



LANGUAGE ACCESS PLAN

2022

I. Introduction

GCT USA, including GCT Bayonne LP and GCT New York LP (collectively referred to herein as GCT), is committed to improving the accessibility of its services to eligible non-English speakers and limited English proficient (LEP) persons. GCT has prepared this Language Access Plan (LAP) to reduce barriers and ensure meaningful access to services, programs, and activities on the part of LEP persons. That said, it is important to note that in general GCT does not provide public-facing services. Its marine cargo handling services are performed pursuant to contractual arrangements with their ocean carrier customers that transport containerized and certain other cargoes through GCT's marine cargo handling facilities. These commercial relationships are governed by the rules and regulations of the Federal Maritime Commission, which has its own rules and procedures regarding discrimination and access. There are a limited number of companies that can be a customer of GCT. Moreover, since GCT's marine cargo handling facilities are subject to the rules and regulations of the United States Coast Guard regarding facility security, members of the general public are not permitted access to GCT's premises. Notwithstanding GCT's own customers, certain agents of its customers or the beneficial owners of the cargo being transported through GCT's marine cargo handling facilities may dispatch truck drivers to pick-up or drop off cargo at these facilities. This plan would apply to these individuals, some of whom may be LEP persons.

This is the first LAP prepared by GCT. It has been published on its website. While implementation of the protocols continues, this LAP is subject to amendment and revision in the discretion of GCT.

GCT will periodically review and update this LAP to ensure continued responsiveness to community needs, consistency with its mission to provide safe and efficient cargo handling services.

II. Purpose

The purpose of this LAP is to ensure meaningful access to GCT marine cargo handling services on the part of persons who have limited English proficiency.

While the universal language for conducting business in the international marine cargo handling industry is English, GCT is committed to this Language Access Plan as the



appropriate response to meeting the needs of LEP individuals who may already use or seek the marine cargo handling services of GCT.

A LEP person is someone who is not able to speak, read, write or understand the English language at a level that allows him/her to interact effectively with GCT customer service personnel. Any person who self-identifies as an LEP person will be given the benefit of the language protocols described in this LAP.

GCT notes that this Language Access Plan is intended as guidance and does not create individual rights or entitlements or establish GCT duties or process beyond what is required under applicable law.

III. Marine Cargo Handling Services

GCT's mission is to provide safe and efficient marine cargo handling services. The terms of this service can be found in its Marine Terminal Tariff found at: www.globalterminalsbayonne.com and www.globalterminalsnewyork.com.

GCT is dedicated to providing anyone who identifies as an LEP person services in a method and manner that the LEP person can comprehend.

IV. Language Access Plan

Approach: This Language Access Plan represents GCT's plan to provide meaningful access to GCT's marine cargo handling services. It outlines the tasks GCT will undertake to meet this objective. GCT's Language Access Plan will be implemented subject to the availability of resources.

GCT will evaluate the totality of circumstances and language access needs, including the four factors mentioned below, to determine the tasks GCT will undertake to meet the objective of providing meaningful access to GCT's services to LEP clients. Factors such as volume or proportion of persons with LEP served, the frequency with which persons with LEP come in contact with our services, documentation, information we provide, the language resources we currently have available, and the costs involved in acquiring/contracting any additional, appropriate language resources will all be considered.



(1) GCT Language Access Coordination:

GCT will coordinate language access planning and responses to language access needs through a language access committee that will include GCT representatives in various departments.

(2) GCT Language Access Needs Assessment:

Steps taken and to be taken by GCT. GCT shall assess:

1. The number and proportion of non-English speakers and LEP persons served by its marine cargo handling services;
2. The frequency with which non-English speakers and LEP individuals come in contact with the service, program or activity;
3. The nature and importance of the service, provided by GCT; and
4. The fiscal resources involved with providing such services.

GCT's customers function in the world of international cargo transportation where the universal language for the transaction of such business is English. However, for any potential entities that require language services for non-English speakers, GCT is committed to providing services to assist these individuals.

