

MULTI-YEAR ACCESSIBILITY PLAN

PURPOSE

This Multi-Year Accessibility Plan (the “Accessibility Plan”) outlines the short and long-term strategies of **Gerdau Ameristeel Corporation** (“Gerdau” or the “Company”) to prevent and remove barriers, improve opportunities for people with disabilities, and otherwise meet the requirements of the *Accessibility for Ontarians with Disabilities Act, 2005* (the “AODA”).

This Accessibility Plan was most recently updated as of **November 26, 2025** and will be reviewed at least once every five (5) years.

STATEMENT OF COMMITMENT

Gerdau is committed to and guided by the core principles of equal and fair opportunity, integration, dignity and independence of all potential and current business partners as well as members of the public and supports the full inclusion of persons as set out under the *Human Rights Code* (the “Code”) and the AODA.

Gerdau has appointed its Human Resources Department to act as Accessibility Coordinators with the mandate of ensuring compliance with the Company’s obligations under the *Code* and the AODA. However, the Company also relies on all of its employees and partners to assist with maximizing accessibility within the Company by:

- Identifying potential barriers to accessibility in all premises owned or operated by the Company in Ontario, and proposing ways to remove them
- Participating in training
- Learning how to interact with persons with disabilities, including those who require the use of a support person or service animal
- Learning how to use existing accessibility devices

COMPLIANCE

By no later than **December 31st** of each calendar year, the Accessibility Coordinator (including his or her designates), will review the AODA, Regulations and Accessibility Standards to identify upcoming compliance obligations and establish a schedule for achieving and/or maintaining compliance within any requisite timelines.

The Accessibility Coordinators (including their designates), in conjunction with the Company’s management, human resources, health and safety, compliance, and other business partners, will regularly:

- Review the *Code* and AODA, regulations and accessibility standards with a

view to ensuring ongoing compliance;

- Review existing policies and strategies and evaluate their effectiveness at removing barriers to accessibility, making changes as needed;
- Identify new barriers to accessibility and develop and implement removal strategies;
- Evaluate the physical accessibility to all premises owned or operated by the Company in Ontario in which the Company does business to ensure barrier-free accessibility and prepare and remit to the Company a report detailing potential barriers to accessibility along with recommended strategies for minimizing or eliminating such barriers;
- Evaluate communication methods as well as the manner in which goods and services are provided to the public and other third parties to ensure barrier-free accessibility;
- Ensure all documents required by the *Code* and the *AODA*, regulations and standards are posted in appropriate locations and otherwise made available in accessible formats;
- Secure a certification of compliance from any business partner, including third party service providers, in respect of any *AODA* compliance obligation falling outside of the Accessibility Coordinator's area of influence; and
- Prepare and file any required accessibility compliance report(s).

EMPLOYMENT

The Company is committed to fair and accessible employment practices that are inclusive of persons with disabilities. To this end, the Accessibility Coordinators (including their designates) shall:

- Review the Company's recruitment, selection, hiring and onboarding processes to ensure compliance with the requirements of the *Employment Standards Act, 2000*, the *Code* and the *AODA*;
- Notify employees and the public of the availability of accommodation for applicants with disabilities during the recruitment and hiring process;
- Inform current and newly-hired employees of policies that support individuals with disabilities;
- Review the Company's performance management, career development and advancement, redeployment and return to work practices to ensure that the accessibility needs of employees are appropriately taken into account throughout when the Company is engaged in these processes;
- Review the Company's processes for preparing and providing individualized workplace emergency response information and documented individual

accommodation plans to ensure AODA compliance;

- Consult with management, human resources, and other business partners, as appropriate, to ensure that all employees with disabilities who have requested such support have been provided with accessible formats and communication supports for any information that is needed for the employee to perform his or her job and that is otherwise generally made available in the workplace; and
- Arrange for and/or provide necessary training on the *Code* and the AODA as it pertains to persons with disabilities, and ensure appropriate records are kept.

TRAINING

In accordance with the AODA, the Company will provide training to employees and other staff on the *Code* and the AODA as it relates to people with disabilities. Training will be provided in a way that best suits the duties of the employees and other staff.

This training will include instruction on the following:

- Purposes and requirements of the AODA, including the *Integrated Accessibility Standards Regulation* (Regulation 191/11) and all five (5) Accessibility Standards;
- Requirements of the *Code* as it pertains to persons with disabilities;
- How to interact and communicate with persons with various types of disabilities as well as those who use assistive devices, or require the assistance of a service animal or support person;
- How to use equipment or devices available from the Company that may help with the provision of goods or services to a person with a disability; and
- What to do if a person with a particular type of disability is having difficulty accessing the Company's goods or services.

