



# ACCESSIBILITY POLICY

## STATEMENT OF COMMITMENT

Lear Corporation (“**Lear**”) is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the *Accessibility for Ontarians with Disabilities Act, 2005* (“**AODA**”) and the Integrated Accessibility Standards Regulation (“**IAS Regulation**”) of the AODA.

It is the policy of Lear that every employee and customer has a right to equitable treatment with respect to employment, services, goods, facilities, and accommodation without discrimination in accordance with the provisions of the Ontario *Human Rights Code*.

## SCOPE

This policy is applicable to all Lear personnel.

For purpose of this policy, “**disability**” is defined as follows:

- i. 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,
- ii. a condition of mental impairment or a developmental disability,
- iii. a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- iv. a mental disorder, or
- v. an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

## POLICY DEVELOPMENT & AVAILABILITY

Lear will maintain its accessibility policy in a written format. They will be available to the public and will be provided in an accessible format if it is requested.

## REVIEW

The Policy was last reviewed on December 8, 2023.

## **INFORMATION AND COMMUNICATIONS STANDARDS**

### ***Accessible Formats and Communication Supports***

Upon request, and in accordance with the compliance schedule set out in the IAS Regulation, Lear will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner and at a cost that is not greater than the cost charged to other persons, if any. Lear will consult with the person making the request to determine the suitability of an accessible format or communication support and notify the public about the availability of these formats and supports.

### ***Feedback***

In accordance with the requirements of the IAS Regulation, Lear ensures that its feedback processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request. We will notify the public of the availability of accessible formats and communication supports including by posting this information online.

Further information about our feedback process is available at the end of this Policy.

### ***Emergency Information***

If and where Lear prepares emergency procedures, plans or public safety information and makes such information available to the public, it shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

### ***Accessible Website***

Lear is committed having an accessible website and, where practicable, all website content that will comply with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) at Level AA, except for success criteria 1.2.4 Captions (Live), and success criteria 1.2.5 Audio Descriptions (Pre-recorded) until further notice, in accordance with the IAS Regulation.

## **EMPLOYMENT STANDARDS**

Lear is committed to ensuring that its employment practices are in compliance with applicable accessibility and human rights legislation, including the AODA, IAS Regulation and the Ontario *Human Rights Code*.

### ***Recruitment***

Accommodation for applicants (including existing team members) with disabilities are available in Lear's recruitment processes.

Lear shall notify applicants when they are individually selected to participate in an assessment or selection process that accommodation, including Accessible Formats and Communication Supports, is available upon request in relation to the materials or processes to be used. If a selected applicant requests accommodation, Lear 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 a disability.

Lear shall notify successful applicants of Lear's policies for accommodating team members with disabilities when making offers of employment or as part of the onboarding process.

Lear shall also notify team members of its policies which support team members with disabilities including, but not limited to, policies on the provision of job accommodations that take into account a team member's accessibility needs due to a disability.

### ***Performance Management, Career Development and Advancement, Redeployment***

Lear shall take into account the accessibility needs and/or individual accommodation plans of team members when using performance management processes, providing career development and advancement, and using redeployment.

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

Lear provides individualized workplace emergency response information to team members who have a disability if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation. Lear provides this information as soon as practicable after becoming aware of the need for accommodation.

If an team member who receives individualized workplace emergency response information requires assistance and provided that the team member's consent is obtained, Lear will provide the workplace emergency response information to the person designated by the employer to provide assistance to the team member.

Lear reviews the individualized workplace emergency response information in the following circumstances: when the team member moves to a different location in the organization, when overall accommodation needs or plans are reviewed, and when it reviews its general emergency response policies.

### ***Documented Individual Accommodation Plans***

Lear's process for the development of documented individual accommodation plans includes:

- How we include the employee in the development of the plan;
- How we consider the employee on an individual basis;
- How we would proceed in getting a medical or other expert's opinion on the accommodation of the employee;
- How other representatives or agents may or may not be involved;
- How the employee's personal information will be protected;
- How often the plan will be reviewed and how it will be done; and
- How the plan will be provided in a format that respects the individual's needs due to a disability.

### ***Return to Work Process***

Lear's process for the development of a return to work process for employees with disabilities who have been absent due to their disability and require accommodations to return to work will:

- Outline the steps we will take to facilitate the employee's return to work; and
- Use their individual accommodation plan — where it exists — as part of the process.

