

# **Bruce Power**

## **Accessibility Plan Progress Report**

### **Dated: June 1, 2024**

Bruce Power proudly supports the rights of people with disabilities to equal access in employment and services. In accordance with our organizational obligations under the *Accessible Canada Act*, S.C. 2019, c. 10 (“ACA”) and the Accessible Canada Regulations, on June 1, 2023, Bruce Power developed and published a comprehensive Accessibility Plan (the “Plan”) to assist in identifying and removing barriers, as well as preventing new barriers from emerging through our policies, programs, practices, structure, and services offered by Bruce Power. This document is Bruce Power’s first progress report related to the Plan.

#### **1. General**

Bruce Power is committed to offering an inclusive and accessible work environment and services for people with disabilities. We are committed to meeting the needs of people with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and complying with the requirements under the ACA. Where it is not possible to remove barriers, Bruce Power will make efforts to accommodate people with disabilities in a timely, effective, and suitable manner.

Bruce Power’s priority as an employer is to offer a barrier-free environment for workers. Accessibility touches all aspects of the worker life cycle including recruitment, onboarding, learning & development, promotion, and retirement. It engages our leadership in the built environment, employment and information and communications technologies.

Bruce Power’s priority as a service provider is to offer a barrier-free experience for visitors and the community. The Bruce Power’s Visitors Centre re-opened to the public following an extensive renovation that considered equitable practices into the design to make the building fully accessible. This includes new interactive exhibits. The interactive centre is available to the public year-round to explore the world of nuclear energy. During the summer months, Bruce Power provides accessible bus tours of the site, which is open to the public.

Annually, Bruce Power’s Accessibility Plan is reviewed and measured for progress. Initiatives are embedded within our Diversity, Equity, and Inclusion strategy to ensure progress towards the commitment to providing an inclusive and accessible work environment and services for people with disabilities.

## **2. Progress under Section 5 of the ACA**

### **a. Employment**

People are our greatest resource. Bruce Power recognizes that having a diverse and talented workforce will allow us to power the future. We are committed to leveraging the power of diversity, equitable practices and focusing our efforts for inclusion within recruitment, performance management, career development and action feedback from our workers through our engagement surveys and Employee Resource Groups.

In 2023, we increased our workforce composition of people with disabilities by 3%.

We took the following steps in 2023 to support an inclusive and accessible workplace:

- Reviewed our external careers website and internal recruitment process to ensure alignment with our Accessibility Plan and identify additional areas for improvement.
- Notified candidates about the availability for accommodation for applicants with disabilities in our recruitment processes through our Frequently Asked Questions portion of our Careers page on our external website.
- Embedded in our Recruitment Strategy organizational hiring commitments specific to the four designated groups, including people with disabilities. In 2023, these commitments were set with the consideration of the current workforce composition, market availability and desire to challenge ourselves to continue to close gaps within our workforce.
- We encouraged candidates to request accommodation measures throughout the hiring process to provide them with an inclusive and barrier-free experience.
- When making offers of employment, we notified the successful applicant of our policies and programs to support people with disabilities.
- If a selected applicant requested an accommodation, Bruce Power consulted with the applicant and provided or arranged for the provision of a suitable accommodation in a manner that considered the needs of the applicant.
- Bruce Power has a comprehensive policy for developing individual accommodation plans and return-to-work plans for employees that have been absent due to a disability. These were utilized throughout 2023 to ensure appropriate accommodations were considered and implemented where appropriate.
- Enhanced our voluntary self-identification survey through our Human Resource Information System expanding the definition of disability to include both visible and non-visible disabilities.

Employees are also offered the survey during the onboarding process and can update anytime within their employment.

- Delivered leadership training “Leadership: Cultivating a Psychologically Safe and Inclusive Workplace” as part of our annual mandatory leadership training. Leaders were taught how to support workers experiencing mental health challenges, the importance of diversity, equity, and inclusion, and how to help to build and foster a culture of excellence where teams can thrive and perform at their best.
- Delivered training on inclusive learning styles to trainers across site to support a more inclusive and effective learning environment by incorporating a variety of instructional methods and materials that cater to different learning preferences, including people with disabilities.
- Delivered inclusive leadership training to our union team leads. This training program was delivered through various learning platforms to include examples on manage the diversity of workers and enhance leadership competency. There was a focus on a psychologically safe training environment for handling difficult situations as well as dramatizations that included DE&I elements to help leaders learn to manage the diversity of our workers.
- Improved our Mentorship Program to increase engagement and promoted the Program specifically to the four designated groups, including people with disabilities, to support development.
- Reviewed exit interviews/surveys and analyzed data for equity trends that may be creating barriers for people with disabilities.
- In support of workers who identified with a mental health disability, we extended Canada’s Mental Health week in May, providing a month-long campaign with weekly programming filled with outreach, lunch and learns, webinars and resources.
- Partnered with our benefits provider to bring awareness and access to resources built out to support women in the workplace who identified with a mental health condition. The resources included offering free virtual therapy, a one-year complimentary subscription to internet based cognitive behavioural therapy and access to a customized mental health and wellness library.

As part of our commitment to the Plan we also have established actions going forward.

In 2024, we intend to:

- Enhance our monthly DEI scorecard related to the four designated groups, including people with disabilities, to measure progress and monitor trends in hiring, promotion, and retention.
- Work to revise governing documentation for training of workers to provide specific support for people with a learning disability.
- Conduct a workplace disability awareness campaign to include education for staff on accessible and inclusive culture to support visible and non-visible disabilities in the workplace. (2024-2025)
- Review/revise our guidelines on the duty to accommodate and expand its application to people with learning disabilities.
- Provide learning resources to bring awareness and education that support people with disabilities and inclusion in the workplace.
- Set hiring commitments for the designated groups, including people with disabilities, in our pre-apprentice programs in partnership with post-secondary institutions and trade unions.
- Review/update our external careers website and application process to ensure the functionality works with assistive technologies.
- Develop resources on inclusive language to break down systemic inclusion barriers.

In 2025, we intend to:

- Support employees interested in forming an Employee Resource Group focused on supporting and elevating people with disabilities in the workplace. Consider partnerships with organizations to increase representation of designated groups candidates where gaps exist, including people with disabilities.
- Evaluate our programs in the learning environment to increase support for workers who identify with a disability.

### *Accommodation*

Bruce Power has a comprehensive policy for developing individual accommodation plans and return-to-work plans for employees that have been absent due to a disability.

Among other things, Bruce Power ensures that each person with a disability is considered individually, on a case-by-case basis, to determine their accommodation needs, if any. We involve the employee requiring the accommodation as well as any applicable union representative, in the accommodation process.

Detailed information on the Accommodation Policy is available on the company's intranet and includes a method to request alternative formats.

## **b. The Built Environment**

Bruce Power considers accessibility needs when building and/or renovating buildings that support the Bruce Power business, including our Visitors' Centre which open to the public. We strive to address accessibility needs in the design phase, aligning with compliance to building codes and standards.

Bruce Power has procedures in place to prevent service disruptions to the accessible areas in public spaces. In the event of a service disruption, we notify the public of the service disruption and alternatives. In the event an accessibility option is temporarily unavailable (i.e., for repair), direction is provided to individuals regarding the next closest available accessible option.

In 2023 Bruce Power took the following initiatives to increase inclusion and accessibility in the built environment:

- Decreased wait times in Supply Chain that were impacted by the pandemic, to prioritize and provide efficient and effective access to material and equipment to maintain accessible doors. This was previously a concern as accessible doors would be out of service for lengthy periods of time.
- To support employee well-being, we have added two additional locations of dedicated rooms for quiet space, personal reflection, meditation and/ prayer. There are now a total of nine locations across site and satellite locations, which also support people with disabilities.
- Upgraded office furniture in the stations with ergonomic, sit/ stand workstations, that complement our ergonomic chairs.
- Evaluated our barrier free parking to ensure adequate space is provided.

