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VULCRAFT CANADA

Integrated Accessibility Standards Regulation: Statement of Commitment, Policy, and Plan.

This policy and plan formalize the commitment of Vulcraft Canada (the “Company”) to accessibility and outlines those steps that the Company will take to remove barriers and improve opportunities for people with disabilities through compliance with the *Integrated Accessibility Standards Regulation* (the “Integrated Standard”).

Statement of Commitment

The Company is committed to treating all people in a way that allows them to maintain their dignity and independence. The Company believes in integration and equal opportunity, is committed to meeting the needs of people with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting the accessibility requirements under the A*ccessibility for Ontarians with Disabilities Act, 2005.*

Policy and Plan

A. General

1. The Company will provide training on the requirements of the Integrated Standard and on the Ontario Human Rights Code as it relates to people with disabilities. The Company will take the following steps to ensure that training is provided to all of our employees, interns, agents, volunteers and those persons who develop our policies or provide goods, services or facilities on our behalf, by:
    a. Developing and consolidating training materials that address the requirements of the Integrated Standard, including information about achieving accessibility by 2021 and on the disability-related regulations obligations under the Human Rights Code;
    b. Reviewing the duties of those individuals that require training, and tailoring the training to be appropriate for such duties;
    c. Delivering the training via a method that is appropriate for the audience and the needs of the Company;
    d. Keeping a record detailing those employees that were trained and when; and
    e. Ensuring that new employees are trained as soon as practicable after being hired and when the Company’s accessibility policies change.

2. At this time, the Company does not utilize kiosks. However, should the use of kiosks become a part of the Company’s business in the future, we will ensure that our employees consider the needs of people with disabilities when designing, procuring or acquiring self-service kiosks.

B. Information and Communication

1. The Company is committed to meeting the communication needs of people with disabilities.

2. The Company ensures that our existing processes for receiving and responding to feedback are accessible to people with disabilities upon request by:
    a. Providing multiple methods for feedback, such as in writing or via email, telephone or in person; and
    b. Considering and implementing those accessible formats or communication supports required elsewhere in the Integrated Standard.

3. The Company ensures that, upon request, we will provide or arrange for the provision of publicly available information that is in respect of our goods, services or facilities in an accessible format and at a cost that is not more than that charged to others by:
    a. Consulting with the person making the request to determine the most appropriate accessible format or communication support, given the needs of the person, whether the content is convertible and the Company's capability;
    b. Providing the accessible format or communication support in a timely manner and at no additional cost; and
    c. Notifying the public about the availability of accessible formats and communication supports.

4. The Company has enacted a process to provide its customers and clients with publicly available emergency procedures, plans or public safety information in an accessible way, as soon as practicable upon request.

5. The Company is committed to meeting the communication needs of people with disabilities, and ensures that all of its new websites and content on those sites conform with WCAG 2.0, Level A.

6. The Company will ensure that all websites and content conform with WCAG 2.0, Level AA by January 1, 2021, by:
    a. Liaising with our Information Technology department to determine whether the website is compliant;
    b. Determining whether the Information Technology department can upgrade the website and content internally, or if third party assistance is required; and

C. <u>Employment</u>

1. The Company is committed to fair and accessible employment practices, and will:
    a. Notify the public and our staff that we will accommodate people with disabilities during the recruitment process, either through our website, via a recruiter or the applicable job posting, as applicable;
    b. Notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be utilized;
    c. Consult with job applicants who request accommodation to support them through the recruitment, selection and/or assessment process and take into account their needs, so that the accommodations provided are effective; and
    d. Notify the successful applicant of the Company's policies for accommodating our employees with disabilities.

2. The Company will inform employees of the policies used to support employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability, by:
    a. Consulting with our employees with disabilities to determine those accessible formats or communication supports that may be of assistance, and how such accommodation may be provided; and
    b. Providing the information as soon as practicable after commencement of employment, and updates whenever there is a change to the policies.

3. The Company provides individualized workplace emergency response information to our employees with disabilities, if the disability is such that the individualized information is

necessary, and the Company is aware of the need for accommodation.

