

Requirement R3

Integrated Accessibility (IAS) Policy, Statement of Commitment and Accessibility Plan

G-FLN/OC

 **BASF**

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Administrative Information

Document	Requirement 3
Title	Integrated Accessibility (IAS) Policy, Statements of Commitment and Accessibility Plan
Code	TBD [for Rule Base code, please consult FFR/OC]
Effective since	July 16, 2013
Owner	CLN/OC
Scope	BASF Canada Inc. and its Canadian subsidiaries and affiliates including BASF Agricultural Specialties Ltd. and Chemetall Canada, Limited
Co-development Partners	GBW/OCH
Approval Body	CLN/OC
Target Group	Canadian employees of the BASF Group
Published	
Superordinate Regulation	N/A
Subordinate Regulations	N/A
Last Update	June 19, 2017 Judy Finlayson – G-FLN/OC
Character of Changes	Updated in accordance with legal accessibility requirements
Revision	5

Change History

Date	Author	Version	Remarks
June 19, 2017	Judy Finlayson	4	To amend scope of Policy
July 1, 2016	Judy Finlayson & Raja Ramanathan	3	Changes to <i>Accessibility for Ontarians with Disabilities Act</i> effective July 1, 2016
January 1, 2016	Judy Finlayson & Raja Ramanathan	2	Changes to <i>Accessibility for Ontarians with Disabilities Act</i> effective July 1, 2016
July 16, 2013	Marie-Eve Rehayem & Chris Hall	1	To comply with <i>Accessibility for Ontarians with Disabilities Act</i>

I. PURPOSE AND SUMMARY

The purpose of this document is to affirm BASF's commitment to meeting the diverse needs of people with Disabilities and to set forth our policy and multi-year accessibility plan for compliance with the requirements of accessibility legislation across Canada.

II. SCOPE

This requirement applies to and governs the activities of all employees, agents and volunteers of BASF Canada Inc., its Canadian subsidiaries, affiliates and partnerships in which BASF Canada Inc and/or its subsidiaries have a majority interest, including BASF Agricultural Specialties Ltd. and Chemetall Canada, Limited (collectively "BASF"), as well as non-Canadian based employees and volunteers of BASF that deal with members of the public or other third parties in Canada on behalf of BASF.

III. DEFINITIONS

1. **"Accessible Format(s)"** includes, but is not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with Disabilities.
2. **"Barrier(s)"** means any obstacle that impedes or prevents a person with a Disability from fully and effectively participating in all aspects of society on an equal basis and includes, but is not limited to, attitudinal barriers, information or communications barriers, technological barriers, organizational barriers, architectural and/or physical barriers, and barriers established or perpetuated by a policy or practice.
3. **"Communication Support(s)"** includes, but is not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.
4. **"Disability"** means the corresponding definitions in the applicable provincial accessibility legislation and human rights legislation of the Province in which the disabled person is doing business with BASF, which includes the followings impairments, conditions and disorders:

(a) 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,

(b) a condition of mental impairment or a developmental disability,

(c) a learning or intellectual disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,

(d) a mental disorder,

(e) a sensory disability, or

(f) an injury or disability for which benefits were claimed or received under the insurance plan established under workplace safety legislation.

IV. STATEMENT OF COMMITMENT

BASF is committed to meeting the diverse needs of people with Disabilities in a timely manner that is consistent with the principles of independence, dignity, integration and equality of opportunity, and will do so by striving to identify, prevent and remove Barriers to accessibility wherever possible as well as by meeting the accessibility requirements under provincial accessibility legislation across Canada.

V. MULTI-YEAR ACCESSIBILITY PLAN

BASF is committed to complying with accessibility requirements under applicable legislation and to reviewing and updating BASF's accessibility plan as set out in this policy as least once every 5 years. The following is a summary of BASF's accessibility plan timeline. This summary is intended only as a guide to inform and assist BASF in its accessibility compliance initiatives.

1. General Requirements

SELF-SERVICE KIOSKS

If and when BASF designs, procures or acquires "self-service kiosks", it will consider what, if any, accessibility features could be built into the kiosks to best meet the needs of customers and clients with Disabilities – having regard to the accessibility needs, preferences and abilities of the widest range of users – and BASF will strive to include accessibility features in the self-service kiosk being designed, procured or acquired where possible.

A "self-service kiosk" means an interactive electronic terminal, including a point-of-sale device, intended for public use that allows users to access one or more services or products or both.

TRAINING

BASF will ensure that all employees and volunteers, and any other persons who provide goods, services or facilities to the public or other third parties on behalf of BASF Canada or who participate in developing BASF's policies on the provision of goods, services or facilities to the public or other third parties, will receive training on accessibility legislation and human rights laws as they pertain to persons with Disabilities.

Training will be provided in accordance with BASF's Customer Service Policy in respect of Providing Goods & Services to People with Disabilities in a manner that is appropriate to the duties of the employees, volunteers and other persons, and will be provided as soon as

practicable after staff, agents or volunteers commence their duties and on an ongoing basis with respect to any changes to this policy.

BASF will maintain a record of the training it provides to staff, agents and volunteers, including a summary of the contents of our training policy, the dates on which the training is provided and the number of individuals to whom it is provided.

2. Information and Communications Requirements

Note: The following accessibility requirements related to information and communication do not apply to products and product labels, “unconvertible” information or communications, and information that BASF does not control directly or indirectly through a contractual relationship.

Information and communications are considered “unconvertible” if it is not technically feasible to convert the information or communications, or the technology required to undergo such conversion is not readily available.

Wherever information and communications are determined to be “unconvertible”, BASF will ensure that the person with a Disability who is requesting the information or communication is provided with: (i) an explanation as to why the information or communication is unconvertible; and (ii) a summary of the unconvertible information or communication.

EMERGENCY PROCEDURE, PLANS OR PUBLIC SAFETY INFORMATION

Wherever BASF prepares emergency procedures, plans or public safety information and makes the information available to the public, it is committed to providing the information in an Accessible Format or with appropriate Communication Supports as soon as practicable upon request.

ACCESSIBLE WEBSITES AND WEB CONTENT

NOTE: The accessible website and web content requirements apply only with respect to:

- (i) BASF’s websites that are accessible to the public (ie. excludes intranet websites but includes websites accessible only by customers);
- (ii) websites and web content, including web-based applications, that BASF controls directly or through a contractual relationship that allows for modification of the product; and
- (iii) web content published on a website after January 1, 2012.

BASF will ensure that all “new internet websites and web content” conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAB) 2.0 Level A requirements, except where doing so is not practicable having regard to, among other things, the availability of commercial software or tools or both, and any significant impact on an implementation timeline that was planned or initiated before January 1, 2012.

“New internet websites and web content” means either a website with a new domain name or a website with an existing domain name undergoing a “significant refresh”.

A “significant refresh” means changing more than 50% of the content, design or technology of the website, such as:

- (i) creating, rewriting or reorganizing more than 50% of the website’s content, including graphics, text, widgets, etc.;
- (ii) changing more than 50% of the design elements including layout, navigation, placement and style; or

- (iii) changing more than 50% of the web publishing platform/model such as the content management system (CMS), Cascading Style Sheet (CSS) or HTML structure.

FEEDBACK

Wherever BASF has existing processes for receiving and responding to feedback, it will provide or arrange for the provision of Accessible Formats and Communication Supports upon request in order to ensure that all such processes are accessible to people with Disabilities.

ACCESSIBLE FORMATS AND COMMUNICATION SUPPORTS

Upon request, BASF will take all reasonable steps to provide or arrange for the provision of Accessible Formats and Communication Supports in a timely manner so that people with Disabilities can access our publicly available information.

In each case, BASF will take into account the accessibility needs of the person with a Disability making the request and will consult with the person to determine the suitability of an Accessible Format or Communication Support.

Accessible Formats and Communication Supports will be provided at no additional cost to the person with a Disability making the request.

BASF will notify the public of the availability of Accessible Formats and Communication Supports.

ACCESSIBLE WEBSITES AND WEB CONTENT

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BASF will ensure that all internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAB) 2.0 Level AA requirements other than success criteria 1.2.4 Captions (Live) and success criteria 1.2.5 Audio Descriptions (pre-recorded), except where doing so is not practicable having regard to, among other things, the availability of commercial software or tools or both, and any significant impact on an implementation timeline that was planned or initiated before January 1, 2012.

5.3 Employment Requirements

Note: The following accessibility requirements apply only in respect of BASF's employees and do not apply in respect of volunteers or other non-paid individuals.

WORKPLACE EMERGENCY RESPONSE INFORMATION

Wherever BASF is aware of the need for individualized emergency response information due to an employee's Disability, we are committed to accommodating the employee by preparing and providing him or her with individualized emergency response information that is suitable in the circumstances.

If the employee with a Disability who receives the individualized workplace emergency response information requires assistance and provides his or her consent, BASF will provide the individualized workplace emergency response information to a person who is designated to assist the employee in case of an emergency.

RECRUITMENT

BASF will notify the public and its employees that, when requested, BASF will provide accommodation for applicants with Disabilities who participate in recruitment processes. During recruitment processes, BASF will notify all job applicants that are selected to participate in an assessment or selection process that BASF will provide reasonable accommodations, upon request, to a person with a Disability in relation to the materials or processes to be used in the assessment or selection process. In any case where an applicant with a Disability requests an accommodation, BASF 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 his or her Disability. As part of all offers of employment, BASF will notify successful job applicants of its policies for accommodating employees with Disabilities.