As part of our commitment to the Plan we also have established actions going forward.

In 2024, we intend to:

- Standardize reflection rooms across site and satellite locations to provide a quiet, sensory-free space to support the well-being of our workers, including people with disabilities.

In 2025, we intend to:

- Continue to apply design standards and consult with employees, including persons with disabilities, when developing new building infrastructure and projects.

### **c. Information and Communication Technologies (“ICTs”)**

Bruce Power utilizes the Microsoft suite of tools such as, but not limited to, Microsoft 365, Outlook, Word, Excel, PowerPoint, Teams, and OneNote which include built-in accessibility features. These features enable users to customize their experience to meet their specific needs, such as adjusting text size, using screen readers, or enabling keyboard shortcuts. In addition, Microsoft 365 adheres to widely recognized accessibility standards, including the Web Content Accessibility Guidelines (WCAG) and the Microsoft Accessibility Standards (MAS). This ensures that Microsoft's products are designed with accessibility in mind from the outset. Employees can be directed to [Microsoft Accessibility Help](#) to enhance their user experience. Information on these resources is also available on our intranet for individuals to access. Support exists for vision, hearing, neurodiversity, learning, mobility, and mental health disabilities.

Bruce Power is committed to ensuring all publicly available information is made accessible upon request and that all existing websites and content conform with WCAG 2.0, Level AA.

In 2023 Bruce Power enhanced conference rooms with visual and audio technology to support hybrid meetings that increased accessibility for engagement and participation. As part of our commitment to the Plan we also have established actions going forward.

In 2024, we intend to embed Closed captioning in our mandatory safety videos.

In 2025, we intend to update our external and internal internet websites to ensure they function with assistive technology.

### **d. Communication, other than ICT**

Bruce Power is committed to meeting the needs of people with disabilities and communicating in ways that consider their disabilities. Bruce Power has ensured that existing processes for receiving and responding to feedback are accessible to people with disabilities, upon request.

#### *Accessible Emergency Information*

Bruce Power provides its visitors, employees, and contractors with publicly available emergency information in an accessible way upon request. All visitors to our site have a sponsor who is responsible for their safety. We also provide people with disabilities with individualized emergency response information when necessary.

Accessibility processes during an emergency event on site include:

- Audio alarms for building evacuations with lights on some of the building fire alarms. In the stations, there is a visual alarm in the main elevators which is activated during an Emergency Response Tone or Station Emergency tone out.
- As per BP-PROC-00405, Bruce Site Assembly, Accounting, and Evacuation, assistance is provided to those who have disability-related restrictions that interferes with their ability to assemble or account during an event.
- There are chair lifts in buildings to assist with people getting up/down the stairs if they require it.

As part of our commitment to the Plan we also have established actions going forward.

In 2024/2025, we intend to seek opportunities to provide on-screen notifications for emergency alerts.

#### **e. Procurement of Goods, Services and Facilities**

When procuring new/leased facilities Bruce Power reviews each space or design in accordance with the ACA. Bruce Power looks to ensure new/leased facilities are designed with accessibility in mind, such as ensuring barrier free: parking, pathways, entrances/doorways, seating, washrooms, and emergency routes.

There was no specific feedback to address in this area. We will continue to monitor and seek feedback for improvement.

#### **f. The Design and Delivery of Programs and Services**

Bruce Power is committed to educating our workers at our public facilities to recognize and support the following:

##### *Assistive devices*

We ensure that our staff are trained and familiar with the assistive devices that may be used by customers and clients with disabilities while accessing our goods and services.

##### *Service Animals*

Bruce Power welcomes people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public.

### *Support Persons*

A person with a disability who requires a support person is permitted to have that person accompany them on our premises.

There was no specific feedback to address in this area. We will continue to monitor and seek feedback for improvement.

### **g. Transportation**

Bruce Power has accessible parking available at each of our occupied facilities. Bruce Power considers alternative transportation in the event it is required.

Identified opportunities to improve in this area include:

- Consider accessible transportation services to/from the work location as well as between site buildings. This is ongoing.

