

Integrated Standards – Statement of Commitment Policy and Plan Policy



Executive Summary	
Process	HR
Sub-process	
Process owner	Bridget Bremner
Purpose	This Policy Statement applies to Trench Limited to provide the guidelines to support those with disabilities and their support persons on Trench Limited property in Canada.
Scope	This policy applies to all operations and facilities of Trench Limited in Canada.
Target group and distribution	All Trench Limited employees in Canada.

Release Information		
Released	2026-03-04	For Version History, see last page
Reviewed	Selim Hostut	
Author	Bridget Bremner	
Valid from	Date of Release	

Approval			
Name, Title	Signature	Name, Title	Signature
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Bridget Bremner HR Director – Trench Limited		Name Title	

Document ID				
Scope	Process	Document type	Record ID	Language
TC	HR	Policy Statement (PS)	010	en

Related documents		
Document ID	Title	Link
HR-PR-002	Individual Accommodation Plan and Return to Work Process	
HR-F-001	Accommodation Plan Form	

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1. Applicability

This policy and plan formalizes the commitment of Trench Limited, to accessibility, and outlines those steps that Trench Limited will take to remove barriers and improve opportunities for people with disabilities in Ontario, Canada through compliance with Ontario’s Integrated Accessibility Standards Regulation (the “Integrated Standard”).

2. Statement of Commitment

Trench Limited is committed to excellence in serving all employees and customers, including people with disabilities. Trench Limited will strive to ensure that policies and procedures established with respect to the provisions of its goods and services to persons with disabilities are consistent with the principles of dignity, independence, integration and equal opportunity, as provided in the Accessibilities for Ontarians with Disabilities Act, 2005 (“AODA”). We are also committed to giving people with disabilities the same opportunity to get involved with our organization and allowing people with disabilities to benefit from the organization in the same place and in a similar way as other customers. Trench Limited will continue to attempt to meet the needs of all its customers, including but not limited to persons with disabilities, in an effective and timely manner.

3. Policy and Plan

3.1 Training and Record Keeping

3.1.1 Trench Limited provides training on the requirements of the Integrated Standard and on the Ontario Human Rights Code as it relates to people with disabilities. Trench Limited takes steps to ensure that training is provided to all of our employees, volunteers and those persons who develop our policies and provide goods, services or facilities on our behalf, including by:

- Integrating training materials that address the requirements of the Integrated Standard, including information about achieving certain accessibility standards and on the disability-related regulations obligations under the Human Rights Code;
- Reviewing the duties of those individuals that require training, and tailoring the training to be appropriate for such duties;

- Scheduling the training such that it is delivered as soon as practicable, including ensuring that new employees are trained as soon as practicable after being hired and that employees are trained when the Company's accessibility policies materially change;
- Delivering the training via a method that is appropriate for the audience and the needs of Trench Limited; and
- Keeping a record detailing those employees that were trained and when.

3.2 Self-Service Kiosks

3.2.1 Trench Limited will give regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.

3.3 Information and Communication

3.3.1 Trench Limited is committed to meeting the communication needs of people with disabilities.

3.3.2 Trench Limited ensures that our existing processes for receiving and responding to feedback are accessible to people with disabilities upon request by:

- Providing multiple methods for feedback, such as in writing or via email, telephone or in person; and
- Considering and implementing, as appropriate, those accessible formats or communication supports required elsewhere in the Integrated Standard.

3.3.3 Trench Limited ensures that, upon request, it will provide or arrange for the provision of publicly available information that is in respect of our goods, services or facilities in an accessible format and at a cost that is not more than that charged to others by:

- Consulting with the person making the request to determine the most appropriate accessible format or communication support, given the needs of the person, whether the content is convertible and within Trench Limited's capability;
- Providing the accessible format or communication support in a timely manner and at no additional cost; and
- Notifying the public about the availability of accessible formats and communication supports.

3.3.4 Trench Limited is reviewing on an ongoing basis to ensure that any applicable website is compliant with the requirements of AODA.

3.3.5 Trench Limited generally does not make its emergency procedures, plans or public safety information public. However, if the Company does so in the future, it will provide such information in an accessible way, as soon as practicable upon request.

3.3.6 On an ongoing basis Trench Limited with review to ensure that any applicable website is compliant with the requirements of the Accessibility for Ontarians with Disabilities Act (AODA).

3.3.7 Additionally, in the event of a planned or unexpected disruption in the facilities' services usually used by people with disabilities, including any accessible elements in public spaces, Trench Limited will provide notice of the disruption (including the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if any, that are available) by posting a notice at a conspicuous place on the premises owned or operated by Trench Limited or by such other method(s) as are reasonable in the circumstances.

