

January 1, 2025

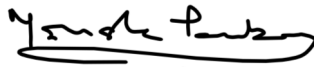
### Statement of Commitment to Accessibility

Armstrong is committed to providing a barrier-free environment for all stakeholders including our clients/customers, employees, job applicants, suppliers, and any visitors who may enter our premises, access our information, or use our services. As an organization, we respect and uphold the requirements set forth under the Accessibility for Ontarians with Disabilities Act (2005), and its associated standards and regulations which sets out a process for developing and enforcing accessibility standards.

Armstrong understands that we have a responsibility for ensuring a safe, dignified, and welcoming environment for everyone. We are committed to ensuring our organization's compliance by incorporating accessibility legislation into our policies, procedures, equipment requirements, training, and best practices. We will review these policies and practices annually, as organizational changes occur, or in anticipation of compliance deadlines. In addition, we will strive to meet the needs of individuals with disabilities in a timely and effective manner.

Providing an accessible and barrier-free environment is a shared effort, and as an organization, Armstrong is committed to working with the necessary parties to make accessibility for all a reality. For more detailed information on our accessibility policies, plans, and training programs, please contact the Armstrong Human Resources Department.

Sincerely,



Monisha Tambay,  
Global Director, Organizational Capability

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## **AODA Accessibility Standards for Customer Service Policy**

The *Accessibility for Ontarians with Disabilities Act (AODA)*, 2005 was enacted in 2005 with the objective of recognizing the history of discrimination against persons with disabilities in Ontario, to benefit all Ontarians by:

- Developing, implementing and enforcing accessibility standards in order to achieve accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises on or before January 1, 2025; and
- Providing for the involvement of persons with disabilities, of the Government of Ontario and of representatives of industries and of various sectors of the economy in the development of the accessibility standards.

To achieve this, the government has focused on creating accessibility standards in five key areas: customer service, employment, information and communication, built environment, and transportation.

The Customer Service Standard came into force January 1, 2008. In accordance with the Accessibility Standards for Customer Service, Ontario Regulation 429/07, this policy addresses the following:

- The provision of services to persons with disabilities;
- The use of assistive devices;
- The use of guide dogs, service animals, and service dogs;
- The use of support persons;
- Customer feedback;
- Training; and
- Notice of availability and format of required documents.

This policy is intended to meet the requirements of Accessibility for Customer Service, Ontario Regulation 429/07 under the Accessibility for Ontarians with Disabilities Act, 2005.

### **The provision of services to persons with disabilities:**

Armstrong will make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- Ensuring that all customers and third parties receive the same value and quality service;
- Allowing customers with disabilities to do things in their own ways, at their own pace when accessing services as long as this does not present a safety risk to themselves or any Armstrong representative;
- Using alternative methods when possible to ensure that customers with disabilities have access to the same services, in the same place, and in a similar manner;
- Taking into account individual needs when providing services; and
- Communicating in a manner that takes into account the customer's disability.

## Assistive devices

**Customer's own assistive devices(s):** Persons with disabilities may use their own assistive devices as required when accessing services provided by Armstrong.

In cases where the assistive device presents a safety concern or where the accessibility might be an issue, other reasonable measures will be used to ensure the access of services. For example, open flames and oxygen tanks cannot be near one other. Therefore, the accommodation of a customer with an oxygen tank may involve ensuring the customer is in a location that would be considered safe for both the customer and the business. Another example, where elevators are not present and where an individual requires assistive devices for the purpose of mobility, service will be provided in a location that meets the needs of the customer.

## Guide dogs, service animals, and service dogs

A customer with a disability that is accompanied by a guide dog, service animal or service dog will be allowed access to Armstrong premises unless otherwise excluded by law\*, or GMP regulations, where applicable. "No pet" policies in certain areas of the facility do not apply to guide dogs, service animals, and/or service dogs unless a safety concern exists for the customer and the guide dog, service animal or service dog, or Armstrong employees, or unless the presence of the guide dog, service animal or service presents a situation of 'undue hardship' on the part of the company.

Exclusion guidelines: If a guide dog, service animal or service dog is excluded by law\* or GMP, or presents a safety risk for Armstrong employees, the customer and/or the guide dog, service animal, and/or service dog, Armstrong will offer alternative methods to enable the person with the disability to access service, when possible (i.e., securing the animal in a safe location and offering the guidance of an employee).