The Company will take the following steps to ensure that it has a standardized training program in place to ensure employees and other staff are provided with the training needed to meet Ontario's accessible laws:

- Develop training materials on the AODA, the *Integrated Accessibility Standards Regulation* and the *Code*;
- Develop a process to maintain records of who has received training and the dates on which accessibility training took place;
- Develop a process whereby new employees will receive training as soon as practicable at the start of their employment;
- Provide the established training to all employees and other staff as appropriate to the duties of each person; and

- Audit the training material and the record keeping processes as necessary to ensure legislative compliance.

Training will take place as soon as practicable for all current affected employees and other staff of the Company.

WEBSITE / COMMUNICATIONS

The Accessibility Coordinators (including their designates) will consult with the Company's information technology and website support partners and will thereafter work to ensure that all websites that are directly controlled by the Company (directly or through a contractual relationship that allows for modification) and content on those sites posted after January 1, 2012 conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level AA, to the extent required by the AODA.

On an ongoing basis, the Accessibility Coordinators (including their designates), will also consult with the Company's human resources, legal, information technology and website support partners to ensure that:

- Existing feedback processes are accessible to persons with disabilities upon request;
- Any emergency procedures, plans and public safety information prepared by the Company which is made available to the public shall be provided in an accessible format, upon request; and
- All other publicly available information required by the AODA shall be posted on the Company's website and shall also be provided in an accessible format, upon request.

WORKPLACE EMERGENCY RESPONSE INFORMATION

Where the Company is aware that an employee has a disability and there is a need for accommodation, individualized workplace emergency response information will be provided to the employee as soon as practicable if such information is necessary given the nature of the employee's disability.

The Company is also committed to providing all customers and clients with publicly available emergency information in an accessible format, upon request.

DESIGN OF PUBLIC SPACES

The Company will ensure that all newly constructed or redeveloped public spaces owned or operated by the Company comply with the Design of Public Spaces

Standards as set out in the *Integrated Accessibility Standard Regulation*, including standards relating to (but not necessarily limited to) the following elements:

- Exterior paths of travel (outdoor sidewalks, walkways, ramps, stairs and curbs)
- Parking (number and type of accessible spaces, aisles and signage)
- Services (service counters, queuing guides and waiting areas)

The Company is committed to making every reasonable effort to provide persons with disabilities opportunities equal to others as it relates to accessible buildings and public spaces including adherence to the following:

- Common areas are kept free of obstacles to accessibility and that there is regular maintenance on elevators and automated door operators to ensure proper functioning;
- Regular inspections of offices and common areas are performed in accordance with the *Occupational Health and Safety Act* and with consideration to the needs of people with disabilities;
- Limited service disruptions that would restrict availability to accessible areas of its public spaces;
- In the event of a service disruption, the Company will notify the public of the service disruption and alternatives will be made available;
- All re-developed or newly constructed outdoor eating areas, sidewalks, walkways, ramps, stairs, service counters and waiting areas adhere to legislative requirements; and
- All newly constructed or redeveloped off-street parking provide:
 - Wider parking spaces for people who use mobility aids such as wheelchairs;
 - Standard-width parking spaces for people who use mobility assistive devices such as canes, crutches and walkers;
 - Access aisles to allow persons with disabilities to get in and out of their vehicles.

The Company will also develop procedures for preventative and emergency maintenance of the accessible elements in public spaces, as well as dealing with temporary disruptions when accessible elements in public spaces are not in working order.

In respect of any construction, renovation or redevelopment project entered into on or after **January 1, 2023**, the project lead or other appropriately responsible party shall certify, using the attached form, that the construction, renovation or redevelopment project has or will be designed and executed in compliance with the accessibility requirements of the AODA, including the Design of Public Spaces Standards. Such certification shall be provided to the Accessibility Coordinators:

- Prior to receiving final approval to commence any construction, renovation or redevelopment project affecting a public space in Ontario;
- Upon completion of any construction, renovation or redevelopment project affecting a public space in Ontario; and/or
- At any other time when requested by the Accessibility Coordinators (including their designate).

AVAILABILITY OF ACCESSIBILITY PLAN

This Accessibility Plan will be included on the Company's internal and external websites and will be posted in a conspicuous place on both. Copies of the Accessibility Plan will be provided in an accessible format, upon request. This Accessibility Plan will be reviewed and updated regularly, but no less than once every five (5) years.

FEEDBACK PROCESSES

The Company will regularly review its internal and external feedback processes (if any) to ensure they are accessible to people with disabilities.

MORE INFORMATION

For more information on this or any other accessibility policy, or to receive a copy of any of the policies or other documents or records required by the *AODA*, please contact the Company's Accessibility Coordinators at:

WhitbyHR@Gerdau.com

This Accessibility Plan will be made publicly available. Accessible formats of this document are also available for free, upon request.

Approved: November 26, 2025

Next Review: December 31, 2026