

Statement of Commitment

Janco Steel Ltd. and its management are committed to providing an environment in which all workers, visitors and members of the public will benefit from safe, healthy and respectful conditions. Janco Steel Ltd. supports the full inclusion of persons with disabilities as set out in the Ontario *Human Rights Code* and the *Accessibility for Ontarians with Disabilities Act (AODA)* 2005. Janco Steel Ltd. is committed to complying with the accessibility standards set out in the AODA's Integrated Accessibility Standards Regulation (IASR) and the Accessibility Standards for Customer Service Regulation.

Current Policies and Practices

Customer Service:

See document "AODA Customer Service Standards 20180830" (Appendix A)

Information/Communication:

Janco Steel Ltd.'s Multi-Year Accessibility Plan will be posted on its website and updated at least once every five years.

When necessary, or when asked, Janco Steel Ltd. will provide accessible emergency and public safety information to members of the public and staff.

When necessary, or when asked, Janco Steel Ltd. will provide workplace information in an accessible format to staff, including information employees need to perform their jobs and general information that is available to all employees at work.

Janco Steel Ltd. will work with a person with a disability who has asked for accessible information or requires communication supports to figure out how to best meet their needs. This information will be given in a timely manner that takes into account the person's accessibility needs due to disability; and at a cost that is no more than the regular cost charged to other persons.

Janco Steel Ltd. employees will be made aware that forms of communication can be made accessible upon request during their orientation. Members of the public will be made aware that forms of communication can be made accessible upon request via the AODA Customer Service Standard posted at reception.

Any significant updates to Janco Steel Ltd.'s website and web content will meet Web Content Accessibility Guidelines (WCAG) 2.0 Level A.

Feedback concerning how Janco Steel Ltd. promotes accessibility can be sent to Melanie Koning (mkoning@jancosteel.com). A response can be expected within 48 hours.

Employment

Recruitment: Management of Janco Steel Ltd. will do their best to accommodate the needs of people with disabilities during the hiring process. Accommodations for applicants with disabilities are available during the recruitment process. When making offers of employment, successful applicants will be notified of Janco's policies for accommodating employees with disabilities.

Talent and Performance Management: Management of Janco Steel Ltd. will consider the needs of an employee with disabilities when holding formal and informal performance reviews and when promoting or transferring employees.

Accommodation Plans: Accommodation plans will be drafted for employees with disabilities.

This process will be documented and include:

- how an employee participates in the development of their individual accommodation plan
- how an employee is assessed on an individual basis
- how an employee can ask for a representative from the workplace to participate in the development of the accommodation plan
- the steps that will be taken to protect the privacy of the employee's personal information
- how and when the employee will be provided with their personalized accommodation plan
- the schedule for when and how the plan will be reviewed and updated
- how an employee will be told that their individual accommodation plan has not been accepted
- how the plan will be provided in an accessible format, if necessary

The plan will be documented and include:

- how workplace information will be provided to the employee in an accessible format, if requested
- how accessible emergency information will be provided to the employee in an accessible format, if necessary
- any other accommodation that is to be provided

RTW Process: In the case that an employee has been absent from work due to a disability and requires disability-related accommodations to return to work, a return-to-work plan will be developed using the "Return to Work Process and Template Plan" (Appendix B)

Training

Janco Steel will provide training to employees who deal with the public or other organizations on behalf of Janco Steel and all those who are involved in the development and approval of customer service policies, practices and procedures. This training will be provided to employees as soon as practicable.

Training will include:

- An overview of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standards.
- 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 Janco Steel's services.
- Janco Steel Ltd. specific policies that aim to support people with disabilities


Janco Steel Ltd. will maintain written records of all training done to meet the accessibility requirements applicable to Janco Steel Ltd. Janco Steel Ltd. will record when the training was delivered and how many people took the training.