### ***Training***

Lear will provide training to employees and other staff members on the AODA and on the *Human Rights Code* as it relates to people with disabilities. Training will be provided in a way that best suits the duties of employees and other staff members. For new hires, this training will be incorporated into the New Employee Orientation program.

Training will cover:

- Accessibility requirements from the IAS Regulation and the Accessible Customer Service Standard;
- How the *Human Rights Code* pertains to persons with disabilities; and
- Changes that are made to the accessibility policies, if and when they happen.

## **ACCESSIBLE CUSTOMER SERVICE POLICY**

Lear strives at all times to provide its goods and services in a way that respects the dignity and independence of people with disabilities. We are also committed to giving people with disabilities the same opportunity to access our goods and services and allowing them to benefit from the same services, in the same place and in a similar way as other customers. Revisions to this policy will only be made after considering the impact on people with disabilities.

### ***Communication***

We will communicate with persons with disabilities in ways that takes into account their disability. Lear will work with the person with a disability to determine what method of communication works for them. We will train staff to communicate with customers in clear and plain language and to speak clearly and slowly.

### ***Documents***

Lear will notify the public that documents related to accessible customer service are available upon request.

Lear will provide this document in an accessible format or with communication support, on request. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and, at no additional cost.

Invoices, company documents or other transaction records will be provided in the following formats upon request: hard copy, large print, e-mail, etc.

Any policies of Lear that do not respect and promote the principles of dignity, independence, integration and equal opportunity for people with disabilities will be modified or removed.

### ***Service Animals***

Service animals accompanying a customer with a disability shall be permitted entry to all Lear facilities that are open to the public and allowable by governing regulations.

If it is not readily apparent the animal is a service animal, Lear may ask the customer with a disability to provide a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the customer's disability. It is the responsibility of the customer using the service animal to ensure the service animal is kept in control at all times.

Lear's employees will receive training on how to interact with customers with disabilities who are accompanied by a service animal.

In the case where Lear is unable to permit a service animal access to a facility, other accommodations may be provided to the customer such as: alternate meeting format, e.g. teleconference with technology permits; delivery of goods or services at an alternate time or

location; other assistive measures available to deliver a good or service to ensure equality of outcome.

### ***Assistive Devices***

Customers with disabilities are permitted, where possible, to use their own assistive devices when on Lear premises for purposes of obtaining, using or benefiting from goods or services. Exceptions may occur in situations where Lear has determined that the assistive device may pose a risk to the health and safety of another person with a disability or the health and safety of others on our premises.

If there is a physical, technological or other type of barrier that prevents the use of an assistive device on our premises, we will first endeavour to remove that barrier. If we are not able to remove the barrier, we will ask the customer how he/she can be accommodated and what alternative methods of service would be more accessible to him/her. We will make best efforts to provide an alternative means of accessibility to the customer.

It should be noted that it is the responsibility of the person with a disability to ensure that their assistive device is operated in a safe and controlled manner at all times.

Lear will ensure that the staff receives training on various assistive devices that may be used by customers with a disability while accessing our goods and services.

### ***Support Persons***

Lear is committed to welcoming customers with disabilities who are accompanied by a support person. Any customer with a disability who is accompanied by a support person will be allowed to enter Lear's premises with his or her support person. At no time will a customer with a disability who is accompanied by a support person be prevented from having access to his or her support person while on the Lear premises.

Where appropriate, support person may be required to acknowledge that it is the customer, and not the support person, to whom Lear is providing its goods and/or services.

If a support person is necessary for the health and safety of a person with disabilities, or for the health and safety of other persons, Lear will require the accompaniment of a support person on Lear premises.

Where a Lear employee believes that a support person should be in attendance to protect the health and safety of the customer with disabilities or others, the following criteria shall be used in consulting with the customer:

- Whether there is significant risk to the health and safety of the customer with disability or to others (the mere possibility of risk is insufficient);
- Whether the risk cannot be eliminated or reduced by other means;

- Whether the assessment of the risk is based on consideration of the duration of the risk, the nature and severity of the potential harm, the likelihood that the potential harm will occur, and the imminence of the potential harm; and
- Whether the assessment of the risk is based on the customer's actual characteristics, not merely on generalizations, misperceptions, ignorance or fears about a disability.