## **3. Consultations**

Following the principle of Nothing Without Us, we developed the Plan and this Progress Report in consultation with our workforce and community. We issued a confidential and anonymous survey asking individuals to review and provide feedback on our Plan through our internal and external websites, extending the survey window to year-round for soliciting feedback.

Additionally, in the second quarter of the year we promoted the Plan and survey through our Social Media channels inviting the community to participate prior to opening our doors to our summer bus tours. Our focus was on identifying, eliminating, and preventing barriers in each of the priority areas set out in the ACA. We will continue to engage with our staff and communities as we implement this Plan and report progress.

Our tri-partite Diversity, Equity & Inclusion Committee also had the opportunity to review and provide input to build this Plan, including developing and supporting initiatives related to accessibility. The Committee meets on a regular basis and received feedback from the union members they represent supporting our diversity, equity and inclusion program which is evaluated and updated annually. For the remainder of 2024 and going forward, the solicitation of feedback will be made a formal agenda item for these meetings.



## 4. Feedback

To strive for excellence, Bruce Power has consulted various organizations', public policies, accessibility plans and progress reporting on accessibility for benchmarking. The Diversity, Equity & Inclusion team members regularly participate in online forums, such as webinars and roundtables with experts to learn about opportunities to support an inclusive and accessible work experience.

Soliciting feedback on our company's Accessibility Plan and Progress report is an essential component of our commitment to diversity, equity, and inclusion (DEI).

### ***Feedback Process***

In the 2023 Plan, Bruce Power provided a mechanism for individuals to receive more information on or a copy of the Plan, request an alternate accessible format of the Plan or provide feedback on barriers encountered when dealing with Bruce Power, the Plan, including its implementation, and/or Bruce Power's approach to accessibility. That contact information is as follows:

- Phone: 519-361-2673 x17188
- Email: [BNPDDiversityEquityandInclusion@brucepower.com](mailto:BNPDDiversityEquityandInclusion@brucepower.com)
- Mail: Bruce Power

PO Box 1540

c/o B10 Human Resources – Diversity, Equity & Inclusion

177 Tie Rd.

Tiverton, ON

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Additionally, as noted above, Bruce Power created a survey link that was posted internally and externally to allow for anonymous feedback. Through that survey link, Bruce Power received feedback directly from people with disabilities.

DEI initiatives are overseen by our executive leadership team, which meets bi-monthly, and ensures a proactive approach to addressing accessibility concerns. Our DEI strategy and programming are evaluated annually, reflecting our dedication to staying responsive to evolving needs and best practices. Consultation and avenues for input are ingrained in our governance framework, extending throughout all levels of the organization to ensure representation and inclusivity. This broad approach allows us to

capture diverse perspectives and insights, enriching our understanding of accessibility challenges and opportunities.

By embedding feedback mechanisms into our DEI program annually, we foster a culture of continuous improvement and accountability. This process enables us to track progress, identify areas for enhancement, and reinforces our commitment to creating an accessible and inclusive environment for all. Our dedication to soliciting feedback underscores our belief in the importance of collaboration and community engagement for driving meaningful change. We recognize that accessibility is not just a checkbox but a fundamental aspect of our organizational goals, and by actively seeking input, we reaffirm our commitment to advancing accessibility and inclusivity across our company. Through ongoing dialogue and partnership, we strive to ensure that our Plan and Progress report accurately reflect the needs and experiences of all individuals accessing our facilities and services, empowering us to make informed decisions and meaningful strides towards a more accessible and equitable future.

Since the issuance of the Plan on June 1, 2023, a total of 13 individuals provided feedback on the Plan, with 54% of those individuals confirming that they identified as having a disability.

As part of our planning for the remainder of 2024 and into 2025, we will review and consider this feedback and look for or create opportunities to incorporate it into our workplace initiatives. Updates on our progress in relation to the feedback will be included in our June 1, 2025, Progress Report, as well as our updated Plan which is due June 1, 2026.