



## **Lufthansa Group Accessibility Plan**

### **First Progress Report (Canada)**

**June 2023 to June 2024- Amended**

## **GENERAL**

As stated in our Accessibility Plan, the purpose of the *Accessible Canada Act* (the **ACA**) is to create a barrier-free Canada by January 1, 2040, through the proactive identification, removal, and prevention of barriers to accessibility wherever Canadians interact with areas of federal jurisdiction. The ACA came into effect on July 11, 2019.

Lufthansa Group reiterates that as an air carrier operating around the world, we strongly believe that making travel and all travel related services accessible to everyone is a necessity. This initial Accessibility Plan was crafted to show our commitment to working with all Canadians, and specifically persons with disabilities, to achieve the goals outlined in the ACA.

This First Progress Report shall set out the actions that Lufthansa Group, as a group of foreign carriers, have taken since June of 2023 to improve our services, products and experiences that our passengers with disabilities have when flying with the Lufthansa Group.

## **FEEDBACK PROCESS AND CONTACT INFORMATION**

Our feedback process is easy and accessible. Simply share your feedback through any of the channels listed below. Our Accessibility Team, led by the Senior Manager Customer Experience Design will acknowledge receipt of any feedback provided (other than anonymous feedback) and will reply in the same manner as received.

Feedback may be submitted to the Senior Manager Customer Experience Design at:

### **Mailing address**

To send feedback about an accessibility barrier or the Accessibility Plan by mail, please send a letter to:

*Deutsche Lufthansa AG  
Airport Customer and Baggage Service Solutions (FRA AE/PG-B)  
Senior Manager Customer Experience Design & Accessibility Team  
Flughafen-Bereich West  
D-60546 Frankfurt/Main  
Germany*

## **Phone**

To provide feedback, including anonymous feedback about accessibility barriers you are experiencing or on the Accessibility Plan, you can contact us using the following number:

Phone: **+1 888 742 1403**

## **Email**

To send feedback by email about accessibility barriers you are experiencing or about the Accessibility Plan, you can write to [Accessibility.LufthansaGroup@dlh.de](mailto:Accessibility.LufthansaGroup@dlh.de). We ask that you do not include any confidential information (for example, a social insurance number or payment information) in your feedback.

## **Online Form**

To submit feedback about barriers you experienced on one of our flights to/from Canada, you can also use one of the forms under <https://www.lufthansa.com/ca/en/feedback>.

## **Teletypewriter (TTY)**

Text telephone for customers with hearing impairments: First dial 711 and then 8339512503 for relaying to the TRS. If you use an operator-assisted relay service, please call our regular telephone numbers instead of the TTY number (refer to the phone section above for these numbers).

## **ALTERNATE FORMAT**

To request a copy of Lufthansa Group's Accessibility Plan or this First Progress Report in an alternate format, please contact us via the above-mentioned channels.

## Progress Report

Lufthansa Group is pleased to report on the progress made in the past year, in the below listed areas, as referenced in the *Accessibility Plan*.

## **FOCUS AREAS**

### **THE BUILT ENVIRONMENT**

Addressing barriers related to the built environment helps us ensure that people using our offices, buildings, lounges and terminal buildings have barrier-free access. Lufthansa Group continues its efforts to retrofit existing spaces and improve planning for new construction. We will work with our team members and external partners, in particular airport operators, to better understand and address barriers experienced by persons with disabilities.

#### **Barriers identified in the Accessibility Plan:**

- Accessibility is inconsistent in buildings, lounges and terminals across Lufthansa Group's network
- Wayfinding and signage is sometimes complex or difficult to navigate

#### **Progress made and action taken:**

- Aspects of physical accessibility are part of the assessment of new infrastructure projects.
- Lufthansa Group has retrofitted several existing buildings to be more accessible.
- FraCares, a joint venture of Lufthansa and Fraport at Frankfurt airport, and our PWD responsible local handling agent, have purchased additional wheelchairs, and some stairway caterpillars to be able to offer alternative transport means if lifts are not available.
- Fracares has moved to new rooms in the non-Schengen transit area B. These rooms offer more comfort for PWD passengers waiting for their connecting flight, and the staff are also closer to their work location.

### **INFORMATION AND COMMUNICATION TECHNOLOGIES (ICT)**

By addressing information and communication technology-related barriers, Lufthansa Group aims to set a high standard for digital accessibility. We are constantly seeking to improve our

offerings and keep pace with technological advancements in our society, especially with regard to persons with disabilities. Our actions include plans to identify and resolve barriers found in our websites, mobile applications, telecommunication and computer systems used by customers and our employees.

