



ACCESSIBILITY POLICY

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1.0 PURPOSE

SNOLAB is the world's premier underground science laboratory. SNOLAB is committed to facilitating excellent science, developing world-leading infrastructure, and developing diverse talent in an inclusive environment. As such, SNOLAB is committed to balancing equal access and participation for people with disabilities (as expressed through the *Accessibility for Ontarians with Disabilities Act*) with the requirements of an industrial workplace (as expressed through the *Ontario Mining Act* and the *Ontario Occupational Health and Safety Act*). SNOLAB is committed to maintaining an inclusive, equitable, and accessible workplace, one that treats people with disabilities in a way that allows them to maintain their dignity and independence. SNOLAB strives for integration, and is committed to meeting the needs of people with disabilities in a timely manner by removing and preventing barriers to accessibility and meeting all legislative requirements.

2.0 SCOPE

This policy applies to all current staff, students, users, and contractors of SNOLAB, including full and part-time, casual, contract, permanent, and temporary employees. This policy also applies to employees on approved leave, including short and long-term disability leave, and job applicants.

This policy applies to all aspects of employment including, but not limited to recruitment, selection, training, promotion, transfers, work arrangements, compensation and benefits, and termination of employment.

3.0 DEFINITIONS

ACCESSIBILITY: means giving opportunities to people of all abilities to participate fully in everyday life. It is used to describe how widely a service, product, device, or environment is available to as many people as possible. Accessibility is the ability to access and benefit from a system, service, program, product, or environment.

ACCOMMODATION: refers to the obligation to eliminate the disadvantage, to the point of undue hardship, caused by barriers that exclude individuals or groups protected under the Ontario Human Rights Code from participating in all aspects of their

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employment and/or their receipt of services on the basis of disability.

CUSTOMER: In the context of our organization's accessibility policy, a 'customer' refers to any individual or department within the organization that relies on or interacts with another individual or department to receive a service, support, or assistance. This encompasses internal stakeholders who provide services or support to their colleagues, thus fostering a culture of collaboration and ensuring accessibility and inclusivity at SNOLAB.

DISABILITY: as defined by the AODA and the Ontario Human Rights Code, is:

- a) Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes, mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or in a wheelchair or other remedial appliance or device;
- b) A condition of mental impairment or a developmental disability;
- c) A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- d) A mental disorder; and
- e) An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

This definition includes disabilities of different severity, visible as well as non-visible disabilities, and disabilities the effects of which may come and go.

4.0 RESPONSIBILITIES

SNOLAB is responsible for:

- eliminating barriers that prevent people from accessing, or being included in, the workplace;
- minimizing the need for individual accommodation by regularly reviewing rules, policies, bylaws, and practices to ensure they are not discriminatory;

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- ensuring all employees and job applicants are advised of their right to be accommodated;
- dealing with requests for accommodation in a timely, confidential and sensitive manner;
- providing individual accommodation to the point of undue hardship; and
- ensuring this policy is effectively implemented and communicated.

SNOLAB SUPERVISORS are responsible for:

- fostering an inclusive work environment by treating all employees, users and students and job applicants with respect and dignity;
- identifying and eliminating barriers that prevent people from accessing, or being included in, the workplace;
- dealing with requests for accommodation in a timely, confidential, and sensitive manner;
- involving individuals requiring accommodation in the search for accommodation;
- informing individuals requiring accommodation what information they need to provide to be accommodated; and
- initiating a discussion about accommodation when they are aware that an employee or job applicant may have a need for accommodation, but is unable, for any reason, to articulate that need.

EMPLOYEES AND JOB APPLICANTS are responsible for:

- making their accommodation needs known to their Supervisors, to the extent that they are able;
- helping to identify potential accommodation options;
- providing documentation in support of their request for accommodation, including information about any restrictions or limitations; and

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- accepting an offer of accommodation that meets their needs, even if it is not their preferred accommodation option.