Recognizing a Guide Dog, Service Dog and/or Service Animal: If it is not readily apparent that the animal is being used by the customer for reasons relating to his/her disability, Armstrong may request verification from the customer. Verification may include:

- A letter from a physician confirming that the person requires the animal for reasons related to the disability;
- A valid identification card signed by the Attorney General of Canada; or,
- A certificate of training from a recognized guide dog or service animal training school.

Care and Control of the Animal: The customer that is accompanied by a guide dog, service dog and/or service animal is responsible for maintaining care and control of the animal at all times.

Allergies: If a health and safety concern presents itself for example in the form of a severe allergy to the animal, Armstrong will make all reasonable efforts to meet the needs of all individuals.

## Support Persons

If a customer with a disability is accompanied by a support person, Armstrong will ensure that both persons are allowed to enter the premises together and that the customer is not prevented from having access to the support person.

There may be times where seating and availability prevent the customer and support person from sitting beside each other. In these situations Armstrong will make every reasonable attempt to resolve the issue.

In situations where confidential information might be discussed, consent will be obtained from the customer, prior to any confidential information being raised.

## Feedback Process

Armstrong shall provide customers with disabilities the opportunity to provide feedback on the service. Information about the feedback process will be readily available to all customers and notice of the process will be made available through verbal communication or in written format. Feedback forms along with alternative methods of providing feedback such as verbally (in person or by telephone) or written (hand written, delivered, or email), will be available upon request.

**Submitting Feedback:** Customers may submit feedback directly to the Human Resources Department, or indirectly through a Armstrong employee. Customers who wish to provide feedback may complete an onsite customer feedback form or can do so verbally to any Armstrong employee.

Customers that provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

## Training

Armstrong will provide training for its employees regarding AODA, Accessibility Standards for Customer Service, and the *Ontario Human Rights Code* as they pertain to individuals with disabilities. Training will also be provided to individuals who are responsible for developing Armstrong' policies, and all other persons who provide goods, services or facilities on behalf of Armstrong.

Training will be provided as soon as is reasonably practicable. Training will be provided to all new employees as a part of the onboarding process. Training will also be provided for current employees as changes to Armstrong' accessibility policies occur and as updates and revisions are made.

**Training provisions:** As reflected in Ontario Regulation 429/07, regardless of the format, training will cover the following:

- A review of the purpose of the Accessibility for Ontarians with Disabilities Act, 2005;
- The *Ontario Human Rights Code* as it pertains to people with disabilities;
- A review of the requirements of the Accessibility Standards for Customer Service, Ontario Regulation 429/07;
- Instructions on how to interact and communicate with people with various types of disabilities;
- Instructions on how to interact with people with disabilities who:
  - use assistive devices;
  - require the assistance of a guide dog, service dog or other service animal; or
  - require the use of a support person.
- Instructions on how to use equipment or devices that are available at our premises which may help people with disabilities;
- Instructions on what to do if a person with a disability is having difficulty accessing your services; and

- Armstrong' policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

**Training schedule:** Armstrong will provide training as soon as practicable. Training will be provided to employees, volunteers, and every new employee as a part of the onboarding process. Revised training will be provided in the event of changes to legislation, procedures and/or practices.

**Record of training:** Armstrong will keep a record of training that includes the employees who received the training, and the date all necessary documents were reviewed.

#### **Notice of Availability and Format of Documents**

Armstrong shall notify customers that the documents related to the Accessibility Standard for Customer Service are available upon request and shall be communicated in a format that takes into account the customer's disability (i.e., larger font, read by an employee). Notification shall be provided through the company web site at [www.armstrongfluidtechnology.com](http://www.armstrongfluidtechnology.com) , and all information will be kept in a central place in the facility such as front reception as well as with Human Resources.

This policy and its related procedures will be reviewed as required in the event of legislative changes.

#### **Definitions:**

**Customer**, for the purpose of the policy, is defined as any person(s) with whom Armstrong has business dealings. This includes, but is not limited to clients, inspectors, suppliers, contractors, and prospective employees.

**“Third parties”** is not defined in the Act or in the Customer Service Standard. However, as suggested by the Government of Ontario's publication Guide: Accessibility Standards for Customer Service, Ontario Regulation 429/07, it will likely include suppliers, wholesalers, consultants and any other person, business or organization that services are provided to that do not fall under the “Customer” definition.

