


CORPORATE POLICY

Diversity, Equity and Inclusion Policy

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Originating Department: Human Resources	
Approved by: Michael Garcia	Signature: 

A. Introduction

We value diversity and strive to create and foster an inclusive environment that encourages its members to bring their whole selves to the workplace, including their unique passions, skills, perspectives, backgrounds, convictions, and interests. This policy is one way in which we are seeking to create an environment where our employees can attend work without feeling as though certain aspects of their personality and identity must be kept private for fear of criticism, harassment, or stigmatization within our organization.

B. Rationale

Algoma Steel recognizes providing an environment rich in Diversity, Equity and Inclusion, strengthens our business, enhances our culture and enriches the relationships we have with our employees, our customers, our suppliers and our community.

C. Organizational Responsibilities

1.1. Algoma's Responsibilities and Commitments:

This policy should be read in conjunction with any specific diversity and inclusion initiatives specific to parts of our business. The context for each part of our business is different and initiatives therein reflect these differences. The policy sets out a number of general commitments to which all parts of our business are committed.

1.2. Departmental and Mill Responsibilities:

- To actively support diversity and inclusion and to ensure that all our people are valued and treated with dignity and respect.
- To strive continually to provide people with a working environment that is free from discrimination.

- To ensure officers, managers and supervisors work in partnership with their people to create and sustain an inclusive working environment where everyone's unique contribution is valued.
- To ensure that decisions affecting employment, learning and development, promotion and career development are based on an individual's ability and reflect genuine role requirements.
- To comply with relevant legislation by requiring all people to meet the minimum standards of behaviour and conduct in relation to how they treat their colleagues and other people they have contact with as part of their work.
- Ensure all systemic barriers to diversity and inclusion are addressed and removed.
- To regularly review the policy and its practical application and make any improvements that may be required to ensure discriminatory practices are being identified and eliminated in the organization.
- To provide everyone with the appropriate information, via this policy, on diversity and inclusion in the workplace as well as to provide diversity and inclusion training for all our people.
- To accommodate the needs of people with disabilities.
- To ensure all internal publications and material reflect, in the language and images, the diverse, inclusive, and equitable organization we wish to create and foster.

1.3. Employee Responsibilities:

- To become familiar with this policy and to act in accordance with Algoma's commitment to diversity and inclusion at all times.
- To treat everyone with respect, not to discriminate against colleagues and other people they have contact with as part of their work and help to create an environment that is free from discrimination and/or harassment of any kind.
- To recognize potential sources of unconscious bias and consider how those biases may be impacting their judgement and responses to or attitudes towards their colleagues;
- To be sensitive to the potential impact of their behaviour on colleagues, clients, visitors, suppliers and contractors.
- To work collaboratively with each other to create and sustain an inclusive working environment in which everyone's unique contribution is valued and any discriminatory practices and/or harassment that is identified is eliminated.

D. Organizational Commitments:

1.4. Recruit and Select

Algoma endeavours to attract applications from all sections of society and we strive to reflect the diversity of the community in which we operate. We will ensure fair treatment through the recruitment free from bias or inequalities. This includes:

- Ensuring that job statements are relevant and non-discriminatory.
- Ensuring that the wording and images used in job advertisements reflect and appeal to all sections of society.
- Objectively matching candidates to opportunities based on skills and qualifications.
- Asking fair, objective and consistent competency based questions at interview.
- Where it is possible to do so, monitoring recruitment and selection to ensure equality of opportunity throughout the process and taking steps to eliminate any discriminatory practices.
- Where we recruit people from, where we advertise, to make sure we are providing the opportunity to apply to all sections of society.

1.5. Promote and Develop

Decisions in respect of promotions and career development focus on skills and talents rather than assumptions based on gender, race, nationality, age, religion, belief, ability or disability, gender identity, gender expression, marriage or sexual orientation.

1.6. Fairly Manage Employee Performance

Evaluations and reports on performance will be based solely on evidence, not on stereotypes and assumptions about the characteristics of any group of people. Assessments will be made on objective measures of performance, contribution and competence.

1.7. Grow and Develop

The role of learning and development is to improve performance, to develop skills and to prepare individuals for other roles and responsibilities. As with promotion and career development, decisions in respect of learning and development will be based on individual development needs and not on gender, race, nationality, age, religion, belief, ability or disability, gender identity, gender expression, marriage or sexual orientation. Where possible a range of learning and development options will be used, such as e-learning, to ensure that everyone has equal access irrespective of disability, location or hours of work. Learning and development material will aim to reflect, in the language and images, the diversity of our people.

1.8. Compensation and Benefits

Decisions in respect of compensation and benefits will not be based on assumptions of gender, race, nationality, age, religion, belief, ability or disability, gender identity, gender expression, marriage or sexual orientation.

1.9. Monitor and Improve

To inform our strategy and to identify any inequalities, where we can legally do so, we will collect, on a voluntary basis, individual personal information on the diversity of potential recruits and existing people. We encourage all people to provide this data when requested.

1.10. Speak Up

All our members have the right to be treated with dignity and respect and to work in an environment where they can feel confident to raise concerns they may have regarding gaps in our organization's efforts to provide for an inclusive, equitable, and diverse workplace. Should anyone believe they are experiencing discrimination, bullying, or harassment, we strongly urge them to raise these concerns with their supervisor, manager or their People & Culture Business Partner ("BP"). All concerns will be taken seriously and BP's

will work with people to investigate these as quickly as possible, with sensitivity and in accordance with the Workplace Violence, Harassment & Sexual Harassment Prevention Program.

1.11. Gender, Ethnicity, Sexual Identity, Race and Culture

We are committed to improving the representation within Algoma of people of all genders, ethnicity, sexual identity and race in order that Algoma can better reflect the representation of these groups within our community.

1.12. Disability

Our aspiration is to be a disability confident organization. We aim to offer a workplace and a culture that allows people with disabilities to flourish.

E. Policy Ownership

This policy is owned by the Chief Executive Officer and will be reviewed every year to ensure that it remains up to date and reflects the needs of Algoma as a whole. The policy may also be reviewed if legislation changes or it is agreed that we will revise our policy or practices.

F. Greater Right and Benefit

In the event of any legislative or regulatory changes that confer a greater right or benefit on persons within the scope of this policy, Algoma shall comply with that greater right or benefit.