

ACCESSIBILITY POLICY

OBJECTIVE:

STC Steel Technologies Canada Ltd. (the “Company”) is committed to excellence in serving all customers including people with disabilities by providing a respectful and inclusive environment.

POLICY:

Assistive Devices:

Persons with disabilities shall be permitted to obtain, use or benefit from our goods or services through the use of their assistive devices. Assistive devices are permitted at all times by persons with disabilities.

Communication:

We will communicate with people with disabilities in ways that take into account their disability, needs and circumstances. All communication shall be provided in a manner that respects the dignity and independence of persons with disabilities.

Service Animals:

We welcome people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public.

Support Persons:

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

Notice of Temporary Disruption:

In the event of a planned or unexpected disruption to services or facilities, the Company will notify everyone promptly. A notice will be posted at each main gate of the work premises.

Training:

We will provide training to teammates who deal with the public or other third parties on our behalf. Training will also be provided to people involved in the development of policies, plans, practices and procedures related to the provision of our goods and services.

Training will include:

- An overview of the *Accessibility for Ontarians with Disabilities Act* (2005) and the requirements of the Accessibility Standard.
- Aspects of the Ontario Human Rights Code related to accessibility.
- The Company’s policy related to this Accessibility Policy.
- 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.
- What to do if a person with a disability is having difficulty in accessing our goods and services.

Feedback Process:



Persons who wish to provide feedback on the way that we provide goods and services to people with disabilities can provide feedback by communicating with us in a manner they deem most convenient to them including in person, in writing, by email or another method. Upon request, we can assist in providing for or arranging an alternative accessible format or communication support to provide such feedback.

Responses to feedback are not mandatory. If a person submits a concern and provides contact information, we will follow up with them in a timely manner to address the feedback.

Access to Accessibility Policy:

The Company will make available our Accessibility Policy on our website. A copy will also be available for customers at our facilities.

DEFINITIONS

Disability:

- Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness;
- A condition of mental impairments or 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;
- An injury or disability for which benefits were claimed or received under the insurance plan established under Workplace Safety and Insurance Plan Act.

INDIVIDUAL ACCOMMODATION PLANS

OBJECTIVE

STC Steel Technologies Canada Ltd. (the “Company”) is committed to providing an inclusive workplace and accommodating teammates with a disability. This Policy addresses the process by which individual accommodation plans will be prepared.

POLICY

Any teammate with a disability who requires accommodation shall consult with their direct supervisor and Human Resources to develop an individual accommodation plan.

The Company is committed to accommodating a teammate with a disability to the point of undue hardship and meeting its obligations under the Ontario Human Rights Code and the *Accessibility for Ontarians with Disabilities Act*.

Upon determination of need, the teammate and Company will work together to develop a plan in order to make the teammate’s duties, responsibilities, and/or work space accessible. The process of the development of such plans and the responsibilities of the parties are listed below.

THE PROCESS

The following process shall be followed when any teammate with a disability initiates a request for an Individual Accommodation Plan.

1. Following a request for an individual accommodation plan, Human Resources (“HR”) will meet with the teammate to discuss the accessibility needs required. Together they will create an action plan for the evaluation and creation of the individual accommodation plan in order to meet the needs of the teammate.
2. This initial meeting will be fact finding, where the teammate will provide information regarding their disability and provide medical documentation to assist in developing the appropriate accommodation.
3. HR will arrange for an assessment of the teammate’s work area and job responsibilities in order to determine any barriers. This could include a walk through with HR, the teammate, and other selected parties from the workplace if required, and/or an evaluation of the job description and duties. Sources outside the Company may also be consulted to evaluate the accommodations required and whether the position and/or workplace can be accommodated for the teammate’s disability. Use of such third-party services will be at the sole discretion and expense of the Company.
4. The teammate can request a representative from the workplace to participate in the creation of the accommodation plan. The representative must be a Team Leader/Group Leader/Supervisor or higher position. If the teammate would like a representative, they must provide the representative’s name with a brief reason why they would like to include the representative in the process.

