

**NEWFOUNDLAND LABRADOR
LIQUOR CORPORATION**

ACCESSIBILITY PLAN

2024-2026

NLC

This document is available in alternate formats.

Please email accessibility@nliquor.com or telephone 709-724-2236

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Message from Bruce Keating, President and CEO

On behalf of Newfoundland and Labrador Liquor Corporation (NLC), I am pleased to share our Accessibility Plan 2024-2026, which will act as a guide towards identifying and removing barriers to policies, programs, and practices, and ensuring inclusive and accessible environments for our employees and customers.

NLC is continually committed to Diversity, Inclusion, and Belonging (DIB) and we recognize the importance of a safe, supportive, and inclusive workplace. We strive to provide an environment where employees feel valued, are encouraged to maintain a healthy and safe work life and are provided opportunities to succeed. In the same manner, customer excellence at NLC involves ensuring that our customers feel safe and included when shopping in our stores and providing barrier-free access so that everyone can enjoy the customer experience at NLC.

This plan and the contents within represent the first phase of a multi-year strategy by NLC to continue to strengthen our commitment to accessibility. To ensure the highest standards, we have consulted with key stakeholders including persons with disabilities and a key representative with Empower, The Disability Resource Centre (EmpowerNL). A steering committee has also been developed within NLC to help guide the continued development of the plan and ensure that any identified barriers to accessibility are removed from all aspects of our operations.

I look forward to working further with key stakeholders and our entire corporation in achieving the commitments laid out in our plan, and to help provide more equitable access for all in our province.

Bruce Keating



Section 1: Accessibility Statement of Commitment

NLC is committed to providing a safe, healthy, and inclusive space for our Employees, Customers and the public. We strive to continually meet the diverse needs of our Employees, Customers and the public by identifying, preventing, and removing Barriers for persons with Disabilities, and ensuring equitable access to all.

Section 2: About NLC

NLC is a Crown Corporation of the Government of Newfoundland and Labrador with responsibility through the Liquor Corporation Act, the Liquor Control Act, and the Cannabis Control Act for importing, selling, distributing, and managing beverage alcohol and cannabis. NLC also ensures the delivery of programs that promote safe, responsible consumption of beverage alcohol and cannabis.

NLC is one of the largest retailers in the province. Through 28 corporate retail locations, over 140 Liquor Express stores, more than 550 Brewer's Agent outlets, and over 1,400 restaurants, lounges, and other licensees, along with private order services, NLC offers over 4,000 products per year to consumers and its retail partners from more than 20 countries. It also regulates and distributes to 56 licensed cannabis retailers across the province, and offers Customers a secure, legal online environment for cannabis purchases via ShopCannabisNL.com. NLC operates a 77,000 square foot distribution centre, as well as a manufacturing operation, Rock Spirits. The facility, which runs world-class blending, bottling and canning operations, ships to more than 30 countries around the world and has been in operation for over 65 years.

NLC operates with the expectation that it will generate revenue for the Government of Newfoundland and Labrador, with 100% of its profits reinvested in the province to fund key public services. NLC aspires to build trust in everything it does - with Customers, Employees, retailers, commercial partners, and communities, along with Government, to ensure a stronger Newfoundland and Labrador.

Section 3: Definitions

To ensure an understanding of the content of this document, the following terms align with the Newfoundland and Labrador Accessibility Act and are specific to NLC.

- **Accessibility Plan**

A document that addresses how to prevent, identify and remove Barriers in policy, programs, practices and services.

- **Accessibility Standard**

The necessary accessibility requirements established under the Newfoundland and Labrador Accessibility Act.

- **Accommodation**

Any action taken to reduce or remove a Barrier preventing or limiting access.

- **Alternate Formats**

Formats other than print, including videos, podcast/ audio files, large print and Braille documents.

- **Barrier**

Anything that prevents a person with a Disability from fully participating in society, including a physical Barrier, an architectural Barrier, an information or communication Barrier, an attitudinal Barrier, a technological Barrier, or a Barrier established by an Act, regulations, a policy or a practice.

- **Built Environment**

Any physical building which involves interaction with NLC Employees, Customers or the public. This includes our corporate Liquor Stores, NLC office buildings, the Distribution Centre, and Rock Spirits manufacturing operation.

- **Customer**
A person or organization that buys goods or services from NLC.
- **Disability (Disabilities)**
A physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation that is permanent, temporary or episodic in nature that, in interaction with a Barrier, prevents a person from fully participating in society.
- **Employee**
A person employed by NLC for wages or salary.
- **Key Focus Area**
Areas of operation within NLC that service Customers and the public or employs people.
- **Provincial Accessibility Act**
Is known as Bill 38: An Act Respecting Accessibility in the Province (The Act).

