

# GLENCORE

## **Glencore Canada Corporation Accessibility Policies and Multi-Year Accessibility Plan**

### **(the “Accessibility Plan”)**

(Ontario Regulation 191/11) of the *Accessibility for Ontarians with Disabilities Act, 2005*

## **Integrated Accessibility Standards Regulations – Employment**

### ***1. Recruitment***

Glencore is committed to fair and accessible employment recruiting practices that attract and retain employees with disabilities. This includes providing accessibility at all stages of the employment cycle.

### **Planned Action:**

In accordance with the IASR, Glencore will do the following:

#### **(i) Recruitment General**

Glencore will notify employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process. This will include:

- review and, as necessary, modification of existing recruitment policies, procedures and processes;
- specifying that accommodation is available for applicants with disabilities, on Glencore’s website and on job postings; and

#### **(ii) Recruitment, assessment and selection**

Glencore will notify job applicants, when they are individually selected to participate in an assessment or selection process and inform them that accommodations are available upon request in relation to the materials or processes to be used in the assessment/selection process. This will include:

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- review and, as necessary, modification of existing recruitment policies, procedures and processes;
- inclusion of availability of accommodation notice as part of the script in the scheduling of an interview and/or assessment; and
- consultation with the applicant and arrangement for provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to the disability where a selected applicant requests accommodation.

### **(iii) Notice to Successful Applicants**

When making offers of employment, Glencore will notify the successful applicant of its policies for accommodating employees with disabilities. This will include:

- a review and, as necessary, modification of existing recruitment policies, procedures and processes; and
- inclusion of notification of Glencore's policies on accommodating employees with disabilities in offer of employment letters.

Required legislative compliance: January 1, 2016

## ***2. Informing Employees of Supports and General Provision of Accessible Formats and Communications Supports***

In accordance with the IASR, Glencore will inform all employees of policies that support 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 a disability.

This will include:

- informing current employees and new hires of Glencore's policies supporting employees with disabilities, including, but not limited to, policies on the

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provision of job accommodations that take into account an employee's needs due to disability;

- providing information as soon as practicable after the new employee begins employment, specifically in the orientation process;
- keeping employees up to date on changes to existing policies on job accommodations with respect to disabilities;
- where an employee with a disability so requests it, Glencore will provide or arrange for provision of suitable accessible formats and communications supports for:
  - information that is needed in order to perform the employee's job;
  - information that is generally available to employees in the workplace; and
- in meeting the obligations to provide the information that is set out above, Glencore will consult with the requesting employee in determining the suitability of an accessible format or communication support.

Required legislative compliance: January 1, 2016

### ***3. Documented Individual Accommodation Plans/Return to Work Process***

Glencore will incorporate new accessibility requirements under the IASR to ensure that barriers in accommodation and return to work processes are eliminated and corporate policies surrounding accommodation and return to work are followed, where applicable.

#### **Planned Action:**

Glencore's existing policies include steps that Glencore will take to accommodate employees with disabilities and to facilitate employees' return to work after absence due to disability.

Glencore will review and assess the existing policies to ensure that they include a process for the development of documented individual accommodation plans for employees with disabilities, if such plans are required.

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In accordance with the provisions of the IASR, Glencore will ensure that the process for the development of documented individual accommodation plans includes the following elements:

- information regarding the manner in which the employee requesting accommodation can participate in the development of the plan;
- information regarding the means by which the employee is assessed on an individual basis;
- information regarding the manner in which Glencore can request an evaluation by an outside medical or other expert, at Glencore's expense, to assist Glencore in determining if and how accommodation can be achieved;
- steps to protect the privacy of the employee's personal information;
- information regarding the frequency with which individual accommodation plans will be reviewed and updated and the manner in which this will be done;
- the reasons for a denial where an individual accommodation plan is denied;
- information regarding the means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs;
- the following will be included if individual accommodation plans are established:
  - any individualized workplace emergency response information that is required;
  - any information regarding accessible formats and communication supports that have been provided for or arranged, in order to provide the employee with:
    - information that is needed in order to perform the employee's job;
    - information that is generally available to employees in the workplace; and
- identify any other accommodation that is to be provided to the employee.

Glencore will ensure that the return to work process as set out in its existing policies outlines:

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- the steps Glencore will take to facilitate the employee's return to work after a disability-related absence;
- the development of a written individualized return to work plan for such employees; and
- the use of individual accommodation plans, as discussed above, in the return to work process.

Required Legislative compliance: January 1, 2016

#### ***4. Performance Management, Career Development and Redeployment***

Glencore will 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;
- when providing career development and advancement to employees with disabilities; and
- when redeploying employees with disabilities.

#### **Planned Action:**

In accordance with the IASR, the Glencore will:

- review, assess and, as necessary, modify existing policies, procedures and practices to ensure compliance with the IASR;
- take the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account when:
  - assessing performance;
  - managing career development and advancement; and
  - redeployment is required.
- review, assess and, as necessary, include in performance management workshops, accessibility criteria;
- take into account the accessibility needs of employees with disabilities when providing career development and advancement to its employees with

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disabilities, including notification of the ability to provide accommodations on internal job postings; and

- take into account the accessibility needs of employees with disabilities when redeploying employees, including review and, as necessary, modification of employee transfer checklist.

Required legislative compliance: January 1, 2016