

CANADA LANDS COMPANY LIMITED

# Multi-Year Accessibility Plan 2026 - 2029

Updated – December 31, 2025



Canada Lands Company  
Société immobilière du Canada



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## COMMITTEE MESSAGE

### Message from Canada Lands Company's Accessible Canada Committee (the "Committee")

Canada Lands Company Limited and its subsidiaries (the "Company") is committed to improving accessibility and inclusion by removing barriers. The Company realizes that providing an accessible and inclusive environment across Canada is a shared effort; communities, businesses, and services must work together to make accessibility a reality.

This updated Multi-Year Accessibility Plan ("MAP"), will serve as an updated roadmap for the Company to continue to work towards becoming a more accessible and inclusive Company, aligning with the Federal Government's expectations as outlined in the *Accessible Canada Act* (the "Act") and its regulations.

The updated MAP introduces a new three-year cycle, setting clear targets and timelines to achieve accessibility goals. It reinforces the Company's commitment to continuous improvement through annual reviews and progress reports, ensuring transparency and accountability.

*Teresa Law*  
Chief Human Resources Officer  
Chair, Accessible Canada Committee



## GENERAL

### Contact Information

Feedback regarding access to goods and services and the ways in which employees interact with others is welcomed and appreciated. Feedback can be provided to the Company's Human Resources department by email, phone, in person, or by using the form [here](#).

If you have any questions, feedback or accommodation requests, or would like to request a copy of the Company's accessibility policies and procedures in an alternate format, please contact:

Rose Crisostomo, CHRL  
Director, Human Resources  
Head Office  
One University Suite 1700 Toronto, ON  
Phone [416-214-1255](tel:416-214-1255)  
Email: [rcrisostomo@clc.ca](mailto:rcrisostomo@clc.ca)

### Accessibility Feedback Process

Feedback can be any comment, whether positive or negative including complaints, related to the Company's goods, services, employees, facilities, programs, accommodations, or other aspects of the Company. Feedback can come from a Company employee, consultant, guest, or any member of the public. An employee of the Company who receives feedback related to accessibility will discuss it with Human Resources to determine the appropriate response.

Anyone providing feedback to the Company will receive an immediate acknowledgement from Human Resources. When possible, a verbal response will be made to the person within five business days. Written responses will be returned to the person, within ten business days, in a format that is understandable to the author.



If an action is required, Human Resources will communicate and work with the person to determine appropriate next steps. Human Resources will attempt to resolve the situation in a timely manner. If an attempt to resolve the feedback fails, then the feedback will be submitted to the President & Chief Executive Officer. Information about actions taken will be provided to the person who submitted the feedback.



## EXECUTIVE SUMMARY

The Company's updated MAP serves as a strategic framework to identify, remove, and prevent barriers across all divisions. This plan aligns with each division's operational objectives and outlines high-level actions that drive accessibility and inclusion across the Company.

Through this review process the Company recognized that Employment and the Design and Delivery of Programs and Services needs further development, particularly in anticipation of the regulation changes. To address these areas, the Company will work with resource groups to identify barriers and create targeted action plans for improvement.

Through this comprehensive approach, the Company reaffirms its commitment to fostering an inclusive environment and ensuring equitable access for all.

## Communication of the Plan

The updated MAP is a multi-year accessibility plan for 2026 - 2029 and will be shared with employees and the broader community. The MAP, progress reports and the updated MAP is available in an accessible PDF format on the Company's website at <https://www.clc-sic.ca/accessibility> and upon request to the Company's Human Resources Department. Every effort will be made to provide the document in other alternate formats upon request.



## ACCESSIBILITY STATEMENT

### Training

The Company is committed to ensuring that its employees receive training in applicable federal and provincial accessibility and human rights laws, with a focus on training employees on general awareness, employment accommodation, alternative formats and WCAG 2.0 Level AA standards.

Training will be provided on the Company's accessibility policies and procedures for new hires in a timely manner. Refresher training will be provided when changes are made to applicable laws or Company policies and procedures. The Company will also ensure that suppliers or service providers working on behalf of the Company or participating in the development or approval of Company policies receive accessibility training.

