



**THIS DOCUMENT APPLIES TO DMC MINING SERVICES
IN THE PROVINCE OF ONTARIO, CANADA.**

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES (AODA)

MULTI-YEAR ACCESSIBILITY PLAN AND COMPANY POLICY



For over 35 years, DMC Mining Services has been a leading provider of mining services and solutions. Our focus is on applying the expertise of our employees to attractive projects while pledging to deliver leading technology and an overriding commitment to safe practices.

DMC Mining Services is a subsidiary of FNX Mining Company Inc. which is part of KGHM International (“KGHMI”) which is an indirect subsidiary of KGHM Polska Miedz S.A.

DMC Mining Services is committed to treating all people in a way that allows them to maintain their dignity and independence while creating an inclusive work environment for DMC employees to develop to their full potential. DMC plans to seek and to prevent / remove barriers to accessibility for persons with disabilities. We believe in integration and equal opportunity. We are committed to meeting the needs of persons with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Integrated Accessibility Regulation (the “ISAR”) under the Accessibility for Ontarians with Disabilities Act (“AODA”).

AODA Accessibility Policy

This Accessibility Policy outlines the strategy of our Company to achieve accessibility and otherwise meet the requirements of the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”).

Our Company is committed to providing our services, programs, goods and facilities to persons with disabilities in a manner that:

- Is free from discrimination
- Seeks to provide integrated services
- Is in an accessible format, and
- Takes into consideration a person’s disability

Our Company relies on all of its employees, and partners to assist with maximizing accessibility within the Company by:

- Identifying potential barriers 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

ACCESSIBILITY COORDINATOR

The Company has appointed an Accessibility Coordinator who will provide primary oversight and guidance on the implementation of *AODA* accessibility standards, in conjunction with the human resources, legal, and information technology departments as well as other members of the management team, as well as prepare accessibility reports, facilitate access for persons with disabilities to the building or premises, and address all other matters to comply with the *AODA*.

As appropriate, the Accessibility Coordinator, in conjunction with legal, will also support and work with managers, supervisors and employees to ensure ongoing compliance, to remove barriers, and to improve accessibility. The Accessibility Coordinator will review the Company's various accessibility policies, practices and procedures at least once every calendar year.

ACCESSIBILITY POLICIES

The Company will develop, implement and maintain any other accessibility policies, plans or procedures and take all other measures as may be required by the *AODA* or any of the regulations or accessibility standards.

In addition, the Company will maintain policies governing how we will meet our requirements under the *AODA*, including policies related to customer service, employment, information and communication. The Company will provide copies of these policies in an accessible format, upon request.

INFORMATION AND COMMUNICATION

The Company 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. Accessible formats and communication supports are available upon request.

The Company's commitment does not necessarily apply to products and product labels, unconvertible information or communications and information that our Company does not control directly or indirectly through a contractual relationship. If it is determined that information or communications are unconvertible, the Company will provide the person requesting the

information or communication with an explanation as to why the information or communications are unconvertible as well as a summary of the unconvertible information or communications.

TRAINING

In accordance with the *AODA*, the Company will provide training to employees, and other staff 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 the employees, and other staff.

This training will include instruction on the following:

- Purposes and requirements of the *AODA*, including the Customer Service Standard (Regulation 429/07) and the Integrated Accessibility Standards (Regulation 191/11)
- How to interact and communication with persons with various types of disabilities as well as those who use an 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
- What to do if a person with a particular type of disabilities is having difficulty accessing our goods or services.

Training will take place as soon as practicable and upon completion the Accessibility Coordinator will keep a record of the training provided, including the date on which the accessibility training took place and the number of people trained.

CONTRAVENTIONS

The Accessibility Coordinator, as well as managers and supervisors of the Company, will monitor existing and new practices and procedures to ensure compliance. A failure by any employee to comply with this Accessibility Policy, the Customer Service Policy, or any other policy, practice or procedure related to accessibility issues, the removal of barriers, or the *Human Rights Code*, may result in disciplinary action, up to and including dismissal.

