

## Vale Canada Limited

### Multi-Year Accessibility Plan

The following multi-year accessibility plan (“Accessibility Plan”) outlines Vale’s strategy to achieve accessibility, remove barriers for individuals with disabilities and meet the Company’s obligations under the *Integrated Accessibility Standards Regulation* (“IASR”) pursuant to the *Accessibility for Ontarians with Disabilities Act* (“AODA”).

The Accessibility Plan will be posted on Vale’s website and will be available in an accessible format upon request. The Accessibility Plan will be reviewed and updated, if applicable, at least once every five years.

#### **Scope**

The Accessibility Plan applies to all employees of Vale, and, where indicated, to third parties that receive or participate in goods or services offered by Vale.

The Accessibility Plan outlines Vale’s strategies to achieve accessibility generally and meet IASR requirements in the following areas:

1. Accessibility Standards for Customer Service;
2. Workplace Emergency Response Information;
3. Public Safety Information;
4. Training;
5. Information and Communication;
6. Employment; and
7. Design of Public Spaces Standards.

#### **1. Accessibility Standards for Customer Service**

Since January 1, 2012, Vale has been committed to compliance with the *Accessibility Standards for Customer Service Regulation* under the AODA, which involves providing of products and services in a way that respects the dignity and independence of people with disabilities. The Company’s Customer Service Accessibility Policy may be found here:

<http://intranet.valeglobal.net/na/canada/en-us/hr/policy/Pages/default.aspx>

*Compliance Date: current*

#### **2. Workplace Emergency Response Information**

Where Vale is aware that an employee has a disability and where due to the nature of that individual’s disability the application of the Company’s standard emergency response procedures would not adequately protect the health and safety of the employee, Vale shall provide

individualized workplace emergency response information to the employee as required and as soon as practicable.

- Vale shall update the emergency response information if: a) the employee is transferred to a new worksite area; b) if the employee's accommodation needs change; and/or c) if the Company amends its emergency response policies and procedures.
- Where required and with the employee's prior consent, Vale shall provide assistance to an employee with a disability during workplace emergencies or disaster based on the individual's particular accommodation needs.
- Vale may communicate individualized emergency plans to the employees' respective managers and safety personnel on an 'as needed' basis.

*Compliance Date: current*

### **3. Public Safety Information**

Where Vale provides emergency safety information to the public concerning its operations, the Company shall make such information available in an accessible format, as soon as practicable, if requested.

*Compliance date: current*

### **4. Training**

Vale is committed to providing training on the requirements of the accessibility standards referred to in the IASR and on the *Human Rights Code*, as it pertains to persons with disabilities.

In accordance with the IASR, Vale will:

- ensure that appropriate training on the requirements of the IASR and the *Human Rights Code* as it pertains to persons with disabilities, is provided as soon as practicable to all employees, volunteers (if applicable), and third-parties that provide goods, services and facilities on Vale's behalf, and persons participating in the development and approval of Vale's policies;
- maintain records of the training provided, including training dates and the number of individuals to whom training was provided; and
- ensure that training is provided on any amendments to Vale's accessibility policies on an ongoing basis.

*Compliance Date: January 1, 2015*

### **5. Information and Communication**

Vale is committed to making its information and communications accessible to persons with disabilities. Vale will adhere to the new accessibility requirements under IASR standards to ensure that information and communications systems and platforms are accessible and, upon request, provided as soon as practicable in formats that meet the needs of persons with disabilities.

**(i) Feedback, Accessible Formats and Communication Supports:**

In accordance with the IASR, Vale will:

- ensure that existing and new processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request and in a timely manner;
- as a general principle, where accessible formats and communication supports for persons with disabilities are requested:
  - provide or arrange for the provision of such accessible formats and communication supports;
  - consult with the person making the request to determine the suitability of the accessible format or communication support;
  - provide or arrange for the provision of accessible formats and communication supports in a timely manner that takes into account the person's accessibility needs due to disability, and at a cost no more than the regular cost charged to other persons; and
- notify the public of the availability of accessible formats and communication supports.

*Compliance Dates:*

- *Feedback Process: current*
- *Accessible Formats and communication supports: January 1, 2016*

**(ii) Accessible Websites and Web Content:**

In accordance with the IASR, Vale will work toward making its Ontario-based websites and web content conform with the World Wide Consortium Web Content Accessibility Guidelines (WCAG 2.0) Level AA.

*Compliance Dates:*

- *WCAG 2.0 Level A – new Internet websites and web content: January 1, 2014*
- *WCG 2.0 Level AA – all Internet websites and web content, except for exclusions set out in the IASR: January 1, 2021*

**6. Employment**

**(i) Recruitment:**

Vale is committed to fair and accessible employment recruiting practices that include providing accessibility across all stages of the employment cycle.

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

- Vale will notify employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process. This will include:
  - reviewing and, as necessary, modifying existing recruitment policies, procedures and processes; and
  - advising that accommodation is available for applicants with disabilities on Vale's website and in job postings
- When applicants are selected to participate in an assessment or selection process, Vale will notify them that accommodations are available upon request in relation to the materials or processes used in the assessment/selection process. This will include:
  - 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 applicants who request accommodation and arrangement for provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs.
- When making offers of employment, Vale will notify the successful applicant of its policies for accommodating employees with disabilities. This will include:
  - review and, as necessary, modification of existing recruitment policies, procedures and processes; and
  - inclusion of notification of Vale's policies on accommodating employees with disabilities in offer of employment letters.

**(ii) Provision of Accessible Formats and Communications Supports:**

In accordance with the IASR, Vale 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 employees' accessibility needs into account. This will include:

- informing current employees and new hires of Vale's policies;
- providing information as soon as practicable after the new employee begins employment, preferably in the orientation process;
- keeping employees up to date on changes to existing policies on job accommodations with respect to disabilities;
- providing or arranging for provision of accessible formats and communications supports, upon request, for:
  - information that is needed in order to perform an 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, Vale will consult with the requesting employee in determining the suitability of accessible formats or communications supports.

**(iii) Documented Individual Accommodation Plans & Return to Work Process:**

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

Vale's existing accommodation process is robust and includes comprehensive steps to accommodate employees with disabilities and mechanisms to facilitate safe return to work after absence due to disability. Vale will review and assess its existing processes and procedures to ensure a mechanism is developed for the development of documented individual accommodation plans for employees with disabilities, as required.

In accordance with the provisions of the IASR, Vale 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 individually assessed;
- information regarding the manner in which Vale can request an evaluation by an outside medical or other expert, at Vale's expense, to assist in determining if and how accommodation can be achieved;
- steps to protect the privacy of employees' 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;
- reasons for 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 necessary to perform the employee's job;
    - information generally available to employees in the workplace; and
- identify any other accommodation that is to be provided to the employee.

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

- steps Vale will take to facilitate return to work after a disability-related absence;
- development of a written individualized return to work plan for employees; and
- the use of individual accommodation plans in the return to work process.

**(iv) Performance Management, Career Development and Redeployment:**

Vale 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.

In accordance with the IASR, Vale 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, as required.
- review, assess and, as necessary, include accessibility criteria in performance management workshops;
- take into account the accessibility needs of employees with disabilities when providing career development and advancement, 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 modification of employee transfer checklist, as required

*Compliance Date for all of the above Employment related standards: January 1, 2016.*

**7. Design of Public Space Standards**

Vale is committed to incorporating barrier free design principles into public spaces that are newly constructed or redeveloped on or after January 1, 2017, as set out in the IASR.

For more information on this Accessibility Plan or for accessible formats of the Accessibility Plan, please contact your HR Coordinator.