### Accessibility Policies and Procedures

For more information on the Company's accessibility services and access to online versions of the Accessibility Policy and the MAP, please visit Company's website. <https://www.clc-sic.ca/policies>.

### Accessibility Compliance

The Company is committed to meeting all the obligations and deadlines for Crown corporations set out in the Act and its regulations. To review the Act, please visit Government of Canada's website. <https://laws-lois.justice.gc.ca/eng/acts/A-0.6/>



## CONSULTATION

The MAP and the progress reports were developed through various consultation processes, including management, employees, accessibility committees, third-party consultants, and members of the disability community. The third-party consultant conducted focus group discussions with members of the disability community, conducted a review, and provided a summary of recommendations and feedback, which were incorporated into the MAP. The updated MAP was also developed through various consultation processes, including management, employees, accessibility committees, and members of the disability community and people with lived experiences.

## Feedback

The Company did not receive any specific feedback on its previous MAP or its progress reports. Since the Company has not received feedback on the MAP or progress reports via its current procedure, it shall investigate whether its process can be made more accessible and adjust accordingly.

However, the Attractions division received feedback on building access and services received, including the following:

### **Building access and exits:**

Feedback on building access.

*The distance from the ramp to the elevator was challenging for someone with mobility needs, it should be communicated to guests ahead of their visit.*

The Company's resolution regarding the feedback included an update to its accessibility guide stating the following:

“After passing a security check, you can take the high-speed elevators up to the Main Observation Level and beyond. Guests will need to traverse a 20 metre (64ft.) ramp at a 6-degree incline to access these elevators.”



Feedback on building exit.

*At times the guests do not notice the accessible door at the exit.*

The Company's resolution to the feedback included additional signage pointing to the accessible exit and the security team member verbally directing guests to the accessible exit as necessary.

Other feedback.

*It's hard for people with mobility limitations. to reach the dining area and no priority line or support for wheelchair or special needs guests.*

The Company will consider these two areas during future planning.

Positive feedback received included comments on access to onsite wheelchairs, parking, entrances, lifts and customer service for persons with mobility challenges.

**Customer service and services received:**

Access 2 card feedback included:

*The policy for support workers and extending the policy to those who do not reside in Ontario would be great.*

The resolution included providing supervisors with the authority to honour the request for a complimentary ticket for the support worker at their discretion, when the guest is not a holder of the Access 2 Card.

Positive feedback included.

*They did accept the Access 2 pass for people with disability, so the support person was free and didn't have to wait in the huge line up. That was a huge bonus. Thank you, CN Tower, for accommodating people with disabilities.*



Customer service feedback included.

*The assistance your team provided was truly extraordinary, but it was the kindness and dignity with which that help was offered that will stay with us always. Thank you for employing such exceptional individuals and for fostering a culture of genuine care.*

Feedback on the low sensory mornings program included.

*I am so excited that you are introducing the Low Sensory option for Autistic children. Kudos to the team managing these events.*

**Focus Group discussion with employees:**

*Documents presented were not in an accessible format.*

*It would be good to investigate transforming the feedback form into a dynamic fillable form on the HTML site, to remove barriers.*

*It would be good to have more guest speakers with lived experiences.*

*As a Company we should celebrate and showcase our accomplishments better and maybe be more active during Accessible Week.*

*Provide leadership training on empathy.*

*Plan was easy understood and good to follow.*

Where possible, the Company has modified, edited or included an objective to address the feedback received.



## PRIORITY AREAS UNDER THE ACCESSIBLE CANADA ACT

- Employment
- Built Environment
- Information and Communication Technologies (ICT)
- Communication, other than ICT
- Procurement of Goods, Services, and Facilities
- The Design and Delivery of Programs and Services



## Employment

The Company is committed to providing fair and accessible employment opportunities at all stages of the employment cycle. This includes ensuring accessible recruitment and selection processes, creating individualized workplace emergency response plans, providing formal written accommodation and the return-to-work plans. All processes involve consultation with the employee or potential employee. The Company is also committed to informing all employees of policies and procedures that support accessibility in the workplace.