HUMAN RESOURCES OFFICER is responsible for:

- implementing this policy and providing interpretation in its application.

5.0 REQUIREMENTS

ACCESSIBLE SERVICES

SNOLAB shall make every reasonable effort to ensure its policies, practices, and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- ensuring that all staff, students, contractors and users receive the same value and quality;
- using alternative methods, whenever possible, to ensure staff, students, and contractors with disabilities have access to the same services, in the same place and in a similar manner;
- taking into account individual needs when providing services; and
- communicating in a manner that takes into account the staff, students, contractor’s disability.

It is recommended that SNOLAB employees use the term “persons with disabilities” or “people with disabilities” and if a specific condition must be referenced, the condition be referenced last (e.g., person with low vision). To guide communication and interaction with or about people with all types of disabilities:

- It is important to put people first. It is more appropriate to say “person with a disability”, rather than “disabled person” or “the disabled”.
- It is best not to make assumptions. Wait until an individual describes their disability to you. Disabilities can be complex, and our assumptions may be inaccurate.

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Guide Dogs and Service Animals

SNOLAB welcomes people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are not subject to restrictions by our industrial host Vale's mining regulations.

A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

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

A regulated health professional is defined as a member of one of the following colleges:

- College of Audiologists and Speech-Language Pathologists of Ontario
- College of Chiropractors of Ontario
- College of Nurses of Ontario
- College of Occupational Therapists of Ontario
- College of Optometrists of Ontario
- College of Physicians and Surgeons of Ontario
- College of Physiotherapists of Ontario
- College of Psychologists of Ontario
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

If service animals are prohibited by another law, SNOLAB will do the following to ensure people with disabilities can access our services:

- explain why the animal is excluded;
- discuss with the customer another way of providing goods, services or facilities.

Service animals are prohibited from the following areas:

- Vale property, as defined by Vale;
- Clean labs, both in the surface facility and underground lab.

Under:

- Occupational Health and Safety Act (OHSA), R.R.O 1990, Reg 851, Reg 854.
- ISO14644-1: Cleanrooms and Associated Controlled Environments.

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Use of Support Persons

If a person with a disability is accompanied by a support person, SNOLAB shall ensure that both persons are allowed to enter its premises together, and that the person with a disability is not prevented from having access to the support person.

SNOLAB may require the person with a disability to be accompanied by a support person when on SNOLAB’s premises in the event that a support person is necessary to protect the health and safety of a person with a disability or the health and safety of others on the premises. This may only occur after consulting with the person with a disability.

The support person will be expected to complete all required safety training to access the SNOLAB site.

Use of Assistive Devices

Persons with disabilities may use their own assistive devices as required when accessing SNOLAB. In cases where the assistive device presents a safety concern or where a barrier may exist, other reasonable measures may be used to ensure the access of services.

SNOLAB shall ensure that its Employees are familiar with the use of assistive devices available on SNOLAB site.

Notice of Temporary Disruptions

SNOLAB site access disruptions may occur due to reasons that may or may not be within the control or knowledge of SNOLAB. When a temporary disruption occurs, SNOLAB will take steps to continue assisting people with disabilities where possible.

SNOLAB shall provide Customers with notice, if possible, in the event of a planned disruption of site access.

Accessibility Feedback

SNOLAB welcomes feedback on how we provide accessible customer service. Customer feedback will help us identify barriers and respond to concerns.

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Feedback may be provided in the following ways:

- Email to HR@snolab.ca or to the Director of Corporate Services;
- In person, to the HR Officer;
- Through the online staff engagement survey.

All feedback, including complaints, will be handled in the following manner:

- Acknowledgement of receipt within 48 hours;
- Review by the Human Resources Officer or designated party;
- A follow up meeting or communication with the individual providing feedback, if necessary, to understand more about the concerns;
- Investigation and action plan development to address the feedback;
- Communication of the outcome to the individual who provided the feedback;
- Documentation of the feedback and response for continuous improvement.

