

Integrated Accessibility Standards: Tenaris Canada's Multi-Year Accessibility Plan to Prevent and Remove Barriers to Accessibility

The Accessibility for Ontarians with Disabilities Act, 2005

In 2005, the government of Ontario passed the *Accessibility for Ontarians with Disabilities Act, 2005*, S. O. 2005, c. 11 (the “Act” or the “AODA”), which requires that Ontario be an accessible province by 2025. On July 1, 2011, the Integrated Accessibility Standards, O. Reg. 191/11 came into force (“Integrated Accessibility Standards”). The regulation establishes standards to address barriers that persons with disabilities face in the areas of employment, information and communications, transportation and built environment. Tenaris’ Canadian entities (“Tenaris” or the “Company”) have obligations under the Integrated Accessibility Standards that come into effect on a rolling basis.

Tenaris is committed to meeting its obligations under the AODA and its regulations.

The Multi-Year Accessibility Plan

The goal of Tenaris’ Multi-Year Accessibility Plan (the “Plan”) is to provide the steps that implement Tenaris’ Integrated Accessibility Standards Policy and Commitment Statement. This document describes:

- how Tenaris will meet accessibility requirements within the Integrated Accessibility Standards’ mandatory timelines,
- how Tenaris will address current accessibility barriers in our organization, and
- how Tenaris will identify and remove future barriers.

The action steps are organized in chronological order in the table below. The different standards applicable to Tenaris and the dates on which compliance with each standard is required are identified. The table also provides information regarding Tenaris’ progress to date with respect to each standard. Over time, this document will be updated with information that reflects the practices and procedures that Tenaris has adopted throughout the compliance process required by the Integrated Accessibility Standards.

Tenaris is committed to reviewing the Plan at least once every five years.

| Applicable Integrated Accessibility Standard | Detailed Standard | Implementation Date | Actions | Status |
|--|---|---------------------|--|---------------------|
| Employment | Emergency Procedure, Plans or Public Safety Information – s. 13 | By January 1, 2012 | <p>Tenaris has emergency response procedures, plans and public safety information that it makes available to the public.</p> <p>Upon request, Tenaris provides or arranges for accessible formats and communication supports for persons with disabilities in a timely manner that takes into account each person’s accessibility needs due to disability and (if applicable) at a cost that is no more than the regular cost charged to other persons.</p> <p>Tenaris consults with the person making the request for an accessible format or communication support for the procedures, plans and public safety information when determining the suitability of an accessible format or communication support.</p> | Ongoing compliance. |
| Employment | Individualized Workplace Response Information – s. 27 | By January 1, 2012 | <p>Tenaris provides individualized workplace emergency response information to employees with disabilities where the disability is such that individualized information is necessary and Tenaris is aware of the need for accommodation.</p> <p>In the event that an employee who receives individualized workplace emergency response information requires assistance, Tenaris designates a person to provide assistance and, with the employee’s consent, Tenaris provides the workplace emergency response information to the person.</p> <p>Tenaris provides workplace emergency response information as soon as practicable after learning of the need for accommodation due to an employee’s disability.</p> <p>Tenaris reviews individualized workplace emergency</p> | Ongoing compliance. |

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| | | | response information, at minimum, whenever: <ul style="list-style-type: none"> • the employee moves to a different location within Tenaris, • the employee’s overall accommodation needs or plans are reviewed, or • Tenaris reviews its general emergency response policies. | |
| General Requirements under the IAS Regulation | Accessibility Policy – s. 3(1) | By January 1, 2014 | An Integrated Accessibility Standards Policy has been drafted and approved by Tenaris’ executive management team, and posted on its internal website. ¹ Additionally, upon request, Tenaris will provide or arrange for accessible formats and communication supports for the Policy for persons with disabilities in a timely manner that takes into account each person’s accessibility needs due to disability and (if applicable) at a cost that is no more than the regular cost charged to other persons. Tenaris will consult with the person making the request for an accessible format or communication support for the Policy when determining the suitability of an accessible format or communication support. | Ongoing compliance. |
| | Statement of Commitment – s. 3(2) | By January 1, 2014 | A Statement of Commitment has been drafted and approved by Tenaris’ executive management team and posted on its internal website. ² | Ongoing compliance. |

