

## Multi-Year Accessibility Plan: 2020 – 2025

### Accessible Customer Service – Training and Policy

	Status	Deadline	Responsibility Owner
1. Develop and implement an Accessible Customer Service Policy addressing all requirements under the regulation.	Complete and Ongoing  Last Reviewed: December 4, 2023	January 1, 2014	HR

**Actions:**

ACL Steel Ltd. has an Accessible Customer Service Policy available on the website and posted on google drive available to all employees.

2. Develop and deliver training to all staff, and individuals completing work on behalf of ACL Steel Ltd. that may assist to the public (or ensure that they have completed similar training). Provide training to all new staff.	Complete and Ongoing  Last Reviewed: December 4, 2023	January 1, 2015	HR
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**Actions:**

- a. Create training presentation using appropriate sources and deliver to all current staff.
- b. Require all new workers to complete AODA training within their first 5 working days of employment with the company. Ensure records of completed training can be found in individual employee files and summarized within ACL Steel Ltd.'s General Training Matrix.
- c. Require all employees with moderate to high level interaction with customers and outside stakeholders to complete Access Forward's Customer Service Module.

### General Requirements

	Status	Deadline	Responsibility Owner
1. Create and make public a statement of commitment.	Complete  Last Reviewed: December 4, 2023	January 1, 2015	Executive Team/ HR

**Actions:**

ACL Steel Ltd. has created and made public a statement of commitment. The statement of commitment is located on the company's website and in the reception area of our office.

2. Develop and implement company-specific accessibility policies.	Complete and Ongoing  Last Reviewed: December 4, 2023	January 1, 2015	Executive Team/ HR
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**Actions:**

- a. Continue to review ACL Steel Ltd.' policies and procedures to identify current and future accessibility barriers. Remove identified barriers change deficient policies. Produce an Accommodation Policy for internal use to communicate how ACL Steel Ltd. will meet its requirements under the IASR, and to address employee responsibilities and expectations. Provide Accommodation Policy to all current employees as part of regular toolbox talk meetings, and to all new hires as part of their orientation package and as part of our AODA training program.

## Multi-Year Accessibility Plan

	Status	Deadline	Responsibility Owner
1. Create and make public a multi-year accessibility plan.	Complete  Last Reviewed: December 4, 2023	January 1, 2014	HR
<p>a. All applicable IASR requirements have been reviewed to develop a living Accessibility Plan. The roles of internal stakeholders have been reviewed to determine how each will be affected by requirements.</p> <p>b. The Accessibility Plan has been created to include training, procedures and policy development to ensure the identification and removal of barriers. The plan has been approved and is available to the public.</p>			
2. Provide the plan in accessible formats upon request.	Complete  Last Reviewed: December 4, 2023	January 1, 2014	HR
<p>Requests for accessible formats of this document will be directed to the Human Resource Generalist who will work with the individual to determine the most suitable format. The plan is available on the accessibility page on ACL's website. The plan is also available in print at the reception desk and on the company Health and Safety Google Drive.</p>			

3. Review the plan every five (5) years.	Complete and Ongoing  Last Reviewed: December 4, 2023	June 1, 2014	Executive Team/ HR
<p>a. This plan has been reviewed fully as of December 4, 2023. The plan will be reviewed and approved again by December 4, 2028.</p>			

## Training

	Status	Deadline	Responsibility Owner
Train all employees, including contract and unpaid coop students on applicable IASR requirements and the organization's responsibilities under the Human Rights Code (as it pertains to persons with disabilities).	Completed  Last Reviewed: December 4, 2023	January 1, 2015	HR
<p>a. Training is provided by the HR department to all new hires using Access Forwards' training module downloadable presentations: General Requirements, Accessible Customer Service, and Employment Standard as and the Ontario Human Rights Commission's Website as key sources.</p> <p>b. ACL Steel Ltd. provides access to the book Demystifying Disability: What to Know, What to Say, and How to Be an Ally. This material will act as a supplement to the basic training and provide more in depth information from someone with expertise and experience in accessibility. How to access this material will be discussed during onboarding and refresher AODA training courses.</p> <p>c. ACL Steel Ltd. will administer an assessment of learning after the training course to ensure understanding and document course completion.</p> <p>d. Managers and those who are likely to have a higher level of interaction with customers and suppliers have received additional training on best practices for accommodating and working with persons with disabilities via completion of Access Forward's online customer service module.</p> <p>e. Training materials will be made available via alternative formats upon request.</p>			

