

IMPERIAL METAL SERVICES

Accessibility Policy & Multi-Year Accessibility Plan

Accessibility for Ontarians with Disabilities Act, 2005 (AODA)
Ontario Regulation 191/11 — Integrated Accessibility Standards Regulation (IASR)

Effective Date: May 2026
Next Scheduled Review: May 2031
Reviewed Annually | Updated at Minimum Every Five Years

1. Statement of Commitment

Imperial Metal Services (“IMS”) is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by preventing and removing barriers to accessibility and by meeting our accessibility requirements under the Accessibility for Ontarians with Disabilities Act, 2005 (“AODA”) and Ontario Regulation 191/11, the Integrated Accessibility Standards Regulation (“IASR”).

This commitment extends to all employees, applicants, customers, suppliers, contractors, visitors, and all other persons who interact with IMS, on site or off site. IMS ensures that all visitors and employees with a disability will be treated in a way that is consistent with the principles of independence, dignity, integration, and equal opportunity.

2. Purpose and Scope

The purpose of this Policy and Multi-Year Accessibility Plan is to outline the strategies, policies, and actions that IMS has put in place, and will put in place, to prevent and remove barriers to accessibility and to meet our obligations under the AODA and the IASR. This Plan covers the period of 2025–2030 and is reviewed annually.

This Policy and Plan applies to:

- All Imperial Metal Services employees, including full-time, part-time, temporary, and contract staff.
- All volunteers, agents, contractors, and third parties who deal with the public or other third parties on behalf of IMS.
- All persons who participate in developing IMS’s policies, procedures, and practices.
- All visitors, customers, suppliers, applicants, and members of the public who interact with IMS.

3. Definitions

Accessible Format: Includes, but is not limited to, large print, recorded audio and electronic formats, braille, and other formats usable by persons with disabilities.

Assistive Device: An auxiliary aid such as a communication aid, cognition aid, personal mobility aid, or medical aid (e.g., canes, crutches, wheelchairs, hearing aids) used by a person with a disability.

Barrier: Anything that prevents a person with a disability from fully participating in all aspects of society because of their disability, including a physical, architectural, information or communications, attitudinal, technological, or policy/practice barrier.

Communication Supports: Includes captioning, alternative and augmentative communication supports, plain language, sign language, and other supports that facilitate effective communication.

Disability: As defined by the AODA and the Ontario Human Rights Code, includes any degree of physical disability, mental impairment, developmental disability, learning disability, mental disorder, or injury for which benefits were claimed under the Workplace Safety and Insurance Act, 1997.

Service Animal: An animal that is readily identifiable as one used by a person for reasons relating to a disability, or for which the person provides documentation from a regulated health professional confirming that the animal is required for reasons relating to the disability.

Support Person: Another person who accompanies a person with a disability in order to help with communication, mobility, personal care, medical needs, or access to goods, services, or facilities.

4. Accessibility Policies (IASR s. 3)

IMS has developed, implemented, and maintains written policies governing how the organization achieves, or will achieve, accessibility through meeting its requirements under the IASR. These policies include a statement of organizational commitment to meeting the accessibility needs of persons with disabilities in a timely manner.

This Policy is publicly posted on our website at www.imperialms.ca and is available in an accessible format upon request, free of charge. To request this document in an alternative format, please contact the Accessibility Coordinator using the contact information provided in Section 16.

5. Customer Service Standard

5.1 Providing Goods and Services to Persons with Disabilities

IMS is committed to providing accessible customer service to people with various kinds of disabilities. We will communicate with people with disabilities in ways that take their disability into account and will train our staff to do the same.

5.2 Assistive Devices

Persons with disabilities are permitted to use their own assistive devices to access our goods, services, and facilities. Where a personal assistive device cannot reasonably be used due to health, safety, or operational reasons, IMS will consult with the individual to determine an appropriate alternative.

5.3 Service Animals

IMS welcomes persons with disabilities and their service animals. Service animals are permitted in all parts of our premises that are open to the public and other third parties. Where a service animal is excluded by law from a particular area, IMS will explain why and offer alternative means to access our services where possible.

