

## **Accessible Service Provision Policy**

### **Purpose**

North American Palladium “NAP”, Ltd. strives at all times to provide goods and services in a way that respects the dignity and independence of persons with disabilities. NAP is also committed to ensuring that persons with disabilities receive accessible goods and services of the same quality that others receive. This Policy has been prepared in accordance with the compliance requirements of the Accessibility for Ontarians with Disability Act, 2005 and outlines what people may expect from NAP in regard to this Act. This Policy is intended to accommodate all persons with disabilities, as defined in the Ontario Human Rights Code, and to ensure all persons with disabilities will be treated with dignity, integration, independence and equal opportunity when receiving goods and services from NAP.

### **Scope**

This policy applies to all employees, contractors and consultants of NAP who deal with members of the public or other third parties on behalf of the Company, and every person who participates in developing policies, practices and procedures relating to the provision of goods and services at the Company.

### **Responsibilities**

The Vice President Human Resources will have the overall responsibility for this Policy.

Managers at each work location will be responsible for the administration of this Policy.

All employees who deal with members of the public or other third parties on behalf of NAP will be responsible for ensuring adherence to this Policy.

### **Assistive Devices**

NAP is committed to serving persons with disabilities who use assistive devices in order to obtain, use or benefit from the goods and services provided by the Company. Assistive devices, such as wheelchairs, are permitted at all Company locations that are open to the public or other third parties. NAP will ensure that employees are trained and familiar with the use of various assistive devices.

### **Access Granted to Service Animals**

Persons with disabilities may bring their service animal into the areas of NAP’s premises that are open to the public or other third parties. NAP will ensure that all employees and third parties dealing with the public are trained in how to interact with persons with disabilities who are accompanied by a service animal. A service animal may not be permitted to enter an area of the premises consistent with other laws. In these instances, managers will suggest appropriate alternatives and provide assistance.

### **Access Granted to Support Persons**

Any person with a disability who is accompanied by a support person will be allowed to enter the areas of NAP’s premises that are open to the public or other third parties. At no time will a person with a disability who is accompanied by a support person be prevented from having access to the support

person while on NAP's premises. When support persons are required (e.g. sign language interpreters) for meetings sponsored by NAP, employees will work to facilitate arrangements for those support persons. Fees will not be charged to support persons should they accompany a person with a disability to any area of NAP that is open to the public or other third parties. All individuals with support persons are requested to inform the Human Resources Department prior to their visit to allow the Company to make the appropriate arrangements to accommodate both individuals.

### **Communication Process**

NAP employees will communicate with persons with disabilities in ways that take into account their individual needs. Persons with disabilities will be able to effectively communicate with NAP for purposes of using, receiving and requesting goods, services and facilities.

NAP will train staff who communicate with members of the public or other third parties on appropriate interactions and means of communication with persons with various types of disabilities.

### **Feedback Process**

The ultimate goal of this Policy is to meet goods and services delivery expectations while responding to the requests of individuals with disabilities. Comments regarding how well NAP is meeting those expectations are welcome and appreciated. Feedback about this Policy or its implementation may be submitted:

- By phone: (416)360-7590, ext 7341.
- In person: Attention: Vice President Human Resources  
One University Avenue, Suite 402  
Toronto, Ontario

- OR -

Attention: Vice President Human Resources  
715 Hewitson Street, Suite 2002  
Thunder Bay, Ontario

- By mail: North American Palladium, Ltd.  
One University Avenue, Suite 402  
Toronto, Ontario  
M5J 2P1
- Online at: [www.nap.com](http://www.nap.com)
- By email: [accessibility@nap.com](mailto:accessibility@nap.com)

Accessibility Feedback Forms are available online or in person from the Human Resources Department and/or at reception. All feedback will be directed to the Vice President Human Resources and will be reviewed for possible action that can be taken to improve the services outlined. Where possible, complaints will be addressed immediately. However, complaints that are reviewed for action may take longer to address. Individuals who choose to offer feedback can expect acknowledgement of the receipt of feedback within five (5) business days. This acknowledgement will indicate how the matter will be

addressed and when the individual might be notified of the outcome. The Company will follow-up on any actions arising from the feedback and the timeframe for implementation will be provided as part of the notification of outcome.