A customer with a disability is required to provide their own support person. A customer who requires the assistance of a support person is also expected to inform Lear that he or she will be attending with a support person.

### ***Notice of Temporary Disruption***

In the event of a planned or unexpected disruption to services for customers with disabilities, Lear security will notify customers promptly. This clearly posted notice will include information about the reason for disruption, its anticipated length of time and a description of alternative facilities or services, if available. This notice will be posted at all public entrances.

In the event that a temporary service disruption occurs that would limit a customer with a disability from gaining access to Lear facilities, goods or services, Lear will make the disruption known to customers by posting a notice of the service disruption on premises in the area at all public entrances. The notice may notify customers of the service disruption by means of recorded message or other reasonable means in the circumstances.

Notices will include information about the nature of the disruption, the reason for the disruption, its anticipated duration, alternate service locations if applicable, and a description of alternate facilities or services if available from the affected service department.

### ***Training***

Lear will provide training to the following persons: i) all employees and volunteers; ii) all persons who participate in developing the organization's policies; and iii) all other persons who provide goods, services or facilities on behalf of the organization, which includes outsourced services, such as payroll and benefits.

Training will be appropriate to the duties of the employees, volunteers and other persons. Broadly speaking, training will address the requirements of the accessibility standards referred to in the AODA and in the *Human Rights Code*, as it pertains to persons with disabilities. The training will include:

- A review of the purpose of the AODA and the requirements of the customer service standard;
- Instructions on the use of available technology and assistive devices, and on interaction with service animals and support persons;
- Instruction on how to use equipment and devices made available on our premises to assist customers with disabilities to obtain, use or benefit from our goods and services;

- Instruction on what to do if a person with disabilities is having difficulties accessing services; and
- Instruction on the content and requirements of Lear's policies, practices and procedures relating to the Customer Service Standard.

Updated training will be provided as policies, practices and procedures change. Training will also be provided when new employees join Lear. In all circumstances, training will be provided as soon as practicable.

Records of training provided to staff, including training protocol, the dates on which the training is provided and the number of individuals to whom the training is provided shall be maintained in accordance with the requirements of the AODA.

### ***Feedback Process***

The goal of Lear is to meet the needs of our customers while paying attention to the unique requirements of our customers with disabilities. Comments on our services regarding how well those expectations are being met are welcomed and appreciated.

Feedback regarding the way Lear provides goods and services to people with disabilities can be made in person, by telephone, or through email at:

Human Resources Manager  
Jeannine McIlmoyle  
1652 Tricont Avenue  
Whitby, ON L1N 7C3  
(906) 619-4325  
[jmcilmoyle@lear.com](mailto:jmcilmoyle@lear.com)

Feedback will be collected by Human Resources and will be responded to in a timely and accessible manner. Where appropriate, feedback will be taken into consideration as part of the ongoing review of the AODA Customer Service Standard policies and procedures.

## MULTI-YEAR ACCESSIBILITY PLAN

### Statement of Commitment

This multi-year plan outlines Lear’s strategy to prevent and remove barriers to address the current and future requirements of the AODA, and in order to fulfill our commitment as outlined in Lear’s Accessibility Policy.

Unless otherwise noted, this Multi-Year Accessibility Plan (the “**Plan**”) applies to Lear’s Ontario locations.

In accordance with the requirements set out in the IAS Regulation, Lear will:

- Post this plan in all Ontario plant locations;
- Provide this plan in an accessible format, upon request; and
- Review and update this plan at least once every five (5) years.

This Plan was last reviewed and revised on December 8, 2023.

### Accessibility Standards for Customer Service

#### *Commitment*

Lear strives at all times to provide its goods and services in a way that respects the dignity and independence of people with disabilities. We are also committed to giving people with disabilities the same opportunity to access our goods and services and allowing them to benefit from the same services, in the same place and in a similar way as other customers. Revisions to this Plan will only be made after considering the impact on people with disabilities.

To achieve this, Lear makes reasonable efforts to ensure that its policies, procedures and practices pertaining to the provision of goods and services to the public and other third parties adhere to the following guiding principles as set out in the Accessibility Standards for Customer Service in the IAS Regulation.

We are committed to the following:

- Our goods and services must be provided in a manner that respects the dignity and independence of persons with disabilities;
- The provisions of our goods or services to persons with disabilities and others must be integrated unless an alternate measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the goods or services; and
- Persons with disabilities must be given an opportunity equal to that given to others to obtain, use and benefit from the goods or services.