Section 4: Accessibility Plan Development

In collaboration with our community partners at EmpowerNL, our Accessibility Plan was developed using a consultative process with key community stakeholders of EmpowerNL.

An Accessibility Steering Committee was established through targeted invitations of key senior management stakeholders who have accountability for specific focus areas. NLC will continue to collaborate with EmpowerNL to ensure that accessibility expertise and insights are included throughout the entirety of the Accessibility Plan.

Our Accessibility Plan and associated requirements will be shared with all

Employees and will highlight the process for Accommodation. Over the next two years, we will focus on increasing our Employees' understanding of accessibility and matters associated with the inclusion of persons with Disabilities. We will communicate responsibilities and timelines for Planned Actions after completion by the Accessibility Steering Committee in January 2025.

Our Accessibility Steering Committee will oversee actions, complaints, or issues that arise, and will provide direction and response when such items are brought forward. NLC will have a dedicated email address and phone number published in the Accessibility Plan, so Employees, Customers and the public can connect with us easily.

Committee Members include

- Ashlie Khaladkar, Manager, Organizational Effectiveness
- Cory Hall, Director, Store Operations & Development
- Derek Taylor, Manager, Facilities
- Doyle Lewis, Manager, Distribution Services
- DJ Murphy, Director, Information Technology
- Greg Eddy, VP Human Resources, Strategy & Risk
- Kristina Stevenson, Director, Manufacturing Operations, Rock Spirits
- Lisa Rodrigues, Director, Human Resources, Strategy and Risk
- Peter Murphy, VP Marketing, Merchandising, Corporate Responsibility & Communications
- Tara Haley, Manager, Corporate Responsibility and Communications
- Vicki Young, Director, Cannabis and Marketing
- Wally Dicks, Chief Operating Officer

Section 5: Focus Areas Overview

NLC has articulated the following focus areas for the upcoming three years to incorporate within our broader DIB, and accessibility work.

- **General Section**

For our efforts to be successful in creating accessible places, practices and policies, NLC is committed to improving accessibility through further educating our Employees and integrating learned practices into policy and program development.

- **Customer Service**

We will seek to understand and mitigate Barriers that Employees, Customers and the public may face when interacting with us, and when shopping in our retail locations.

- **Information Technology**

NLC is committed to improving accessibility and efficiency through intelligent application of technology. As technology is constantly evolving, we recognize that we must continue to seek out and leverage new technology to move towards a Barrier-free technology environment.

- **Employment**

We will review all components within our Human Resource (HR) processes and plans to reduce Barriers for accessing employment at NLC. We are committed to building upon our current accessibility HR features, so that all people have equitable access to meaningful employment.

- **Information & Communications**

We will increase the accessibility of shared communications with Employees, Customers and the public.

- **Built Environment**

We will focus on mitigating and removing Barriers for our Employees and in areas where our Customers and the public interact with us. We will review our corporate Liquor Store locations and establish a plan to reduce Barriers throughout all retail locations.

Section 6: Timelines

Timelines for our Accessibility Plan based on calendar years is as follows:

- **Year One – 2024**

We will look to collaborate with community partners to develop our Accessibility Plan, create the Accessibility Steering Committee, and complete an initial review of associated items of accessibility currently available at NLC.

- **Year Two – 2025**

We will continue to review and identify any shortfalls in accessibility to ensure further reduction and removal of Barriers. The Accessibility Steering Committee will meet quarterly to review key focus areas. Through these meetings and further research, we will identify priorities and begin to mitigate Barriers as identified across our lines of business.

- **Year Three – 2026**

We will begin to implement the action items that were established in the previous year. We will report on accessibility gains made to date and update and amend our Accessibility Plan for the following three years, from 2027 -2029. The next iteration of this plan will include our work on Programs and Services as well as procurement as articulated in the Accessibility Act.

Section 7: Barriers

NLC is committed to reducing our current Barriers to accessibility. This Accessibility Plan will provide a mechanism to continually examine our practices, so that our Employees, Customers and the public can maximize their interactions with us. We also recognize that we will learn of new Barriers as this process develops, through consultation with community partners, and through stakeholder feedback.

Section 8: Provide Your Feedback

We welcome feedback from our Employees, Customers and the public. Internal and external feedback will help inform our advancements and remove Barriers for everyone. Upon review of this document, if you would like to provide feedback based on insights and lived experience, please contact NLC representatives by email or phone.

Email: accessibility@nlliquor.com

Phone: 709-724-2236

Section 9: Keeping the Plan Up-To-Date

This document will serve as our initial plan. As we move forward with the tasks outlined in the Accessibility Plan, we recognize that our work is just beginning and understand that there will be things we will learn, and the Accessibility Plan will be updated as we move forward.