5.4 Support Persons

A person with a disability who is accompanied by a support person will be allowed to have that support person with them at all times while on IMS premises that are open to the public. IMS does not charge a fee for admission of a support person.

5.5 Notice of Temporary Disruptions

In the event of a planned or unexpected disruption to services or facilities used by persons with disabilities, IMS will provide notice as soon as reasonably possible. The notice will include the reason for the disruption, its anticipated duration, and a description of alternative facilities or

services, if available. Notice will be posted at the affected location, on our website, or by another method that is reasonable in the circumstances.

6. Information and Communications Standard

6.1 Feedback Process (IASR s. 11)

IMS welcomes feedback on how we provide goods, services, and facilities to people with disabilities. Feedback helps us identify barriers and respond to concerns. Feedback may be provided in person, by telephone, in writing, by email, or by any other method reasonable in the circumstances.

All feedback will be directed to the Accessibility Coordinator and will be promptly acknowledged. Where contact information is provided, a substantive response will be issued within 30 days, in the same format as the feedback was received unless the individual requests otherwise. Accessible formats and communication supports will be provided on request, free of charge.

6.2 Accessible Formats and Communication Supports (IASR s. 12)

Upon request, IMS will provide, or arrange for the provision of, accessible formats and communication supports for persons with disabilities. This will be done:

- In a timely manner that takes into account the person's accessibility needs;
- At a cost no greater than the regular cost charged to other persons; and
- In consultation with the person making the request to determine the suitability of the format or support.

IMS notifies the public of the availability of accessible formats and communication supports through this Policy on our website and on our public-facing materials.

6.3 Emergency Procedures, Plans, and Public Safety Information (IASR s. 13)

Although IMS's emergency procedures are not made publicly available, any emergency procedures, plans, or public safety information that we do make available to the public will be provided in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

6.4 Accessible Websites and Web Content (IASR s. 14)

IMS is committed to making our public-facing website (www.imperialms.ca) and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, Level AA, in accordance with the schedule and exceptions set out in the IASR. We work with our marketing and IT functions to:

- Ensure new web content meets WCAG 2.0 Level AA at the time of publication;
- Review existing web content regularly and remediate accessibility barriers; and

- Train staff who publish or update web content on accessibility requirements.

7. Employment Standard

7.1 Recruitment, Assessment, and Selection (IASR ss. 22–23)

IMS notifies employees and the public about the availability of accommodation for applicants with disabilities during recruitment. A statement confirming the availability of accommodation is included on our website careers page and on all internal and external job postings.

When job applicants are individually selected to participate in an assessment or selection process, IMS notifies them that accommodations are available upon request in relation to the materials or processes to be used. Where a selected applicant requests accommodation, IMS consults with the applicant and provides or arranges for suitable accommodation that takes into account the applicant's accessibility needs due to disability.

7.2 Notice to Successful Applicants (IASR s. 24)

When making offers of employment, IMS notifies successful applicants of our policies for accommodating employees with disabilities. A statement to this effect is included in all offer letters.

7.3 Informing Employees of Supports (IASR s. 25)

IMS informs employees of our policies for supporting employees with disabilities, including policies on the provision of job accommodations. This information is included in the IMS Employee Handbook, which is provided to all new employees as soon as practicable after their start date, and is updated whenever there are changes to the relevant policies.

7.4 Accessible Formats and Communication Supports for Employees (IASR s. 26)

Where an employee with a disability requests it, IMS consults with the employee and provides, or arranges for the provision of, accessible formats and communication supports for:

- Information that the employee needs in order to perform their job; and
- Information that is generally available to employees in the workplace.

IMS consults with the employee making the request to determine the suitability of the accessible format or communication support.

7.5 Workplace Emergency Response Information (IASR s. 27)

IMS provides individualized workplace emergency response information to employees who have a disability where the disability is such that individualized information is necessary, and where IMS is aware of the need for accommodation. With the employee's consent, this information is also provided to the person designated by IMS to assist the employee in an emergency.