5. Once the terms of the individual accommodation plan have been agreed upon it will be documented and executed by both the teammate and their supervisor. The teammate will be provided with a signed copy of the plan, and a copy will be placed in the teammate's personnel file.
6. The contents and the reason for the individual accommodation plan will be confidential and only shared with the workplace parties necessary to implement the accommodation plan. Any parties that are privy to the information will be advised that the information is strictly confidential and not to be disclosed.
7. The individual accommodation plan will be revisited on an annual basis, when the teammate's position changes or on the request of the teammate to ensure it still meets the needs of the teammate. Updated medical documentation may be requested by HR at the time of review to ensure they are meeting any necessary requirements, and the teammate will be reimbursed for all costs incurred. If at the time of review, it is determined the individual accommodation plan is no longer required, then a letter stating such will be provided by HR to the teammate, and a copy placed in the personnel file.
8. If the accommodation request is denied, HR will provide a written response indicating the denial, and the reason why the request was denied. If denied, the teammate can request an evaluation by an outside medical or other expert to assist in understanding whether an accommodation is required and in the development of the accommodation. This request must be made within five (5) days of receiving the denial.
9. The individual accommodation plan will be provided to the teammate in an accessible format as required by the teammate.

RESPONSIBILITIES

Many workplace parties have responsibilities during the above noted process of preparing the individual accommodation plan. These responsibilities are outlined below.

Employer Responsibilities:

It is the employer's responsibility to make every reasonable effort to accommodate teammates on an individual basis to the point of undue hardship.

Teammate Responsibilities:

1. Notify their direct supervisor and/or HR of the request for an individual accommodation plan.
2. Productively participate in the creation of the individual accommodation plan in a good faith fashion.
3. Ensure all supporting documentation is submitted according to the set timelines; if more time is required, notify HR and seek an extension.
4. Participate in the assessment of the responsibilities and/or workspace in order to define barriers and assist in developing the required accommodation.

5. Submit receipts for supporting documentation in order to receive reimbursement.
6. Participate in the review of the plan annually, and provide any relevant and necessary documentation.
7. Inform HR of any changes in the teammate's condition in order to properly assess and revise the individual accommodation plan as needed.

Human Resources:

1. Respond to the request for an independent accommodation plan as soon as practicable.
2. Include the teammate in all steps of assessing and preparing the individual accommodation plan.
3. Inform the teammate of all supporting documentation required for the claim and provide timelines for completion.
4. Ensure reimbursement to the teammate of all expenses incurred for any medical documentation required.
5. Arrange the assessment of the job responsibilities and/or workspace of the teammate. This includes arranging for and compensating any external sources for their expertise.
6. Accommodate the participation of another teammate in the process upon the request of the teammate.
7. Maintain the confidentiality of the teammate's request and the individual accommodation plan.
8. Set follow up dates for review of the plan yearly, and ensure a review is done as soon as practicable following any changes to the individual's position.
9. Ensure the teammate receives copies of all documentation relating to the request and outcome(s) of the request.

Managers and Supervisors:

1. Participate in the development of the individual accommodation plan where requested.
2. Monitor and evaluate the accommodation plan once implemented and advise HR of any issues.
3. Participate in the review of the plan if requested.
4. Protect the teammate's right to confidentiality regarding the disability and the individual accommodation plan.

DEFINITIONS**Disability:**

- Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness;
- A condition of mental impairments or 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;
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INDIVIDUALIZED WORKPLACE EMERGENCY RESPONSE PLANNING FOR TEAMMATES WITH DISABILITIES

POLICY

STC Steel Technologies Canada Ltd. (the “Company”) is committed to the safety of our teammates. This Policy addresses the process for the creation of individual workplace emergency response plans for teammates with disabilities who require individual assistance.