Language Makeup of Customers. At present, 100% of GCT's customers are fluent in English as it the universal language of the international marine cargo handling industry.

Points of Contact with Customers. Most of GCT's business related to customer service is handled by GCT's Commercial Department, which can be reached at (718) 568-1870. It's website, which includes its Marine Terminal Tariff is available at www.globalterminalsbayonne.com and www.globalterminalsnewyork.com.

(3) Language Resources Assessment:

Existing Staff. GCT has made significant efforts to increase the number of staff as in points of contact who are linguistically and culturally diverse. These staff are able to deliver interpretation services to persons with LEP on a case-by-case basis, depending on the language spoken by the client and the availability of staff at a particular day and time.

In particular, GCT has several staff members who are fluent in Spanish, Portuguese, Polish, Russian, Tagalog, Hindi, Sinhala, Arabic, Mandarin, Albanian and Turkish.

GCT will update its survey of existing staff periodically and will provide a list of volunteer translators to staff who are likely to encounter persons with LEP.

Financial Resources – GCT does not currently charge fees for the cost of translating documents.

(4) Language Service Protocols:

- Main office staff are surveyed periodically to determine who is available to provide interpretation for persons who use GCT marine cargo handling transportation services, and those staff names and languages spoken have been given to the main receptionists.
- Staff have been trained and will continue to be trained on how to provide language services to persons with LEP who appear at GCT needing language assistance.
- When staff are not available to interpret in the language of a person with LEP, GCT will make arrangements for other interpretation services.
- As needed, staff will identify vital documents that need translations, and will continue to do so , as resources permit.

(5) Vital Document Translation

GCT has begun to review its forms, letters and documents used in providing marine cargo handling services, and identifying those documents considered vital. GCT will translate vital documents as resources permit, and in consideration of the four factors discussed above. GCT will continue to review, identify, and translate vital documents, to ensure it is taking reasonable steps to provide meaningful access to its marine cargo handling services.

(6) Stakeholder Consultations

GCT working relationships with many stakeholder groups regarding its marine cargo handling services. GCT will seek feedback from these groups to help it assess LEP populations and needs.

On an on-going basis, GCT will take comments from any stakeholder groups or from the general public regarding this Language Access Plan and will continue to update the plan as appropriate.

(7) Staff Training

GCT will undertake certain staff training regarding the provision of language assistance to persons with LEP. GCT will review and revise guidance and instructions and offer training, as needed, to ensure that language access planning is sufficient and consistent with regulations and practices. Staff will be routinely educated on revisions to policy, revised initiatives, and best practices regarding the provision of language assistance services.

(8) Notice to Public

To assist visitors to GCT's offices in identifying their language needs, certain staff will be provided with the U.S. Department of Commerce *Language Identification "I-Speak" flashcard*, which features over 30 languages. The flashcard will enable staff to effectively determine language needs and provide language assistance to persons with LEP.

The GCT Language Access Plan is posted on its website to notify the public that language assistance services are available, as needed, to meaningfully access GCT's marine cargo handling services.

(9) Monitoring

On an on-going basis, GCT will monitor the effectiveness of its LAP and evaluate areas for improvement of its policies, procedures, protocols, and training.

In addition, GCT will solicit feedback from persons with LEP.

(10) Complaints.

Complaints about this Language Access Plan or services provided to clients in accordance with this LAP may be filed with GCT's Language Access Committee or with the Human Resources Department. Complaint Procedures are set out in Attachment A.



Attachment A

Language Access Complaint Procedure

You may file a complaint with the GCT Language Access Committee or the Human Resources Department, if you believe you have not received the services set out in this Plan. You must file a written complaint within 6 months of the alleged denial. To file a complaint with the Language Access Committee, submit the written complaint to:

Language Access Committee
GCT USA
300 Western Avenue
Staten Island, NY 10307