Individualized workplace emergency response information is reviewed when:

- The employee moves to a different location within the organization;
- The employee's overall accommodation needs or plans are reviewed; and
- IMS reviews its general emergency response policies.

Each department has designated personnel (including Fire Captains by bay and the Operations Manager) responsible for liaising with persons requiring assistance and ensuring safe evacuation.

7.6 Documented Individual Accommodation Plans (IASR s. 28)

IMS has a written process for the development of documented individual accommodation plans for employees with disabilities. The process includes:

- The manner in which an employee requesting accommodation can participate in the development of their plan;
- The means by which the employee is assessed on an individual basis;
- The manner in which IMS can request an evaluation by an outside medical or other expert, at IMS's expense, to assist in determining if and how accommodation can be achieved;
- The manner in which the employee can request the participation of a representative from their bargaining agent (where applicable) or another representative from the workplace, in the development of the accommodation plan;
- 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 manner in which this will be done;
- If an individual accommodation plan is denied, the manner in which the reasons for denial will be provided to the employee; and
- The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

7.7 Return-to-Work Process (IASR s. 29)

IMS has a documented return-to-work process for employees who have been absent from work due to a disability and who require disability-related accommodations to return to work. The process outlines the steps IMS will take to facilitate the return to work and uses individual documented accommodation plans, as described in Section 7.6, as part of the process. This process does not replace or override any other return-to-work process created by or under any other statute.

7.8 Performance Management, Career Development, and Redeployment (IASR ss. 30–32)

IMS takes into account the accessibility needs of employees with disabilities and their individual accommodation plans when:

- Conducting performance management;
- Providing career development and advancement opportunities; and
- Redeploying employees.

8. Design of Public Spaces Standard

When undertaking new construction or making major changes to public spaces under IMS's control, we will meet the accessibility requirements set out in the IASR Design of Public Spaces Standard. These requirements may apply to exterior paths of travel, accessible parking, service-related elements such as service counters, and waiting areas. Maintenance and restoration procedures for the accessible elements of public spaces are included in our facility management practices.

9. Training (IASR s. 7)

IMS provides training on the requirements of the accessibility standards referred to in the IASR and on the Ontario Human Rights Code as it pertains to persons with disabilities to:

- All employees and volunteers;
- All persons who participate in developing IMS's policies; and
- All other persons who provide goods, services, or facilities on behalf of IMS.

Training is provided as soon as practicable, and in any event within three (3) months of an individual's start date. Training is updated and re-delivered whenever there are changes to our accessibility policies. IMS maintains records of the training provided, including the dates and the number of individuals trained.

10. Procurement (IASR s. 5)

IMS incorporates accessibility criteria and features when procuring or acquiring goods, services, or facilities, except where it is not practicable to do so. Where it is not practicable, IMS will provide an explanation upon request.

11. Self-Service Kiosks (IASR s. 6)

IMS will have regard to the accessibility needs of persons with disabilities when designing, procuring, or acquiring self-service kiosks. Currently, IMS does not operate self-service kiosks; should that change, the requirements of this section will be applied.

12. Multi-Year Accessibility Plan (2025–2030)

This Multi-Year Plan sets out IMS’s strategy to prevent and remove barriers and to meet our obligations under the IASR. The Plan is posted on our website, is reviewed annually, and will be updated no less than every five years. It is available in an accessible format upon request.

12.1 Past Achievements (Initial Compliance Period)

Since the introduction of the AODA and IASR, IMS has completed the following key initiatives:

- Established and documented the IMS Accessibility Policy.
- Developed and posted this Multi-Year Accessibility Plan.
- Implemented accessibility training for all employees and new hires within three months of their start date.
- Established a documented process for receiving and responding to feedback.
- Implemented a written process for documented individual accommodation plans, return-to-work, and individualized workplace emergency response information.
- Updated the Employee Handbook to reflect AODA obligations and accommodation policies.
- Included accommodation statements in job postings, screening communications, and offer letters.
- Achieved WCAG 2.0 Level A on our public website, with Level AA as the active ongoing target.