**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 customers bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

**Disability** as 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 coordination, 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; or
- An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

**Guide Dog** is a highly-trained working dog that has been trained at one of the facilities listed in the Ontario Regulation 58 under the Blind Persons' Rights Act, to provide mobility, safety, and increased independence for people who are blind.

**Service Animal** as reflected in Ontario Regulation 429/07 is a service animal for a person with a disability if:

- It is readily apparent that the animal is used by the person for reasons relating to his/her disability; or
- If the person provides a letter from a physician confirming that the person requires the animal for reasons relating to the disability.

**Service Dog** as reflected in the Health Protection and promotion Act, Ontario Regulation 562 a dog other than a guide dog for the blind is a service dog if:

- It is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability; or
- The person who requires the dog can provide on request a letter from a physician confirming that the person requires a service dog.

**Support Person** as reflected in Ontario Regulation 429/07, a support person means, in relation to a person with a disability, another person who accompanies him/her in order to help with communication, mobility, personal care, medical needs, or access to goods and services.

*\* Applicable laws (May not necessarily apply to Armstrong.):*

*Food Safety and Quality Act 2001, Ontario Regulation 31/05: Animals not intended for slaughter or to be euthanized are not allowed in any area or room of a meat plant. It also makes an exception for service dogs to allow them in those areas of a meat plant where food is served, sold or offered for sale to customers and in those areas that do not contain animals or animal parts and are not used for the receiving, processing, packaging, labelling, shipping, handling or storing of animals or parts of animals.*

*The Health Protection and Promotion Act, Ontario Regulation 562 Section 60, normally does not allow animals in places where food is manufactured, prepared, processed, handled, served, displayed, stored, sold or offered for sale. It does allow guide dogs and service dogs to go into places where food is served, sold or offered for sale. However, other types of service animals are not included in this exception.*

*Dog Owners' Liability Act, Ontario: If there is a conflict between a provision of this Act or of a regulation under this or any other Act relating to banned breeds (such as pit bulls) and a provision of a by-law passed by a municipality relating to these breeds, the provision that is more restrictive in relation to controls or bans on these breeds prevails.*

## AODA Employment Standards Policy

In June 2011, the Ontario government enacted the *Integrated Accessibility Regulation (IAR)* under the Accessibility for Ontarians with Disabilities Act (AODA). The Regulation gave force of law to four new standards to address barriers facing persons with disabilities in the areas of employment, information and communications, design of public spaces, and transportation. Although this Regulation came into force in June 2011, specific requirements under the various standards will be phased in between 2012 and 2025.

Based on the *Employment Standard*, Armstrong will proactively identify, remove, and prevent barriers hindering full participation in employment of persons with disabilities. In the event where barriers cannot be removed proactively, Armstrong will establish individual accommodation plans.

Armstrong is committed to:

- Preventing, identifying, and removing barriers throughout the entire employment cycle;
- Designing inclusive employment systems and processes;
- Supporting persons with disabilities from recruitment through hiring;
- Establishing individual accommodation plans;
- Respecting the privacy of information related to accommodation;
- Providing information in accessible formats and methods (include but not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities);
- Providing disability awareness training to employees.

Armstrong is committed to complying with the accessibility employment standards under the AODA, as well as meeting all obligations under the *Human Rights Code* and the *Workplace Safety Insurance Act*.

### General Requirements

General requirements that apply across all of the four (4) standards, Information and Communications, Employment, Transportation (not applicable), and Design of Public Spaces, are outlined as follows:

### Establishment of Accessibility Policies and Plans

Armstrong will develop, implement and maintain policies governing how it will achieve accessibility through these requirements.

Armstrong will include a statement of its commitment to meeting the accessibility needs of persons with disabilities in a timely manner in its policies. These documents will be made publicly available in an accessible format, upon request. Armstrong will establish, implement, maintain and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR.

Accessibility plans will be made available in an accessible format, upon request. Armstrong will review and update its accessibility plan once every five (5) years, or more frequently, if needed, and will establish, review and update the accessibility plans in consultation with persons with disabilities or an advisory committee.

### Procuring or Acquiring Goods and Services, or Facilities

Armstrong will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities. The only exception is in cases where it is impracticable to do so.

