

INTEGRATED ACCESSIBILITY POLICY

1. PURPOSE AND SCOPE

The following policy has been established by North American Steel to govern the provision of services with Regulation 191/11, “Integrated Accessibility Standards” (“IASR) under the *Accessibility for Ontarians with Disabilities Act, 2005*.

These standards are developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment.

North American Steel is governed by this policy as well as the Accessibility Standards for Customer Service Policy and the *Accessibility for Ontarians with Disabilities Act, 2005* in meeting the accessibility needs of persons with disabilities.

2. COMMITMENT

North American Steel is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of persons with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act.

This policy is implemented in accordance with the time frames established by the Regulation.

a) Accessibility Plan

North American Steel developed, maintains and documents an Accessibility Plan outlining the company’s strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities.

The Accessibility Plan will be reviewed and updated at least once every five years and will be posted on the company’s website. Upon request, North American Steel will provide a copy of the Accessibility Plan in an accessible format.

b) Training Employees and Volunteers

North American Steel ensures that training is provided on the requirements of the accessibility standards referred to in the Regulation and continues to provide training on the *Human Rights Code* as it pertains to persons with disabilities, to:

- all its employees and volunteers.
- all persons who participate in developing North American Steel policies; and,
- all other persons who provide goods, services or facilities on behalf of the company

The training will be appropriate to the duties of the employees, volunteers and other persons. Employees will be trained when changes are made to the accessibility policy. New employees are trained within first week of employment. North American Steel keeps a record of the training it provides.

North American Steel Equipment Inc.

Policy No.

3.07p_2026

INTEGRATED ACCESSIBILITY STANDARD

Revised:

January 1, 2026

Approved by:

Tania Fabricius

Distribution:

Corporate Policy Manual, Employee Resource Manual, Plant Handbook

3. INFORMATION AND COMMUNICATIONS STANDARDS

a) Feedback

North American Steel ensures that its process for receiving and responding to feedback is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communications supports, upon request.

b) Emergency Procedures, Plans and Public Safety Information

North American Steel does not currently make emergency procedures or public safety information available to the public. If such information is made available in the future, the Company will provide the information in accessible formats or with communication supports upon request, in accordance with the Integrated Accessibility Standards Regulation. Requests for accessible formats will be addressed as soon as practicable, taking into account the individual's accessibility needs due to disability.

c) Accessible Formats and Communication Supports

Upon request, North American Steel will provide, or will arrange for the provision of accessible formats and communication supports for persons with disabilities in a manner that takes into account the person's accessibility needs due to disability. North American Steel will consult with the person making the request in determining the suitability of an accessible format or communication support.

North American Steel notifies the public about the availability of accessible formats and communication supports.

d) Accessible Websites and Web Content

North American Steel is updating its Internet websites, including web content, to conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA except where this is impracticable. Completion of this update is expected by end of 2026.

4. EMPLOYMENT STANDARDS

a) Recruitment

North American Steel notifies its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

b) Recruitment, Assessment or Selection Process

North American Steel notifies job applicants, in the job postings that accommodations are available upon request in the hiring process.

If a selected applicant requests an accommodation, North American Steel 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 disability.

c) Notice to Successful Applicants

When making offers of employment, North American Steel notifies the successful applicant of its policies for accommodating employees with disabilities.

d) Informing Employees of Supports

North American Steel continues to inform its employees of its policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practicable after commencing employment.

e) Accessible Formats and Communication Supports for Employees

Upon the request of an employee with a disability, North American Steel will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his/her job, and information that is generally available to other employees. In determining the suitability of an accessible format or communication support, North American Steel will consult with the employee making the request.

f) Workplace Emergency Response Information

North American Steel will provide individualized workplace emergency response information to employees with disabilities when necessary, if the disability is such that the information is required and the Company is aware of the need for accommodation. This information will be provided as soon as practicable after the Company becomes aware of the need.

Where an employee requires assistance in the event of a workplace emergency, North American Steel will, with the employee's consent, provide the workplace emergency response information to the person designated to assist the employee.

North American Steel will review the individualized workplace emergency response information when the employee moves to a different location within the organization, when the employee's accommodation needs are reviewed, or when the Company otherwise becomes aware that the plan requires updating.

g) Documented Individual Accommodation Plans

North American Steel will maintain a written process for the development of documented individual accommodation plans for employees with disabilities.

If requested, information regarding accessible formats and communications supports provided will also be included in individual accommodation plans.

In addition, the plans will include individualized workplace emergency response information (where required) and will identify any other accommodation that is to be provided.

h) Return to Work Process

North American Steel maintains a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations to return to work. The return to work process outlines the steps North American Steel will take to facilitate the return to work and will include documented individual accommodation plans as part of the process. This return to work process will not replace or override any other return to work process created by or under any other statute (i.e., the *Workplace Safety Insurance Act, 1997*).

i) Performance Management, Career Development and Advancement

North American Steel will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees.

5. QUESTIONS ABOUT THIS POLICY

This policy has been developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment. If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation will be provided by:

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