

Base Metals – Human Resources

Rev.: 01-11/06/2014

No. INS-7004-HRVNA

**INTERNAL AND
EXTERNAL USE**

Responsible Person: Manager, Human Resources Base Metals	Training Code: N/A
Target Audience: All Employees in Ontario	Key words: AODA, Disability, Training, Communication, Accessibility, Recruitment, Public Spaces

Purpose:

- Vale Canada Limited (“Vale” or “the Company”) is committed to accessibility in accordance with the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”) and its Regulations and will endeavour to ensure that individuals with disabilities are meaningfully able to integrate in its workplace.
- Vale strives to treat all individuals with dignity and in manner that promotes integration and equal opportunity. Vale shall endeavor to meet the needs of individuals with disabilities in a timely manner. The Company shall seek to achieve this by preventing and removing barriers to accessibility and meeting the accessibility requirements under the AODA and its Regulations.

Scope:

- This instruction applies to all Canadian business units operating within the province of Ontario.
- This instruction applies to all employees of Vale within the province of Ontario, and, where indicated to third parties that receive or participate in goods or services offered by Vale.

References:

- *Accessibility for Ontarians with Disabilities Act, 2005*, S.O. 2005, C 11
- Vale’s Multi Year Accessibility Plan
- Customer Service Accessibility Instruction (INS-7005-HRVNA)
- Workplace Violence, Harassment & Discrimination Policy and Program documents

Definitions:

- **Manager/Supervisor:** An individual who supervises the work performance of other employees
- **Employees:**
 - **Permanent Employees:** Individuals who are hired as Regular Full Time employees onto the Vale payroll.
 - **Fixed term:** All Employees on Vale payroll who have a specific start and end of employment date (i.e. are not permanent) and are either Full-time or Part-time. This includes Casual Employees, Fixed Term Employees, students, interns, co-ops, trainees, etc.
- **Customer:** An individual that purchases Vale’s product, namely pellets and powder.
- **Third Party:**
 - An individual that interacts with Vale employees as a visitor or a guest.
 - An outside party who receives a service from Vale employees.
 - Not a contractor or an employee.

Principles & Application:

- Accessibility standards have been created as part of the AODA. These standards are rules that Vale is required to follow in order to identify, remove and prevent barriers so that people with disabilities have more opportunities to

participate in everyday life. As a result of the AODA, Vale must achieve accessibility generally and meet requirements in the following areas by the listed compliance date:

1. Accessibility Standards for Customer Service (January 1, 2012)
2. Workplace Emergency Response Information (January 1, 2012)
3. Public Safety Information (January 1, 2012)
4. Training (January 1, 2015)
5. Information and Communication (January 1, 2016)
6. Employment (January 1, 2016)
7. Design of Public Spaces Standards (January 1, 2017)

Responsibilities

• Employees:

- Respect the diversity of people in the workplace and behave in a manner that is respectful of others.
- Our continued success requires that we utilize everyone's skills and knowledge to the fullest, without discrimination or harassment based on disability, or any other protected ground under Human Rights legislation. Discrimination and harassment will not be tolerated.
- If you have a disability and require assistance in order to perform your work, move around the premises, follow safety and emergency procedures, etc., notify your supervisor as soon as possible.
- In the case of perceived harassment or discrimination for yourself or another person, raise your concern promptly to your supervisor or HR Business Partner.

• Managers, Supervisors:

- Uphold the principles of the AODA.
- Respond promptly to accessibility concerns for employees with disabilities.
- Respect the needs of employees to use assistive devices pertaining to their disability (e.g., wheelchairs, assistive listening devices).
- Consult with Human Resources or other departments such as Occupational Medicine when and as required to support the accommodation of employees with disabilities and the administration of this procedure.

• HR Business Partner:

- Support client groups in the administration of this procedure.

• HR Coordinator (GTA and Ontario Operations)

- Arrange to have this instruction available in an accessible format if requested.

• HR Coordinator(Corporate)

- Review this instruction on an annual basis, and revise where necessary.

Appendix:

- Vale Multi-Year Accessibility Plan