



Accessibility Plan (January 2025 – December 2026) for Manitoba Liquor and Lotteries Corporation

The following plan highlights Manitoba Liquor and Lotteries Corporation’s (MBLL) achievements in calendar years 2023 and 2024 as well as identifies the actions MBLL will commit to in calendar years 2025 and 2026.

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This publication is available in alternate format upon request.

Overview of programs and services

MBLL is a Crown corporation of the Province of Manitoba.

We distribute and sell liquor, provide gaming and entertainment experiences, and source and distribute non-medical cannabis to retailers in the province, all in a socially responsible manner.

As a Crown corporation, our mandate is to provide revenue to the Government of Manitoba to support provincial programs and initiatives in areas such as healthcare, education, social services, housing, and infrastructure. Each year, MBLL commits 2% of annual anticipated net income for liquor, gambling and cannabis based social responsibility programs.

As a retailer, MBLL operates 63 Liquor Marts (including six Liquor Mart Express locations) in Manitoba. As the province's distributor, wholesaler, and retailer of liquor, we manage liquor distribution for approximately 1,800 commercial customers including licensees (bars, restaurants, hotel beer vendors), liquor vendors, and specialty wines stores, as well as Liquor Marts.

MBLL owns and operates Club Regent Casino and McPhillips Station Casino as well as the Club Regent Event Centre. We are also responsible for the conduct and management of three First Nations casinos, manage and operate gaming activities at the Shark Club Gaming Centre for True North Sports & Entertainment, and deliver online gambling for Manitobans through PlayNow. We are also responsible for the operation and maintenance of the province's Video Lottery Terminal (VLT) network.

As the sole distributor of lottery products, MBLL manages a lottery retailer network across Manitoba that is responsible for selling products and services for lotteries, conducted, and managed under the authority of the Western Canada Lottery Corporation (e.g., Lotto 6/49, Lotto Max, Sport Select, Scratch n' Win). MBLL is also the exclusive supplier of breakopen tickets and bingo paper in the province.

As Manitoba's designated wholesale and distributor of non-medical cannabis, MBLL facilitates the purchase and delivery of non-medical cannabis transactions between cannabis retailers and licensed producers.

MBLL employs approximately 3,000 people throughout our offices, warehouses, casinos, and liquor retail locations. Focusing on sustainability, and customer and employee well-being are central to our business approach.

Statement of commitment

MBLL believes in diversity and inclusion. We are committed to equitable access and participation for all people, regardless of their abilities. We are committed to treating all people in the way that allows them to maintain their dignity and independence. We are committed to identifying, removing, and preventing barriers to accessibility and meeting the requirements of *The Accessibility for Manitobans Act*.

On an ongoing basis, MBLL monitors its operations as it relates to *The Accessibility for Manitobans Act* and standards. MBLL's policies, including its accessibility policy, are reviewed, and if required, updated to ensure consistency. These policies are available in alternate formats upon request.

Accessibility achievements in 2023 and 2024

MBLL continually looks to identify, remove, and prevent barriers for people with disabilities. Past achievements can be found in the Corporation's website by clicking on this link called: [previous accessibility plans](#).

Please note that the achievements referenced and completed in earlier accessibility plans have not been included below.

In the calendar years 2023 and 2024, the Corporation took the following steps to enhance accessibility for customers and employees:

Corporate

- A new long-term Diversity, Equity & Inclusion (DEI) Roadmap has been developed by the DEI Committee. This new roadmap incorporates accessibility considerations for 2023-2026.
- Accessibility requirements have been embedded within the Corporation's educational development policy.
- A specifications list has been developed for procurements to ensure accessible requirements are considered for standard goods and services contracts.
- Inclusion of commitment to *The Accessibility for Manitobans Act* in the corporate overview is included for all procurement requests for goods and/or services requiring all applicants demonstrate alignment with legislated standards in procurement bids.
- A commitment to increase procurement from equity deserving groups, including persons with disabilities, in company qualification sections of all requests for goods or services.

Customer service

- Updated the Accessible Customer Service training in 2024 to ensure ongoing compliance. As of December 2024, MBLL maintained an 80% completion rate. All employees will be required to retake the updated Accessible Communication and Customer Service training by January 30, 2025.

- MBLL's new accessibility standards document includes policies and procedures for service animals.
- Certain electronic games in our casinos have accessibility features such as volume control to accommodate customer needs.
- Club Regent Event Centre has designated accessible seating available upon request.
- Introduced universal, accessible, private washrooms at both McPhillips Station and Club Regent casinos.