### Initiatives:

1. Collaborate with external employer partners to identify and implement strategies that improve accessibility for candidates throughout the recruitment process, including converting forms into fillable formats, and ensuring that the forms are created using plain language.

**Human Resources – December 2026**

2. Improve the collection of health and safety data, including emergency evaluation information for persons with disabilities.

**Human Resources – December 2026**

3. Consult with resource groups to stay informed of the Act and its regulations, Employment standards, and to identify accessibility barriers, incorporating changes and updates into the MAP.

**Human Resources – December 2026**

4. Meet with employees to ensure they understand their responsibilities in the process of identifying accessibility barriers and improving documenting initiatives and progress.

**Human Resources – December 2026**



5. Identify employee accessibility barriers through employee engagement surveys and focus groups.

**Human Resources – December 2027**

6. Develop and strengthen partnerships with CanWin, Ready, Willing and Able, Ontario Disability Employment Network and Realize to expand expertise in accessibility through targeted training and awareness programs.

**Human Resources – December 2027**

7. Enhance understanding and compliance with the accessibility legislation by providing employees with refresher training on the *Canadian Human Rights Act*.

**Human Resources – December 2027**

8. Train managers to improve their knowledge and empathy regarding managing people with disabilities in the workplace. In addition, develop a workshop for employees in sign language for people with hearing impairments

**Human Resources – December 2027**

9. Develop and maintain a workforce that is broadly reflective of the communities in which the Company operates, including the disability communities.

**Human Resources – December 2028**

10. Ensure Real Estate employees are trained on the Company's accessibility policy, plans, resources, and reporting requirements.

**Real Estate – December 2028**



## The Built Environment

The Company is committed to ensuring, wherever possible, that newly constructed or redeveloped built environments and public spaces are designed in a way that takes into consideration the prevention or removal of barriers for all users. Unplanned changes to existing public spaces to meet the standard are at the Company's discretion (including emergency repairs or forced changes that were not anticipated or planned for in advance).

### Initiatives:

1. Work with the City of Toronto to create specific action plans related to improving the passenger drop-off area on Bremner Blvd and PATH accessibility, including curb ramp, signage, paving and seating.

**CN Tower Facilities & Engineering – December 2026**

2. Create specific action plan related to the re-development of the outdoor patio areas, including seating, shelter, and signage.

**CN Tower Facilities & Engineering – December 2026**

3. Create and manage an action list of existing building improvements that can be made to improve accessibility and remove barriers within the CN Tower for all users.

**CN Tower Facilities & Engineering – December 2026**

4. Identify and consider the inclusion of policies and guidelines in new policy plans and guideline documents that direct the design of the public realm, using feedback received during engagement processes and local municipal requirements. Policies and guidelines should promote widely accepted accessibility standards.

**Real Estate Project Managers – December 2028**



5. Meet or exceed accessibility requirements in the design and construction of the public realm, public spaces, signage, and wayfinding.

**Real Estate Project Managers – December 2028**

6. Consider accessibility for all users when making decisions about the acquisition of new properties, the rehabilitation of Company-owned buildings, and the leasing and design of new Company offices.

**Real Estate Project Managers – December 2028**

7. Work with accessibility consultants to create actionable plans that incorporate accessibility into all new designs and enhance access throughout Downsview Park.

**Downsview Park – December 2029**



## Information and Communication Technologies (ICT)

The Company is committed to making ICT accessible to all users. This includes hardware and software that enable employees and others to share or do their work. Examples include websites, web applications such as Outlook, documents in PDF, MS word, or PowerPoint, phones or tablets, or virtual platforms like Zoom or Microsoft Teams. It also includes all matters concerned with the design, development, installation and implementation of information systems and applications to meet business requirements.

### Initiatives:

1. Continue to stay informed of the Act and its regulations, including changes and updates of the ICT standards.

**Information Technology – December 2026**

2. Identify and enable accessibility features on all devices and relevant software provided to employees by the Information Technology shared services team.

**Information Technology – April 2027**

3. Ensure all Real Estate project websites, web content, and social media meet established accessibility design standards.

