

## **Multi-Year Accessibility Plan**

### **1. STATEMENT OF COMMITMENT**

Kirkland Lake Gold Ltd. (the “Company” or “KL Gold”) will, in accordance with the Accessibility for Ontarians with Disabilities Act, 2005 (the “AODA”), create and maintain an accessible environment for third parties and will provide accommodation where required. The Company will prevent and remove barriers to accessibility for all third parties, including people with disabilities, and will meet the requirements under the AODA in a timely fashion.

KL Gold will provide services, programs, goods and facilities to persons with disabilities in a manner that:

- Is free from discrimination;
- Seeks to provide integrated services;
- Is in an accessible format; and
- Takes into consideration a person’s disability.

KL Gold relies on all of its employees, directors, volunteers, consultants, contractors and guests to assist with maximizing accessibility within the Company by:

- Identifying potential barriers and proposing ways to remove them;
- Participating in training;
- Learning how to interact with persons with disabilities, including those who require the use of a support person or service animal;
- Learning how to use existing accessibility devices; and
- Advising the Company when they require either temporary or permanent assistance with their accessibility needs.

### **2. INTRODUCTION**

The AODA was enacted in 2005 to develop, implement, and enforce accessibility standards in order to achieve accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures, and premises throughout Ontario by 2025. Accessibility standards include the Accessible Customer Service Standard, and the Integrated Accessibility Standard Regulation (“IASR”), which includes the areas of Information and Communication, Transportation, Employment, and the Design of Public Spaces. The IASR requires that the Company establish, implement, maintain, and document a Multi-Year Accessibility Plan.

This Plan outlines KL Gold’s strategy to identify, prevent and remove accessibility barriers and meet its requirements under the IASR. KL Gold will:

- Post the Plan on the Company website or in a public area;
- Provide the Plan in an accessible format upon request; and
- Review and update the Plan at least once every five years.

### 3. ACCESSIBILITY PLAN

The IASR consists of five parts:

1. General Requirements
2. Accessible Information and Communications Standard
3. Accessible Employment Standard
4. Accessible Transportation Standard
5. Design of Public Spaces Standard

The Accessible Transportation Standard and the Design of Public Spaces Standard do not apply to KL Gold's business. To address the remaining standards, KL Gold Alamos has designed the Plan set out in Schedule A.

### 4. FEEDBACK

KL Gold welcomes inquiries and feedback about accessibility. Feedback can be made in person, via e-mail, telephone, fax, or in writing to:

Human Resources  
Kirkland Lake Gold  
Royal Bank Plaza, South Tower  
3120 – 200 Bay St.  
Toronto, Ontario M5J 2J1  
P. 416-840-7884 | F. 416-360-2723  
E. [info@klgold.com](mailto:info@klgold.com)

A representative of the Company will respond within 7 business days either in writing, by e-mail, or by telephone, as appropriate, acknowledging receipt of the feedback. KL Gold will provide a proposed resolution in a timely manner.

For more information on this or any other accessibility policy, or to receive a copy of any of the policies or other records required by the AODA, please KL Gold's Human Resources department using the information above.

Alternate formats of this document are available upon request.



SCHEDULE A

Requirement	Action Plan
<p><b>Information and Communication Standard</b></p> <p>Make emergency procedures, plans, or public safety information available in an accessible format or with appropriate communication supports, upon request.</p>	<ul style="list-style-type: none"> <li>▪ The Company will provide emergency evacuation information in accessible formats or with communication supports upon request.</li> <li>▪ The Company will provide employees who may deal with the public with appropriate emergency evacuation information and train those employees on what support options may be required.</li> </ul>
<p><b>Employment Standard - Workplace Emergency Response</b></p> <p>Provide individualized workplace emergency response information to employees requesting an accessibility-based accommodation.</p>	<ul style="list-style-type: none"> <li>▪ As part of Health &amp; Safety training sessions, the Company will advise employees that they may notify Human Resources of any permanent or temporary accessibility accommodations that may be required.</li> <li>▪ The Company will develop and document individual emergency response plans for each employee who identifies the need for accommodation or support during an emergency due to a disability.</li> <li>▪ The Company will create a process for regularly updating emergency response plans.</li> </ul>
<p><b>General Requirements</b></p> <p>File Accessibility Compliance Report.</p>	<ul style="list-style-type: none"> <li>▪ The Company will file Accessibility Compliance Reports every three years, starting in 2014, on or before December 31.</li> </ul>
<p><b>General Requirements</b></p> <p>Develop an AODA Policy. The Accessibility Policy must include a statement of commitment to meet the accessibility needs of persons with disabilities in a timely manner.</p>	<ul style="list-style-type: none"> <li>▪ The Company will create an Accessibility Policy.</li> <li>▪ The Company will create a Statement of Commitment.</li> <li>▪ The Company will post the AODA policy on the KL Gold website.</li> </ul>