3.4 Employment

3.4.1 Trench Limited is committed to fair and accessible employment practices. Currently, Trench Limited:

- Notifies the public and our staff that we will make reasonable accommodations for people with disabilities during the recruitment process, either through our website, via a recruiter or the applicable job posting, as applicable;
- Notifies job applicants, when they are individually selected to participate in an assessment or selection process, that reasonable accommodations are available upon request in relation to the materials or processes to be utilized;
- Consults with job applicants who request accommodation to support them through the recruitment, selection and/or assessment process and take into account their needs, so that the accommodations provided are effective; and
- Notifies the successful applicant of Trench Limited's policies for reasonably accommodating our employees with disabilities.

3.4.2 Currently, Trench Limited provides individualized workplace emergency response information to our employees with disabilities, if any, if the disability is such that the individualized information is necessary, and Trench Limited is aware of the need for reasonable accommodation. If an employee has a disability and may need help during an emergency, the employee should contact Human Resources.

3.4.3 Trench Limited has developed and put in place a process for the creation of individual accommodation plans for those employees that have been absent from work due to a disability. See Exhibit A. This process was implemented by:

- Considering how employees with disabilities will participate in the development of their accommodation plan and what the plans may include;
- Establishing where the plans will be stored and what steps will be taken to protect the privacy of employee information; and

- Determining when and how the individual accommodation plans will be reviewed and updated.
- 3.4.4 Trench Limited has developed and put in place a documented return to work process for those employees that have been absent from work due to a disability and require reasonable disability-related accommodation in order to return to work. This process outlines the steps that Trench Limited will take to facilitate the return to work of the applicable employees and the use of individual documented accommodation plans. See Exhibit A.
- 3.4.5 Trench Limited ensures, and will ensure, that it takes into account the accessibility needs of employees with disabilities (as well as their individual accommodation plans) when implementing its performance management process. This has been, and will be, achieved by:
- Reviewing an individual's accommodation plan to understand their needs and determine whether it should be adjusted to improve job performance;
 - Providing performance-management related documents in accessible formats; and
 - Providing informal and formal coaching and feedback in a manner that takes in account an employee's disability.
- 3.4.6 Trench Limited takes into account the accessibility needs of its employees with disabilities (as well as their individual accommodation plans) when providing career development, advancement, or redeployment. This occurs through the consideration of what reasonable accommodations employees with disabilities may need to succeed elsewhere within our organization, to take on new responsibilities in a current role, or when redeployment has become necessary.

3.5 Design of Public Spaces

- 3.5.1 Trench Limited may from time to time in Ontario, Canada develop or redevelop certain public spaces, as defined in the Design of Public Spaces Standard. Should it choose to do so, such development (or redevelopment) will be performed in accordance with applicable law. Further, Trench Limited has in place preventative and emergency maintenance procedures with respect to accessible elements, including any in public spaces.

3.6 Going Forward

- 3.6.1 For more information on this accessibility policy and plan, please contact Trench Limited's Human Resources Department:
- In person at 71 Maybrook Drive, Scarborough Ontario M1V 4B6 or 1865 Clements Road, Pickering Ontario L1W 3R8
 - By Telephone at 1 + 416-298-8108

- By e-mail at TC@trench-group.com
 - In writing by completing the feedback form below through the Trench Group Global Website.
- 3.6.2 Accessible formats of this document are available free upon request made to Trench Limited's Human Resources department. This document is also posted on the Trench Group Global website.
- 3.6.3 Any questions regarding this policy and plan, or its associated practices or procedures, should be submitted through the feedback process identified above.

4. Exhibit A

Individual Accommodation Plan and Return to Work Process

1. If an employee requires a disability-related accommodation (including in the event the employee is requesting an accommodation to return to work after a leave), the employee must call Human Resources to discuss potential reasonable accommodations.
2. When contacted by an employee who requires a disability-related accommodation, Human Resources will aim to accommodate the employee as reasonably as possible by:
 - Contacting the employee to discuss proposed accommodations (the employee requesting accommodation can participate in the development of any individual plan of accommodation by phone, in writing or by email);
 - Consulting with the employee and the employee's managers as necessary, to assess the employee's accommodation needs on an individual basis;
 - Notifying the employee in the event Trench Limited elects to exercise its right to request an evaluation by an outside medical or other expert, at the Company's expense, to determine how reasonable accommodation can be achieved;
 - Keeping the employee's personal information confidential in accordance with Trench Limited's policies and practices, including by restricting access to the employee's personnel files through both physical and technological means;
 - Providing any individual accommodation plan in an accessible format;
 - If requested or required, including in a plan of accommodation: (a) information regarding accessible formats and communication supports provided, (b) individualized workplace emergency response information and (c) any other accommodation measures provided
 - Upon the employee's request, reviewing and updating any accommodation plan will be reviewed and updated; and
 - Notifying the employee by phone or email if an accommodation plan is denied and why.

3. Trench Limited will also take into account any accessibility needs of an employee who has notified the Company of their disabilities (and any applicable individual accommodation plan) when conducting any performance management or career development process.

Change History

History of changes		
Version / Date	Changes	Cancels or replaces
V 0.0 / 2026-03-04	Initial Release	n/a