

## **Accessibility for Ontarians with Disabilities Act (AODA) Policy and Plan**

## **1.0 Our Mission**

Lumentum delivers game-changing photonics innovation to enable breakthrough advancements in technology that transform the way the world connects, creates, and interacts.

## **2.0 Scope**

This policy applies to all persons employed at Lumentum Ottawa ULC ('Lumentum'), with specific applicability in the Ontario, Canada facilities, and includes all customers, contractors, and visitors.

## **3.0 Statement of Organizational Commitment**

Lumentum is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the Accessibility for Ontarians with Disabilities Act (AODA) and Ontario's accessibility laws.

Lumentum is committed to giving people with disabilities the same ability to access opportunities as other employees.

## **4.0 Training**

Lumentum is committed to training all staff and volunteers based in Ontario and including those who are involved in recruiting, hiring, promoting, as well as developing and approving policies, practices and procedures based in Ontario.

Training of our employees and volunteers on accessibility relates to their specific roles.

Training will include:

- The purposes of the Accessibility for Ontarians with Disabilities Act, 2005.
- How to interact and communicate with people with various types of disabilities.
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person.
- How to use any equipment or devices available on our premises or otherwise that may help with the provision of goods or services to people with disabilities.
- What to do if a person with a disability is having difficulty in accessing Lumentum's job postings or other employment tools.
- Lumentum's policies, practices and procedures relating to the integrated accessibility standard.

Applicable staff will be trained on policies, practices and procedures that affect the way employees are found, hired, and supported. Staff will also be trained on an ongoing basis when changes are made to these policies, practices, and procedures.

## 5.0 Employment

Lumentum is committed to excellence in employing people with disabilities and we will carry out our functions and responsibilities in the following areas:

### 5.1 Accommodation

Lumentum has the duty to accommodate its employees to the point of undue hardship as defined in the [Ontario Human Rights Commission Policy and guidelines on disability and the duty to accommodate](#). Lumentum will determine the most appropriate accommodation and will implement such accommodation short of undue hardship. The most appropriate accommodation is one that most respects the dignity of the individual needs, best promotes integration and full participation and ensures confidentiality.

Employees have the responsibility to make their accommodation needs known, to the best of their abilities, and to identify any known restrictions or limitation they may have.

Lumentum will work with employees requesting accommodation plans to develop a plan that meets their individual needs and that ensures the employee is able to perform the essential duties of their position. If requested, information regarding accessible formats and communications supports provided will also be included in individual accommodation plans. In addition, the plans will include individualized workplace emergency response information (where required) and will identify any other accommodation that is to be provided.

For employees who have been absent from work due to a disability and require disability-related accommodations to return to work, we will work in collaboration with the employee and third party benefits provider to create an accommodation plan.

### 5.2 Recruitment

We will notify employees, job applicants and the public about the availability of accommodation for applicants with disabilities in the recruitment and hiring process.

### 5.3 Hiring Standards

Applicants will be informed that accommodations will be available upon request for interviews, testing, and other selection methods, and are directed to request accommodations when applying or inquiring about employment with Lumentum.

Selected applicants will be made aware of the policies and support for accommodating employees with disabilities. If a selected applicant requests an accommodation, Lumentum will consult with the applicant and provide, or arrange for the provision of, a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

### 5.4 Performance Management, Career Development and Redeployment

We will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.

### 5.5 Informing Employees of Supports

Lumentum will continue to inform its employees of its policies used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practicable after commencing employment.

## **6.0 Assistive Devices**

We are committed to serving people with disabilities who use assistive devices. We will ensure that our staff are trained and familiar with various assistive devices that may be used by individuals with disabilities, including if applicable, various assistive devices provided by Lumentum, for individuals with disabilities while accessing our facilities or services.

## **7.0 Service Animals and Support Persons**

We are committed to welcoming people with disabilities who are accompanied by a service animal on the parts of our premises that are open to the public. We will ensure that our staff are properly trained in how to interact with people with disabilities who are accompanied by a service animal.

We are committed to welcoming people with disabilities who are accompanied by a support person. People accompanied by a support person will be allowed to have that person accompany them on our premises and will not be prevented access to that support person.

Fees will not be charged for support persons for admission to Lumentum premises.

## **8.0 Communication**

We are committed to meeting the communication needs of people with disabilities. We will consult with the person with the disability to determine what method of communication meets their needs. Accessible communication may include, but is not limited to, large print, text alternative.

## **9.0 Notice of Temporary Disruption**

In the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities, Lumentum will provide notice promptly. This clearly posted notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available.

## **10.0 Information and Communication**

Lumentum communicates with people with disabilities in ways that consider their disability. When asked, we will provide information about our organization and its services in accessible formats or with communication supports:

- In a timely manner, considering the person's accessibility needs due to disability; and
- At a cost that is no more than the regular cost charged to other persons.

We will consult with the person making the request in determining the suitability of an accessible format or communication support. If the organization determines that information or communications are unconvertible, the organization shall provide the requestor with:

- An explanation as to why the information or communications are unconvertible; and

- A summary of the unconvertible information or communications.

