



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

**ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES (AODA)
MULTI-YEAR ACCESSIBILITY PLAN AND COMPANY POLICY**



INTRODUCTORY STATEMENT

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 Ltd. is part of the KGHM Group of Companies.

DMC Mining Services Ltd. 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 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 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; and,
- 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.

We welcome people with disabilities and their service animal or support person in areas that are accessed by the public or other third parties.

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 communicate with persons with various types of disabilities as well as those who use an assistive device, 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 disability is having difficulty accessing our goods or services.

Training will take place as soon as practicable and a record of the training will be documented, 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 termination of employment.

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.

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.

GENERAL REQUIREMENT STANDARDS			
Initiative	Description	Action	Compliance Date
<i>Workplace Emergency Response Information</i>	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 with disabilities with individualized workplace emergency response information.	January 1, 2012
	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 aid the employee.	Created a process including a mechanism to obtain consent from the DMC person to share the information with those designated to aid in the event of an emergency.	January 1, 2012
	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.	January 1, 2012
	Every employer shall review the individualized workplace emergency response information, (a) When the employee moves to a different location in the organization; (b) When the employee's overall accommodations needs / plans are reviewed; and (c) When the employer reviews its general emergency response policies.	Created a process including guidelines for when plans and information are to be reviewed due to a move or change in accommodation needs. The process also includes dates for; reassessment, updated medical information and next review.	January 1, 2012
<i>Establishment of Accessibility Policies</i>	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 completed and posted on the DMC external website and internal intranet.	January 1, 2014

<i>Establishment of Accessibility Plans</i>	<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>	<p>Plan completed and posted on DMC external website and internal intranet.</p> <p>Plan has been reviewed at least once every five years.</p>	January 1, 2014
<i>Training</i>	<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>(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>	Provided during onboarding of new employees and contractors.	January 1, 2015

CUSTOMER SERVICE STANDARDS			
Initiative	Description	Action	Compliance Date
<i>Establishment of Policies, Practices and Procedures</i>	Every provider of goods or services shall establish policies, practices and procedures governing the provision of its goods or services to persons with disabilities.	Developed and distributed policies and practices regarding accessibilities for persons with disabilities.	January 1, 2012
<i>Use of Service Animals and Support Persons</i>	This section applies if goods or services are provided to members of the public or other third parties at premises owned or operated by the provider of the goods or services and if the public or third parties have access to the premises.	Included a statement in the Accessibility Policy that indicates the acceptance of service animals in areas that are accessed by the public or other third parties.	December 31, 2020

	<p>If a person with a disability is accompanied by a guide dog or other service animal, the provider of goods or services shall ensure that the person is permitted to enter the premises with the animal and to keep the animal with him or her unless the animal is otherwise excluded by law from the premises. If a service animal is excluded by law from the premises, the provider of goods / services shall ensure that other measures are available to enable the person with a disability to obtain, use or benefit from the provider's goods / services.</p> <p>If a person with a disability is accompanied by a support person, the provider of goods / services shall ensure that both persons are permitted to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the premises.</p>		
<p><i>Notice of Temporary Disruptions</i></p>	<p>If, in order to obtain, use or benefit from a provider's goods or services, persons with disabilities usually use particular facilities or services of the provider and if there is a temporary disruption in those facilities or services in whole or in part, the provider shall give notice of the disruption to the public. Notice of the disruption must include information about the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available.</p>	<p>Developed a standard operating procedure to notify the public of temporary disruptions to facilities that benefit persons with disabilities and meet the communication needs of people with disabilities.</p>	<p>December 31, 2020</p>
<p><i>Training for Staff</i></p>	<p>Every provider of goods or services shall ensure that the following persons receive training about the provisions of its goods or services to persons with disabilities:</p> <p>(a) Every person who deals with members of the public of other third parties on behalf of the provider, whether the person does so as an employee, agent, volunteer or otherwise.</p>	<p>Provided AODA training to all new employees during new hire orientation. This encompasses employees who interact with the public or other third parties and employees who participate in the development of policies, practices and procedures. Training will be provided in a way that best suits the duties</p>	<p>January 1, 2012</p>

	(b) Every person who participates in developing the provider's policies, practices and procedures governing the provisions of goods or services to members of the public or other third parties.	of the employees and a record will be kept of the training provided.	
<i>Notice of Availability of Documents</i>	Every designated public sector organization and every other provider of goods or services that has at least 20 employees in Ontario shall notify persons to whom it provides goods or services that the documents required by this Regulation are available upon request. The notice may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting on the provider's website, if any, or by such other methods as is reasonable in the circumstances.	Included a notice of availability for the accessibility policy and accessibility plan on company website. This includes contact information to request the required documents and an accessible process for receiving and responding to feedback.	December 31, 2020

INFORMATION AND COMMUNICATION STANDARDS			
Initiative	Description	Action	Compliance Date
<i>Accessible Websites & Web Content</i>	Large organizations shall make their websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines.	Conducted an assessment on current web functionality to ensure compliance and adequate accessibility features.	December 31, 2020
<i>Feedback</i>	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 support, upon request.	Created a process for feedback to be submitted by phone, writing or in person.	January 1, 2015
<i>Accessible Formats & Communication Supports for Employees</i>	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 provisions of accessible format and communication supports for, (a) Information that is needed in order to perform the employee's job; and	Educated employees and Managers on the availability as well as the process for requesting of accessible format and communication supports; in accordance with AODA. Reviewed current ergonomic assessment process to	January 1, 2016

	<p>(b) Information that is generally available to employees in the workplace.</p> <p>The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>	<p>identify gaps and implement improvements as necessary.</p> <p>Developed a process for consulting with employees to determine accommodation needs.</p> <p>Developed a process for advising employee of solutions.</p>	
<i>Accessible Websites & Web Content 2.0</i>	<p>Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out in this section.</p>	<p>Complied to WCAG 2.0 Level AA in accordance with outlined AODA compliance schedule.</p>	<p>December 31, 2020</p>

EMPLOYMENT STANDARDS			
Initiative	Description	Action	Compliance Date
<i>Recruitment, General</i>	<p>Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.</p>	<p>Reviewed all mechanisms for posting DMC Mining positions.</p> <p>Incorporated language on postings and DMC Mining Services career websites to make applicants (internal/external) aware that in accordance with AODA, accommodation is available.</p>	<p>January 1, 2016</p>
<i>Recruitment, Assessment or Selection Process</i>	<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 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>Incorporated language in all notifications to applicants for interview (email, letter, phone), that accommodation is available upon request.</p> <p>Encouraged and provided more diversity-related training to HR team on how to engage in conversation to solicit and handle accommodation requests.</p> <p>Educated HR team on inclusive selection strategies developed by the Ontario Human Rights Commission and on how to implement and request support for accommodation related requests.</p> <p>Reviewed recruitment process (tests, assessment, rooms) to ensure barriers</p>	<p>January 1, 2016</p>

		may be removed or accessible features provided upon request.	
<i>Notice to Successful Applicants</i>	Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	Incorporated the notification to successful applicants in the offer / indoctrination process.	January 1, 2016
<i>Informing Employees of Support</i>	<p>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 consider an employee's accessibility needs due to disability.</p> <p>Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.</p> <p>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.</p>	<p>Developed change and communication strategy to educate and advise people on DMC's accessibility policies, plan and processes.</p> <p>Accessibility policies and processes have been incorporated in onboarding process for Ontario.</p> <p>Developed process and strategy to communicate any policy changes by email or posting on the intranet</p>	January 1, 2016
<i>Documented Individual Accommodation Plan</i>	<p>Employers, other than employers that are small organizations, shall develop and have in place 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 shall include the following elements:</p> <ul style="list-style-type: none"> (a) The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. (b) The means by which the employee is assessed on an individual basis. (c) The manner in which the employer can request an evaluation by an outside medical or other expert, at the 	<p>Reviewed current accommodation processes and practices.</p> <p>Developed and operationalized a standard process for the development of individualized accommodation plans.</p> <p>Created a standard operating procedure for the development of documented plans that will incorporate the following elements:</p> <ul style="list-style-type: none"> (a) Manner in which employee can request. (b) Under which circumstances medical is requested. (c) Who (Occupational Health Lead) will be assessing the medical. 	January 1, 2016

	<p>employee's expense, to determine if accommodation can be achieved and, if so, how accommodation can be achieved.</p> <p>(d) The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.</p> <p>(e) The steps taken to protect the privacy of the employee's personal information.</p> <p>(f) The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> <p>(g) If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>(h) 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>(d) Work with Occupational Health Lead to determine the process for assessing and responding (approve/decline) to individual accommodation plan requests.</p> <p>(e) Accommodation Plans will incorporate confidentiality requirements and outline when, to whom and what information may be shared.</p> <p>(f) Educate DMC employees and Managers on the Accessibility policies and processes and procedures for requesting individual plans.</p> <p>(g) Develop change and communication plan to support awareness of process for, and availability of, individual accommodation plans in accordance with AODA.</p>	
<p><i>Return to Work Process</i></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>Liaised with occupational Health Lead to conduct a review of the current return to work process.</p> <p>Updated and documented return to work process based on gaps and compliance requirements.</p>	<p>January 1, 2016</p>

	(b) Use documented individual accommodation plans, as part of the process.		
<i>Performance Management</i>	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.	Assessed current performance review processes to ensure accessibility features are incorporated (i.e., forms accessible, conversations in plain text). Ensured updated/new performance management processes to be rolled out incorporate accessibility features. Ensured 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.	January 1, 2016
<i>Mental Health</i>	Continue to provide and improve the Employee Assistance Program to support employees in the areas of mental health and wellness through a wide range of supports and resources.	Provided an Employee Assistance Program that provides support and resources regarding mental health and wellness to all employees.	January 1, 2016
<i>Career Development & Advancement</i>	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 career development and advancement to its employees with disabilities.	Reviewed current training and professional development materials to determine accessibility features. Ensured all developed training materials were developed with accessibility features in mind. Ensured promotion criteria, practices and processes took into account individual accommodation needs and plans in accordance with AODA. Tracked career progression of individuals with disabilities.	January 1, 2016

DESIGN OF PUBLIC SPACES STANDARD			
Initiative	Description	Action	Compliance Date
<i>Waiting Area</i>	Where there is fixed seating in a waiting area, a minimum of 3% must be accessible.	Identified potential barriers and arranged spacing between fixed seating to provide accessible seating in the waiting area.	January 1, 2017
<i>Room Lighting Levels</i>	Ensure lighting levels are per AODA guidelines.	Adjusted lighting levels in adherence to AODA guidelines.	January 1, 2017
Stairs, Ramps, and Elevated Platforms	Ensure there are ramps, lifts, or elevators whenever there are stairs.	Ensured there are ramps and elevators to accompany all steps or stairs.	January 1, 2017
<i>Outdoor Path of Travel</i>	Accessible parking. Maintenance and restoration of public spaces.	Provided accessible parking and travel paths in public spaces.	January 1, 2017

CONTACT

In accordance with the AODA and with DMC Mining Services Ltd.'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 Ltd.'s website and will be reviewed and updated at least every 5 years.

If you have any questions, or have feedback related to DMC Mining Services Ltd.'s Multi-Year Accessibility Plan, please contact a DMC Human Resources Department representative. Contact information below.

By Email: hr@dmcmining.com

By Phone: +1 905 780 1980 and ask to be transferred to Human Resources.

By Mail:
DMC Mining Services Ltd.
191 Creditview Road, Suite 400
Vaughan, ON
L4L 9T1