PROCESS FOR PREPARATION OF INDIVIDUAL EMERGENCY RESPONSE PLANS

1. Any teammate who requires assistance during a workplace emergency shall advise Human Resources (“HR”) and their direct supervisor.
2. HR will consult with the teammate to identify barriers in the teammate’s response to an emergency. Further, HR will consult with the teammate in the development of an appropriate individualized workplace emergency response plan that responds to the teammate’s disability.
3. HR will only discuss the individualized workplace emergency response plan with those parties who, because of their position, require such information. These can include, but are not limited to, direct supervisors or fellow teammates who are assigned duties during an emergency response. Only information necessary for the implementation of the individualized workplace emergency response plan will be disclosed. All individuals who are made aware of the individualized workplace emergency response plan will be advised of the teammate’s confidentiality and that the plan and the disability shall not be disclosed.
4. The workplace emergency response plan will be reviewed when: (a) the teammate moves to a different location in the organization; (b) when the teammate’s overall accommodations/needs are altered; (c) when the Company reviews its general emergency response policies; or (d) upon the request of the teammate.

ROLES AND RESPONSIBILITIES

Employer:

The Company shall make every reasonable effort to provide individualized workplace emergency response plans to teammates who have a disability and require such a plan. Further, the Company will make every reasonable effort to ensure teammates have adequate training to implement the individualized workplace emergency response plans.

Teammate:

- Notify HR and the teammate’s direct supervisor of the need for an individualized workplace emergency response plan.
- Productively participate in the creation of the individualized workplace emergency response plan in a good faith fashion.
- Provide documentation that is requested by HR to assist in the identification of barriers and preparation of the individualized workplace emergency response plan.
- Participate in the review of the plan as required.

Human Resources:

- Respond to the request for the individualized workplace emergency response plan immediately.
- Include the teammate in all steps of assessing and preparing the individualized workplace emergency response plan.
- Advise the teammate of any supporting documentation required to assess and prepare the individualized workplace emergency response plan.
- Maintain the confidentiality of the teammate's request and the individualized workplace emergency response plan.
- Ensure the required parties within the workplace are notified of the individualized workplace emergency response plan and that they have the necessary training to implement the plan.

Managers and Supervisors:

- Participate in the development of the individualized workplace emergency response plan if requested.
- Participate in the review of the individualized workplace emergency response plan if requested.
- Protect the teammate's right to confidentiality regarding the disability and the individualized workplace emergency response plan.

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- A mental disorder;
- An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Plan Act.

Workplace Emergency:

- An unforeseen or unexpected situation that threatens the health or safety of teammates.

RECRUITMENT

OBJECTIVE

STC Steel Technologies Canada Ltd. (the “Company”) is committed to accommodating all applicants with disabilities throughout the recruitment process. This Policy applies to the recruitment and selection of all full-time, part-time, temporary and casual positions with the Company.

POLICY

The Company will notify the public and teammates about the availability of accommodation for applications with disabilities when advertising for a position. This includes when advertising internally or externally for applicants for vacant positions or for internal promotions.

The Company will also notify all applicants selected to participate in further assessment within the specific recruitment selection process that accommodations are available.

The Company will accommodate each applicant to the point of undue hardship during the recruitment process.

The successful applicant will be advised of the Company’s policies regarding accommodation of teammates with disabilities.

All applicant information and discussions/decisions during the recruitment process, including regarding accommodation or accessibility, are to be held in the strictest of confidence.

This Recruitment Policy will be available on the Company’s website and a copy will be provided if requested.

DEFINITIONS

Applicant: An individual who has applied for employment with the Company.

Disability:

- Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness;
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- A mental disorder;
- An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Plan Act.

RETURN TO WORK PROCESS

OBJECTIVE

The purpose of this Policy is to ensure the safe return to work of teammates who have been absent from work due to a disability and require disability-related accommodations in order to return to work. This Policy shall be read in conjunction with the Individual Accommodation Plans Policy.

STC Steel Technologies Canada Ltd. (“the Company”) is committed to accommodating an teammate to the point of undue hardship and meeting its obligations under the Ontario Human Rights Code and the *Accessibility for Ontarians with Disabilities Act*.