**Real Estate Project Managers – December 2028**



## Communication, other than ICT

The Company is committed to making information and communications accessible to all. This includes a commitment to ensuring both print and online information is accessible to employees and the public, including emergency and safety information and website content. The Company is also committed to making every effort to provide information in alternate formats when requested.

### Initiatives:

1. Install a comprehensive digital messaging system at the CN Tower.

**CN Tower Communications – December 2026**

2. Train employees in working with and providing communications to people with accessibility needs, including the use of plain language and making documents accessible.

**CN Tower Communications – December 2026**

3. Continue to stay informed about new communications tools that could help provide accessibility information to employees and guests.

**Communications – December 2027**

4. Continue to stay informed of the Act and its regulations, including changes and updates the Communications, other than ICT standards.

**Communications – December 2026**

5. Conduct an accessibility review of wayfinding and signage around the CN Tower.

**CN Tower Communications – December 2027**



## Procurement of Goods, Services and Facilities

The Company is committed to ensuring meaningful consideration to accessibility when specifying requirements in the goods, services, and procurement. To ensure the Company's products meet ergonomic standards, clear instructions and support materials are available.

### Initiatives:

1. Continue to stay informed of the *Act* and its regulations, including changes and updates to the Procurement of Goods, Services and Facilities standards.

**Legal – December 2026**

2. Train employees that are involved in the procurement of accessible products and services on the *Act* and human rights to understand the needs of people with disabilities.

**Human Resources – December 2029**



## Design and Delivery of Programs and Services

The Company is committed to the guiding principles and best practices of accessibility for all employees, visitors, guests, and customers. This includes continuing to improve accessibility through programs and services, accessible platforms, engagement, and feedback forms.

### Initiatives:

1. Identify areas of action defined by the Act, that will enable the Company to integrate accessibility principles into its operations.

**Human Resources – December 2026**

2. Consult with resource groups to stay informed of the Act and its regulations to the Design and Delivery of Programs and Services standards, and to identify accessibility barriers, incorporating changes and updates into the MAP.

**Human Resources – December 2026**

3. Review the process for posting the MAP and progress reports to investigate whether its process can be made more accessible.

**Human Resources – December 2026**

4. Review the feedback process and ensure that the process, including the forms are in an accessible and barrier-free format.

**Human Resources – December 2026**

5. Implementation of the Hidden Disabilities Sunflower program. The program provides a way for people to voluntarily share that they have a disability or condition that may not be immediately apparent and that they may need a helping hand, understanding, or more time in shops, at work, on transport, or in public spaces.

**CN Tower – December 2027**



6. Conduct a review of the self-identification process and add a question in the survey to identify employees that would be willing to participate in focus group or one-one discussions with Human Resources.

**Human Resources – December 2027**

7. Collaborate with Downsview Park's education team, community groups, and accessibility consultants to design and deliver inclusive and accessible programs for visitors.

**Downsview Park – December 2028**

8. Ensure public engagement programs consider accessibility when designing materials and planning events. Public materials should be accessible and in-person events should be barrier-free.

**Real Estate Project Managers – December 2028**



## CONCLUSION

The Company is committed to the prevention, identification, and removal of Barriers for people with disabilities. The Committee will monitor its progress against the updated MAP commitments and provide status updates annually on the Company's corporate website.

The review of the updated MAP will occur in 2028 in consultation with the Company's accessibility committees, employees, and community members, including the disability community. The MAP will coordinate across all service areas to create a shift in the workplace culture with respect to accessibility standards. The Company will demonstrate and maintain accessibility excellence as an inclusive employer, service provider and Crown corporation.

The MAP will coordinate across all service areas to create a shift in the workplace culture with respect to accessibility standards. The Company will demonstrate and maintain accessibility excellence as an inclusive employer, service provider and Crown corporation.

Copies of the MAP, the updated MAP, or the progress reports can be made available, and the Company will provide alternative formats upon request. Please contact Rose Crisostomo, CHRL Director, Human Resources. Head Office at One University Suite 1700 Toronto, ON Phone 416-214- 1255 Email: [rcrisostomo@clc.ca](mailto:rcrisostomo@clc.ca).