We will also meet internationally recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario's accessibility laws.

### **11.0 Feedback**

Lumentum welcomes and appreciates all forms of feedback. We are committed to meeting and surpassing expectations while supporting persons with disabilities. Comments on our services regarding how well those expectations are being met are welcome and appreciated.

Employees who wish to provide feedback or questions on the way Lumentum provides services, programs, accommodations or facilities to people with disabilities can provide feedback by contacting their HR Business Partner or HR Connections.

Customers who wish to provide feedback on the way Lumentum or subcontractors provide Lumentum Services to people with disabilities can provide feedback by contacting their Lumentum Sales Account Manager or Customer Service Professional. All efforts will be made to respond to customer feedback within five business days.

If a method of providing feedback is not suitable, Lumentum will provide additional alternate methods upon request and will ensure that the feedback process is accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request.

Along with providing acknowledgement of such feedback, Lumentum will communicate any resulting actions based on concerns or complaints that were submitted. Upon request and in a timely manner, Lumentum will arrange for its responses to feedback to be provided in an accessible format and/or with necessary communication supports.

### **12.0 Modification to this Policy**

We are committed to developing policies that respect and promote the dignity and independence of people with disabilities. Therefore, no changes will be made to this policy before considering the impact on people with disabilities. Any Lumentum policy that does not respect and promote the dignity and independence of people with disabilities based in Ontario will be modified or removed. This policy supersedes any prior Lumentum policies or documents applicable in Ontario that address the same subject matter.

## **Ontario Multi-Year Accessibility Plan**

### **Purpose**

This 2025-2030 accessibility plan outlines the policies and actions that Lumentum will put in place to improve opportunities for people with disabilities.

### **Statement of Commitment**

Lumentum is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and

independence. We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the Accessibility for Ontarians with Disabilities Act (AODA) and Ontario's accessibility laws.

## **Achievements**

### **Information and Communications**

Lumentum is committed to meeting the communication needs of people with disabilities.

Customers requiring an accommodation and/or documentation in an accessible format have been able to contact their Lumentum Sales Account Manager or Customer Service Professional. Lumentum employees will work with the requestor to determine the applicable accessibility support.

Lumentum's external website is compliant with Web Content Accessibility Guidelines (WCAG).

### **Employment**

Lumentum is committed to excellence in employing people with disabilities. We have published this commitment and our Ontario Accessibility Policy on the global and internal websites.

Some notable employment areas we showcase our commitment include:

#### ***Accommodation***

Lumentum will work with employees requesting accommodation plans to develop a plan that meets their individual needs and that ensures the employee is able to perform the essential duties of their position. If requested, information regarding accessible formats and communications supports provided will also be included in individual accommodation plans.

#### ***Workplace emergency response***

Lumentum will work with employees to create an individualized workplace emergency response plan and will identify any other accommodation that is to be provided.

#### ***Recruitment***

On all Lumentum North American job advertisements we ensure that applicants are aware of Lumentum's commitment to building an inclusive workplace by providing a statement of commitment and an email address to reach out to if they require an accommodation.

*We are committed to building an inclusive workplace where everyone feels valued and empowered. We welcome applicants from all backgrounds and provide accommodations for individuals with disabilities throughout the hiring process. Your uniqueness makes us stronger, sparks creativity, and drives our success.*

### **Spaces**

In 2022 the Lumentum Ottawa office building was updated to improve accessibility. The building now includes automatic doors on two levels, as well as, accessibility stalls and showers on various levels of the building. Ergonomic workstations were added to allow employees to adjust their desks from sit to stand at various heights.

To further our goals of diversity and inclusion we also included a gender-neutral washroom and a prayer room which created a more inclusive space for all.

Please note, the Lumentum Ottawa office building is not a public space.

## **Future Plans**

### **Information and Communication**

Lumentum will be redesigning our external website with a launch date by 2026. The new website will be designed with a focus on accessibility; our goal is to achieve or exceed all standards for accessibility. The website will include a 'Contact Us' page with an option for an accessibility request.

### **Training**

Lumentum is committed to providing training in the requirements of Ontario's accessibility laws and the Ontario Human Rights Code as it applies to people with disabilities.

We will be utilizing our Learning Platform to rollout training to all Canadian based employees in 2025. Using our learning platform will enable us to better deploy training to new hires and to keep track of who has completed the training.

### **Employment**

To continue progress in removing accessibility barriers Lumentum will:

#### ***HR Programming***

Any updates to our programming related to performance management, career development and redeployment will consider accessibility needs of our employees. Subsequently any changes resulting from the updates of programming will ensure accessible documentation will be provided to those requiring it.

As we progress with any updates accessibility will remain a consideration in the development or improvement of future policies, procedures and practices in our Ontario, Canada location.

#### ***Workplace Emergency Response***

Ensure future Ontario Occupational Health and Safety programs and Emergency Response Plan reviews incorporate accessibility considerations, including individualized emergency response plans for employees with disabilities.

### **Spaces**

The Lumentum Ottawa office will ensure any future renovations take into account accessibility requirements, both under the AODA and any applicable Building Code, as well as general best practices developed in the industry.