<p><b>General Requirements</b></p> <p>Develop the Multi-Year Accessibility Plan.</p>	<ul style="list-style-type: none"> <li>▪ The Company will outline current and future barrier reduction activities.</li> <li>▪ The Company will assign a single point of contact to provide oversight and governance of AODA initiatives, and will identify other stakeholders (e.g. IT, Communications, H&amp;S and HR departments) that will be accountable for implementing the Plan.</li> <li>▪ The Company will allocate resources to meeting the action items in the Plan as required.</li> <li>▪ The Company will post the Plan on the KL Gold website.</li> </ul>
<p><b>General Requirement</b></p> <p>Training on the requirements of the IASR accessibility standards and on the Human Rights Code.</p>	<ul style="list-style-type: none"> <li>▪ The Company will develop a training strategy which includes:             <ul style="list-style-type: none"> <li>○ A plan for developing AODA and IASR training.</li> <li>○ Identification of employees or groups of employees that may require additional or specialized training related to the responsibilities of their roles.</li> <li>○ A mechanism for tracking training.</li> </ul> </li> </ul>
<p><b>Information and Communication Standard</b></p> <p>Have an accessibility process in place for receiving and responding to feedback.</p>	<ul style="list-style-type: none"> <li>▪ The Company will identify an appropriate person to receive and respond to feedback.</li> <li>▪ The Company will provide a means on its website for feedback on accessibility concerns, requests or questions.</li> <li>▪ The Company will make feedback requests and responses available in accessible formats or with communication supports when requested.</li> <li>▪ The Company will track all feedback.</li> </ul>



<p><b>Information and Communication Standard</b></p> <p>Notify the public about the availability of accessible formats and communication supports.</p> <p>Provide or arrange for the provision of accessible formats and communications supports, upon request.</p>	<ul style="list-style-type: none"> <li>▪ The Company will develop a mechanism for the provision of accessible formats and communication upon request.</li> <li>▪ The Company will ensure that PDF documents posted to the website are tagged and structured to be accessible.</li> <li>▪ The Company will, as required, produce accessible standard documents, such as quarterly reports and financial statements.</li> <li>▪ The Company will allocate a budget for the creation of alternative formats.</li> </ul>
<p><b>Employment Standard</b></p> <p>Notify employees and the public about the availability of accommodation for applicants with disabilities throughout the recruitment process.</p>	<ul style="list-style-type: none"> <li>▪ The Company will create a statement on the Careers page regarding the availability of accommodations upon request.</li> <li>▪ The Company will ensure that all documents and tools used in the recruitment process are accessible, or can be modified to meet accommodation requests, as required.</li> </ul>
<p><b>Employment Standard</b></p> <p>If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant’s accessibility needs due to disability.</p>	<ul style="list-style-type: none"> <li>▪ The Company will consult with job applicants that indicate the need for accommodation on the type of accommodation that they require for the interview.</li> <li>▪ The Company will update hiring procedures to support this requirement.</li> <li>▪ The Company will train recruiters and HR staff on accessible hiring policies and procedures.</li> </ul>
<p><b>Employment Standard</b></p> <p>When making offers of employment, notify the successful applicant of policies for accommodating employees with disabilities.</p>	<ul style="list-style-type: none"> <li>▪ The Company will create a policy for accommodating disability and discussing the requirement of a job accommodation with all new hires upon receipt of their accepted offer of employment or during their orientation.</li> </ul>



<p><b>Employment Standard</b></p> <p>Inform employees of policies used to support employees with disabilities, including, but not limited to, policies on the provision of job accommodations.</p> <p>Information should be provided:</p> <ul style="list-style-type: none"> <li>▪ as soon as practicable after employees begin their employment, and</li> <li>▪ whenever there is a change to existing policies on the provision of job accommodations</li> </ul>	<ul style="list-style-type: none"> <li>▪ The Company will create a process for the provision of information regarding job accommodation policies and supports for employees with disabilities.</li> <li>▪ The Company will make the policy and procedures available for all new and existing employees and provide notification to employees whenever the policy and procedures are changed or updated.</li> <li>▪ The Company will make accommodation policies and procedures easily accessible for employees.</li> </ul>
<p><b>Information and Communication Standard</b></p> <p>When requested, consult with an employee with a disability to provide or arrange for the provision of accessible formats and communication supports for:</p> <ul style="list-style-type: none"> <li>▪ Information that is needed in order to perform the employee’s job; and</li> <li>▪ Information that is generally available to employees in the workplace.</li> </ul>	<ul style="list-style-type: none"> <li>▪ The Company will consult with employees to find out what accommodation is right for them.</li> </ul>
<p><b>Employment Standard</b></p> <p>Develop a written process for the development of documented individual accommodation plans for employees with disabilities.</p>	<ul style="list-style-type: none"> <li>▪ The Company will establish a process for the development of individual accommodation plans (each, an “IAP”).</li> <li>▪ The Company will document IAPs for each employee, upon receipt of such a request.</li> </ul>
<p><b>Employment Standard</b></p> <p>Develop, document and have in place a return to work process for employees absent due to disability who require a disability-related accommodation to return to work.</p>	<ul style="list-style-type: none"> <li>▪ The Company will develop a documented return to work process which includes non-work injury related disabilities.</li> </ul>



<p><b>Employment Standard</b></p> <p>For performance management, career development and staff redeployment, consider the accessibility needs and individual accommodation plans in the overall process.</p>	<ul style="list-style-type: none"><li>▪ The Company will review any accommodations that may be in place in order to meet the employee’s needs while conducting performance reviews.</li><li>▪ The Company will update and issue the revised procedures to all employees, as required.</li><li>▪ The Company will review and include accommodations detailed in an employee’s IAP as part of any career development and advancement activities.</li><li>▪ The Company will update the policy to include a review of IAPs as part of the learning and development process.</li><li>▪ The Company will update Human Resources policies and procedures in support of this requirement.</li></ul>
<p><b>Information and Communication Standard</b></p> <p>All internet websites and web content must conform with WCAG 2.0 Level AA with exceptions:</p> <ul style="list-style-type: none"><li>▪ Live Captions</li><li>▪ Audio Descriptions</li></ul>	<ul style="list-style-type: none"><li>▪ The Company will develop a plan to remediate or redesign any existing web sites, web applications and web content to meet WCAG 2.0 Level AA by 2021.</li></ul>