## **Training Requirements**

Armstrong will provide training for all employees regarding the Integrated Accessibility Standards and the *Ontario Human Rights Code* as they pertain to individuals with disabilities.

Training will be provided to new employees as part of the onboarding process, and training will be provided for current employees as changes to Armstrong's accessibility policies occur.

## **Records**

Armstrong will maintain records on the training provided, when it was provided, all test scores, and the number of employees that were trained.

## **Recruitment, Assessment, Selection and Employment Cycle**

Armstrong will notify employees and the public about the availability of accommodation for job applicants who have disabilities. This may be communicated through job postings, through the Company web site, or directly to the candidate. Accommodation might include application forms in an alternative format or adjustments to the recruitment process such as arrangements during the interview or correspondence in a different format.

Applicants will be informed that these accommodations are available, upon request, for the interview process and for other candidate selection methods. Armstrong will notify job candidates when they have been 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. Where accommodation is requested, Armstrong will consult with the applicant and provide or arrange for suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability. Armstrong will make the final decision regarding which accommodation to be provided.

During the offer stage, successful applicants will be made aware of Armstrong's policies and supports for accommodating people with disabilities, including, but not limited to, job accommodations that take into account an employee's accessibility needs due to disability. Armstrong will then notify employees again, as soon as practicable, after they commence their employment. Armstrong will strive to provide several opportunities to discuss any required accommodations. Armstrong will inform all current employees of its policies used to support and accommodate employees with disabilities, including, but not limited to, job accommodations that take into account an employee's accessibility needs due to disability.

## **During employment**

As soon as practicable after employment begins, Armstrong will inform all employees of company policies used to support employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. Update employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.

Where an employee with a disability so requests it, Armstrong will consult with the employee to provide or arrange for accessible formats and communication supports for information that is needed in order to perform the employee's job, and information that is generally available to employees in the workplace



Provide workplace emergency response information to the person designated to provide assistance to the employee with a disability (if the employee requires assistance and if the employee consents).

Review the individualized workplace emergency response information when an employee moves to a different location within the organization, when reviewing an employee's overall accommodation needs or plans, and at any time Armstrong typically undergoes a review of the general company emergency response policies.

Make individual accommodation plans that, if requested, include any information regarding accessible formats and communications supports available, include individualized workplace emergency response information, and identify any other accommodation that is to be provided

Prepare and have in place a written process for the development of documented individual accommodation plans for employees with disabilities  
Prepare written job descriptions to help identify the essential duties of a position that outline the special skills, knowledge and abilities required to carry out the essential duties That considers the following factors:

- Whether the reason the position exists is to perform that function
- The number of other employees available to perform the function or among whom the performance of the function can be distributed
- Whether the function is highly specialized and the incumbent is hired for the degree of expertise or skill required to perform the function

### **Accessible Formats and Communication Supports for Employees**

If an employee with a disability requests it, Armstrong will provide or arrange for the provision of accessible formats and communication supports for the following:

- Information needed in order to perform his/her job; and
- Information that is generally available to all employees in the workplace.

Armstrong will consult with the employee making the request to determine the best way to provide the accessible format or communication support. Armstrong is committed to ensuring that employees feel they can disclose information and ask for assistance.

Accessible formats and communication supports include but are not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

### **Workplace Emergency Response Information**

Where required, Armstrong will create individual workplace emergency response information for employees with disabilities. This information will take into account the unique challenges created by the individual's disability and the physical nature of the workplace, and will be created in consultation with the employee. If an employee who receives individualized workplace emergency response information requires assistance, with the employee's consent, Armstrong will provide the workplace emergency response information to the person designated by the company to provide assistance to the employee.

This information will be reviewed when:

- The employee moves to a different physical location in the organization;
- The employee's overall accommodation needs or plans are reviewed; and/or
- Armstrong reviews general emergency response policies.

## **Documented Individual Accommodation Plans**

Armstrong has developed and has in place a written processes for the development of documenting individual accommodation plans for employees with disabilities. The process for the development of these accommodation plans should include specific elements, including:

- The manner in which an 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 ways that an employee can request an evaluation by an outside medical or other expert, or other experts (at the employer's expense) to determine if accommodation can be achieved, or how it can be achieved;
- The steps taken to protect the privacy of the employee's personal information;
- The frequency with which the individual accommodation plan should be reviewed or updated and how it should be done; and
- The manner in which the reasons for denial will be provided to the employee, if an individual accommodation plan is denied;
- The means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs.