The following measures have been implemented by Lear:

- Ensuring all persons who, on behalf of Lear, deal with the public or other third parties, and all those who are involved in the development and approvals of customer service policies, practices and procedures, as well as all others providing services to our customers, are trained to communicate and provide the best possible customer service to all customers, including persons with disabilities;
- Ensuring staff are trained and familiar with various assistive devices that may be used by customers with disabilities who are accessing Lear's goods and services;
- Ensuring completion of accessibility training is tracked and recorded;
- Ensuring customers accompanied by a guide dog or other service animal in areas of Lear open to the public and other third parties, are accommodated;
- Ensuring that is person with a disability is accompanied by a support person, the support person is accommodated;
- Issuing a public notice in a timely manner in the event of a planned or unexpected disruption of service or inaccessibility of facilities used by persons with disabilities. The notice must include the reason of the disruption, the anticipated duration, and a description of alternate facilities or service, if any, that may be available; and
- Continuing to welcome and appreciate feedback from persons with disabilities through multiple communication methods.

**Required compliance date:** January 1, 2012

**Status:** Completed

## **Emergency Procedure, Plans or Public Safety Information**

### ***Commitment***

Lear is committed to complying with the provisions of the AODA in respect of this requirement, with the objective of making our facilities safer for persons with disabilities during emergency circumstances.

The following measures have been implemented by Lear effective Emergency procedures, plans and public safety information that are prepared by Lear and made available to the public, will be made available in an accessible format or with appropriate communication supports, as soon as practical, upon request.

- Emergency procedures, policies and handouts have been updated to reflect assistance to be provided to persons with disabilities during an emergency.

**Required compliance date:** January 1, 2012

**Status:** Completed

## **Employment Standard**

### **(i) Recruitment**

#### ***Commitment***

Lear is committed to complying with the provisions of the AODA in respect of this requirement, with the objective of making the recruitment process accessible to persons with disabilities.

The following measures will be implemented by Lear:

- Lear will notify employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process. This will include:
  - A review and, as necessary, modification of existing recruitment policies, procedures, processes and templates; and
  - Specifying that accommodation is available for applicants with disabilities, on Lear's job postings.
- Lear will notify job applicants, when they are individually selected to participate in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used in the assessment/selection process. This will include:
  - A review, and, a necessary, modification of existing recruitment policies, procedures, processes and templates;
  - Inclusion of availability of accommodation notice as part of the script in the scheduling of an interview and/or assignment; and
  - If a selected applicant requests an accommodation, consult with the applicant and arrange for provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to disability.
- When making offers of employment, Lear will notify the successful applicant of its policies for accommodating employees with disabilities. This will include:
  - A review and, as necessary, modifications of existing recruitment policies, procedures, processes and templates; and
  - Inclusion of notification of Lear's policies on accommodating employees with disabilities in offer of employment letters. Dasha

**Required compliance date:** January 1, 2016

**Status:** Completed

### **(ii) Employee Supports**

#### ***Commitment***

Lear is committed to complying with the provisions of the AODA in respect of this requirement, with the objective of improving accommodation and return to work processes in the workplace.

The following measures have or will be implemented by Lear:

- Lear's existing policies will be reviewed to include process that Lear will follow to accommodate an employee with a disability and to facilitate an employee's return to work after absenteeism due to disability
- Lear will review and assess the existing policies to ensure that they include a process for the development of documented individual accommodation plans for employees with a disability, if such plans are required.
- Lear will ensure that the process for the development of documented individual accommodation plans include the following elements:
  - The manner in which the employee requesting accommodation can participate in the development of the individual accommodation plan
  - The means by which the employee is assessed on an individual basis
  - The manner in which Lear can request an evaluation by an outside medical or other expert, at Lear's expense, to assist Lear in determining if accommodation can be achieved and, if so, how accommodation can be achieved
  - The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.
  - The steps taken to protect the privacy of the employee's personal information
  - The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done
  - If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee
  - The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to the disability.
- Individual accommodation plans will:
  - If requested, include any information regarding accessible formats and communication supports provided, as required by the IAS Regulation;
  - If required, include individual workplace emergency response information, as required in the IAS Regulation; and
  - Identify any other accommodation that is to be provided.
- Lear will ensure that the return to work process as set out in its existing policies outlines the steps Lear will take to facilitate the employee's return to work after a disability-related absence, outlines the development of a written individualized return to work plan for such employees, and requires the use of individual accommodation plans, as discussed above, in the return to work process.