FEEDBACK

DMC will ensure that DMC's process for receiving and responding to feedback is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communications supports, upon request. DMC is committed to responding to all feedback within 72 hours of receipt. Investigation process will be initiated on an as required basis. DMC will notify the public about the availability of accessible formats and communication supports by posting appropriate information in entrance of each DMC building location in Ontario.

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 your local Human Resources Representative.

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

Barrier Definitions:

Physical/Architectural: design elements of a building or a space that cause problems for persons with disabilities.

Attitudinal: our perceptions of, and how we interact with, persons with disabilities.

Informational/Communication: things/situations that make it difficult for a person with a disability to give / receive or understand information.

Systemic: organizational policies or practices that restrict the participation of persons with disabilities.

Technological: poor or inexistent technology system that can prevent people from accessing information. Common tools like computers, telephones and other aids can all present barriers if they are not set up or designed with accessibility in mind.

Initiative	AODA Requirement	Action	Commencement
Establishment of Accessibility Policies	Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this Regulation.	Policy complete and posted on the DMC external website and internal intranet.	

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Accessibility Plans	<p>Large organizations shall,</p> <p>(a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization’s strategy to prevent and remove barriers and meet its requirements under this Regulation;</p> <p>(b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and</p> <p>(c) review and update the accessibility plan at least once every five years.</p>		
Training	<p>Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to,</p> <p>(a) all employees, and volunteers;</p>	<p>Provide during onboarding of new employees and contractors.</p>	

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	<p>(b) all persons who participate in developing the organization's policies; and</p> <p>(c) all other persons who provide goods, services or facilities on behalf of the organization.</p>		
Feedback	<p>Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request.</p>	<p>Create a process for feedback to be submitted by phone, writing or in person.</p>	
Accessible Websites & Web Content	<p>Large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines.</p>	<p>Conducted an assessment current web functionality to ensure compliance and adequate accessibility features</p>	
Recruitment, General	<p>Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment</p>	<p>Review of all mechanisms for posting DMC Mining positions</p> <p>Incorporate language on postings and DMC Mining Services</p>	

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	processes.	career websites to make applicants (internal/external) aware that in accordance with AODA accommodation is available	
Recruitment, Assessment or Selection Process	<p>During a recruitment process, an employer shall notify job applicants, when they are individually selected to participate 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 applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability</p>	<p>Incorporate language in all notifications to applicants for interview (email, letter, phone), that in accordance with AODA, accommodation is available upon request</p> <p>Encourage and provide more diversity-related training to HR team on how to engage in conversations to solicit and handle accommodation requests, in accordance with AODA (how to ask for accommodation – develop scripts)</p> <p>Educate HR team on inclusive selection strategies developed by Ontario Human Rights Commission and on how to implement and request support for accommodation</p>	Complete

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		<p>related requests, in accordance with AODA</p> <p>Review of recruitment process (tests, assessment, rooms) to ensure barriers may be removed or accessible features provided, upon request in accordance with AODA</p>	
Notice to Successful Applicants	Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	Incorporate in offer letter a section regarding DMC's accessibility policies and where to access additional information on DMC Mining internal and external internet	
Informing Employees of Supports	Every employer shall inform its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.	Develop change and communication strategy to educate and advise DMC Mining people on DMC's accessibility policies, plan and processes	

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	Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	Accessibility policies and processes to be Incorporated in onboarding process for Ontario	
	Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.	Develop process and strategy to communicate any policy changes by email, posting intranet	
Accessible Formats and Communication Supports for Employees	<p>In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for,</p> <p>(a) information that is needed in order to perform the employee's job; and</p> <p>(b) information that is generally available to</p>	<p>Educate employees and Managers on the availability of accessible format and communication supports; in accordance with AODA;</p> <p>Educate employees and Managers on process for requesting accessible formats and communication supports;</p> <p>Review current ergonomic assessment process to identify gaps and implement improvements as</p>	

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	employees in the workplace.	necessary	
	The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	<p>Develop a process for consulting with employees to determine accommodation needs</p> <p>Develop a process for advising employee of solution</p>	
Workplace Emergency Response Information	Every employer shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability.	Established process to provide people in Ontario who request, or for whom DMC Mining is aware of the need for accommodation due to the employee's disability, to receive individualize workplace emergency response information	
	If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to	DMC's process for creating Individualized Workplace Emergency Response Information includes a mechanism to obtain consent from the DMC person to share the information with those designated to provide assistance in the event of an emergency	