Information and communication

- Assigned a project team who met monthly to understand and address the obligations in the Accessible Information & Communication Standard.
- Completed accessibility reviews then created accessible templates of the Liquor Mart Sip n' Savor newsletter, the Casinos of Winnipeg Club Card e-calendar, and Club Regent Event Centre pre-sale emails for upcoming events to ensure all newsletters have the accessibility features.
- Conducted professional web accessibility audits for MBLL's eight websites for WCAG 2.1 Level AA conformance. Findings from these audits have been used to implement additional accessibility improvements to websites, web applications, as well as maintain ongoing accessible online conformance.
- Graphic designers, web and digital media specialists, and the internal communications team completed accessibility training. They apply their learnings to reports, documents, ads, graphics, web and social media content, and video creations.
- Developed a website and social media accessibility checklist to assist content creators when publishing new online content.
- Updated the website and intranet request for services forms to acknowledge that the documents submitted for hosting on our websites meet accessibility standards.
- Intranet structure has been updated to meet WCAG 2.1 AA accessibility requirements.

- Communications employees developed the Do Write: MBLL Style Guide to improve accessible communication within the Corporation. More than 100 employees across seven departments and three worksites have been trained to date. A custom session for executive leaders is under development to ensure oversight is prioritized. Next steps are converting the workshop into a virtual training session that can be rolled out all 3,000+ employees.
- Improved awareness of accessibility considerations among employees by increasing the cadence of internal communications that featured accessibility topics. This included intranet features, posters, and signage for the Do Write: MBLL Style Guide, and a virtual Learning Table on the topic of accessible communications with a guest speaker from Squarely Accessible.

Employment

- New job portal that includes an accommodation statement encouraging applicants to request accommodations as needed.
- Onboarding training for new hires is available in accessible formats upon request.
- Human Resources developed standardized questions for recruitment in Liquor Mart locations to streamline seasonal hiring while reducing barriers to equity seeking groups including persons with disabilities.
- Procured accessible communication assistive devices to support communication with deaf and hard of hearing employees.
- Updated online training guide for Workers Compensation claims to include the return-to-work individualized accommodations procedure for employees who were injured in the workplace.
- Installed seven evacuation chairs at multi-level worksites to accommodate employees during emergency evacuations.
- Certain corporate positions continued to be hybrid in 2023 and 2024 which allows for increased flexibility and ease of access to employment.

Built environment

Liquor Marts

- Seven Liquor Mart locations received accessibility upgrades through the Accessibility Maintenance and Modernization Program. Upgrades included new accessible staff washrooms and cash desks in some locations, improved staff washroom accessibility through new fixtures, doors, and hardware in other locations, along with improvements to vestibules and exterior doors.

Casinos

- Casino locations received accessible upgrades through the Accessibility Maintenance and Modernization Program. Upgrades included a new satellite bar with an accessible customer area and a new stage ramp at Club Regent Event Centre.
- Confirmed with electronic gaming vendors of the accessibility features on slots and VLTs which includes accessible height, adjustable volume, large font, and bright displays.
- A small number of low-sensory games are available, as well as quiet spaces in the casinos. Many slot machines provide enough space for a support person.

Offices

- The Corporate office at Buffalo Place received a new accessible women's washroom and gender-neutral universal washroom in the basement, automatic door openers in the central hallways, and an accessible drinking fountain on each floor. Several sit/stand adjustable workstations are now provided throughout the building.
- Central Services received eight new automatic door openers in high traffic areas and washrooms, and a wheelchair accessible picnic table.

Current accessibility barriers

Consultations have occurred with external vendors, disability groups, as well as MBLL employees from all areas of the Corporation to understand potential barriers. Some of the barriers discovered include:

Physical and architectural

- While the facilities are being continuously upgraded to increase accessibility, not all sites currently meet accessibility requirements.

Informational and communication

- The internal website called iNET, is not fully accessible.
- PlayNow, a third-party hosted website, is not accessible. MBLL staff continue to make changes where available, but the site has accessibility barriers.
- The Pause and Plan website requires accessibility fixes.
- The current solution to communicate with deaf employees is not fully accomplishing our needs. Communication barriers continue.
- Not all our in-house training is fully accessible.
- The current telephone system does not accept telephone calls from deaf individuals.
- Intercoms at corporate offices are not height accessible, and not accessible for persons who are deaf or blind.
- Multiple assistive devices continue to be made available to casino customers at no charge, however, headsets are not yet available for gaming devices.
- While 95% of electronic games in casinos are physically accessible with its seating design, very few machines have low-sensory features.