RETURN TO WORK PROCESS

The Company shall facilitate the teammate’s safe return to work through the following process:

1. When an on-the-job injury occurs, Team Leader/Group Leader/Supervisor will arrange for or provide first aid and stabilization; if medical treatment is necessary, arrange for transportation and when the injured teammate is appropriately cared for, complete an accident investigation, and report the injury as outlined in the Accident and Injury Investigation Procedure.
2. The teammate shall advise Human Resources (“HR”) of all absence(s) required due to a disability along with the estimated timeframe for the return to work. The teammate shall provide medical documentation regarding all absences due to a disability or medical reasons if requested.
3. The teammate will be provided the following documentation in a packet form to take with them to a health care provider:
 - a) A Functional Abilities Form with the Employer section completed
 - b) Letter to Health Care Provider and Early and Safe Return to Work – Modified Duty Task List
 - c) Teammate Information Letter
4. The teammate shall regularly update HR regarding the disability and/or medical condition, including the timeframe for the return to work. Medical documentation shall be provided by the teammate as requested by HR.
5. When the teammate is medically able to return to work, the teammate shall advise HR and provide any medical documentation requested.
6. The return to work procedures shall ensure that the teammate is offered appropriate and safe accommodation until pre-injury or pre-disability employment can be restored, if possible.
7. HR shall discuss with the teammate what accommodations, if any, the teammate requires based on the medical documentation provided.
8. If accommodation is required, the parties will follow the process as specified in the Individual Accommodation Policy.

9. The return to work plan shall be provided to the teammate in an accessible format as required by the teammate.
10. The return to work plan will be assessed on a weekly basis for the first three (3) weeks and as needed thereafter through HR's consultation with the teammate and will be revised as needed.

GENERAL RETURN TO WORK GUIDELINES

1. In the situation of a compensable injury, WSIB provides partial wage replacement when an teammate is injured at work and is not capable of working due to the nature of the disability.
2. All teammates who require an accommodation will receive their normal hourly rate of pay for hours worked.
3. The early and safe return to work tasks are intended to be progressive in physical requirements. As the teammate's abilities are increased as noted by the treating provider on the Functional Abilities Form, the assigned duties will increase in physical requirements until the teammate is able to resume the "pre-injury" job.

RESPONSIBILITIES

Many parties have responsibilities during the above noted return to work process. These responsibilities are outlined below.

Employer Responsibilities:

It is the Company's responsibility to make every reasonable effort to facilitate a teammate's safe return to work.

Teammate Responsibilities:

1. No matter how minor the incident, teammates will immediately report work injuries in writing to their shift Team Leader/Group Leader/Supervisor.
2. Notify the teammate's direct supervisor and/or HR of the disability and provide medical documentation as necessary.
3. Productively participate in the creation of a plan for the safe return to work, including preparation of the individual accommodation plan if required, in a good faith fashion.
4. Ensure all supporting documentation is submitted according to the set timelines; if more time is required notify HR and request an extension.
5. Participate in the assessment of the responsibilities and/or workspace in order to define barriers and assist in developing the plan for the safe return to work.
6. Submit receipts for supporting documentation in order to receive reimbursement.
7. Advise HR and/or the supervisor of any changes needed to ensure a safe return to work.

Human Resources:

1. Will ensure that all documentation regarding injury and return to work is managed and up to date.

2. Facilitate a teammate's return to work as soon as safely possible.
3. Develop a return to work plan and an individual accommodation plan, if necessary.
4. Include the teammate in all steps of the process of preparing a return to work plan.
5. Inform the teammate of all supporting documentation required for the claim and to provide timelines for completion.
6. Arrange the assessment of the job responsibilities and/or workspace of the teammate. This includes arranging for and compensating any external sources for their expertise.
7. Maintain the confidentiality of the teammate's request and the return to work plan.
8. Follow up with the teammate to ensure the plan is meeting the goal of allowing the teammate to safely return to work.
9. Ensure the teammate receives copies of all documentation.

Managers and Supervisors:

1. Assist HR in the collection of required documentation regarding the injury and return to work as needed.
2. Participate in the development of the return to work plan where requested.
3. Monitor and evaluate the return to work plan once implemented and advise HR of any issues.
4. Participate in the review of the plan if requested.
5. Protect the teammate's right to confidentiality regarding the disability and the individual accommodation plan.

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