Responses made by NAP in regard to feedback given will be delivered in a format that is accessible and responsive to the needs of each individual. The Company will respect the privacy of anyone who offers feedback.

### **Notice of Temporary Disruptions**

NAP will provide notice in the event of a planned or unexpected disruption in the facilities or services used by persons with disabilities. This notice will include information about the reason for the disruption, how long the disruption is expected to last and a description of any alternative facilities or services available (where applicable).

The notice will be placed at all public entrances of the facility disrupted. Depending on the nature of the disruption, notice will also be provided via email and/or outgoing telephone messages as well as on NAP's website. This notice will be provided in accessible formats.

### **Training on Accessibility Standards**

NAP will provide training on Accessibility Standards for Customer Service, Ontario Regulation 429/07 to every employee, contractor and consultant who deals with members of the public or other third parties on behalf of the Company. Training will also be provided for every person involved in the development of policies, practices and procedures regarding the provision of goods and services.

Training will occur on an ongoing basis and whenever changes are made to relevant policies, practices and procedures. Training will be provided to each person as soon as practicable after he/she is assigned applicable duties.

Training will include:

- an overview of the Accessibility for Ontarians with Disability Act, 2005 and the customer service standard requirements;
- NAP's plan to create an accessible standard for all customers;
- how to communicate and interact with people with disabilities;
- how to interact and assist people with disabilities that require the assistance of a service animal or a support person or use of an assistive device; and
- what steps to take if a person with a disability is experiencing difficulty accessing NAP's goods and services.

### Accessibility Feedback Form

North American Palladium “NAP” Ltd. is committed to providing goods and services in a way that respects the dignity and independence of persons with disabilities. Your feedback will be used to ensure that NAP’s policies and procedures continue to provide the best service for all our customers.

Once completed, please submit this form to [accessibility@nap.com](mailto:accessibility@nap.com), fax it to (416) 360-7709 or mail it to North American Palladium Ltd., Attention: Vice President Human Resources, Royal Bank Plaza, South Tower, 200 Bay Street, Suite 2350, P.O. Box 93, Toronto, Ontario, M5J 2J2, Canada.

Should you prefer to provide verbal feedback, you may instead speak with the Vice President Human Resources by calling (416) 360-7590, ext. 7341.

1. North American Palladium Ltd. location that was visited or with which communication was initiated:

Corporate Office  
 Thunder Bay Office  
 Mine Site  
 Other: \_\_\_\_\_

2. Date of interaction (dd/mm/yyyy): \_\_\_\_\_

3. Time of interaction: \_\_\_\_\_ a.m. / p.m.

4. Was service provided to you in an accessible manner?

Yes  
 No

5. If you answered “No” to question #4, please explain:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

6. What could we do to make our goods and services more accessible to you?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

7. Would you like to be contacted with an acknowledgement of the receipt of feedback?  
 Yes  
 No

8. If you answered 'Yes' to question #7, please provide contact information below. Please indicate with a checkmark, the method that you prefer to be contacted.

Name: \_\_\_\_\_

Address: \_\_\_\_\_  Preferred Contact

Telephone: \_\_\_\_\_  Preferred Contact

Email: \_\_\_\_\_  Preferred Contact

The personal information you have provided on this form will be used solely for the purpose of responding to your feedback. Please contact North American Palladium Ltd., Vice President Human Resources if you have any questions or concerns about the use and disclosure of your personal information.

Thank you for taking the time to share your feedback with us. All feedback will be directed to the Vice President Human Resources. You may expect acknowledgement of the receipt of your feedback within five business days. If applicable, we will also explain how your feedback will be used.