## Information and Communication Standard

	Status	Deadline	Responsibility Owner
1. Ensure website and web content published after January 1, 2021 conform to the World Wide Web Consortium Web Content Accessibility Guidelines 2.0, level AC.	Complete Ongoing  Last Reviewed: December 4, 2023	January 1, 2021	Executive Team
<b>Actions:</b> a. ACL Steel Ltd.'s public website and its content meet all requirements under the WCAG 2.0 level AA. b. ACL Steel Ltd.'s IT contractors are aware of WCAG requirements and will ensure all new content and/or any substantial			
2. Be able to receive and respond to feedback from clients, individuals inquiring about ACL Steel Ltd., our employees and members of the public who have a disability upon request.	Complete  Last Reviewed: December 4, 2023	January 1, 2015	Executive Team
<b>Actions:</b> a. A process for receiving and responding to accessible feedback requests has been developed and communicated to all relevant employees. b. Receiving and responding to feedback will be included in all new hire orientations where the position frequently receives and responds to requests. c. All other employees have been notified as to the contact person to whom they should direct any accessible feedback requests.			
Provide and inform stakeholders of available accessible formats and communication supports to individuals with disabilities.	Complete  Last Reviewed: December 4, 2023	January 1, 2016	Executive Team
<b>Actions:</b> a. Develop processes for responding to accessible format requests. b. Employees Trained on guidelines/processes and ensured awareness that requests that cannot be met immediately must be forwarded to the HR Coordinator who will arrange for a suitable and alternative format/communication support.			

c. Make public ACL Steel Ltd.s' ability to provide of accessible formats and communication supports by posting a statement on the company website.			
Where a communication support or accessible format cannot be provided immediately, consult with the client to arrange for a suitable format as soon as possible.	Complete and Ongoing  Last Reviewed: December 4, 2023	January 1, 2016	Executive Team/HR

**Employment Standard**

**Accessibility Planning**

	Status	Deadline	Responsibility Owner
Create and implement individualized plans to assist employees with disabilities during an emergency.	Complete and Ongoing  Last Reviewed: December 4, 2023	January 1, 2012	HR/ Department Managers

**Actions:**

1. Recognize that disabilities can be invisible or episodic and therefore we should not assume employee needs. Allow employees to identify emergency planning requirements on New Employee Information Form.
2. Emergency planning information and directions in ACL Steel Ltd.'s Accommodation Policy provided and communicated to all current employees and provided to all new hires as a part of their orientation package.
3. Obtained consent from employees with individualized plans to disclose emergency response or evacuations plans to the person responsible for assisting the employee in situations where the plan requires the assistance of a colleague.
4. Emergency information made available in accessible formats upon request.
5. Review the individualized plan/information: when the employee changes work location, during the periodic review of accommodation plans, upon review of ACL Steel Ltd.'s general emergency response policies.

Develop and implement documented individual accommodation plans for employees with disabilities.	Complete  Last Reviewed: December 4, 2023	January 1, 2016	HR/ Department Managers
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**Actions:**

ACL Steel Ltd. has used the Sample Individual Accommodation Plan Process form available on the Ontario Government's Repository of Forms webpage and formatted it to match ACL's other forms. This ensures that we are meeting the requirements as set out by the AODA and IASR when working with an employee to complete their individual accommodation plan. As per IASR requirements, the plan includes the following elements:

- The way an employee requesting accommodation can participate in the development of the individual accommodation plan.
- The means by which the employee is assessed on an individual basis.
- The way the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be provided and, if so, how accommodation can be achieved.
- The steps taken to protect the privacy of the employee's personal information.
- The frequency with which the individual accommodation plan will be reviewed and updated and the way it will be done.
- If an individual accommodation plan is denied, the reason for the denial will be provided to the employee.
- The means of providing the individual accommodation plan in a format that considers the employee's accessibility needs due to disability.
- Include any information regarding accessible formats and communications supports provided.
- If required, include individualized workplace emergency response information.