## **Barriers identified in the Accessibility Plan:**

- Websites and mobile apps may not be easy to navigate because of the large volume of information. Language used may be too complex and difficult to understand, especially for persons with sensory impairments
- Websites and mobile apps may not offer alternate methods of communication and requesting assistance services may be considered complicated
- Chat tools, drop-down menus, selection of options, and online forms are not consistently accessible
- Options to address, and getting confirmation for, special requests pre-flight (such as wheel-chair service) may not be fully accessible
- Flight tickets booking process may not be easy to navigate for people with certain disabilities

## **Progress made and action taken:**

- Lufthansa Group Accessibility guidelines (based on WCAG 2.1 AA guidelines), documentation & tools database is being created for easy and visual introduction to Accessibility and as a corporate digital accessibility point of reference
- Multiple invited experts presented on topics of Accessibility, WCAG 2.1 AA standards, the European Accessibility Act to raise Accessibility awareness
- Accessibility testing automation tools demo have been presented to teams for assessment
- Digital Accessibility Community and working groups established to align on initiatives and progress. Working with our Joint Venture Partners Air Canada and United to make sure systems provided to travel agents are accessible
- Amended online form to register assistance requirements implemented (all wheelchair types can now be registered; form only needs to be sent once instead of to two different departments as in the past; IATA conforming form for battery powered wheelchairs was integrated). The Lufthansa Group is evaluating the improvement of the booking process to become a one-stop-shopping service also reflecting PWD-related needs
- Mobile applications are now currently being reviewed and improved for accessibility

- A new “Help Center” is now accessible in just one click across all Lufthansa Group mobile apps. It now includes an “Accessible Travel” icon to access information about service assistance

## **COMMUNICATION, OTHER THAN ICT**

By addressing communication-related barriers, Lufthansa Group will improve the way we interact with passengers and employees. We want to provide information and advertising on our products and services in the most accessible way possible.

### **Barriers identified in the Accessibility Plan:**

- Documents, newsletters, advertisements and other communication may not always be accessible
- Alternate options and methods of communication are not consistently mentioned in marketing materials or advertisements
- Primary communication with passengers is in writing (email, website, mobile apps) which can be difficult for persons with visual impediments
- Communications from our external partners might differ in their accessibility standards

### **Progress made and action taken:**

- Adapting websites and intranet according to WCAG 2.1 AA standards to become accessible for persons with disabilities
- The Lufthansa Group Apps, both for passengers and employees, will also be adapted according to WCAG 2.1 AA standards
- Implemented the WCH icon of the IATA one-click-away initiative (currently located in the footer of all websites)
- Regarding the IATA one-click-away initiative, it is under evaluation to see if the structure and/or content of PWD-related information can be changed to become the same for all Lufthansa Group airlines (LH, OS, LX, SN)

## **TRANSPORTATION**

By addressing transportation related barriers, Lufthansa Group aims to ensure persons with disabilities have meaningful options for travel and connect to loved ones. We want to ensure every person is free to make their own choices, with support if they desire, regardless of their

disabilities. This includes improving the accessibility of our products and services and improving our efforts to provide great customer experiences for everyone. The Passenger journey includes arrival and exit of airport buildings, moving between terminals and gates, boarding and de-boarding of aircraft and/or buses and the time spent on board of our aircraft.

## **Barriers identified in the Accessibility Plan:**

- Some passengers face difficulties during the on-boarding and de-boarding process, especially when boarding with all other passengers
- Passengers with battery-powered mobility devices face challenges before and during their travel
- Checked-in mobility devices may be left behind or delayed during peak operations
- Passengers may face difficulties seeking support from our ground and in-flight staff
- On-board food and beverage service may not be fully accessible (obtain menu information, certain dietary restrictions, allergies, etc.)

## **Progress made and action taken:**

- The Lufthansa Group is evaluating the implementation of the sunflower initiative on all human touchpoints along the customer journey. Austrian Airlines is the first carrier of the Group that has joined the initiative already.
- Pre-boarding initiatives have been implemented to alleviate the difficulties faced by passengers during boarding.

## **THE DESIGN AND DELIVERY OF PROGRAMS AND SERVICES**

Please refer to Focus Areas referenced above for passenger related services. In regards to employee programs and services, all training programs are being reworked under the WCAG 2.1 AA standards. During the 2024/2025 reporting period, the Lufthansa Group will be creating a separate accessibility plan for Employee and Applicants of the LH Group in order to provide more localized service via our North American Human Resources team.

## **PROCUREMENT OF GOODS, SERVICES AND FACILITIES**

We endeavor to ensure our procurement practices address accessibility procurement barriers, and encourage the use of suppliers who are part of our supplier diversity program. Although we

have not identified any barriers of accessibility in this area so far, Lufthansa Group will continue to use its best efforts to identify, and if necessary, improve, accessibility within its procurement processes.

## **FEEDBACK**

Lufthansa Group has, in the past year, received a total of three (3) feedbacks via the feedback processes referenced above.

The Lufthansa Group has received 3 messages via our Accessibility feedback methods: 2 calls and one email. All were pre-flight requests for LH flights and were forwarded to the New York Medical Operations desk who took over to respond to the requests. So in reality, no real feedbacks were received.

