

<b>Russel Metals Group of Companies</b>		Section 2:	Date: <b>November 1, 2023</b>
<b>Human Resources Policy &amp; Procedures</b>		Policy No. HR 2 - 14	Supersedes: <b>October 1, 2014</b>
Scope of Policy: <b>All Ontario Russel Metals Group of Companies</b>	Title: <b>AODA Integrated Accessibility Standards Regulation— Employment Standard Policy</b>		

## **Intent**

This policy is intended to meet the requirements of the *Integrated Accessibility Standards, Ontario Regulation 191/11* for the Employment Standard set forth under the *Accessibility for Ontarians with Disabilities Act, 2005*. This policy applies to the provision of accessible employment services for people with disabilities.

All employment services provided by Russel Metals shall follow the principles of dignity, independence, integration, and equal opportunity.

## **Scope**

This policy shall apply to every person who deals with members of the public or their agents on behalf of Russel Metals, whether the person is an employee, agent or otherwise.

## **Commitment**

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*.

## **General Principles**

In accordance with the *Integrated Accessibility Standards, Ontario Regulation 191/11*, the requirements are defined in the following Human Resources policies;

- Section 2.1 Recruitment and Selection
- Section 2.8 Discrimination, Harassment and Bullying
- Section 2.11 Accommodation in Employment
- Section 5.11 AODA Customer Service Policy

## **General Requirements**

General requirements that apply across all of the three standards, *Information and Communications, Employment and Transportation* are outlined as follows.

### Establishment of Accessibility Policies and Plans

Russel Metals will develop, implement and maintain policies governing how it will achieve accessibility through these requirements and make these documents publicly available, in an accessible format upon request.

A multi-year accessibility plan has been established. It is being implemented and maintained outlining the strategy to prevent and remove barriers and meet the requirements under the IASR regulation. The Accessibility plan is posted on the external website and as requested will provide the plan in an

<b>Russel Metals Group of Companies</b>		Section 2:	Date: <b>November 1, 2023</b>
<b>Human Resources Policy &amp; Procedures</b>		Policy No. HR 2 - 14	Supersedes: <b>October 1, 2014</b>
Scope of Policy: <b>All Ontario Russel Metals Group of Companies</b>	Title: <b>AODA Integrated Accessibility Standards Regulation— Employment Standard Policy</b>		

accessible format upon request. The accessibility plan will be reviewed and updated once every five years and will establish, review, and update its accessibility plans in consultation with persons with disabilities. Periodic status reports will be prepared to report on the progress of steps taken to implement Russel Metals’ accessibility plan and the report will be posted on the website. If requested, the report shall be created in an accessible format.

Procuring or Acquiring Goods and Services, or Facilities

Russel Metals will incorporate accessibility criteria and features when procuring or acquiring goods, services, or facilities. The only exception is in cases where it is impracticable to do so.

Training Requirements

Russel Metals will provide training for its employees regarding the IASR and the Ontario *Human Rights Code*. Training will be provided for individuals who are responsible for developing Russel Metals’ policies, and all other persons who provide goods or services on behalf of Russel Metals.

Return to Work Process

Russel Metals maintains a return-to-work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

Emergency Response Information

Russel Metals will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if Russel Metals is aware of the need for accommodation due to the employee’s disability. Russel Metals will provide this information as soon as practicable after becoming aware of the need for accommodation.

**Information And Communication Standards**

Accessible Formats and Communication Supports

Upon request, Russel Metals will provide, or will arrange for the provision of accessible formats and communication support for persons with disabilities in a timely manner that takes into account the person’s accessibility needs due to disability.

Russel Metals will consult with the person making the request in determining the suitability of an accessible format or communication support.

Russel Metals will also notify the public about the availability of accessible formats and communication supports.

<b>Russel Metals Group of Companies</b>		Section 2:	Date: <b>November 1, 2023</b>
<b>Human Resources Policy &amp; Procedures</b>		Policy No. HR 2 - 14	Supersedes: <b>October 1, 2014</b>
Scope of Policy: <b>All Ontario Russel Metals Group of Companies</b>	Title: <b>AODA Integrated Accessibility Standards Regulation— Employment Standard Policy</b>		

Accessible Websites and Web Content

Russel Metals will ensure that our Internet websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA except where this is impracticable.

For any questions about this policy, or if the policy is not understood, please contact the Human Resources Department at:

Contact: Human Resources Department, Russel Metals Inc.

Email: [hr@russelmetals.com](mailto:hr@russelmetals.com)

<b>Russel Metals Group of Companies</b>		Section 2:	Date: <b>November 1, 2023</b>
<b>Human Resources Policy &amp; Procedures</b>		Policy No. HR 2 - 14	Supersedes: <b>October 1, 2014</b>
Scope of Policy: <b>All Ontario Russel Metals Group of Companies</b>	Title: <b>AODA Integrated Accessibility Standards Regulation— Employment Standard Policy</b>		

### **Acknowledgement & Agreement**

I, [employee name], acknowledge that I have read and understand the **AODA Integrated Accessibility Standards Regulation - Employment Standard Policy** of Russel Metals Inc.

Further, I am committed to excellence in working with all employees including people with disabilities and will ensure that dealings and interactions are provided in a manner that respects the dignity and independence of people with disabilities. I understand that if I violate the rules set forth in this policy, I may face corrective action, up to and including termination of employment.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_