12.2 Strategy and Action Plan by IASR Standard

The tables below set out the initiatives, IASR section references, descriptions of the action being taken, and the current status. Status legend: “Complete” = implemented and operating; “Ongoing” = continuous activity or under continuous review; “Planned” = scheduled future action.

Part 1 – General Requirements			
Initiative	IASR Section	Description / Action	Status
Accessibility Policies	s. 3	Develop, implement, and maintain written policies governing how IMS achieves accessibility under the IASR; include a statement of organizational commitment. Action: Policy drafted, posted on www.IMSmetal.com, and available in accessible format upon request. Reviewed annually by the Accessibility Coordinator.	Complete

Part 1 – General Requirements

Initiative	IASR Section	Description / Action	Status
Accessibility Plans	s. 4	<p>Establish, implement, maintain, and document a multi-year accessibility plan; post it on the website; provide it in an accessible format upon request; review and update at least every five years.</p> <p>Action: This Plan is posted on the IMS website; annual review by the Accessibility Coordinator; full review and update no less than every five years.</p>	Complete
Procurement of Goods, Services, and Facilities	s. 5	<p>Incorporate accessibility criteria and features when procuring goods, services, or facilities, except where not practicable.</p> <p>Action: Accessibility criteria embedded in procurement requests; explanations provided on request where not practicable.</p>	Ongoing
Self-Service Kiosks	s. 6	<p>Have regard to accessibility for persons with disabilities when designing, procuring, or acquiring self-service kiosks.</p> <p>Action: IMS does not currently operate self-service kiosks; requirement will be applied if circumstances change.</p>	Ongoing
Training	s. 7	<p>Provide training on the IASR and the Human Rights Code as it pertains to persons with disabilities to all employees, volunteers, persons developing policies, and other persons providing goods, services, or facilities on IMS's behalf.</p> <p>Action: Training delivered to all current staff; new hires trained within three months of start; refresher training provided when policies change; training records maintained by HR.</p>	Ongoing

Part 2 – Information and Communications Standards

Initiative	IASR Section	Description / Action	Status
Feedback Process	s. 11	Ensure that processes for receiving and responding to feedback are accessible to persons with	Complete

Part 2 – Information and Communications Standards			
Initiative	IASR Section	Description / Action	Status
		<p>disabilities, including by providing accessible formats and communication supports upon request.</p> <p>Action: Feedback received by telephone, email, or in writing; accessible alternatives provided on request; all feedback acknowledged and substantively responded to within 30 days where contact information is provided.</p>	
Accessible Formats and Communication Supports	s. 12	<p>Upon request, provide accessible formats and communication supports for persons with disabilities, in a timely manner, in consultation with the requester, and at no greater cost.</p> <p>Action: Accessibility Coordinator coordinates each request; suppliers and tools identified to deliver supports such as large print, audio, plain language, and electronic formats.</p>	Ongoing
Emergency Procedures, Plans, and Public Safety Information	s. 13	<p>Where emergency procedures, plans, or public safety information are made available to the public, provide them in an accessible format or with appropriate communication supports upon request.</p> <p>Action: IMS’s emergency procedures are not made publicly available; where they are shared with employees or visitors, accessible formats and communication supports are provided on request.</p>	Ongoing
Accessible Websites and Web Content	s. 14	<p>Ensure that public websites and web content conform with WCAG 2.0 Level AA, subject to the exceptions in the IASR.</p> <p>Action: Website currently meets WCAG 2.0 Level A; ongoing remediation toward full Level AA conformance; accessibility considered in all new content; live captions and pre-recorded audio descriptions are the only excluded criteria per the IASR.</p>	Ongoing