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	provide assistance to the employee.		
	Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.	Upon request, the Accessibility Coordinator will work with the individual who requires accommodation, to provide Individual Workplace Emergency Response Information as soon as possible	
	<p>Every employer shall review the individualized workplace emergency response information,</p> <p>(a) when the employee moves to a different location in the organization;</p> <p>(b) when the employee's overall accommodations needs or plans are reviewed; and</p> <p>(c) when the employer reviews its general emergency response policies.</p>	<p>DMC process for creating Individualized Workplace Emergency Response Information includes guidelines for when plans and information are to be reviewed due to a move, or change in accommodation needs</p> <p>The process also includes dates for; reassessment, updated medical information and next review.</p>	
Documented Individual Accommodation Plans	Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of	<p>Review of current accommodation processes and practices</p> <p>Develop and operationalize a</p>	

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	documented individual accommodation plans for employees with disabilities.	standard process for the development of individualized accommodation plans; in accordance with AODA	
	<p>The process for the development of documented individual accommodation plans shall 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 the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if accommodation can be achieved and, if so, how accommodation can be achieved. 4. The manner in 	<p>Create a standard operating procedure for the development of documented plans that will incorporate the following elements:</p> <ul style="list-style-type: none"> • Manner in which employee can request • Under which circumstances medical is required • Who (Occupational Health Lead) will be assessing the medical provided • Work with Occupational Health Lead to determine the process for assessing and responding (approve/decline) to individual accommodation plan requests • Accommodation Plans will incorporate confidentiality requirements and 	

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	<p>which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, 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</p>	<p>outline when, to whom and what information may be shared</p> <ul style="list-style-type: none"> • Educate DMC employees and Managers on the Accessibility policies and processes and procedures for requesting individual plans • Develop change and communication plan to support awareness of process for, and availability of, individual accommodation plans in accordance with AODA 	

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	<p>into account the employee's accessibility needs due to disability.</p>		
<p>Return to Work Process</p>	<p>Every employer, other than an employer that is a small organization,</p> <p>(a) shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability- related accommodations in order to return to work; and</p> <p>(b) shall document the process.</p> <p>The return to work process shall,</p> <p>(a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and</p> <p>(b) use documented individual accommodation plans, as part of the process.</p>	<p>Liaise with Occupational Health Lead to conduct a review of the current return to work process</p> <p>Update and document return to work process based on gaps and compliance requirements</p>	

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Performance Management	An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.	<p>Assess current performance review processes to ensure accessibility features are incorporated (i.e., forms accessible, conversations in plain text).</p> <p>Ensure updated/new performance management processes to be rolled out incorporate accessibility features</p> <p>Ensure training or communications to performance managers provides awareness on effective communication strategies, timing to allow for employees to review and understand feedback prior to meeting, and reasonable accommodation</p>	<p>When applicable</p> <p>Ongoing – to be incorporated into Hiring Manager training sessions</p>
Career Development & Advancement	An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing	<p>Review of current training and professional development materials to determine accessibility features</p> <p>Ensure all future developed training and materials are developed with accessibility features</p>	<p>When applicable</p>

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	career development and advancement to its employees with disabilities.	<p>in mind</p> <p>Ensure promotion criteria, practices and processes take into account individual accommodation needs and plans in accordance with AODA</p> <p>Track career progression of individuals with disabilities</p>	<p>When applicable</p> <p>When applicable</p>

In accordance with the AODA and with DMC Mining Services’s objective of treating all people in a way that allows them to maintain their dignity and independence while creating an inclusive work environment for our employees to develop to their full potential, the Multi- Year Accessibility plan is posted on DMC Mining Services’s website and will be reviewed and updated at least every 5 years.

For the public:

If you have any questions, or have feedback related to DMC Mining Services’s Multi-Year Accessibility Plan, please our local DMC Human Resources Department representative.

For DMC Mining Services employees:

If you have any questions, or have feedback related to DMC Mining Services’s Multi-Year Accessibility plan, please contact your local Human Resources Department representative.