**Required compliance date:** January 1, 2016

**Status:** Completed

### **(iii) Performance Management, Career Development and Redeployment**

#### ***Commitment***

Lear will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans:

- When using its performance management process in respect of employees with disabilities
- When providing career development and advancement to its employees with disabilities
- When redeploying employees with disabilities

The following measures have or will be implemented by Lear:

- Review, assess and, as necessary, modify existing policies, procedures, practices and templates to ensure compliance with the IAS Regulation;
- Take the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account when:
  - Assessing performance
  - Managing career development and advancement
  - Redeployment is required

### **(iv) Workplace Emergency Response Information**

#### ***Commitment***

Where Lear is aware that an employee has a disability and that there is a need for accommodation, individualized emergency response information will be provided to the employee as soon as possible if such information is necessary given the nature of the employee's disability.

The following measures have been implemented by Lear:

- Where the organization becomes aware of the need to accommodate an employee's disability, and if the employee's disability is such that the individualized emergency response information is necessary, Lear will provide the individualized workplace emergency response information to the employee with the disability as soon as practical after it becomes aware of the need.
- If an employee who received individualized workplace emergency response information requires assistance, with the employee's consent, Lear will provide the workplace emergency response information to the person designated by the organization to provide assistance to the employee.
- Lear will review the individualized workplace emergency response information when:
  - The employee moves to a different location in the organization;
  - The employee's overall accommodation needs or plans are reviewed; and/or
  - Lear reviews its general emergency response policies.

**Required compliance date:** January 1, 2012  
**Status:** Completed

**(v) Training**

***Commitment***

Lear is committed to implementing a process to ensure that all employees, volunteers and all other person who provide goods, services and facilities on Lear's behalf and persons participating in the development and approval of Lear's policies, are provided with appropriate training on the requirements of the IAS Regulation and the Ontario *Human Rights Code* as it pertains to persons with disabilities, and are provided with such training as soon as practical.

The following measures have or will be implemented by Lear:

- Determine and ensure that appropriate training on the requirements of the IAS Regulation and on the Ontario Human Rights Code as it pertains to persons with disabilities, is provided to all employees, volunteers, third-party contractors who provide goods, services and facilities on Lear's behalf, and persons participating in the development and approval of Lear's policies.
- Ensure that the training is provided to persons referenced above as soon as practical.
- Keep and maintain a record of the training provided, including the dates that the training was provided and the number of individuals to whom it was provided.
- Ensure the training is provided on any changes to the prescribed policies on an ongoing basis.

**Required compliance date:** January 1, 2015  
**Status:** Completed

**Information and Communication Standards**

***Commitment***

Lear is committed to complying with the provisions of the AODA in respect of this requirement, with the objective of making applicable company information and communications accessible to persons with disabilities.

**(i) Feedback, Accessible Formats and Communication Supports**

The following measures have or will be implemented by Lear:

- Ensure that the feedback processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request. The organization will notify the public about the availability of accessible formats and communication supports.
- Except as otherwise provided for under the IAS Regulation, provide or arrange for the provision of accessible formats and communication supports upon request for persons with disabilities in a timely manner that takes into account the person's accessibility needs.
- Consult with the person making the request in determining the suitability of an accessible format or community support.
- Notify the public about the availability of accessible formats and communication supports.

**Required compliance date:**

January 1, 2015 – Feedback related provisions

January 1, 2016 – Accessible formats and communication supports

**Status: Completed**

**(ii) Accessible Websites and Web Content**

Lear is committed having an accessible website and, where practicable, all website content that will comply with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) at Level AA, except for success criteria 1.2.4 Captions (Live), and success criteria 1.2.5 Audio Descriptions (Pre-recorded) until further notice, in accordance with the IAS Regulation.

**Required compliance date:** January 1, 2021 – WCAG 2.0 Level AA – all Internet websites and web content, except for exclusions set out in the IAS Regulation

**Status: Completed**

**Future Actions**

Lear will report continued compliance with the AODA and the IAS Regulation using the Government of Ontario's Accessibility Compliance Report.

**Required compliance date:** December 31, 2023

**Status: Completed**