## **CONSULTATIONS**

As a group of international air carriers all formed in Europe, the Lufthansa Group must be mindful of the various European regulations when consulting with advocacy groups.

As various advocacy groups are being vetted for collaborations, Lufthansa Group has expanded their internal Accessibility Working Group over the past year into a cohesive team. We are proud to relay that members of this working group are now members of the following accessibility related communities:

- IATA Accessibility Working Group (ACCWG). The ACCWG was formed by IATA and includes representatives from thirteen (13) international air carriers, including the Lufthansa Group and Air Canada. This group has monthly meetings, with two in-person meetings per year. The focus of the ACCWG is as follows:
  - Gather and exchange information concerning accessible air travel
  - Elaborate on industry processes and standards for accessible air travel and work towards more harmonization of respective regulations
  - Support in communications and exchanges between air carriers, regulators and disability advocacy groups



The priorities in 2024 have been to (a) review process around wheelchair assistance, (b) create a globally accepted definition of a “service dog” and (c) encourage attendance of stakeholders at the joint IATA/ICAO accessible aviation meeting later in 2024.

Current findings:

- The codes used within flight reservations for wheelchair assistance needed improvement and expansion as service products have changed.
- Wide range of training and qualification requirements for service dogs around the world; questions on how to apply differing regulations and reduce obstacles for passengers are being discussed.

In addition to expanding our involvement in the global accessibility community, we have also implemented the following:

- A team of six (6) Customer Service specialists was formed within Lufthansa Group. This highly specialized team exclusively handles accessibility claims to allow for our customers getting knowledgeable and individual support. So far, we have found that customers with accessibility claims are handled more empathetically and efficiently.
- *CoCreation Hub*: Lufthansa Group has previously launched the so-called *CoCreation Hub*, a collaborative platform designed to engage directly with our customers in improving all aspects of our services. Today, the hub has grown to include over 4,000 customers, who regularly participate in surveys, offer suggestions for improvements, and gain early access to new solutions for feedback. Early access to new services or products enables these customers to test and provide feedback before wider implementation, allowing us to fine-tune both digital and physical experiences. Accessibility inclusivity has become a cornerstone of the *CoCreation Hub*, and since the implementation of the ACA we have been able to grow our connections with our passengers with disabilities. Currently 20% of our customer participants are individuals with disabilities, providing essential feedback that informs our ongoing efforts to make our services accessible to all. This diversity ensures that both our digital platforms and real-world interactions are designed with a wide range of users in mind.
- Consultations with visually impaired advocacy expert to review our digital products to improve our websites, applications and other digital tools.

Since 2014, Lufthansa Group has partnered with an external accessibility expert to ensure that all of our digital channels are continuously improved to meet the needs of individuals

with disabilities. This collaboration reflects our long-term commitment to accessibility and inclusivity, ensuring that our digital platforms remain up-to-date with changes in technology, standards and user needs. Our external expert works closely and on a regular basis with Lufthansa Group, providing hands-on support and strategic guidance across all digital initiatives. Their expertise helps us stay aligned with international accessibility standards, such as WCAG, while also addressing the specific needs of our diverse user base. Their findings during the design and development phase ensure that accessibility is embedded in our digital projects from the start.

- A Lufthansa Group-wide Community of Experts for Accessible Travel was founded and is exchanging about accessibility topics on a monthly basis. This team currently has over forty (40) members from all parts of the internal organization, such as customer service, digital marketing, crew and ground handling training, operations and legal. We have found that these meetings allow the Lufthansa Group make changes quickly. This group was able to identify a need a certain airport for individual members of this team are also meeting with our partners, such as Air Canada and United, on a monthly basis in order to streamline our processes for our North American passengers. Currently the Air Canada Sunflower lanyard initiative is being tested in international markets by Austrian Airlines.
- Lufthansa Group is participating to a new co-creation space on Accessibility coordinated by Airbus, called Cross-Industry Customer Experience Team Accessibility & Inclusion. 51 cross-industry participants joined a design thinking workshop in June 2024 to review customer pain points along the travel journey and discuss digital and physical solutions. The scope included a set of personas and their user journeys representing the wide spectrum of disability generated by AI, Airbus customer surveys and market data. Some of the solutions that were discussed will be evaluated as part of Lufthansa Group accessibility roadmap.

The Lufthansa Group looks forward to reporting more findings from the above and reporting on new consultation and partnerships in our 2024-2025 Progress Report.

## PROVISIONS OF CTA ACCESSIBILITY-RELATED REGULATIONS

Lufthansa Group, as a large carrier under Canadian Transportation Agency regulations, must abide by all provisions of the *Accessible Transportation for Persons with Disabilities Regulations (SOR/2019-244)* contained in Part 1, 2 and 7 applicable to foreign carriers.

Details on *Accessible Transportation for Persons with Disabilities Regulations (SOR/2019-244)* can be obtained under: <https://laws-lois.justice.gc.ca/eng/regulations/SOR-2019-244/index.html>