospace.com](mailto:accessibility@impaerospace.com)

- Mail to

Kate Laing - HR Director  
557 Barnes Drive  
Enfield, Nova Scotia, B2T 1K3

- Or Call 902-873-2250 Ext: 1265

### **Areas described under section 5 of the ACA**

#### **Employment**

As a federally regulated employer, governed by the Employment Equity Act, it is part of IMP Aerospace's mandate to reduce/eliminate barriers in the workplace for people with disabilities. We have recently had members of our hiring teams, including our hiring managers, recruiters and HR Department complete intercultural competency and unconscious bias training in an effort to reduce bias in the hiring process.

We have begun the process of reviewing our job descriptions to validate minimum requirements and to eliminate unnecessary references which could result in barriers to people with disabilities.

We are working with our IT Department on the implementation of new applicant tracking software, with a mandate to ensure the system is user friendly for all applicants.

As part of our interview process, both with internal and external candidates, for both entry level and promotion-based opportunities, we verify whether a candidate requires any level of accommodation to ensure accessibility. We also ensure interviews can be held in an accessible location.

We have an equity statement in all of our job postings welcoming persons with disabilities to apply and to self identify if they choose to do so.

Ongoing consultation is required to continue to identify any barriers to employment within our organization, and to update the Accessibility Plan as appropriate. Over the next six (6) months, we will be conducting several focus groups with our Employment Equity Committee and persons with disabilities to ensure we have properly considered all barriers to employment.

I.M.P. Group Limited – Aerospace Division - Accessibility Plan

Action	Steps	Responsibility	Timeline
Ongoing Focus Groups with Persons with Disabilities/Employment Equity Committee	Review Recruitment Process Review Hiring Policies	Director HR	June-Sept 2023
Identify mitigation strategies based on Focus Group Results	Make changes to policies and procedures Update Accessibility Plan	Director HR	October – December 2023
Provide communication and training on changes to all requisite parties	Provide training	Director HR	December 2023

**The Built Environment:**

IMP Aerospace operates from multiple leased hangars and buildings located at Halifax Stanfield International airport. There is a large range in building age – the oldest buildings were constructed when the Halifax International airport first opened in 1960. Since then, IMP Aerospace has constructed or acquired newer facilities on site – the newest was built in early 2000. While all buildings met code during the time of construction, not all accessibility features are available in legacy buildings.

IMP Aerospace will work with building owners to review existing building accessibility requirements and engage with a third-party consultant to review accessibility requirements with a goal of assessing 2 out of 7 buildings by the end of March 2024 and ensuring all future building modifications consider all accessibility requirements.

IMP Aerospace will continue to provide assistive devices and tools for employees with disabilities such as adjustable height desks and assistive technology such as speech to text. In addition, IMP will work with persons with disability to identify barriers and challenges and develop strategies to implement modifications and renovations to the physical workspace.

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<b>Action</b>	<b>Steps</b>	<b>Responsibility</b>	<b>Timeline</b>
Assess buildings for accessibility	Assess 2 out of 7 Buildings	Facilities	Sept 2023 – Mar 2024
Assess buildings for accessibility	Assess 7 out of 7 Buildings	Facilities	Apr – Dec 2024

### **Information and Communication Technology**

IMP Aerospace has implemented information and technology to improve accessibility for our employees. This includes requests for assistive technologies (e.g. text-to-speech, closed captioning, dictation, high contrast, alternative input devices, etc.) in order to implement the best fit solution.

The IMP Aerospace IT team will collaborate with the Employee Equity Committee and consult with persons with disabilities to help identify barriers and challenges which may be remedied through IT. In addition, the IT infrastructure team will undertake an internal learning session on accessibility in IT, such that they will be more readily able to respond to accessibility requests from all users and ensure accessibility is included as a design consideration for software developed for internal use.

### **Communication**

Through our annual engagement survey process, accessibility to communication has been identified to be an ongoing priority for our employee group. A project team was initiated to devise a strategy to improve the accessibility of all formal communications. As a result of that project the process for issuing company communication has been standardized, and all communications are posted on the company intranet site to ensure accessibility for all.