Individual accommodation plans shall, if requested, include any information regarding accessible formats and communication supports provided. If it is required, it shall include individualized workplace emergency response information and any other identified accommodations to be provided.

## **Performance Management**

Armstrong will consider the accessibility needs of employees with disabilities, as well as individual accommodation plans, when implementing performance management processes, or when offering career development or advancement opportunities.

Armstrong will use its performance management processes and ensure that they can be, and are, used in a way that is consistent with employees' individual accommodation needs or plans. Armstrong shall retain and promote staff using the same criteria for all employees. Armstrong will also provide information in accessible formats and will consider all options in looking for ways to support employees.

*Individual accommodation plans will be consulted, as required.*

## **Career Development and Advancement**

Armstrong provides career development and advancement opportunities to its employees and will take into account the accessibility needs of its employees with disabilities, as well as any individual accommodation plans when providing career development and advancement to its employees with disabilities.

Armstrong will make sure that employees with disabilities receive information in a way that is consistent with their individual accommodation needs or plans. All employees have the same opportunity for learning and personal development. All employees shall be made aware of opportunities for transfers and promotions, and all efforts shall be made to avoid informal contacts to avoid excluding anyone who might be interested in an opportunity. When an employee who has individual accommodation needs or an accommodation plan takes on new job

responsibilities, Armstrong will provide training on the essential job duties, which will take into account the employee's accommodation needs or plan.

### **Redeployment**

In the event of redeployment, Armstrong shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.

Armstrong's procedure for moving an employee to another job where the existing position has ended shall:

- Apply to employees with disabilities
- Take individual accommodation needs or plans into account
- Include consultation with the employee, upon request.

### **Return to Work**

Armstrong will develop and implement return to work processes for employees who are absent from work due to a disability and require disability-related accommodation(s) in order to return to work.

The return to work process will outline the steps Armstrong will take to facilitate the employee's return to work and shall use documented individual accommodation plans (as described in section 28 of the regulation).

### **Review**

This policy will be reviewed regularly to ensure that it is reflective of Armstrong's current practices as well as complaint with legislative requirements.

### **AODA Information & Communications Policy**

The standard for information and communications focuses on accessible information and communications relating to the provision of goods and services. The definition of "information and communication" is very broad and can include such things as websites, brochures, flyers, invoices, order forms, feedback forms, complaint forms, telephone calls, marketing materials, etc. The main goal of the standard is to promote inclusive design of information and communication platforms and to specify requirements to prevent and remove barriers to persons with disabilities when creating, conveying, distributing, procuring and receiving information and communicating to and from the organization.

Armstrong shall notify the public about the availability of accessible formats and communication supports. In the event a person with a disability makes a request for information and communication in an accessible format or using a communication support, Armstrong will consult with the person making the request in determining the suitability of an accessible format or communication support. The final determination as to which accessible format or communication support to use will rest with the Company.

Armstrong will ensure there exist processes for receiving and responding to feedback, and that these processes are accessible for persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request.

In accordance with the *Accessibility Standards for Customer Service, Ontario Regulation 429/07*, Armstrong will make the availability of accessible feedback formats publicly known.

## **Accessible Formats and Communication Supports for Employees**

Unless deemed unconvertible, Armstrong will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, upon request. Accessible formats and communication supports will be provided in a timely manner and at no additional cost to the individual.

Accessible formats may include, but are not limited to, large print, recorded audio and electronic formats, braille and other formats used by persons with disabilities. Communication supports include, but are not limited to, captioning, alternative and augmentative communication supports, plain language sign language and other supports that facilitate effective communications.

Armstrong recognizes the right to accessibility extends to accessing electronic or other documents in formats that work correctly with assistive technologies (communication support such as special computer hardware and software designed to help those with accessibility challenges).

Armstrong will take into account the person's accessibility needs when customizing individual requests and shall consult with the individual making the request to ensure suitability.

Armstrong will make the availability of accessible formats and communication supports publicly known.

For more information on this accessibility plan, please contact:

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Our accessibility plan is publicly posted at: [www.armstrongfluidtechnology.com/](http://www.armstrongfluidtechnology.com/)

Standard and accessible formats of this document are free on request from

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