

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*

Introduction

The Integrated Accessibility Standards Regulations (“IASR”) under the *Accessibility for Ontarians with Disabilities Act, 2005* (the “AODA”) require that effective January 1, 2014, Glencore Canada Corporation (“Glencore”) establish, implement, maintain and document its accessibility policies and multi-year accessibility plan (the “Accessibility Plan”), which outlines Glencore’s strategy to prevent and remove barriers for persons with disabilities and to meet its requirements under the IASR.

The Accessibility Plan 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.

Application

The Accessibility Plan applies to all employees and clients of Glencore, and, where indicated, to any independent contractor representatives working for the company.

Our Commitment

Glencore promotes integration and equal opportunity and is committed to meeting the needs of people with disabilities in a timely manner. We will seek to achieve this by preventing and removing barriers to accessibility and by meeting accessibility requirements under the AODA. This Accessibility Plan sets out Glencore’s policy on how we will achieve accessibility generally, as well as in employment, information and communications, and the design of public spaces (built environment).

Under the IASR, the following accessibility strategies set out the requirements that are applicable to Glencore:

1. Workplace Emergency Response Information;
2. Training;
3. Information and Communication;
4. Employment; and
5. Design of Public Spaces Standards

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Accessibility Standards for Customer Service

Glencore is committed to compliance with the Customer Service Standards under the Integrated Accessibility Standards Regulations (O.Reg.191/11) of the AODA, which involves providing its services in ways that respects the independence, dignity, integration and equality of opportunity for people with disabilities.

1. Assistive Devices

People with disabilities may use their personal assistive devices when accessing our goods, services or facilities.

In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other reasonable measures will be considered to enable the person with a disability to access our goods, services or facilities.

2. Communication

Glencore is committed to making company information and communications accessible to persons with disabilities.

We will communicate with people with disabilities in ways that take into account their disability and, upon request, will consult with such persons to determine what method of communication works for them.

3. Service Animals

We welcome people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public.

When we cannot easily identify that an animal is a service animal, our staff may ask a person to provide documentation (template, letter or form) from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.

If service animals are prohibited by another law or for reasons of safety, we will do the following to ensure people with disabilities can access our goods, services or facilities:

- explain why the animal is excluded
- consult with the customer to determine if there is another reasonable and safe way of providing goods, services or accessing our facilities

4. Support Persons

A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises.

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In certain cases, we might require a person with a disability to be accompanied by a support person for the health or safety reasons of:

- the person with a disability
- others on the premises

Before making such a decision, we will:

- consult with the person with a disability to understand their needs
- consider health or safety reasons based on available evidence
- determine if there is no other reasonable way to protect the health or safety of the person or others on the premises

5. Notice of Temporary Disruption

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, we will notify customers promptly. This clearly posted notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available.

6. Training

Glencore's employees will be trained on Glencore's Customer Service Policy and the requirements below by December 31, 2016, and all new employees will receive such training as part of their orientation with the company. Training will also occur when changes are made to our accessible customer services policies. Training will include:

- purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard
- our policies related to the customer service standard
- how to interact and communicate with people with various types of disabilities
- how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- what to do if a person with a disability is having difficulty in accessing our goods, services or facilities

7. Feedback Process

We welcome feedback on how we provide accessible customer service. Customer feedback will help us identify barriers and respond to concerns. We will make sure our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request.

Customers who wish to provide feedback on the way we provide goods, services or facilities to people with disabilities, or for more information on this Accessibility Plan or for accessible formats of the Accessibility Plan, please contact:

Glencore Canada Corporation
100 King Street West, Suite 6900, P.O. Box 403
Toronto, ON M5X 1E3
(416) 775-1500
reception@glencore-ca.com

You can expect a response from us within 2 business days.

8. Notice of Availability of Documents

We will provide this document in an accessible format or with communication support, on request. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and, at no additional cost.

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Integrated Accessibility Standards Regulations (IASR) and Multi-Year Accessibility Plan

The following sets out how Glencore is committed to complying with the IASR.

1. Workplace Emergency Response Information

Where Glencore is aware that an employee has a disability and that there is a need for accommodation, individualized workplace emergency response information will be provided to the employee as soon as practicable if such information is necessary given the nature of the employee's disability.

Action Taken:

Glencore is in the process of implementing the following measures:

- individualized workplace emergency response information procedures for employees with disabilities, as disclosed and required;
- workplace emergency response information forms for employees who have disclosed a disability and who are being accommodated according to their disabilities;
- where required, provide assistance to specific disabled employees, with the disabled employees' prior consent, to help them evacuate the workplace in case of an emergency or disaster as set out in individualized emergency plans for the employees;
- individualized emergency plans communicated to the employees' respective managers and safety personnel on an 'as needed' basis;
- on an ongoing and regular basis, and as per the applicable terms of the IASR review and assess general workplace emergency response procedures and individualized emergency plans to ensure accessibility issues are addressed.

Expected Compliance by: June 30th, 2015; target date will be updated as required.

2. Training

Glencore 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.

Planned Action:

In accordance with the IASR, Glencore will:

- determine and ensure that appropriate training on the requirements of the IASR and on the *Human Rights Code* as it pertains to persons with disabilities, is provided to all employees, independent contractor representatives, volunteers, third-party service providers who provide services related to products, services and facilities on Glencore's behalf, and persons participating in the development and approval of Glencore's policies;

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- ensure that the training is provided to persons referenced above as soon as practicable;
- keep and maintain a record of the training provided, including dates the training was provided and number of individuals to whom it was provided; and
- ensure training is provided on any changes to Glencore's policies on an ongoing basis.

Expected Compliance by: June 30th, 2015; target date will be updated as required

3. Information and Communication

Glencore is committed to making company information and communications accessible to persons with disabilities. Glencore will incorporate new accessibility requirements under the information and communication standards to ensure that its information and communications systems and platforms are accessible and are provided, upon request, in accessible formats that meet the needs of persons with disabilities.

a. Feedback, Accessible Formats and Communication Supports

Planned Action:

In accordance with the IASR, Glencore 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;
- more broadly, 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 about the availability of accessible formats and communication supports.

Required Legislative Compliance: Feedback: January 1, 2015; Accessible formats and communication supports: January 1, 2016.

b. Accessible Websites and Web Content

Planned Action:

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In accordance with the IASR, Glencore recognizes its obligation to provide web content which conforms with the World Wide Consortium Web Content Accessibility Guidelines (WCAG 2.0) Level AA.

Any website hosted by Glencore Canada Corporation shall meet the requirements set out in the IASR.

Required Legislative Compliance:

WCAG 2.0 Level A – new Internet websites and web content: January 1, 2014

WCAG 2.0 Level AA – all Internet websites and web content, except for exclusions set out in the IASR: January 1, 2021.

4. Employment

a. *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.

(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

b. 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 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

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- 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

c. 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 will review and assess 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.

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.

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

- 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

d. 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 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

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