## Recruitment, Assessment and Selection

	Status	Deadline	Responsibility Owner
ACL Steel Ltd. will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	Complete	January 1, 2016  Last Reviewed: December 4, 2023	HR

**Actions:**

ACL Steel Ltd. will include an accessibility statement on all job postings, so all potential applicants are aware of available supports.

During a recruitment process, 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 used	Complete	January 1, 2016  Last Reviewed: December 4, 2023	HR
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**Actions:**

1. Successful applicants will be informed of the availability of accommodations during the selection/assessment process upon initial contact from the hiring manager or HR Coordinator;
2. When currently available alternate formats do not satisfy any accommodation request ACL Steel Ltd. will work with the applicant to develop an acceptable alternative.

If a selected applicant requests an accommodation, the employer 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.	Complete	January 1, 2016  Last Reviewed: December 4, 2023	HR
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**Actions:**

1. When scheduling interviews, the company will inform the applicant that accommodations are available and ask the applicant to inform HR of any necessary accommodations.

After offers of employment have been accepted, ACL Steel Ltd. will inform successful applicants of its policies for accommodating employees with disabilities.	Complete	January 1, 2016  Last Reviewed: December 4, 2023	HR
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**Actions:**

1. ACL Steel Ltd.'s Accommodation Policy is provided to all new hires as part of their AODA orientation training. As detailed above the training outlines the process ACL Steel Ltd. will use to support employees with disabilities.
2. The policy outlines how the company will work with the employee to gather relevant information as well as the process to develop, implement and monitor individual accommodation plans.
3. Emergency planning, accessible formats and communication supports will be detailed.
4. Alternative formats of the policy will be made available upon request.

**Supports For Employees**

	Status	Deadline	Responsibility Owner
Work with individual employees to provide suitable accessible formats and communication supports for information that is needed to perform their job and information generally available to employees in the workplace.	Complete	January 1, 2016  Last Reviewed: December 4, 2023	HR

**Actions:**

1. Availability of accessible formats and communication supports have been communicated to all employees through ACL Steel Ltd.'s Accommodation Policy and periodic AODA review training sessions.
2. New employees are informed of supports available by being provided with the policy within the new hire orientation package.
3. Employees are invited to request accessible formats and communication supports regularly by training employees and supervisors during the training process and while on the job.
4. Information that is generally available in the workplace will be provided in a variety of formats upon request including hardcopy or electronically.
5. Prior to providing the information needed to perform one's job or information generally available in the workplace, employees requiring accessible formats or communication supports will be requested to notify the HR department so that alternate arrangements may be made.

6. When a request is received the employee, HR and any other facilitating parties will work together to determine and provide the appropriate accessible formats or communication supports with the obtained consent of the employee.			
7. Employees will be informed of any changes to ACL Steel Ltd.'s Accommodation policy upon effective date.			
Augment organization's current performance management and career development processes to address accessibility needs of employees to reduce barriers and ensure processes are inclusive.	Ongoing	Last Reviewed: December 4, 2023	HR
<b>Actions:</b> Review current performance management and career development processes to identify barriers. Develop processes to ensure that applicable processes are accessible. ACL Steel Ltd.'s Accommodation Policy will outline the means of accessible performance management to ensure consistent and clear application and communication to employees.			
Recognize the accessibility needs and accommodation plans of employees who are reassigned to an alternate department or position with the company as an alternative to a layoff.	Complete	January 1, 2016  Last Reviewed: December 4, 2023	HR
<b>Actions:</b> When an employee changes department or position HR will integrate the accessibility needs and accommodation plans of that employee. Confidentiality will be prioritized when determining who is to be involved with and informed of any accessibility plans and/ or accommodation requirements.			
<b>Return to Work and Related Accommodations</b>			
	<b>Status</b>	<b>Deadline</b>	<b>Responsibility Owner</b>
Put in place a process for return to work for employees who have been off work because of disability including accommodation planning, tracking and structured communication.	Complete	January 1, 2016  Last Reviewed: December 4, 2023	HR
<b>Actions:</b> Created accommodation and return to work forms meet all IASR requirements. Consistent use of these forms will ensure that all accommodation and RTW plans are documented and stored. Employees will be provided with a return-to-work package including the RTW and Accommodation form and policy/ process documents at the onset of absence from work.			