

Accessibility Plan & Feedback Process

Pivot Airlines is a privately-owned air transportation provider of Aircraft Charter Maintenance and Insurance (“ACMI”) services. Co-creating an inclusive and accessible Canadian experience is at the heart of our mission. Our Accessibility Plan and Feedback Process is part of ensuring our clients are providing a seamless journey for everyone, regardless of ability. By implementing policies, technologies, and support services, we are committed to removing barriers and enhancing the ACMI experience for all. This document outlines our ongoing efforts to improve accessibility in all aspects of our ACMI operations.

General

Our Commitment

In alignment with the Accessible Canada Act and the Canada Transportation Act, Pivot Airlines is committed to co-creating, with its peers and clients, a barrier-free Canada by January 1, 2040. This commitment involves identifying, removing, and preventing barriers in:

- employment
- built environment
- information and communication technologies (ICT)
- communication
- procurement
- design and delivery of programs & services
- transportation

Our Accessibility Principles

1. All persons must be treated with dignity regardless of their disabilities.
2. All persons must have the same opportunity to make for themselves the lives that they are able and wish to have regardless of their disabilities.
3. All persons must have barrier-free access to full and equal participation in society, regardless of their disabilities.
4. All persons must have meaningful options and be free to make their own choices, with support if they desire, regardless of their disabilities.
5. Laws, policies, programs, services and structures must consider the disabilities of persons, the different ways that persons interact with their environment and the multiple and intersecting forms of marginalization and discrimination faced by persons.
6. Persons with disabilities must be involved in the development and design of laws, policies, programs, services and structures.

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Your Feedback

The link to our anonymous feedback form is provided at the end of this document.

In addition to anonymous form, non-anonymous feedback can be provided directly to:

E: Accessibility@Flypivot.com

P: 1(855)-937-4868

Address: 6900 Airport Road, Suite 121, TICC 6, Mississauga ON L4V 1E8

Please use any of the above three methods should you wish to request an alternate format of the Accessibility Plan and Feedback Process.

As part of our ongoing commitment to accessible communication, Pivot Airlines is moving toward a more inclusive telecommunications platform. We will soon be adding a Telecommunication Relay Service (TRS) to our main company lines, enabling improved access.

1. Employment

At Pivot we:

- have a central point of contact for all questions and requests related to accessibility
- encourage employees with disabilities to inform Human Resources of any accommodations needed
- include statements in employment policies that accommodations are available throughout the employment process
- seek to recruit more people with disabilities for qualified positions.
- provide awareness training for all managers, supervisors, and employees on accessibility barriers faced by people with disabilities

Our future focus will include updating materials for awareness training on accessibility barriers

2. Built Environment

Pivot Airlines operates aircraft to numerous destinations using two types of aircraft. Our client's passengers for ACMI services utilize both large passenger terminals and small remote stations. We have developed a fire safety plan that includes provisions for the evacuation of people with disabilities. At Pivot we continuously review the facilities we use to identify and address barriers such as narrow halls and doorways, lack of automatic doors, and inaccessible washrooms. For our client's we ensure the provision of wheelchairs and boarding chairs at all locations served by Pivot Airlines. Where possible and available, we take steps to ensure passenger boarding ramps are made available at various locations served by Pivot.

Our future focus is to engage in consultations to update our ACMI facility review process.

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3. Information and Communication Technologies (ICT)

At Pivot we are actively working on updating our internal websites and software that has important accessibility features built in. We have updated our internal device procurement process, with all devices equipped with a comprehensive suite of accessibility products.

We have initiated researching the feasibility of making our external website compliant with the Web Content Accessibility Guidelines (WCAG). We are reviewing our digital content and company web locations to ensure internal and external web-based platforms are accessible and have adaptive technology, which includes the use of headings alt-text for images and strong colour contrast and compliance with digital content accessibility standards.

4. Communication

We have developed an Accessibility Plan and Feedback Process for publication on our website. We have included an accessibility page and anonymous feedback form on the current website. We have also created a central contact point for accessibility through e-mail, phone and a mailing system specific to accessibility. We continue to

- provide clear, polite, and simple language in all communications
- offer training to improve communication skills and promote inclusivity
- provide multilingual materials where appropriate
- provide information in alternative formats such as print, large print, Braille, audio, and accessible electronic formats when it is requested

Our future focus will include updated periodic audits of equipment to ensure auditory announcements and visual messaging is accessible.

5. Procurement of Goods, Services, and Facilities

At Pivot we are developing requirements for accessibility considerations in all procurement processes. This step will assist us in ensuring we are focused on suppliers who include accessibility considerations in their proposals. We regularly evaluate if ground equipment could be modernized with new technological advances to improve mobility.

Our plans include creating a training framework and reference guide for those involved with the procurement process to identify and list product requirements for accessibility.

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6. Employment

At Pivot we are:

- training staff on how to interact and communicate with people with various types of disabilities
- providing accommodation options to clients to deliver services without barriers, including safety briefing adjustments, service animals, mobility aids, and assistance with personal items
- reviewing and updating the Duty to Accommodate policy every three years

Our development plans include initiating an internal Accessibility Committee to assist in a company-wide System Accessibility Assessment, which will include conducting a review of our policies, guidelines, programs and services to identify how we can make our ACMI offering to clients more accessible and inclusive.

7. Transportation

As a Transportation Service Provider, Pivot complies with all applicable requirements of the Canadian Transportation Agency regarding the transport of people with disabilities. We provide on-board special attention passenger briefings for clients requiring accommodations, collaborate with airport authorities to assess accessibility of ground transportation, and ensure that any agreements with service providers for ground transportation include accessibility considerations.

Consultations

Pivot consults. When we do, we are conducting individual consultations with those who identify as persons with disabilities. Pivot engages in consultations to co-design initiatives, to provide ongoing support and to foster a culture of inclusion with our employees and clients.

Pivot Airlines conducted its first employee survey in 2025 related to challenges and barriers faced in travel and employment and the results of that survey are being assessed. Our future focus includes conducting a GAP assessment specific to the provision of wheelchairs, boarding chairs and boarding ramps at all locations utilized by Pivot clients, along with additional employee, client and vendor surveys. Another future focus is to assess our handling policy and priority storage for luggage and mobility aids for our ACMI clients.

Provisions of CTA Accessibility-Related Regulations

Obligations for accessibility are outlined within the following:

[Accessible Canada Act](#), S.C. 2019, c 10

[Accessible Canada Regulations](#), SOR/2021-241

[Accessible Transportation Planning and Reporting Regulations](#), SOR/2021-243

[Canada Transportation Act](#), S.C. 1996, c. 10

[Accessible Transportation for Persons with Disabilities Regulations](#), SOR/2019-244

Feedback Process

At Pivot we are:

- Actively seeking and receiving feedback from employees and clients on the accessibility of facilities and services
- Promptly acknowledging and addressing feedback, where it is appropriate to do so
- Integrating feedback into internal processes to improve accessibility
- Providing multiple methods for submitting feedback, including email, phone, and online forms

Canadians wanting to provide feedback or requesting an alternative format of the **Accessibility Plan and Feedback Process**, are encouraged to contact Pivot's accessibility co-ordinator at:

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P: 1(855)-937-4868

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For those wanting to provide anonymous feedback, this [FORM](#) is provided for completion. Feedback, as well as anonymous feedback provided through this form, is collected, assessed and reported on within each subsequent Pivot Accessibility Progress Rep.