4. The Company has implemented a process for the creation of individual accommodation plans for those employees that have been absent from work due to a disability. This process:
    a. Considers how employees with disabilities will participate in the development of their accommodation plan and what the plans may include;
    b. Establishes where the plans will be stored and what steps will be taken to protect the privacy of employee information; and
    c. Determines when and how the individual accommodation plans will be reviewed and updated.

5. The Company has implemented a documented return to work process for those employees that have been absent from work due to a disability and require disability- related accommodation in order to return to work. This process outlines the steps that the Company will take to facilitate the return to work of the applicable employees and the use of individual documented accommodation plans.

6. The Company considers the accessibility needs of employees with disabilities (as well as their individual accommodation plans) when implementing its performance management process, by:
    a. Reviewing an individual's accommodation plan to understand their needs and determine whether it should be adjusted to improve job performance;
    b. Providing performance-management related documents in accessible formats; and
    c. Providing informal and formal coaching and feedback in a manner that takes in account an employee's disability.

7. The Company will take into account the accessibility needs of its employees with disabilities (as well as their individual accommodation plans) when providing career development, advancement, or redeployment. This may occur through the consideration of what accommodations employees with disabilities may need to succeed elsewhere within our organization, to take on new responsibilities in a current role, or when redeployment has become necessary.

D. Design of Public Spaces

1. At the present time, the Company does not plan on developing or redeveloping any of its public spaces, as defined in the Design of Public Spaces Standard. However, should it choose to do so, this policy and plan will be revised to include the requirements thereunder and how we will achieve compliance.

E. Going Forward

1. The Company will consider accessibility in all aspects of its business and operations and will endeavour to identify and remove accessibility barriers going forward.

F. For More Information

1. For more information on this accessibility policy and plan, please contact: Robert Filice.
Telephone: 289-443-2000
Email: rfilice@vulcraft.ca

Accessible formats of this document are available free upon request from: Name: Robert Filice
Telephone: 289-443-2000
Email: rfilice@vulcraft.ca

Accessibility Standards for Customer Service Policy

Purpose

Vulcraft Canada (the "Company") is committed to providing a barrier-free environment for its customers, and to providing our goods and services in a manner that respects the dignity and independence of people with disabilities. The objective of this policy is to ensure that the Company is compliant with the customer service requirements of the *Accessibility for Ontarians with Disabilities Act, 2005* (the "AODA").

Application

This policy applies to all persons who interact with the public, other organizations or third parties on behalf of the Company. This includes employees, volunteers, agents, contractors and third parties (hereafter referred to as "personnel").

Our Commitment

The Company 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 providing 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.

Principles

The Company will ensure that this policy and any related practices or procedures are consistent with the following core principles:

1. **Dignity:** people with disabilities should be treated as valued customers who are as deserving of effective and full service as other customers.

2. **Independence**: goods and services must be provided without the control or influence of others, and the freedom of people with disabilities to make their own decisions must be respected.

3. **Integration:** people with disabilities must be able to benefit from services or products in the same place and the same or similar manner as other customers, whenever possible
.
4. **Equality of Opportunity:** people with disabilities must be given an opportunity equal to that given to others to obtain, use and benefit from goods and services.

Providing Goods and Services to Persons with Disabilities

The Company is committed to excellence in serving all of its customers, including those with disabilities, and will do so in the following ways:

1. **Communication:** We will communicate with people with disabilities in ways that - take into account their disability. Personnel will be trained on how to utilize the available methods of communication, and on how they can best interact and communicate with people with various types of disabilities.

2. **Assistive Devices:** Personnel will be trained and familiar with various assistive devices that may be used by our customers with disabilities while accessing our goods and services. We will also ensure that personnel are trained and familiar with the assistive devices that as available on our

premises for our customers:

3. **Use of Service Animals or Support Persons:** People with disabilities who are accompanied by a service animal are welcome on the parts of our premises that are open to the public and other third parties unless the service animal is otherwise excluded by law. If a service animal is excluded, we will explain to the customer why exclusion is necessary and explore alternative measures of accommodation. If it is not readily apparent that the animal is a service animal, we may ask the person with a disability for a letter from a physician or nurse confirming that the person requires the animal for reasons relating to his or her disability.