Section 10: Evaluation

Employees, Customers and the public play a vital role in the success of our service delivery. Recognizing that one in four residents of Newfoundland and Labrador experience Barriers on a daily basis, we understand the importance of ongoing feedback and evaluation to continue to remove Barriers for our stakeholders.

The Accessibility Steering Committee will conduct an ongoing evaluation of our Accessibility Plan to guide our work for the next two years. Tools such as Microsoft Office Checklists, Web Content Accessibility Guidelines (WCAG) 2.1 Checklists, and new standards developed by Federal and Provincial governments will help inform our ongoing work to mitigate Barriers. Accessibility Steering Committee representatives will continue to inform NLC's

Executive team and Board of Directors on the ongoing evaluation and progress made throughout the calendar year.

Section 11: Conclusion

NLC is proud and excited to work towards greater accessibility. As we continue to collaborate with community partners and receive feedback from our Employees, Customers and the public, we will be able to better identify Barriers and take the necessary steps to ensure Barrier-free experiences in the future.

Section 12: Focus Area Details

Section 12.1: General

One of the key components to the success of our efforts is to create accessible places, practices, and policies and provide education to Employees across all lines of business and departments within NLC.

- **Barriers**
 - Voluntary self-identification is in place during recruitment processes and with Employee feedback mechanisms. As it is voluntary, we do not have comprehensive data on our Employee representation and diverse needs.
- **Actions To Date**
 - We are re-forming a DIB Committee to work with all lines of our business and departments within NLC.
 - Work has been completed to provide information and training on topics such as gender diversity, unconscious bias, Indigenous culture, creating an inclusive work culture and Black History Month.
 - We continue our Employee Partnership with the Canadian Centre for Diversity and Inclusion (CCDI) to engage with the larger business community committed to a more equitable and inclusive society for all.
 - NLC has celebrated various designated calendar days, including International Day of Persons with Disabilities, Bell Let's Talk Day, PRIDE month, Anti-Bullying Day (Pink Shirt Day), National Day for Truth and Reconciliation, Orange Shirt Day, and International Women's Day.
 - A sensory-friendly shopping hour was launched in NLC's corporate Liquor Stores.
 - Inclusive language training has been incorporated within our Onboarding Program and in training videos for all retail staff.

- **Planned Actions**

- Provide Executive and NLC's Board of Directors information regarding our Accessibility Plan and educate them on the requirements of the Newfoundland and Labrador Accessibility Act.
- Expand NLC's DIB practices to include the recognition of Disability Employment Awareness Month and National Accessibility Awareness Week.
- Host quarterly Accessibility Steering Committee meetings to oversee our ongoing Accessibility Plan evaluation.
- Provide ongoing information sessions on the inclusion of people with Disabilities across all lines of business and departments within NLC.
- Continue to budget accordingly to mitigate Barriers in 2025 and 2026.
- Ensure accessibility features are included in emergency plans.

Section 12.2: Customer Service

We will continue to monitor, understand, and mitigate any Barriers that Employees, Customers and the public may experience while interacting with us.

- **Barriers**

- Customers in remote areas may experience difficulties with internet access for online ordering and purchasing.
- Customers may have limited abilities to use online platforms for purchasing products.

- **Actions To Date**

- Corporate Liquor Stores across the province have standard onsite layouts to support the Customer's orientation and access during their shopping experience.
- We provide multiple forms of Customer interaction in retail stores through onsite posters, newsletters, and magazines.

- NLC corporate Liquor Store Employees currently provide additional assistance upon request of a Customer with Disabilities such as finding products, carrying purchases to vehicles and shopping with Customers.
- **Planned Actions**
 - Review printed marketing materials available to Customers and Employees for accessibility features. Update these items to include more accessibility features.
 - Ensure that location searches completed through Google Maps include accessibility designations.
 - Increase signage in corporate Liquor Stores regarding accessible checkouts and other features available to Customers.
 - Review and develop a plan to update virtual interactions to provide alternate delivery formats to Customers.
 - Include accessibility questions on Customer satisfaction survey (while recognizing that Customers may have similar Disabilities but require different accessibility features).

Section 12.3: Built Environment

Our focus will primarily be on ensuring that accessibility features are identified and highlighted in our physical buildings which involve interactions with NLC Employees, Customers or the public.

- **Barriers**
 - Customers may not be aware of the accessibility features currently available to them.
 - Costs associated with potential updates may be significant.
- **Actions To Date**
 - Many corporate Liquor Stores have recently undergone renovations.
 - In many locations, one checkout has a larger aisle width and can be deemed accessible.
 - The positioning of products in corporate Liquor Stores does not impede Customer navigation.

- **Planned Actions**

- Review blueprint files of corporate Liquor Stores to identify additional accessibility features across all locations.
- Complete accessibility review of NLC's office buildings, Distribution Centre, and Rock Spirits manufacturing facility.
- Gain Board/Executive approval on the approach to incorporating accessibility features in the long-term plans of the Corporation.
- Review products used within stores, such as shopping bags, shopping carts, navigational signage, and promotional signage.
- Review washroom accessibility and develop a plan to mitigate any Barriers.