Systemic

- The process for organizational budgeting related to employee accommodations expenses impedes employees access to supports.
- Employee awareness of their access to accommodations is a barrier to providing employees with proper supports.

- Employees who have identified a workplace accommodation at time of hire need to disclose again during the onboarding process.
- Not all employees have access to software licenses for the accessibility features they learn in the Adobe and Microsoft training.
- Barriers still exist for some employees to access training to provide accessible customer service in key front-line positions (e.g., casino security)

Actions for 2025 and 2026

The ongoing actions identified below represent the initiatives that MBLL will continue to monitor, and deliver on, in the upcoming two years.

Please note that the actions referenced and completed in earlier accessibility plans have not been included below.

1: Corporate-wide processes to ensure equitable access and participation for people with disabilities

Ongoing actions

- The Vice-President, General Counsel & Corporate Secretary continues to have executive responsibility and oversight of accessibility policy and compliance.
- The Accessibility Coordinator continues to consult with internal stakeholders to embed accessibility considerations, monitor progress, and facilitate priority planning for the accessibility plan. The Accessibility Coordinator also leads consultations with the disability community to identify and remove barriers.
- All employees have a role in ensuring accessible customer service is provided, enabling access in compliance with provincial accessibility standards.
- Customers and members of the disability community will be invited to share their feedback and identify barriers in the Corporation and customer-facing facilities.
- The Procurement team will continue to include a commitment to equity deserving groups, including persons with disabilities, in requests for goods and services.
- The Procurement team will continue to outline our commitment to *The Accessibility for Manitobans Act* in all requests for goods and services.

New initiatives/actions

- Information Technology Services (ITS) will develop and apply new standard accessibility requirements for all ITS procurement requests to ensure new purchases meet accessibility requirements.
- The Procurement team will receive formal training on accessibility.

- The Procurement team will ensure all requests for goods or services include a checklist for accessibility review.

Expected outcomes

- Executive and senior management is aware of the progress made on the two-year accessibility plan and supports the actions necessary to stay compliant with *The Accessibility for Manitobans Act*.
- MBLL's Accessibility & French Language Services (FLS) Committee will monitor the progress made on the delivery of actions or initiatives identified in the two-year accessibility plan.
- Clear expectations will be set by the Accessibility & FLS Committee about accessibility commitments and requirements.
- Identified barriers will be removed and/or reasonable accommodation alternatives will be put in place.
- The current accessibility plan will be posted on the mbll.ca website and be available in alternate formats.

2: Provide accessible customer service

Ongoing actions

- A record of accessibility requests through accessibility@mbll.ca is maintained. Employees are given the tools and support to provide accessible customer service when requests are received.
- A process to communicate to the public about temporary barriers is in place and has been shared with applicable employees.
- Accessibility guidelines are included in corporate event planning processes.
- The recording of the annual public meeting will continue to include closed captioning and an ASL interpreter on-screen. If the annual public meeting returns to in-person, an ASL interpreter will be on site.

New initiatives/actions

- A solution for accessible telephone capabilities will be resolved.
- A more formal approach to receiving feedback from the disability community and from our customers and employees will be considered.

- Accessibility improvements for table game layouts, collaborating with vendors to comply with standards and requirements.

Expected outcomes

- Improved customer service at all MBLL locations.
- Employees are trained to identify and remove barriers, respond to customer's accommodation requests, and offer reasonable alternatives when a barrier cannot be removed at facilities and public events.

3: Provide accessible information and communications

Ongoing initiatives

- The Digital Media team has undertaken accessibility training and has applied their learnings to develop accessible web content, social media content, and document creation.
- MBLL employees will continue to offer training on accessible communication in alignment with the Do Write: MBLL Style Guide.
- Remediation of iNET pages and documents to align with accessibility standards will be ongoing in 2025.
- Continue to maintain and update the accessibility page on corporate website.
- Continue to work with BCLC to ensure the hosted PlayNow website, future web applications, and all related customer services are accessible.

New initiatives/actions

- Procure and implement new accessibility monitoring software to assist with ongoing compliance with web accessibility requirements.
- Procure and implement communication software to communicate with deaf employees and customers.

Expected outcomes

- Information about accessibility commitments and plans are clear and accessible.
- Employees are aware of accessible formats and communication to enhance customer service.

- All websites, web applications, social media channels and newsletters managed by the Corporation are accessible.