   People with disabilities that require a support person are allowed to enter our premises, and 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.

   We will ensure that personnel are trained to be able to appropriately interact with people with disabilities that are accompanied by service animals or support persons.

4. **Notice of Temporary Disruption:** We will notify our customers if there is a planned or unexpected disruption in the facilities or services usually used by people with disabilities. This notice will be posted at the entrance of the applicable premises and at the footer on www.vulcraft.ca. The notice will include the following information:
   a. The facility or service that is unavailable;
   b. The reason for the disruption;
   c. The anticipated duration of the disruption; and
   d. Alternative facilities or services, if available.

5. **Training and Record Keeping:** We will ensure that all personnel, and all those who are involved in the development of the Company's policies, practices and procedures, are trained.

6. The training will be provided as soon as possible after hiring or engagement, on commencement of new or additional duties that require training, and on an ongoing basis when changes are made to the applicable policy, practices or procedures. Training will include the following:
   a. A review of the purpose of the AODA and the requirements of the Customer Standard;
   b. A review of this policy;
   c. How to interact and communicate with persons with various types of disabilities;
   d. How to interact with persons with a disability who use an assistive device or require the assistance of a service animal or support person;
   e. How to use assistive devices provided by the Company; and
   f. How to assist a person with a disability that is experiencing difficulty accessing the Company's premises, goods or services.

   The Company will ensure that accurate and up-to-date training records are kept. These records shall include the dates of the training, and the number of individuals to whom the training was provided.

7. **Feedback Process:** We welcome feedback from the public regarding this policy and its implementation. Feedback regarding the way the Company provides goods and services to people with disabilities can be made:
   a. In person at Vulcraft Offices in Ancaster
   b. By telephone at 289-443-2000
   c. In writing to Vulcraft Canada Inc. 1362 Osprey Dr. Ancaster, ON
   d. Electronically to rfilice@vulcraft.ca

e. All feedback will be directed to Robert Filice *Manager Environmental, Health and Safety* and those providing feedback can expect to receive a response within 7 business days.

Documentation

The Company will prepare one or more documents that will describe the policies, practices and procedures regarding accessible customer service, with particular reference to:

(i) The use of personal assistive devices, as well as those provided by the Company;
(ii) Entry of service animals and support persons;
(iii) The steps that will be taken in connection with a temporary disruption to facilities or services used by people with disabilities;
(iv) Provision of accessible customer service training; and
(v) Receiving and responding to feedback regarding the provision of goods and services to people with disabilities.

The Company will make this documentation available to members of the public upon request, and in a format that takes into account a person's disability, if applicable.

Notification of the availability of this documentation will be posted at a conspicuous place at our premises and on our website.

Modifications

We are committed to developing customer service policies that respect and promotes the dignity and independence of people with disabilities. Therefore, no changes will be made to this policy before considering the impact on people with disabilities. Any policy of the Company that does not respect and promote the dignity of people with disabilities will be modified or terminated.

Questions/Clarification

This policy exists to achieve service excellence to customers with disabilities. Any questions regarding this policy, or its associated practices or procedures, should be directed to Robert Filice at rfilice@vulcraft.ca or 289-443-2000.

ACCESSIBILITY PLAN AND POLICY (POLICY #137)

Vulcraft Canada is committed to providing our goods and services and employment opportunities in a manner that respects persons with disabilities and we strive at all times to do so with the dignity, safety and independence of everyone. Vulcraft Canada is also devoted to preventing and removing barriers to accessibility and meeting accessibility requirements.

Scope

- This policy applies to the provision of goods and services and employment practices at premises operated by Vulcraft Canada.
- This policy applies to all teammates, who deal with the public or other third parties that act on behalf of Vulcraft Canada, including the provision of goods and services and employment opportunities.
- All visitors to Vulcraft Canada must adhere to our visitor access policy upon entering our locations.