¹ Note: Tenaris will, by 2021, ensure that the Policy is posted in a format that conforms with WCAG 2.0 at Level AA, except with respect to success criteria 1.2.4 and 1.2.5 or where meeting the requirement is not practicable.

| Applicable Integrated Accessibility Standard | Detailed Standard | Implementation Date | Actions | Status |
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| | | | <p>Additionally, upon request, Tenaris will provide or arrange for accessible formats and communication supports for the Statement of Commitment for persons with disabilities in a timely manner that takes into account each person’s accessibility needs due to disability and (if applicable) at a cost that is no more than the regular cost charged to other persons.</p> <p>Tenaris will consult with the person making the request for an accessible format or communication support for the Statement of Commitment when determining the suitability of an accessible format or communication support.</p> | |
| | Multi-Year Accessibility Plan – s. 4 | By January 1, 2014 | <p>This document, the Multi-Year Accessibility Plan (the “Plan”), has been developed and approved by the executive management team, with input from applicable departments on an as needed basis.</p> <p>The Plan has been posted on the website in an accessible format that conforms with, at minimum, WCAG 2.0 Level A.³</p> <p>The Plan will be reviewed and updated at least once every five years.</p> <p>Additionally, upon request, Tenaris will provide or arrange for accessible formats and communication</p> | Ongoing compliance. |

² Note: Tenaris will, by 2021, ensure that the Statement of Commitment is posted in a format that conforms with WCAG 2.0 at Level AA, except with respect to success criteria 1.2.4 and 1.2.5 or where meeting the requirement is not practicable.

³ Note: Tenaris will, by 2021, ensure that the Multi-Year Accessibility Plan is posted in a format that conforms with WCAG 2.0 at Level AA, except with respect to success criteria 1.2.4 and 1.2.5 or where meeting the requirement is not practicable.

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| | | | <p>supports for the Plan for persons with disabilities in a timely manner that takes into account each person’s accessibility needs due to disability and (if applicable) at a cost that is no more than the regular cost charged to other persons.</p> <p>Tenaris will consult with the person making the request for an accessible format or communication support for the Plan when determining the suitability of an accessible format or communication support.</p> <p>Finally, prior to the Design of Public Spaces Requirements come into effect under the Integrated Accessibility Standards, Tenaris will ensure that its Plan is updated to include the items required under the Maintenance Standard (s. 80.44).</p> | |
| | Self-service kiosks – s. 6 | By January 1, 2014 | Although Tenaris currently does not use self-service kiosks, Tenaris will have regard to the accessibility for persons with disabilities should it design, procure or acquire self-service kiosks by considering what accessibility features could be built into kiosks to best meet the needs of our customers and clients. | Currently not applicable. |
| Information & Communication Standard | Accessible websites & web content – s. 14(4) | By January 1, 2014 | Tenaris will ensure that new internet websites, including web content on those sites (that Tenaris controls directly or through a contractual relationship that allows Tenaris to modify the content), conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 at Level A. ⁴ | Ongoing compliance. |

⁴ Note: As reflected in the chart below, Tenaris will, by 2021, ensure that its websites, including web content on those sites (that Tenaris controls directly or through a contractual relationship that allows Tenaris to modify the content) conform with WCAG 2.0 at Level AA, except with respect to success criteria 1.2.4 and 1.2.5 or where meeting the requirement is not practicable.

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| General Requirements | Training – s. 7 | By January 1, 2015 | <p>Tenaris will provide training to:</p> <ul style="list-style-type: none"> • all of its employees and volunteers, • all persons who participate in developing Tenaris’ policies, and • all other persons who provide goods, services or facilities on behalf of Tenaris <p>on the requirements of the accessibility standards referred to in the Integrated Accessibility Standards and continue to provide training on the <i>Human Rights Code</i> (Ontario) as it pertains to persons with disabilities. Training will be provided as soon as practicable. Training will also be included as part of Orientation for all new hires.</p> <p>The training provided will take into consideration and be appropriate to the duties of those receiving the training.</p> <p>Tenaris will provide training, on an ongoing basis, with respect to changes made to the Integrated Accessibility Policy and Commitment Statement.</p> <p>Records of the training provided will be maintained and will include: (i) the dates on which training was provided and (ii) the number of individuals to whom training is provided.</p> | Ongoing compliance. |
| Information & Communication | Feedback – s. 11 | By January 1, 2015 | <p>Tenaris will ensure that its processes for receiving and responding to feedback are accessible to persons with disabilities by, upon request, providing or arranging for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account each person’s accessibility needs due to disability and (if applicable) at a cost that is no</p> | Ongoing compliance. |

