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| <b>Pemco Inc.</b>                               |                                       | Section       | Date:<br><b>September 01, 2014</b>     |
| <b>Human Resources Policies</b>                 |                                       | HR Policy No. | Supersedes:<br><b>January 25, 2012</b> |
| Scope of Policy:<br><b>All Pemco Facilities</b> | Title:<br><b>Accessibility Policy</b> |               |  |

### ***Policy Statement***

Pemco Steel will use every reasonable effort to ensure that our policies, practices, and procedures are consistent with the following Accessibility for Ontarians with Disabilities Act, (AODA) principles:

- Respecting the dignity and independence of persons with disabilities;
- Integrating the provision of goods and services to persons with disabilities;
- Giving persons with disabilities an opportunity equal to that given to others to obtain, use, and benefit from the goods and services available from our firm.

### ***Definitions***

**Dignity** - service is provided in a way that allows the person with a disability to maintain self-respect and the respect of other people.

**Independence** - when a person with a disability is allowed to do things on their own without unnecessary help or interference from others.

**Integration** - service is provided in a way that allows the person with a disability to benefit from the same services, in the same place, and in the same or similar way as others, unless an alternate measure is necessary to enable a person with a disability to access goods or services.

**Equal opportunity** - service is provided to a person with a disability in such a way that they have an opportunity to access goods or services equal to that given to others.

### ***Policy***

Pemco Steel is dedicated to the provision of exemplary service to our customers, vendors, and visitors we serve. Our team of dedicated professionals strives at all times to provide services in a way that respects the dignity and independence of people with disabilities. We are 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 of our business. If necessary, we will work with persons with disabilities to assist them in identifying alternative means to access services.

### ***Procedures***

Pemco Steel is committed to excellence in serving all customers, vendors, visitors and including people with disabilities. We will strive to accommodate people with disabilities by facilitating the following;

**Communication** - We will communicate with people with disabilities in ways that take into account their disability. We will train staff who communicate with customers, vendors, visitors, and others on how to interact and communicate with people with various types of disabilities.

**Telephone Services** - We are committed to providing fully accessible telephone service to people with disabilities. We will train staff to communicate over the telephone in clear and

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plain language and to speak clearly and slowly. If we are advised that telephone communication is not suitable to a particular individual, we will aim to provide the needed accommodation.

**Assistive Devices** - We are committed to serving people with disabilities who use assistive devices to obtain, to use or benefit from our services. We will ensure that our staff members are trained and familiar with various assistive devices that may be used by people with disabilities while accessing our services.

**Billing** - We are committed to providing accessible invoices to all of our customers. For this reason, invoices will be provided in alternate formats upon request. We will answer any questions about the content of the invoice in person, by telephone or email, in accordance with our Privacy Policy.

**Accommodating Service Animals and Support Persons** - Pemco Steel welcomes people with disabilities who are accompanied by a guide dog or service animal on the parts of our premises that are open to the public and other third parties. We will also ensure that all staff dealing with customers, vendors, and visitors are properly trained in how to interact with people with disabilities who are accompanied by a guide dog or service animal.

We also welcome people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed access to our office with his or her support person. 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.

**Feedback** Pemco Steel will accept feedback from anyone who has any concern about the Accessibility Program. Feedback may be submitted in writing, by email, or by telephone to the Vice President Human Resources. Please direct your feedback to [anthonyfolan@pemcosteel.com](mailto:anthonyfolan@pemcosteel.com) or call (905) 846-3390.

**Availability of Documents** All documents relating to the Customer Service Standard of the Accessibility for Ontarians with Disabilities Act (AODA) will be made available upon request and in a format reasonably accommodating Disabilities. You may make a request in writing, by email or by telephone. Please address your request to [anthonyfolan@pemcosteel.com](mailto:anthonyfolan@pemcosteel.com) or call (905) 846-3390.

### ***Training***

We will provide training to all employees, and others who work with us and on our behalf, with a view to ensuring that they are familiar with our policies, practices and procedures

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for providing persons with disabilities with goods and services. This training will be provided to existing staff at the time this policy is implemented and for new staff when they commence their orientation.

Training will include the following:

- A review of the *Accessibility for Ontarians with Disabilities Act, 2005* and the requirements of the regulations and accessibility standards established under the Act;
- 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;
- How to locate and implement our office's policies, practices and procedures on accessibility standards;
- What to do if a person with a particular type of disability is having difficulty accessing our goods and services;