A. The Provision of Goods and Services and Employment Opportunities to Persons with Disabilities

Vulcraft Canada is committed to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- ensuring that all customers receive the same value and quality;
- using alternative methods when possible to ensure that customers and teammates with disabilities have safe access;
- taking into account individual needs when providing goods and services and employment opportunities; and
- communicating in a manner that takes into account any applicable disability.

B. The Use of Assistive Devices

- Persons with disabilities may use their own assistive devices as required.
- In cases where the assistive device may present a safety concern or where accessibility might be an issue, we will endeavor to use other reasonable measures.

C. The Use of Service Animals

Any individual with a disability that is accompanied by a service animal will be allowed access to our premises in accordance with our visitor policy, unless otherwise excluded by law. “No pet” policies do not apply to service animals. The person requiring the service animal will be responsible for maintaining care and control of the animal at all times. If it is not readily apparent that the animal is being used for rea- sons relating to a disability, Vulcraft Canada may request verification.

If a health and safety concern presents itself for example in the form of a severe allergy to the animal, Vulcraft Canada will make all reasonable efforts to meet the needs of all individuals.

D. The Use of Support Persons

If an individual with a disability is accompanied by a support person, Vulcraft Canada will ensure that both persons are allowed to enter the premises together in accordance with our visitor policy and that they are not prevented from having access to the support person.

In situations where confidential information might be discussed, written consent where possible will be obtained from the individual, prior to any conversation where confidential information might be discussed.

E. Employment

Vulcraft Canada is committed to fair and accessible employment practices.

Current recruitment policies, job descriptions, processes and communications will be amended as necessary to comply with the required integrated accessibility standards. Vulcraft will review and provide if necessary any accommodations that may be required during the recruitment, assessments or hiring processes and during employment.

Vulcraft Canada will work with our Return to Work policy to develop or revise as required individual accommodation and return to work plans for our teammates that have been absent due to disability. We will review and amend if required our performance management, career development and relocation processes to ensure the accessibility needs of our teammates with disabilities are considered and accommodated if necessary.

F. Notice of Service Disruptions

Vulcraft Canada is dedicated to providing equal opportunities in obtaining, using or benefiting from our goods and services and employment opportunities; therefore in the event of a planned or unexpected disruption to our services or facilities for customers and teammates with disabilities Vulcraft will assure this is communicated to all visitors arriving at the premises. This notice of disruption will be indicated on Vulcraft's entrance of the location. This notice will indicate the reasons for disruption, anticipated duration of the disruption and a description of alternative facilities or services, if any are available.

G. Feedback

All feedback including questions, concerns, compliments or complaints will be investigated and resolved by the Human Resources Department within 3 business days of receipt by Vulcraft Canada.

H. Training

Vulcraft Canada will provide training to the Operations/Branch Manager and/or their designate.

Training will include:

- An overview of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Accessibility Standards for Customer Service, Ontario Regulation 429-07 and Integrated Accessibility Standards.
- Vulcraft Canada policies, procedures and practices pertaining to providing accessible customer service and employment practices to people with disabilities.
- Instructions on how to interact and communicate with people with various types of disabilities.
- Instructions on how to interact with people with disabilities who:
    - use assistive devices;

  - require the assistance of a guide dog, service dog or other service animal; or
  - require the use of a support person
- Instructions on how to use equipment or devices in a safe manner that are available at our premises or that we provide that may help people with disabilities.
- Instructions on what to do if a person with a disability is having difficulty accessing your services.

Training brochures are also included with all new hire packages in accordance with Integrated Accessibility Standards.

Revised training will be provided in the event of changes to legislation, procedures and/or practices.

I. Notice of Availability and Format of Required Documents

Please note that all policies and procedures established by Vulcraft Canada are available in various media formats upon request.

Administration - Any questions or concerns about this policy or its related procedures can contact: Jennifer Pearson, Regional Human Resources Manager, Nucor Rebar Fabrication 905-662-0611, jennifer.pearson@nucor.com