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| | | | <p>more than the regular cost charged to other persons.</p> <p>Tenaris will consult with the person making the request for an accessible format or communication support when determining the suitability of an accessible format or communication support.</p> <p>The processes that Tenaris develops to meet its feedback obligations under the Integrated Accessibility Standards will be complementary to, and will not detract from, the feedback processes Tenaris has developed in accordance with the Customer Service Standards.</p> | |
| Employment Standard | Recruitment – ss. 22 -24 | By January 1, 2016 | <p>In our recruitment processes, Tenaris will advise our employees and the public about the availability of accommodation for applicants with disabilities.</p> <p>Tenaris will notify job applicants, when they are individually selected to participate further in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.</p> <p>If a selected job applicant requests accommodation, Tenaris will consult with the individual and provide or arrange for the provision of suitable accommodation that takes into account the applicant’s disability-related needs.</p> <p>When making offers of employment, Tenaris will notify successful applicants of our policies for accommodating employees with disabilities.</p> | Tenaris is in the preliminary planning stages. |
| | Information for employees regarding supports – s. 25 & 26 | By January 1, 2016 | Tenaris will notify our employees of Tenaris’ policies (and any updates to those policies) for supporting employees with disabilities, including (at minimum) our policies regarding the provision of job accommodations that take | Tenaris is in the preliminary planning stages. |

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| | | | <p>into account an employee’s accessibility needs due to disability.</p> <p>This information will be provided to new hires as soon as practicable after they commence employment.</p> <p>If an employee with a disability asks for information in an accessible format or to receive communication supports, Tenaris will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that the employee needs to perform his/her job, as well as information that is generally available to other employees.</p> <p>In determining the suitability of an accessible format or communication support, Tenaris will consult with the employee making the request.</p> | |
| | <p>Documented Individual Accommodation Plans – s. 28</p> | <p>By January 1, 2016</p> | <p>Tenaris will develop and maintain a written process for the development of documented individual accommodation plans for employees with disabilities.</p> <p>The process for the development of documented individual accommodation plans will include the following elements:</p> <ol style="list-style-type: none"> 1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. 2. The means by which the employee is assessed on an individual basis. 3. The manner in which Tenaris can request an evaluation by an outside medical or other expert, at Tenaris’ expense, to assist Tenaris in determining if accommodation can be achieved and, if so, how accommodation can be achieved. | <p>Tenaris is in the preliminary planning stages.</p> |

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| | | | <p>4. The manner in which the employee can request the participation of a representative from the workplace in the development of the accommodation plan.</p> <p>5. The steps taken to protect the privacy of the employee’s personal information.</p> <p>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> <p>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>8. The means of providing the individual accommodation plan in a format that takes into account the employee’s accessibility needs due to disability.</p> <p>If requested, information regarding accessible formats and communication supports provided will also be included in individual accommodation plans, in accordance with the Accessible Formats and Communication Supports for Employees Standard (s. 26).</p> <p>Additionally, the plans will include individualized workplace emergency response information (where required) and will identify any other accommodation that is to be provided, in accordance with the Workplace Emergency Response Information Standard (s. 27).</p> <p>Finally, individual accommodation plans will identify any other accommodation that is to be provided.</p> | |
| | Return to Work Process – s. 29 | By January 1, 2016 | Tenaris will develop and maintain a documented return to work process for its employees who have been absent from work due to a disability and who require disability- | Tenaris is in the preliminary planning stages. |

