



LANGUAGE ASSISTANCE/ACCESS PLAN FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY

This policy is available for review by the public on the IMTT website. Copies also are posted internally so that all employees and visitors to IMTT facilities are able to receive notice. Print copies, including alternate language versions, are available upon request from the IMTT Human Resources Department.

I. Scope and Purpose of Plan

a. Scope

This Language Assistance/Access Plan for Persons With Limited English Proficiency (LEP Plan) applies to all facilities, programs, activities, and operations of International Matex Tank Terminals (IMTT).

b. Limited English Proficiency Defined

Limited English Proficient (LEP) individuals are persons for whom English is not their primary language and who are unable to communicate proficiently in English. Such individuals may have limited ability to read, write, speak, and/or understand English.

c. Purpose

This LEP Plan is designed to comply with Title VI of the Civil Rights Act of 1964, which requires recipients of federal financial assistance to conduct their programs, activities, and operations in a way that does not subject persons to discrimination based on race, color, or national origin. The obligation to conduct programs and activities in a non-discriminatory manner includes the obligation to offer foreign



language assistance, if necessary, to provide meaningful access to LEP individuals.

II. Policy Statement

It is the policy of IMTT to ensure that LEP individuals who desire to participate in IMTT's programs and activities or to benefit from its services have effective and meaningful access to language assistance services such that they may participate fully in and receive equal access to the benefits of IMTT's programs, activities, and services.

III. Plan Development

IMTT recognizes that LEP individuals may benefit from interpreters who can translate to and from their primary language. IMTT further recognizes that LEP individuals also may need to have documents written in English translated into their primary language. In determining when and how to provide such oral and written language assistance services, IMTT examines the following factors:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered;
2. The frequency with which LEP individuals are encountered;
3. The nature and importance of the program, activity, or service provided; and
4. The resources available to IMTT and the costs of providing language services.

To the extent necessary, IMTT also will consult with community-based organizations to assess the most effective means of providing language assistance services to LEP individuals. All language assistance services are provided free of charge.

IV. Responsibility for Implementation

IMTT's Human Resources Department (HR) is responsible for implementing this LEP Plan, monitoring and assessing its effectiveness, and updating the Plan as necessary. HR staff understand their obligations under the Plan and are made



aware of available resources to ensure that meaningful access to information about IMTT's services is provided to LEP individuals when requested.

V. To Request Language Assistance Services

To request more information about IMTT's LEP Plan or to request language assistance services, please contact **Kay Kittleman, Vice President of Human Resources**, kaykittleman@imtt.com. **You also may call the IMTT Compliance Hotline: 1-833-945-3465.** The IMTT Compliance Hotline is an automated telephone service with multiple language options.