Section 12.4: Information Technology

We are committed to assessing existing and new technologies to move towards a Barrier-free technology environment.

- **Barriers**

- Accessibility features may be limited on NLC's four websites and digital media assets.

- **Actions To Date**

- NLC consistently upgrades its websites to improve Customer accessibility.
- NLC is researching and implementing the international accessibility standards outlined in WCAG 2.1.

- **Planned Actions**

- Complete accessibility audits on NLC websites and social media platforms.
- Educate Executive and Board of Directors on all virtual accessibility features.
- As new technologies are integrated within the business, evaluate accessibility features of third-party software.

- Review accessibility features of NLC's new employment portal to remove all technical Barriers to accessibility.
- Provide alternate documentation options for reports currently hosted on the NLC's corporate website.
- Ensure that the Accessibility Plan is available through a link on the front page of each website to support those navigating the website with screen-reading software.

Section 12.5: Employment

We will review and plan to reduce Barriers to accessing employment with the NLC. We are committed to creating a Barrier-free recruitment process so anyone can access meaningful employment with NLC.

- **Barriers**
 - The diversity of employment opportunities and responsibilities within them can present accessibility challenges.
 - Comprehensive data regarding current Employees with Disabilities is not available.
 - Successful applicants with a limitation or restriction may be unaware of options for accessing Accommodation to provide safety in the workplace.
 - Potential applicants may be unaware of the current accessibility features available. Not all Barriers in our process have been identified.
- **Actions To Date**
 - Job ads include a statement that encourages diversity and people with Disabilities to apply.
 - Job ads are distributed to multiple platforms with accessibility features, such as Indeed and Career Beacon.
 - Accommodation is provided to interview candidates as needed.
 - Employees and supervisors will develop an Accommodation process, if required.

- **Planned Actions**

- Continue to explore best practices regarding Employee diversity within the workforce.
- Review processes and tools available to obtain more complete information from current Employees regarding their diversity status, including those with Disabilities.
- Continue to provide accessibility training to all Employees to support increased Customer service and Employee experiences.
- Further define and communicate the process for workplace Accommodations.

Section 12.6: Information and Communications

We will increase the accessibility of shared communications with Employees, Customers and the public.

- **Barriers**

- Multiple methods of communication exist within NLC, and Employees, Customers and the public may not be aware of accessible communication options.
- Employees, Customers and the public may not be aware of how to access communications in alternate formats.
- Rapid technology advancements can impede accessible communications.

- **Actions to Date**

- Communications are distributed in multiple formats.
- Alternative Formats of communications are available to Employees, Customers and the public upon request.

- **Planned Actions**

- Complete a review of accessibility with all communication methods and documentation.

- Research and develop standards on alternate formats of materials for Employees, Customers and the public.
- Ensure that PDFs are created with accessibility features available for those using screen-reading software.
- Continue to review final drafts of communications using an accessibility lens prior to distribution.
- Increase accessibility on social media platform messages by offering image descriptions, alternative tags, and Camel-cased hashtags for better compatibility.
- Research and develop methods on Employee, Customer and public interaction standards, so accessibility features are available.

Appendix

Overview of the NL Accessibility Act

The Provincial Accessibility Act is known as **Bill 38: An Act Respecting Accessibility in the Province (The Act)** can be located at <https://www.assembly.nl.ca/Legislation/sr/statutes/a01-001.htm>. This enabling legislation was passed on December 3rd, 2021. It outlines the principles and goals that will improve accessibility in the province and identifies key focus areas, where Barriers often exist that prevent individuals with Disabilities from participating in society.

The key focus areas specific to public bodies include:

- The design and delivery of programs, services and goods ensures equitable access.
- Built environment that ensures buildings, shared spaces, public transportation and transportation infrastructure are accessible.
- Information and communication ensure everyone can receive, understand and share the information provided.
- Accommodation ensures accessible and inclusive options are available for equitable access.
- Procurement processes ensure equitable access to goods and services that are sourced and purchased.
- Employment ensures an accessible workplace and support for persons with Disabilities to find and maintain meaningful employment.

The Act requires that Public Bodies create an Accessibility Plan within two years of The Act coming into force and every three years after that. Accessibility Plans must address prevention, identification and removal of Barriers in public body operations and be publicly available. Public bodies must consult with persons with Disabilities or representatives of organizations

representing persons with Disabilities in preparing a plan.

The Act allows Provincial Government to develop accessibility standards and provide inspection and enforcement power to ensure accessibility standards are met. The first accessibility standard approved for development is the Accessible Customer Service Standard.