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| | | | <p>related accommodations in order to return to work.</p> <p>The return to work process will, as part of the process, outline the steps that Tenaris will take to facilitate the return to work and will include documented individual accommodation plans.</p> <p>Tenaris notes that this return to work process will not replace or override any other return to work process created by or under any other statute (for example, <i>the Workplace Safety Insurance Act, 1997</i>).</p> | |
| | <p>Performance Management (s. 30), Career Development and Advancement (s. 31), and Redeployment (s. 32)</p> | <p>By January 1, 2016</p> | <p>Tenaris will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.</p> | <p>Tenaris is in the preliminary planning stages.</p> |
| <p>Information & Communication</p> | <p>Accessible formats and communication supports – s. 12</p> | <p>By January 1, 2016</p> | <p>Upon request, Tenaris will provide or arrange for accessible formats and communication supports for persons with disabilities in a timely manner that takes into account each person’s accessibility needs due to disability and at a cost that is no more than the regular cost charged to other persons.</p> <p>Tenaris will consult with the person making the request for accessible formats or communication support when determining the suitability of an accessible format or communication support.</p> <p>Tenaris will advise the public about the availability of accessible formats and communication supports through a</p> | <p>Tenaris is in the preliminary planning stages.</p> |

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| | | | notification on our company website. | |
| Design of Public Spaces | Outdoor Public Use Eating Areas – ss. 80.16 and 80.17 | By January 1, 2017 | Tenaris will adhere to the general obligations and technical requirements of the Integrated Accessibility Standards when we construct new or redevelop outdoor public use eating areas that we intend to maintain. | Tenaris is in the preliminary planning stages. |
| | Exterior Paths of Travel – ss. 80.21 - 80.31 | By January 1, 2017 | Tenaris will adhere to the general obligations and technical requirements of the Integrated Accessibility Standards when we construct new or redevelop exterior paths of travel that we intend to maintain (including ramps, stairs, curb ramps, depressed curbs, pedestrian signals and rest areas) that are intended to serve a functional purpose, subject to applicable exceptions and limitations as contemplated by the Integrated Accessibility Standards. | Tenaris is in the preliminary planning stages. |
| | Accessible Parking – ss. 80.32 - 80.39 | By January 1, 2017 | Tenaris will adhere to the general obligations and technical requirements of the Integrated Accessibility Standards when we construct new or redevelop off-street parking facilities that we intend to maintain, subject to applicable exceptions and limitations as contemplated by the Integrated Accessibility Standards. | Tenaris is in the preliminary planning stages. |
| | Obtaining Services – ss. 80.40 - 80.43 | By January 1, 2017 | Tenaris will adhere to the general obligations and technical requirements of the Integrated Accessibility Standards when we construct new or redevelop service counters, fixed queuing guides and waiting areas. | Tenaris is in the preliminary planning stages. |
| | Maintenance – s. 80.44 | By January 1, 2017 | Prior to the Design of Public Spaces Requirements come into effect under the Integrated Accessibility Standards, Tenaris will ensure that its multi-year accessibility plan is updated to include: 1. Procedures for preventative and emergency | Tenaris is in the preliminary planning stages. |

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| | | | <p>maintenance of the accessible elements in Tenaris' public spaces that are governed by the Integrated Accessibility Standards.</p> <p>2. Procedures for dealing with temporary disruptions when accessible elements in Tenaris' public spaces that are governed by the Integrated Accessibility Standards are not in working order.</p> | |
| Information & Communication | Accessible websites and web content | By January 1, 2021 | Tenaris will ensure that its websites, including web content on those sites (that Tenaris controls directly or through a contractual relationship that allows Tenaris to modify the content), conform with the WCAG 2.0 at Level AA, except with respect to success criteria 1.2.4 (captions (live)) and 1.2.5 (pre-recorded audio descriptions) or where meeting the requirement is not practicable. | In progress ⁵ . |
| Full Accessibility | | By January 1, 2025 | This is the date by which the development, implementation and enforcement of accessibility standards is contemplated by the AODA in order to achieve accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises. Tenaris will ensure compliance with its obligations under the AODA and its regulations by this date. | In progress. |

⁵ Tenaris is in the process of reviewing its website and content with its hosting agencies in order to determine the changes required to make its new websites and content WCAG 2.0 Level A compliant.

Information Availability

Copies of the Tenaris Accessibility for Ontarians with Disabilities Act: Customer Service Standard and the Integrated Accessibility Standards Policy & Commitment Statement are available in an accessible format upon request. Requests or questions may be submitted to <mailto:AODA@tenaris.com>