

TRENT METALS (2012) LIMITED HUMAN RESOURCES POLICIES

(AODA) MULTI-YEAR ACCESSIBILITY PLAN

PLAN OBJECTIVE:

The Multi Year Accessibility Plan for Trent Metals (2012) Limited, operating as TML Supply Company (TML), outlines and policies and actions that TML will put in place to improve opportunities for people with disabilities. **This plan will be reviewed annually for completion of targets and to address new legislative changes.**

COMMITMENT:

TML is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are 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 accessibility requirements under the Accessibility for Ontarians with Disabilities Act.

ACCESSIBLE EMERGENCY INFORMATION:

TML is committed to providing customers and clients with publicly available emergency information in an accessible way upon request. We will also provide employees with disabilities with individualized emergency response plan when necessary.

Branch	Target	Compliance
All new employees are informed that TML will provide individualized emergency response plan if required.	Part of Orientation	Upon hire
All customers/suppliers have access to contact methods in policy which is posted at all of our locations if they require individualized emergency response plans or information	Posted at all branches	Upon request

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TRAINING:

TML will continue to provide training to employees, volunteer and other staff members on Ontario's accessibility laws and on the Human Rights Code as it relates to people with disabilities. Training will be provided in a way that best suits the duties of employees, volunteers and other staff members. TML will take the following steps to ensure employees are provided with the training needed to meet Ontario's accessible Laws by January 1, 2015.

A) Travel to all branches to train all staff on AODA.

Branch	Target	Compliance
Peterborough	January 1, 2015	May 2/14
Richmond Hill	January 1, 2015	June 12/14
Sudbury	January 1, 2015	August 20/14
Ottawa	January 1, 2015	June, 11/14
Mississauga	January 1, 2015	June 12/14
SSM	January 1, 2015	August 19/14
Orillia	January 1, 2015	May 29/14
Barrie	January 1, 2015	May 29/14
London	January 1, 2015	Oct 2/14
Consolidated	January 1, 2015	May 30/14
St. Catharines – opened March 1, 2015	May 1, 2015	May 19, 2015
Belleville	June 29, 2017	September 1, 2017
Kitchener	June 1, 2021	
Pickering	June 1, 2021	

B) New/Promoted employee training

All new/promoted employees training provided to best suit new duties	Part of Orientation	Upon hire/promotion
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C) Legislative changes

Updates will be provided to all appropriate employees	legislation change date	
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INFORMATION AND COMMUNICATIONS:

- A) TML is committed to meeting the communication needs of people with disabilities. We will consult with people with disabilities to determine their information and communication needs as well as providing access for feedback to TML.

All Branches	Target	Compliance
All new employees informed that TML will provide individualized communication needs if required. TML is open to feedback about employment experiences by contacting Human Resources.	January 1, 2015 Part of Orientation	January 1, 2015 Upon hire or Upon request
All customers/suppliers – contact methods listed below, as well as being posted in our AODA policy posted at all branch locations if individualized communication needs are required	January 1, 2015	January 1, 2015 New Customers/Suppliers - Upon request
All customers/Suppliers – contact methods listed below, as well as being posted in our policy posted at all branch locations for feedback about our processes. Where possible, we will respond to complaints within two (2) weeks of the date that the complaint is received, as per our AODA policy. In certain circumstances we may be required to take more action to effectively address the complaint, in which case, the customer will receive an acknowledgement that the complaint has been received and we will respond to the complaint as soon as is practicable thereafter.	January 1, 2015	January 1, 2015 New Customers/Suppliers - Upon request

Request for alternate modes of communication or Feedback:

TML may be contacted in following ways:

- i) In person at any TML location
- ii) By telephone at 1-800-461-7610
- iii) In writing to: Trent Metals (2012) Limited
2040 Fisher Drive
Peterborough, ON
K9J 7B1
- iv) Electronically to dpsmith@tmlsupply.com

- B) TML will take the following steps to make sure all publically available information is made accessible upon request by January 1, 2016

All Branches	Target	Compliance
Wholesale Supplier information available in other formats if required	January 1, 2016	

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INFORMATION AND COMMUNICATIONS Continued:

C) TML will take the following steps to make all new websites and content on those sites conform to **WCAG 2.0, Level A** by January 1, 2014:

All Branches	Target	Compliance
New Summaire website to be compliant as per compliance report by website provider	January 1, 2014	November 2014
New Summaire website provider to address deficiencies addressed in their November compliance report	June , 2015	Website no longer available

Trent Metals will take the following steps to make all websites and content on those sites conform to **WCAG 2.0, Level AA** by January 1, 2021:

All Branches	Target	Compliance
New Summaire website provider to address deficiencies addressed in their November compliance report	June , 2015	December 29, 2017 Website no longer available
TML website will be updated from old original format to the new WCAG 2.0, Level AA	January 1, 2021	May 17, 2018

EMPLOYMENT

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TML is committed to fair and accessible employment practices.

- A) **Recruitment and Assessment process**
Job ads will contain a notification that if there is a physical, technological or other type of barrier that prevents a qualified person from applying or interviewing for a position with TML. We will make every reasonable effort to provide an alternative means of accommodation to the person with a disability as set out in our AODA policy.
- B) **Individual Accessibility Plans**
New employees are informed about TML commitment to providing individual accommodation plans, to the best of our ability, during the orientation process.
- C) **Return-to-work plans for injured workers**
Injured workers are informed about TML commitment to providing individual accommodation plans, during the orientation process and after an injury as per our Health and Safety Return-to-Work policies (E-130 and E-140).
- D) **Performance management and career development processes**
TML is committed to fair and accessible performance management and career development. If a qualified person identifies accessibility barriers in order to advance their career, TML will do their best to accommodate them by removing barriers or, to the extent possible, provide another way to access work or technology that takes into account the person's individual needs.
- E) **Identification of accessibility barriers**
If a person identifies legitimate accessibility barriers, TML will do their best to accommodate them by removing barriers or, to the extent possible, provide another way to access work, technology or services that take into account the person's individual needs

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DESIGN OF PUBLIC SPACES

TML will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces. Public spaces relevant to TML would include:

- Accessible off street parking
- Accessible building entrances
- Service-related elements like service counters and waiting areas
- Outdoor paths of travel, like sidewalks, ramps, stairs, curb ramps, rest or eating areas and accessible pedestrian signals
- **2021 Kitchener and Pickering location modifications will meet the AODA legislation requirements**

DISRUPTION OF SERVICES

TML will do its best to prevent service disruptions to its accessible parts of its public spaces. In the event of a service disruption, we will notify the public of the service disruption and alternatives available by posting our “Notice of temporary disruption” (see attached) at the entrance of the applicable premises and try to post the notice on our website as per our AODA policy.

FOR MORE INFORMATION

For more information about the Policy or for questions regarding TML’s Customer Service Related Policies for accessible customer service please contact:

Danielle Smith – 1-800-461-7610 or dpsmith@tmlsupply.com

DOCUMENTS AVAILABILITY AND FORMAT

This Policy shall be made available to any member of the public upon request. A copy will also be posted at information centers at all TML locations. TML will provide documents, or the information required to be provided under the Standard, to a person with a disability in a format that takes the person’s disability into account.

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NOTICE OF TEMPORARY DISRUPTION

LOCATION:

SERVICE THAT IS UNAVAILABLE:

ANTICIPATED DURATION OF
DISRUPTION:

REASON FOR DISRUPTION:

ALTERNATIVE FACILITY OR SERVICE, IF
AVAILABLE:

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POSTING

FEEDBACK PROCEDURE

Receiving Feedback

TML welcomes and appreciates feedback regarding how it delivers goods and services to persons with disabilities. Feedback can be provided in the following ways:

- i) In person at any TML location
- ii) By telephone at 1-800-461-7610
- iii) In writing to: Trent Metals (2012) Limited
2040 Fisher Drive
Peterborough, ON
K9J 7B1
- iv) Electronically to dpsmith@tmlsupply.com

Responding to Complaints

Where possible, we will respond to complaints within two (2) weeks of the date that the complaint is received. In certain circumstances we may be required to take more action to effectively address the complaint, in which case, the customer will receive an acknowledgement that the complaint has been received and we will respond to the complaint as soon as is practicable thereafter.