1. **Purpose:** The purpose of this policy is to provide guidance and standards to ensure that Ciena meets its duty to accommodate, prescribed by the Ontario Human Rights Code and the Accessibility for Ontarians with disabilities Act (AODA).

2. **Scope:** This policy applies to Ciena’s Ontario based employees, customers and job applicants who may require accommodation during the selection process.

3. **Owner:** Interpretation and application of Ciena’s Accommodation Duties for Ontarians with Disabilities Policy resides with Director of Global Benefits.

4. **Accommodations:**
   
   **4.1 Employees’ Responsibility.** 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.

   **4.2 Ciena’s Responsibility.** Ciena has the duty to accommodate its employees to the point of **Undue Hardship**. Ciena 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 with a disability, meets individual needs, best promotes integration and full participation and ensures confidentiality.

   **4.3 Guidelines.** Ciena will rely on the *Policy and Guidelines on Disability and the duty to accommodate* document published by the Ontario Human Rights Commission to determine how best to meet its Accommodation obligations.

5. **Compliance with the AODA:**

   Ciena will comply with the AODA, including, without limitation.

   **5.1 Assistive Devices**

   **5.1.1** People with disabilities may use their personal assistive devices when accessing Ciena Services or facilities. In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with a disability can access Ciena services or facilities.

   **5.1.2** Ciena will ensure that its staff is trained and familiar with various assistive devices available on its premises that may be used by employees, customers, and job applicants with disabilities while accessing Ciena Services or facilities.

   **5.2 Communication**

   **5.2.1** Ciena will communicate with people with disabilities in ways that take into account their disability. Ciena will work with the person with a disability to determine what method of communication works for them.
5.3 Service Animals

5.3.1 Ciena welcomes people with disabilities and their service animals. Service animals are allowed on the parts of Ciena premises that are open to the public. When Ciena cannot easily identify that an animal is a service animal, Ciena staff may ask a person to provide documentation (template, letter or form) from a Regulated Health Professional that confirms the person needs the service animal for reasons relating to their disability.

5.3.2 A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

5.3.3 If service animals are prohibited by another law, Ciena will do the following to ensure people with disabilities can access Ciena Services or facilities:
   - explain why the animal is excluded
   - discuss with the customer another way of providing Ciena Services or facilities.

5.4 Support Persons

5.4.1 A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on Ciena premises.

5.4.2 In certain cases, Ciena might require a person with a disability to be accompanied by a support person for the health or safety reasons of:
   - the person with a disability
   - others on the premises

5.4.3 Before deciding, Ciena will:
   - consult with the person with a disability to understand their needs
   - consider health or safety reasons based on available evidence
   - determine if there is no other reasonable way to protect the health or safety of the person or others on the premises

5.5 Notice of Temporary Disruption

5.5.1 In the event of a planned or unexpected disruption to services or facilities for people with disabilities Ciena will notify its employees (and job applicant when applicable) 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.

5.6 Customer Service Standard Training

5.6.1 Ciena will provide accessible customer service training to:
   - all employees and volunteers
POLICY ON CIENA’S DUTY TO ACCOMMODATE ONTARIANS WITH DISABILITIES

5.6.2 Staff will be trained on accessible customer service within 90 days after being hired.

5.6.3 Training will include:

- purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard.
- Ciena’s policies related to the customer service standard.
- 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 the equipment or devices available on-site or otherwise that may help with providing goods, services or facilities to people with disabilities.
- what to do if a person with a disability is having difficulty in accessing Ciena Services or facilities.

5.6.4 Employees will also be trained when changes are made to our accessible customer service policies.

5.7 Feedback Process

5.7.1 Ciena welcomes feedback on how it provides accessible services and facilities. Feedback will allow Ciena to identify barriers and respond to concerns.

5.7.2 Customers who wish to provide feedback on the way Ciena or its subcontractors provide Ciena Services or facilities to people with disabilities can provide feedback by contacting their Ciena Sales Account Manager.

5.7.3 Employees who wish to provide feedback on the way Ciena or its subcontractors provide Ciena Services or facilities to people with disabilities can provide feedback by contacting their HR Business Partner or HR Connect.

5.7.4 Ciena will make sure its feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request. Ciena will make commercially reasonable efforts to respond to all customers who provided feedback within 10 business days.

5.8 Notice of Availability of Documents

5.8.1 Ciena will post its accessible customer service policy in the following location (In Agile and accessible via: Inside Ciena – Employee Essentials - Policies):

5.8.2 Ciena will provide policies in an accessible format or with communication support, on request. Ciena 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.

5.9 Modifications to Policies

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

5.10 Confidentiality

5.10.1 Personal information concerning an employee’s disability cannot be released without the prior written consent of the individual and must be managed in a manner that is consistent with Freedom of Information Guidelines and Personal Information Protection Guidelines, where appropriate.

5.10.2 To facilitate the accommodation process, employees/applicants will not unreasonably withhold pertinent information. Employees with disabilities are expected to assist in providing information necessary to secure the timely implementation of appropriate accommodation or an accommodation plan.

5.10.3 Where the accommodation process requires the release of confidential information to a third party (such as an external resource group), the third party, and any person or department delegated by that third party, will be required to ensure that confidentiality is protected, that the information obtained is kept in a secure location, and used solely for the purpose that the release was required.
### A. Applicable and Reference Documents

<table>
<thead>
<tr>
<th>Document Name</th>
<th>Document Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

### B. Standard and Reference Elements

<table>
<thead>
<tr>
<th>Std. / Req.</th>
<th>Ref No./ Cycle</th>
<th>Description / Title</th>
<th>Relevant Paragraph Within This Document</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

### C. Definitions

<table>
<thead>
<tr>
<th>Process Term / Acronym</th>
<th>Definition / Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ontario Human Rights Code</td>
<td><a href="https://www.ontario.ca/laws/statute/90h19#BK3">https://www.ontario.ca/laws/statute/90h19#BK3</a></td>
</tr>
<tr>
<td>Accessibilities for Ontarian with Disability Act (AODA)</td>
<td><a href="https://www.ontario.ca/laws/statute/05a11">https://www.ontario.ca/laws/statute/05a11</a></td>
</tr>
<tr>
<td>Undue Hardship</td>
<td>The Ontario Human Rights Code provides that the tribunal or court would consider the following factors when determining whether the needs of a person cannot be accommodated without undue hardship: the cost, outside sources of funding, if any, and health and safety requirements.</td>
</tr>
<tr>
<td>Ciena Services</td>
<td>All services offered either directly from Ciena or indirectly by one of Ciena’s subcontractors including all Ciena branded Products.</td>
</tr>
</tbody>
</table>
| A regulated health professional | A regulated health professional is defined as a member of one of the following colleges:  
  - College of Audiologists and Speech-Language Pathologists of Ontario  
  - College of Chiropractors of Ontario  
  - College of Nurses of Ontario  
  - College of Occupational Therapists of Ontario  
  - College of Optometrists of Ontario  
  - College of Physicians and Surgeons of Ontario  
  - College of Physiotherapists of Ontario  
  - College of Psychologists of Ontario  
  - College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario |