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ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES

MULTI-YEAR ACCESSIBILITY PLAN

Introduction and Background Information regarding our parent company, KGHM Polska Miedź S.A.

For more than 50 years KGHM Polska Miedź S.A. and its subsidiaries have been providing the world with resources that allow for sustainable development. The company's history started in 1957 with the discovery of one of the world's largest copper deposits, located in south-west Poland. Today our operations span three continents – Europe, North and South America.

The KGHM Polska Miedź S.A. group is composed of KGHM Polska Miedź S.A. and several dozen subsidiaries. Globally it employs almost 34 thousand employees, who believe that their work matters for the world. Thanks to employees' knowledge, courage and accountability the group produces valuable metals.

KGHM International ("KGHMI") is an indirect subsidiary of KGHM Polska Miedz S.A. KGHMI operates in Ontario and elsewhere, both directly and through subsidiaries.

KGHMI's commitment to Accommodation

KGHMI 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 KGHMI's people to develop to their full potential. KGHMI's plan seeks to prevent and 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").

This document applied to KGHMI, specifically, and does not apply to other companies of the group, including subsidiaries of KGHMI.

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 KGHMI external website and internal intranet.	Complete
Accessibility Plans	Large organizations shall, (a) establish,		

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	<p>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>(a) Complete</p> <p>(b) Complete</p> <p>(c) Ongoing, as required</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</p>	<p>Provide during onboarding of new employees and contractors.</p>	<p>Ongoing</p>

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	<p>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>		
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>	<p>Complete</p>
Accessible Websites	<p>Large organizations shall make their</p>	<p>Conducted an assessment current</p>	<p>Complete</p>

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& Web Content	internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines.	web functionality to ensure compliance and adequate accessibility features	
Recruitment, General	Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	Review of all mechanisms for posting KGHMI positions Incorporate language on postings and KGHMI career websites to make applicants (internal/external) aware that in accordance with AODA accommodation is available	Complete
Recruitment, Assessment or Selection Process	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	Incorporate language in all notifications to applicants for interview (email, letter, phone), that in accordance with AODA, accommodation is available upon	Complete

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	<p>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>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 related requests, in accordance with AODA</p> <p>Review of recruitment process (tests, assessment, rooms) to ensure barriers may be removed or accessible features</p>	<p>Scheduled for Q2 2016</p> <p>Complete</p> <p>Complete</p>

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		provided, upon request in accordance with AODA	
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 KGHMI's accessibility policies and where to access additional information on KGHMI internal and external internet	Complete
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 KGHMI people on KGHMI's accessibility policies, plan and processes	Complete
	Employers shall provide the information required under this section to new employees as	Accessibility policies and processes to be Incorporated in onboarding process	Complete

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	soon as practicable after they begin their employment.	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	Complete
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</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</p>	<p>Complete</p> <p>Complete</p> <p>Complete</p>

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	<p>perform the employee's job; and</p> <p>(b) information that is generally available to employees in the workplace.</p>	<p>ergonomic assessment process to identify gaps and implement improvements as necessary</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>Develop a process for consulting with employees to determine accommodation needs</p> <p>Develop a process for advising employee of solution</p>	<p>Complete</p>
<p>Workplace Emergency Response Information</p>	<p>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.</p>	<p>Established process to provide people in Ontario who request, or for whom KGHMI is aware of the need for accommodation due to the employee's disability, to receive individualize workplace emergency response information</p>	<p>Complete</p>

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	<p>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 provide assistance to the employee.</p>	<p>KGHMI's process for creating Individualized Workplace Emergency Response Information includes a mechanism to obtain consent from the KGHMI person to share the information with those designated to provide assistance in the event of an emergency</p>	<p>Complete</p>
	<p>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.</p>	<p>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>	<p>Complete</p>
	<p>Every employer shall review the individualized workplace</p>	<p>KGHMI process for creating Individualized Workplace</p>	<p>Complete</p>

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	<p>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>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>	
<p>Documented Individual Accommodation Plans</p>	<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>Review of current accommodation processes and practices</p> <p>Develop and operationalize a standard process for the development of individualized accommodation plans; in accordance with AODA</p>	<p>Complete</p> <p>Complete</p>
	<p>The process for the development of documented individual</p>	<p>Create a standard operating procedure for the development of documented plans</p>	<p>Complete</p>

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	<p>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 which the employee 	<p>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 outline when, to whom and what 	

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	<p>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</p>	<p>information may be shared</p> <ul style="list-style-type: none"> • Educate KGHMI 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>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>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>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>	<p>Complete</p>

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	<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>Performance Management</p>	<p>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</p>	<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>Complete</p> <p>When applicable</p>

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	disabilities.	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	Ongoing – to be incorporated into Hiring Manager training sessions
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 career development and advancement to its employees with disabilities.	<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 in mind</p> <p>Ensure promotion criteria, practices and processes take into account individual accommodation</p>	<p>Complete</p> <p>When applicable</p> <p>When applicable</p>

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		<p>needs and plans in accordance with AODA</p> <p>Track career progression of individuals with disabilities</p>	When applicable

In accordance with the AODA and with KGHMI'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 KGHMI'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 KGHMI's Multi-Year Accessibility Plan, please email AODA.Standard@KGHM.com

For KGHMI employees:

If you have any questions, or have feedback related to KGHMI's Multi-Year Accessibility plan, please contact your local Human Resources Department, or email AODA.Standard@KGHM.com