Part 3 – Employment Standards			
Initiative	IASR Section	Description / Action	Status
Recruitment – General	s. 22	<p>Notify employees and the public about the availability of accommodation for applicants with disabilities in the recruitment process.</p> <p>Action: Accommodation statement posted on the careers page of www.IMSmetal.com and included in all internal and external job postings.</p>	Complete
Recruitment, Assessment, and Selection	s. 23	<p>Notify applicants selected for assessment or selection that accommodations are available upon request; consult with applicants and provide suitable accommodations.</p> <p>Action: Accommodation statement included in all interview and screening confirmation emails; HR consults with each applicant who requests accommodation.</p>	Complete
Notice to Successful Applicants	s. 24	<p>When making offers of employment, notify successful applicants of policies for accommodating employees with disabilities.</p> <p>Action: Policy statement included in all offer letters; HR continues to monitor template compliance.</p>	Complete
Informing Employees of Supports	s. 25	<p>Inform employees of policies used to support employees with disabilities, including job accommodation policies; provide to new employees as soon as practicable; update employees when policies change.</p> <p>Action: Information included in the IMS Employee Handbook; handbook distributed to new hires during orientation and re-issued when material changes are made.</p>	Complete
Accessible Formats and Communication Supports for Employees	s. 26	<p>Upon request from an employee with a disability, provide accessible formats and communication supports for information needed to perform the job and information generally available to employees in the workplace.</p> <p>Action: HR and the Accessibility Coordinator review each request, consult with the employee, identify appropriate supports, and document outcomes.</p>	Ongoing

Part 3 – Employment Standards			
Initiative	IASR Section	Description / Action	Status
Workplace Emergency Response Information	s. 27	<p>Provide individualized workplace emergency response information to employees whose disability requires it; with consent, share with designated assistants; review when location, accommodation needs, or general emergency response policies change.</p> <p>Action: Designated personnel in each department (Operations Manager, Fire Captains by bay, JHSC members) coordinate individualized plans and evacuation procedures.</p>	Complete
Documented Individual Accommodation Plans	s. 28	<p>Develop and maintain a written process for documented individual accommodation plans, including employee participation, individual assessment, expert evaluation where needed, privacy protection, review frequency, denial reasoning, and accessible delivery of the plan.</p> <p>Action: Written process documented in the IMS AODA Accommodation Plan; reviewed by the Director of Health and Safety; revised as required.</p>	Complete
Return-to-Work Process	s. 29	<p>Develop and document a return-to-work process for employees absent due to disability who require accommodations to return; use individual accommodation plans as part of the process.</p> <p>Action: Return-to-work process documented in the IMS Health & Safety manual; reviewed and updated by EH&S and HR on a case-by-case basis.</p>	Complete
Performance Management	s. 30	<p>Take into account the accessibility needs and individual accommodation plans of employees with disabilities when conducting performance management.</p> <p>Action: Performance management process reviewed against each individual accommodation plan; managers receive guidance from HR.</p>	Complete
Career Development and Advancement	s. 31	<p>Take into account the accessibility needs and individual accommodation plans of employees with disabilities when providing career development and advancement.</p>	Ongoing

Part 3 – Employment Standards			
Initiative	IASR Section	Description / Action	Status
		Action: Career development reviews vetted against accommodation plans; training and development opportunities adjusted as needed.	
Redeployment	s. 32	Take into account the accessibility needs and individual accommodation plans of employees with disabilities during redeployment. Action: Redeployment decisions reviewed against accommodation plans by HR with the Director of Health and Safety.	Ongoing

Part 4 – Design of Public Spaces Standards			
Initiative	IASR Section	Description / Action	Status
Accessible Elements in Newly Built or Redeveloped Public Spaces	ss. 80.1–80.44	Meet IASR requirements for accessible parking, service-related elements, exterior paths of travel, and other public spaces under IMS’s control when newly constructed or redeveloped. Action: Accessibility considered in capital project planning; designs reviewed against IASR and the Ontario Building Code; consultation with the Joint Health & Safety Committee as appropriate.	Ongoing
Maintenance of Accessible Elements	s. 80.44	Maintain accessible parts of public spaces in working order; have procedures for preventive and emergency maintenance and for dealing with temporary disruptions. Action: Accessibility-related maintenance integrated into facility management routines; temporary disruptions communicated as set out in Section 5.5.	Ongoing