INFORMING EMPLOYEES OF DISABILITY-RELATED SUPPORTS

BASF will notify its employees of its existing policies in respect of employees with Disabilities including, but not limited to, any policies regarding job accommodations that take into account an employee's accessibility needs due to Disability. BASF will also provide updated information to its employees with respect to any changes to existing policies regarding employees with Disabilities and to accommodations for Disability-related needs as soon as practicable after beginning their employment.

ACCESSIBLE FORMATS AND COMMUNICATION SUPPORTS FOR EMPLOYEES

Upon request, BASF will consult with an employee with a Disability in order to provide or arrange for the provision of reasonable Accessible Formats and Communications Supports for the employee with respect to all: (i) information that is needed by the employee in order to perform his or her job; and (ii) information that is generally available to employees in the workplace. BASF will also consult with the employee requesting Accessible Formats or Communication Supports to determine the suitability of an Accessible Format or Communication Support.

INDIVIDUAL ACCOMMODATION PLANS

BASF will develop and have in place a written process for the development of documented individual accommodation plans for employees with Disabilities that have come to BASF's attention, which will include the following elements:

- (i) The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan;
- (ii) The means by which the employee is assessed on an individual basis;
- (iii) The manner in which BASF can request an evaluation by an outside medical or other expert, at BASF's expense, to assist BASF in determining if accommodation can be achieved and, if so, how accommodation can be achieved;

- (iv) 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;
- (v) The steps taken to protect the privacy of the employee’s personal information;
- (vi) The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done;
- (vii) If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee;
- (viii) The means of providing the individual accommodation plan in a format that takes into account the employee’s accessibility needs due to Disability;
- (ix) If requested, any other information regarding Accessible Formats and Communication Supports that the employee requires with respect to information needed by the employee to perform his or her job and any other information that BASF generally makes available to employees in the workplace;
- (x) If required in the circumstances, the individualized workplace emergency response information for the employee; and
- (xi) Any other accommodations that will be provided to the employee.

RETURN TO WORK PROCESS

BASF will develop and have in place a documented return to work process for employees who have been absent from work due to a Disability and who require Disability-related accommodations in order to return to work.

The return to work process will outline the steps that BASF will take to facilitate the return to work of employees who have been absent from work due to Disability and will incorporate the use of individual accommodation plans as part of the process.

PERFORMANCE MANAGEMENT, CAREER DEVELOPMENT AND ADVANCEMENT, REDEPLOYMENT

Wherever BASF uses “performance management” or “redeployment” in respect of its employees, or provides “career development and advancement” to its employees, it will take into account the accessibility needs of employees with Disabilities as well as the employee’s individual accommodation plans.

“Performance management” means any activity related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.

“Career development and advancement” includes providing additional responsibilities within an employee’s current position and the movement of an employee from one job to another within BASF that may be higher in pay, provide greater responsibility or be at a higher level in the organization, or any combination thereof, and is usually based on merit and/or seniority.

“Redeployment” means the reassignment of employees to other departments or jobs within BASF as an alternative to layoff, when a particular job or department has been eliminated.

5.4 Compliance Strategy

BASF believes that our staff and customers are our best resources for assisting us to identify, prevent and remove Barriers to accessibility and thereby ensure that the diverse needs of people with Disabilities are met or exceeded.

For various reasons, Barriers to accessibility can often be difficult to identify. Our staff and customers, including in particular those persons with Disabilities, are often in the best position to recognize the existence of any accessibility Barriers and their impact on people with Disabilities, and to alert BASF so that it can take appropriate action to prevent or remove the Barriers wherever reasonably possible.

Accordingly, BASF will take the following steps to facilitate the identification, prevention and removal of accessibility Barriers wherever it is reasonably possible to do so:

- in order to promote an understanding of and appreciation for the accessibility requirements under provincial legislation, as well as the importance of identifying, preventing and removing Barriers to accessibility, BASF will ensure that all employees are provided with a copy of this policy and are encouraged to review the policy and to raise any questions that they may have regarding the policy with the Legal Department;
- BASF will encourage, welcome and appreciate all feedback from staff and customers regarding any Barriers to accessibility and more generally on how BASF can best achieve its goal of striving towards a Barrier-free environment;
- BASF will take a proactive approach to accessibility wherever reasonably possible by striving to have regard to and incorporating Disability-related needs and accessibility issues in general in all aspects of our business and decision-making; and
- BASF will strive to work cooperatively and consult with any person with a Disability who brings to BASF's attention an issue or concern regarding accessibility, and BASF will take all reasonable steps in the circumstances to address the Disability-related needs of the individual.

VI. QUESTIONS ABOUT THIS REQUIREMENT

All questions regarding this policy, including with respect to the steps that BASF intends to take in order to comply with its legal requirements, should be referred to BASF's Canadian Legal Department.