Future Strategies and Action Plan

Information/Communication

Janco Steel Ltd.'s website and web content will meet WCAG 2.0 Level AA other than criteria 1.2.4 (live captions) and 1.2.5 (pre-recorded audio descriptions) – **January 1, 2021**

Appendix A

	<p>POLICY: AODA CUSTOMER SERVICE STANDARDS</p>
<p>REVIEWED & EFFECTIVE: August 2018</p>	
<p>In accordance with the Accessibility for Ontarians with Disabilities Act, 2005, Janco Steel strives at all times to provide its goods and services in a way that respects the dignity and independence of people with disabilities. We are also committed to giving people with disabilities the same opportunity to access our goods and services and allowing them to benefit from the same services, in the same place and in a similar way as other customers.</p> <p>Janco Steel is committed to excellence in serving all customers including people with disabilities and will carry out its functions and responsibilities in the following areas:</p> <p><i>Assistive devices</i> We are committed to serving people who need assistive devices to obtain, use or benefit from our goods and services.</p> <p><i>Communication</i> We will communicate with people with disabilities in ways that take into account their disability.</p> <p><i>Service animals</i> We are committed to welcoming people with disabilities who are accompanied by a service animal on the parts of our premises that are open to the public and other third parties.</p> <p><i>Support persons</i> We are committed to welcoming people with disabilities who are accompanied by a support person. No person with a disability who is accompanied by a support person will be denied access Janco Steel's premises.</p> <p>At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises.</p> <p><i>Notice of temporary disruption</i> In the event of a planned or unexpected disruption to services or facilities or services usually used by people with disabilities, Janco Steel will notify customers promptly. This notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available.</p> <p>The notice will be placed at the main entrance of our building.</p> <p style="text-align: right;">Page 1 of 2</p>	

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Feedback process

The ultimate goal of Janco Steel is to meet and surpass customer expectations while serving customers with disabilities. Comments on our services regarding how well those expectations are being met are welcome and appreciated.

Customers who wish to provide feedback on the way Janco Steel provides goods and services to people with disabilities can email Melanie Koning at mkoning@jancosteel.com. Customers can expect to hear back within 48 hours. Complaints will be addressed according to our organization's regular complaint management procedures.

Modifications to this or other policies

Any policy of Janco Steel that does not respect and promote the principles of dignity, independence, integration and equal opportunity for people with disabilities in accessing our good and services will be modified or removed.

Questions about this policy

This policy exists to achieve service excellence to customers with disabilities. If anyone has questions about this policy, they may contact Melanie Koning at mkoning@jancosteel.com.

Appendix B

Sample Return to Work Process

_____ is committed to supporting employees who have been absent from work due to a disability. We will use the following process to help employees who require accommodation to return to work.*

Step 1. Initiate the leave and stay in contact with the employee

If an employee needs to take a disability leave, s/he will inform his/her manager and human resources. The employee and manager will maintain regular contact, with the employee's consent, to address any problems that may arise and facilitate the return to work process.

Step 2. Gather relevant information and assess individual needs

The employee and manager will work together to share information and find the most appropriate accommodation, for example:

Manager

- Provides the employee with return to work information
- Helps resolve any problems with treatment if requested to do so by the employee
- Maintains regular contact with the employee
- Ensures work practices are safe for returning employee
- Assists with identifying accommodations
- Assists with analyzing the demands of each job task

Employee

- Gets and follows the appropriate medical treatment
- Provides updates about their progress, including information about his/her functional ability to perform the job
- Provides his/her health care provider with the return to work information

Health care provider(s), union/workplace representative(s) and health and safety professional(s) may also participate in the process, if needed.

Step 3. Develop a return to work plan

After identifying the most appropriate accommodation, safety considerations and any transitional measures, capture the details in a written plan.

Depending on circumstances, the employee may:

- return to the original position
- return to the original position with accommodation(s) on a temporary or permanent basis
- return to an alternate position on a temporary or permanent basis

The return to work plan should be attached to the employee's individual accommodation plan.

Step 4. Implement, monitor and update the plan

After implementing the return to work plan, the employee and manager will monitor and review the plan regularly to ensure that it remains effective. If the accommodation is no longer appropriate, they will reassess the situation (step 2) and update the plan.

* This return to work process does not replace or override any other return to work process created by or under any other statute. It should not be taken as legal advice. You should contact a lawyer for advice for your particular set of facts or circumstances.