4: Maintain an accessible workplace that encourages a diverse workforce

Ongoing initiatives

- Job postings are being reviewed to remove barriers where possible.
- The job portal includes a statement asking applicants if there are any accommodation needs for the interview.
- Continue recruitment partnerships with the disability community:
 - Project SEARCH – work placements
 - Reaching E-Quality Employment Services (REES) - job postings
 - Manitoba Possible – job postings
- Information about requesting accommodation is accessible and available to all employees, especially new employees during orientation. Continue to ensure that employees who have identified a workplace accommodation at time of hire do not need to disclose again.
- Continue the DEI Committee that brings together employees from various employment equity groups to discuss diversity issues, including disabilities.
- Accessible features are offered in employee training to ensure employees are aware of available accommodations.
- Individualized accommodation plans are outlined in the workplace accommodation policy to provide a safe and productive work environment for employees.
- The Employee Mass Notification System notifies employees of hazardous or dangerous events at or around their workplaces. This system allows corporate email users to receive email notifications and an additional notification to corporate cell phone users. Employees who do not have corporate cell phones have the option to receive notifications on their personal cell phones.
- Accessibility procedures are incorporated into fire safety plans. Employees are asked to self-declare a temporary or permanent disability that could impact a workplace emergency. A copy of the individual's needs is maintained within the

facility's fire safety plans. A support person is identified and informed of an individual's specific needs during a workplace emergency.

- All new hiring managers are required to complete Reducing Unconscious Bias in Hiring training.
- As part of the performance review cycle, check-in instructions provided to leaders include a step that prompts leaders to proactively discuss workplace barriers and accommodations with their employees.
- Leaders will retake Accessibility Act for Employment training every four years; the next rollout is scheduled for 2025.

New initiatives/actions

- Increase employees' awareness of all employment accommodations.
- Encourage employees to participate in the next employee census (nearly 20% did not participate in 2021) to have a more accurate measure of employees who self-identify as having a disability. At time of reporting, 4.9% of employees self-identify as having a disability. This measure was 5.5% in 2021.
- Will create a DEI dashboard on internal website to view DEI survey results.
- Share employment opportunities more broadly with the disability community.

Expected outcomes

- Match the provincial employee diversity goal of 9%.
- Compliance with the Employment Standard under *The Accessibility Act*.
- Job applications are received from persons with disabilities.
- Job descriptions will not unreasonably exclude persons with disabilities.
- Interview processes that do not create barriers for persons with disabilities.
- New employees are aware of how to request and receive accommodation.
- A network of coworkers who are committed to advising on issues related to diversity, equity and inclusion in the workplace.
- Employees are supported and provided with the training and accommodation required to perform their duties to the best of their abilities.

5: Create and maintain barrier-free facilities and workplaces

Ongoing initiatives

- Ongoing review of facilities and workplaces to identify, temporarily accommodate, and remove barriers.
- Continue the annual Accessibility Maintenance & Modernization Program for barrier-free access to liquor, casino, and corporate facilities.
- Ensure all applicable building codes and by-laws with respect to accessibility are met in future lease acquisitions, and facility and site renovations.
- Continue to evolve wayfinding signage at corporate facilities.
- Maintain fire safety plans and evacuation procedures.
- Allowing service animals to have full access to all spaces available to customers and are provided space next to the guest at Club Regent Event Centre and other assigned/rushed seating events throughout the casino.
- Promotional displays are placed in areas where they do not inhibit access or navigation and are produced in a format that can be clearly visible by all customers.

New initiatives/actions

- Consider a new additional universal washroom at Club Regent Event Centre.
- Will include sections of City of Winnipeg 2015 Design Standard 3rd Edition in new builds, which exceed the requirements of building regulations.
- Summer students to physically assess locations and create a requirements checklist based on applicable sections of the City of Winnipeg 2015 Design Standard 3rd Edition.
- Consider the need for low-sensory games and spaces in our casinos.
- Upgrade eight rural Liquor Marts and 22 urban Liquor Marts deemed an accessibility priority in 2023 and ongoing. Upgrades will include parking lot, sidewalk, entrance, vestibule, flooring, point-of-sale, offices, and washrooms.

Expected outcomes

- Barrier-free facilities and workplaces.
- Service animals welcomed in our facilities and workplaces.

- Removal and prevention of barriers is included and considered in future leased space, and facility maintenance and renovations on an ongoing basis.
- Ongoing improvements are made in consultation with the disability community.
- Improved wayfinding at retail locations.
- Emergency response plans remove barriers during a workplace emergency.

Contact

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Approved by:

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Date approved