

AODA Policy

Effective Date: December 2014

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Personnel Applicability: All

Geographic Applicability: Canada

Contact: Human Resources Department

Approving Authority: Head of Operations

Canada, and Human Resources Generalist

AODA Policy: Providing Goods and Services to People with Disabilities

1. Purpose

This policy is intended to meet the requirements of *Accessibility Standards for Customer Service, Ontario Regulation 429/07 under the Accessibility for Ontarians with Disabilities Act, 2005*, and applies to the provision of goods and services to the public or other third parties, not to the goods themselves.

All goods and services provided by the Company (LANXESS Canada Co./Cie) shall follow the principle of dignity, independence, integration and equal opportunity.

2. Scope

This policy applies to all Covered Persons who provide goods and services on behalf of LANXESS Canada Co./Cie. and who may interact with LANXESS Canada's customers, shareholders, the public, or third parties.

3. Definitions

The following definitions apply for the purposes of this policy:

“Company” means LANXESS Canada Co./Cie.

“Covered Person” means any person employed by the Company, including without limitation any full-time, part-time, seasonal, contract, or project temporary employee, any Company officer, intern or cooperative student, volunteer, third-party consultant or independent contractor.

“Disability” is defined by the *Accessibility for Ontarians with Disabilities Act, 2005, and the Ontario Human Rights Code, refers to:*

- any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device
- a condition of mental impairment or a developmental disability
- a learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language
- a mental disorder
- an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act. 1997

“Assistive Device” is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that individuals bring with them that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading, such as wheelchair, walker or a personal oxygen tank, etc.

“Service Animal” is an animal for a person with disability if:

- it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability

“Support Person” is another person who accompanies a person with a disability in order to help with communication, mobility, personal care, medical needs or access to goods and services.

4. Mission Statement

LANXESS Canada is committed to providing accessible customer service to persons who have disabilities. The Company will make reasonable efforts to ensure that this policy and related practices and procedures are consistent with the following principles as prescribed in the Customer Service Standard:

- a) We will provide goods or services in a manner that respects the dignity and independence of persons with disabilities
- b) We will provide integrated services to persons with disabilities wherever possible and will provide alternate measures where necessary, whether temporarily or on a permanent basis, to enable a person with disability to obtain, use or benefit from the goods or services.
- c) We will provide equal opportunity to persons with disabilities to obtain, use and benefit from the goods or services

5. Providing Goods and Services with Disabilities

The Company is committed to excellence in serving all covered persons including people with disabilities and we will carry out our functions and responsibilities in the following areas:

Communication

When communicating with persons with a disability, the Company will take into account the particular individual’s needs and circumstances. All covered persons at LANXESS Canada who communicate with customers will be trained on how to interact and communicate with people with various types of disabilities in order to ensure that LANXESS Canada provides responsive and effective communication. All communication shall be provided in a manner that respects the dignity and independence of persons with disabilities.

Assistive Devices

Persons with disabilities shall be permitted to obtain, use or benefit from goods or services through the use of their own assistive devices. All covered persons will be trained to ensure that they are familiar with various assistive devices that may be used by customers with disabilities while accessing services.

LANXESS Canada will train all covered persons on how to use assistive devices that are available at the facilities for customers and to inform customers of the assistive devices that are available.

Telephone Services

The Company is committed to providing fully accessible telephone service to our members. We will train covered persons to communicate over the telephone in clear and plain language

and to speak clearly and slowly. If telephone communication provides a barrier to a person with a disability, LANXESS Canada will be available to communicate in writing, by e-mail, by fax, by TTY or by other electronic means.

Use of Service Animals and Support Persons

Service Animals

LANXESS Canada is committed to welcoming persons with disabilities who are accompanied by a service animal on the parts of our premises that are open to the public. If a service animal is excluded by law, the Company will suggest appropriate alternatives and provide assistance in order to ensure that the person is able to access, obtain, use or benefit from LANXESS Canada's services where possible.

The Company will train covered persons on how to interact with customers who are accompanied by service animals.

Support Persons

Any person with a disability who is accompanied by a Support Person will be allowed to access any services provided by LANXESS Canada with his or her Support Person. Where there are barriers to access or attendance by a Support Person, the Company will seek to facilitate access to ensure the participation of persons with disabilities.

Notice of Temporary Disruptions

LANXESS Canada will provide individuals with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

The notice will be placed at the gatehouse, lobby, canteens, LCD communicators to ensure that the notice reaches those persons potentially affected by the temporary disruption in a manner that is accessible to them.

Training for Staff

LANXESS Canada will ensure that all covered persons who interact with customers on its behalf receive AODA Customer Service Standard Training. Further, training shall be provided on an ongoing basis whenever changes are made to this Policy to ensure that this Policy is properly implemented at all times.

Training will include the following:

- An overview of the purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Customer Service Standard;
- Training on how to interact and communicate with people with various types of disabilities;
- Training on how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person;
- Training on how to use equipment or assistive devices available at the facilities or otherwise provided by the Company that may help with the provision of goods or services to a person with a disability;
- Training on what to do if a person with a disability is having difficulty in accessing LANXESS Canada's goods and services; and
- Training on LANXESS Canada's current policies, practices and procedures relating to the Customer Service Standard.

LANXESS Canada will keep records of the training provided, including the dates on which training was received and the names of participants.

6. Feedback Process

In order to properly assess the needs of persons with disabilities, LANXESS Canada has created a feedback process and has named the Human Resources Generalist, the Plant Manager, Engineering & Maintenance Manager, HSE Manager, or designate of these roles, as part of the AODA compliance committee.

Contact Ask_HR@LANXESS.com or call 519-669-1671 ext. 531

Receiving Feedback

A person with disability may provide feedback by contacting the HR Department, by e-mail, phone, mail or in person. All feedback will be processed by the AODA committee. All feedback will be kept in strict confidence and will be used to improve customer service.

Responding to Feedback

If the feedback raises serious concerns with respect to the delivery of goods and services to persons with disabilities, LANXESS Canada will provide a response to the concerns in a timely manner. The author of the feedback will be provided a response in the format requested (or the most appropriate format where no request was made) outlining actions taken. The Company shall make best efforts to respond to feedback within five (5) business days.

7. Modifications to the Policy and Related Policies

LANXESS Canada is committed to developing and updating customer service policies and procedures that respect and promote the dignity and independence of people with disabilities.

8. Additional Obligations

LANXESS Canada recognized that the AODA does not replace or supersede the *Human Rights Code, R.S.O. 1990, c. H.19 (the "Code")*.

9. Enquiries

Any Enquiries related to this policy and any feedback should be directed to our AODA Compliance Committee.

10. Responsibility

The Human Resources Department is responsible for drafting, maintaining, and coordinating the update of this policy. HSE Manager, Engineering/Maintenance Manager, Production Manager and Head of Operations Canada will be involved into the action plan development and implementation.