Availability of Accessibility Documents

- SNOLAB notifies the public that documents related to accessible customer service, are available upon request by posting a notice in the following location(s)/way(s):
 - On the SNOLAB public website, including a downloadable format;
 - On the internal HR SharePoint Site;
 - In the Human Resources DocuShare folder.
- SNOLAB will provide these documents in an accessible format or with communication support, upon 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 cost.

TRAINING

SNOLAB is committed to training all staff and volunteers in accessible customer service, other Ontario accessibility standards, and aspects of the Ontario Human Rights Code that relate to persons with disabilities.

In addition, we will train:

- a) all persons who participate in developing the organization's policies; and
- b) all other persons who provide goods, services or facilities on behalf of the organization.

Training of our employees and volunteers on accessibility relates to their specific roles.

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Training includes:

- purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Customer Service Standards
- our policies related to the Customer Service Standards
- 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
- when necessary, how to use the equipment or devices available on-site or otherwise that may help with providing goods, services, or facilities to people with disabilities.

List of Equipment/Devices:

- Adult changing table
- Evacuation Chairs
- Tablets

SNOLAB trains every person on their first day of work and provides training in respect of any changes to the policies.

We maintain records of the training provided.

INFORMATION AND COMMUNICATION

SNOLAB has a process for receiving and responding to feedback and the process is accessible to persons with disabilities upon request.

SNOLAB communicates with people with disabilities in ways that take into account their disability. When asked, we will provide information about our organization and its services, including public safety information, in accessible formats or with communication supports:

- a) in a timely manner, taking into account the person's accessibility needs due to disability; and
- b) at a cost that is no more than the regular cost charged to other persons.

We will consult with the person making the request in determining the suitability of an accessible format or communication support. If the organization determines that

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information or communications are unconvertible, the organization shall provide the requestor with:

- a) an explanation as to why the information or communications are unconvertible; and
- b) a summary of the unconvertible information or communications.

We notify the public about the availability of accessible formats and communication supports by:

- Including information in all public communications, such as brochures, advertisements, and announcements.

EMPLOYMENT

SNOLAB notifies employees, job applicants and the public that accommodations can be made during recruitment and hiring. We notify job applicants when they are individually selected to participate in an assessment or selection process that accommodations are available upon request. We consult with the applicants and provide or arrange for suitable accommodation.

SNOLAB notifies successful applicants of policies for accommodating employees with disabilities when making offers of employment.

SNOLAB notifies staff that supports are available for those with disabilities as soon as practicable after they begin their employment. We provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that take into account an employee's accessibility needs due to a disability.

SNOLAB will consult with employees when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to disability. We will consult with the person making the request in determining the suitability of an accessible format or communication supports specifically for:

- a) information that is needed in order to perform the employee's job; and
- b) information that is generally available to employees in the workplace.

Where needed, SNOLAB will also provide customized emergency information to help an employee with a disability during an emergency.

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With the employee’s consent, we will provide workplace emergency information to a designated person who is providing assistance to that employee during an emergency.

SNOLAB will provide the information as soon as practicable after we become aware of the need for accommodation due to the employee’s disability.

SNOLAB will review the individualized workplace emergency response information:

- a) when the employee moves to a different location in the organization;
- b) when the employee’s overall accommodations needs or plans are reviewed; and
- c) when the employer reviews its general emergency response policies.

SNOLAB maintains a written process to develop individual accommodation plans for employees.

SNOLAB has a written process for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work.

SNOLAB’s performance management, career development and redeployment processes consider the accessibility needs of all employees.

6.0 RECORDS

All records associated with accommodation requests are confidential and will be maintained in a secure location, separate from employees’ personnel files.

Access to this information will be provided only to authorized persons who have a ‘need to know’ by the HR Officer.

7.0 REFERENCES

- Accessibility for Ontarians with Disabilities Act
- Canadian Human Rights Act
- Ontario Human Rights Code

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8.0 REVISION HISTORY <the original publication is Rev 00>

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