A feedback mechanism is built into the site which allows employees to indicate whether the communication was clear and concise. This and any other feedback received about the communication tool related to accessibility will be used to make changes to the accessibility plan.

In addition, the IMP Aerospace recently engaged in an update of our Mission and Vision Statements. During the consultation process we obtained feedback about the “readability” of the framework for persons with visual disabilities and incorporated that feedback into our final design.

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Feedback from the Employment Equity Committee and Focus Groups will also be incorporated into our plan.

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

IMP Aerospace procures a wide range of products and services to support its operations.

IMP Aerospace will work to embed accessibility requirements within the procurement process by identifying at the procurement request stage whether the goods or services to be procured have accessibility requirements. Guidance and training will be provided to the procurement team to improve their awareness of accessibility considerations in all procurement and contract activities.

### **Design and Delivery of Programs and Services**

IMP Aerospace's core business is the maintenance, repair and overhaul of Canadian and International military aircraft. For a significant portion of our workforce there are occupational requirements related to the work performed.

IMP Aerospace works to create Policies and Procedures that consider accessibility whenever possible. The following programs and policies support the ongoing needs of persons with disabilities in our workplace:

AD (Administrative Directive/Policy) 215 – Workplace Flexibility. This policy was released in 2022 and allows employees to select from a base of core hours, part time work, and temporary work from home options. This is one tool that allows employees with disabilities to address additional personal care or medical requirements and deal with temporary worsening conditions or flare ups.

AD (Administrative Directive/Policy) 224 – Workplace Accommodation – outlines the Company's duty to accommodate mental or physical disabilities. This AD (Administrative Directive) outlines the process for obtaining a medical accommodation which allows for people with physical or mental disabilities to reduce hours of work, alter the shift schedule, and introduce restrictions to the working conditions.

IMP Aerospace has a comprehensive Benefits Program that includes short- and long-term disability benefits for the management of acute mental and physical disability, as well as an extended health plan and employee and family assistance plan that supports the ongoing care and management of many mental and physical disabilities.

There is also a significant commitment to the Return-to-Work process following an injury or illness that has led to a permanent disability, including workplace assessments by occupational therapists, ergonomic assessments, and the option for alternate work, when an employee cannot return to their previous occupation or job classification.

## I.M.P. Group Limited – Aerospace Division - Accessibility Plan

Ongoing consultations with the Employment Equity Committee will include a review of our current policies and programs to determine if changes are recommended to further reduce barriers to people with disabilities. In addition, additional Focus Groups will assess any feedback given in these areas, and the plan will be amended as necessary to address any updates.

### **Transportation**

IMP Aerospace is only engaged in the transportation of its employees on a very limited basis and therefore this is not a key consideration of the Accessibility plan for IMP Aerospace.

Throughout the year a small number of IMP Aerospace employees in specific job classifications may be required to travel for work. We do not transport these employees directly, but we arrange their transportation. In these cases, we have introduced several policies and procedures to ensure transportation is barrier free including the following:

In most cases, designation of persons for travel is based on a request for volunteers in the job classification.

Anyone with barriers to travel may go through our Workplace Arrangement or Medical Accommodation process and be excused from the travel requirement altogether.

Alternate transportation methods can be arranged (air, vehicle, shared vehicle, taxi) depending on the distance and time requirements of the work assignment.

Special accommodations for travel are made by making the requirements known to the travel coordinator.

In addition, if an employee is facing short term transportation issues related to the day-to-day work location – an employee can request a flexible work arrangement to their core hours or temporary work from home arrangement through our Workplace Flexibility Policy or Medical Accommodation Policy to address these issues.

### **Consultations**

IMP Aerospace has surveyed its employees to get their feedback and recommendation on accessibility throughout its facilities. The survey was built to cover the areas under section 5 of the ACA. Survey results were mainly distributed under the Built, Communication, Programs, and ICT sections. Main initiatives covered in this plan were built to address those main areas.

Although the survey was key to building the Accessibility Plan, IMP Aerospace will continue to identify ways to consult and work with the Employment Equity Committee over the coming year to improve the plan and to explore in more detail some areas in order to make our organization more accessible to persons with disabilities.