Ongoing Compliance and Reporting			
Initiative	IASR Section	Description / Action	Status
Accessibility Compliance Report	AODA Reporting	As a private-sector organization with 20 or more employees in Ontario, file an Accessibility Compliance Report with the Government of Ontario by each applicable deadline. Action: Accessibility Coordinator monitors deadlines (next private-sector deadline: December 31, 2026) and coordinates filing with HR and Health & Safety.	Ongoing
Annual Review of This Plan	Internal	Review this Policy and Multi-Year Accessibility Plan annually and update no less than every five years. Action: Annual review by the Accessibility Coordinator with input from HR, EH&S, IT, and the Joint Health & Safety Committee; revised document re-posted on www.IMSmetal.com .	Ongoing

13. Accessibility Coordinator

IMS has appointed an Accessibility Coordinator who provides primary oversight and guidance on the implementation of AODA accessibility standards. The Accessibility Coordinator works in conjunction with Human Resources, Health & Safety, Information Technology, and other members of the management team to:

- Oversee implementation of this Policy and the Multi-Year Plan;
- Coordinate responses to requests for accommodation and accessible formats;
- Prepare and file the AODA Accessibility Compliance Report;
- Review accessibility policies, practices, and procedures at least once every calendar year; and
- Address any other matters required to comply with the AODA.

14. Requesting Accommodation – Visitors and Employees

Requests for accommodation may be made by visitors, applicants, or employees and will be responded to in the same manner in which they were received. IMS will:

- Acknowledge receipt of the request promptly;
- Hold a meeting within forty-eight (48) hours of receiving a request with the Accessibility Coordinator, the Operations Manager, EH&S, and members of the Joint Health & Safety Committee as appropriate;
- Develop an individualized accommodation plan for the person concerned;
- Develop an individualized emergency evacuation plan where applicable; and
- Permit the use of personal assistive devices, service animals, and support persons in accordance with this Policy.

For visitors, the Plant Manager or designate will meet the visitor at the entrance and provide any additional assistance requested, including coordinating emergency evacuation procedures during the visit. For employees, the Plant Manager, the Health and Safety Co Ordinator, and the Fire Captain(s) of the bay in which the employee works will ensure that all accommodations are met and that all emergency procedures are executed where needed.

15. Feedback

IMS welcomes feedback from members of the public and from employees on the way we provide goods, services, and facilities to people with disabilities. Feedback helps us identify and remove barriers and respond to concerns. Feedback may be provided in person, by telephone, by email, in writing, or by any other method reasonable in the circumstances. We encourage feedback to include, where possible:

- The nature of the concern and a description of the experience;
- The date, time, and location of the event giving rise to the feedback;
- The names of any IMS personnel involved (if known); and
- Contact information for the person providing the feedback (optional).

All feedback is directed to the Accessibility Coordinator, who reviews the feedback together with relevant departments (including Human Resources and Health & Safety) and coordinates an appropriate response. Where contact information is provided, a substantive response will be provided within thirty (30) days, in the same format in which the feedback was received unless the individual requests otherwise. Accessible formats and communication supports are available on request.

16. Contact Information

For more information about this Policy and Multi-Year Accessibility Plan, to provide feedback, to request an accommodation, or to request this document or any related document in an accessible format, please contact:

Accessibility Coordinator

Imperial Metal Services

Attention: Ashley Koruna, Human Resources Manager

Telephone: (416) 744-9988

Email: Ashley.Koruna@imperialms.ca

Website: www.imperialms.ca

17. Review and Approval

This Accessibility Policy and Multi-Year Accessibility Plan is reviewed annually by the Accessibility Coordinator with input from Human Resources, Health & Safety, Information Technology, and the Joint Health & Safety Committee, and is updated no less than every five years.

Effective Date: May 2026

Last Reviewed: May 2026

Next Scheduled Review: May 2031

This document is available in an accessible format upon request, free of charge.