

Accessibility Plan – Hudbay Minerals Inc. Manitoba Business Unit

General

Hudbay Minerals Inc. MBU (hereafter “Hudbay MBU”) is a publicly traded company with Manitoba operations located primarily in Snow Lake with a services group in Flin Flon.

The Snow Lake operations include the Company’s 100% owned Lalor mine (an underground zinc, gold and copper mine), the Stall concentrator (which produces zinc and copper concentrates) and the New Britannia mill which produces gold ore and copper concentrates.

The Flin Flon operations include a small administrative group, fabrications shop and concentrate handling.

Hudbay’s Manitoba Business Unit currently employs approximately 740 unionized employees. In addition to the unionized employees, there are approximately 260 employees working in non-unionized roles in Hudbay’s Manitoba Business Unit.

Executive Summary

A fundamental value at Hudbay MBU is the safe return to work and the accommodation at work for employees with disabilities, either temporary, permanent, or episodic. Our Disability Management program oversees the return to work program as well as assists in accommodating employees at work who need assistance, access, or accommodation. Each department at Hudbay MBU expects to accommodate employees who are able to return to work with modified or accommodated duties.

On review of Hudbay MBU’s injury reporting and short term disability statistics, we were able to identify two areas where our employees were distinctly experiencing disability; these areas were in chronic pain and reduced mobility, and mental health and mental wellness.

We have structured our Accessibility Plan to both improve access for those two groups in particular, but also to improve care and management of these two issues for all Hudbay MBU’s employees.

Consultation

To engage in the consultation process Hudbay MBU formed a Committee of employees to initially review the requirements for creating an Accessibility Plan and to identify barriers and access issues. The entire community of Hudbay MBU employees was invited to attend, as well as some specific employees representing their departments. The committee was composed of the Disability Management Coordinator, the Industrial Health Nurse, the Workforce Management Specialist, Hudbay MBU’s Indigenous Liaison Officer, the Labour Relations

Superintendent and Coordinator, the Information Technology Manager, Hudbay MBU's Health and Safety Worker Representative and two employees in operations. Outside of Hudbay MBU's employees, a counsellor from the Employee and Family Assistance Program was also part of the committee.

The Committee assisted in developing a survey regarding barriers, access, and disability at Hudbay MBU which was distributed to the employees to complete, both online and in paper form. This was to give an opportunity to any Hudbay MBU employee who did not wish to participate in the Committee to add their input to the review of barriers and their removal at their workplace.

Survey Results

Hudbay MBU's survey gave the committee an opportunity to gather information on the composition of the workforce:

- overall 14.6 % of employees completing the survey identified themselves as having a disability;
- of that group 38% of those identifying as disabled felt that their disability limited the amount or type of work they could do;
- while 38% of those identifying as disabled indicated they had changed their work or role at Hudbay MBU, only 22% of those attributed the change to their disability, and 61 % felt that their disability would not affect their ability to change roles at Hudbay MBU.

Of the respondents, five employees indicated they had asked for an accommodation and it had not been made available to them, with one indicating they felt they had been directly refused the requested accommodation. There were also various individual comments throughout the survey responses indicating a few of the respondents did not know they could ask for accommodation or did not feel comfortable doing so. This indicates that Hudbay MBU should review our current training for supervisors and increase awareness among the employees in general about the Disability Management Program and the obligation to accommodate employees and increase accessibility.

Accessibility Statement

The *Accessible Canada Act*, assented to June 29, 2021 requires that all federally regulated entities prepare and publish an accessibility plan by June 1, 2023. This Accessibility Plan must be developed in consultation with persons with disabilities and that plan will identify barriers to access and equal participation for persons with disabilities in their workplace. The plan is also to prevent future barriers from being created.

At all times Hudbay MBU's goals for accessibility must be mindful of our Health and Safety obligations.

Hudbay MBU has the advantage of having a robust Disability Management Program to manage and arrange a return to work for those employees who are permanently or temporarily disabled.

This program works cooperatively with our health and safety goals and obligations to both return employees to work and to keep our employees safely at work.

Hudbay MBU's Accessibility Plan will be guided by our Core Values and Hudbay MBU's obligations and requirements under both Health and Safety Legislation and mining legislation, all of which will intersect with the reach of any Accessibility Plan:

- Hudbay MBU's core values, which are: Dignity and Respect, Caring, Openness, Trustworthiness.
- Hudbay MBU, which operates in mining and processing, is also strictly governed by Health and Safety Legislation, listed in their entirety in Appendix "A" but primarily:
 - H-5.6 *An Act Respecting The Hudson Bay Mining and Smelting Co., Limited*, S.C. 1947, c. 62; amended by S.C. 1987, C.52
 - W 210 *The Workplace Safety and Health Act*, C.C.S.M. c. W210
 - Operation of Mines Regulation, Man. Reg. 212/2011

Definitions per the *Accessible Canada Act*:

barrier means anything — including anything physical, architectural, technological or attitudinal, anything that is based on information or communications or anything that is the result of a policy or a practice — that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation.

disability means any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment — or a functional limitation — whether permanent, temporary or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person's full and equal participation in society.

Feedback and Inquiries

You may contact Hudbay MBU's Disability Management Coordinator at the following:

By Mail: PO Box 1500, Flin Flon MB R8A 1N9

By email: accessplan@hudsonbayminerals.com

By phone: 1 (204) 687-2256

Use the above contacts to:

- provide feedback on this Accessibility Plan;
- request a description of Hudbay MBU's feedback process in print, large print, Braille, audio format or an electronic format compatible with adaptive technology intended to assist those persons with disabilities; and
- request this Accessibility Plan in print, large print, Braille, audio format or an electronic format compatible with adaptive technology intended to assist those persons with disabilities.

1. Employment

Recruiting and employment is managed by Hudbay MBU's HR Workforce Management Team, which is committed to taking all steps to recruit the best candidate for all available roles. We have identified the below barriers and an action plan to assist in removing those barriers which may be discouraging to excellent candidates, both internal and external to our operations.

Identified Barrier	Action
Inaccessible bulletin posting process for internal positions	<p>Review the current process and develop an online posting process.</p> <p>Anticipated Result: Current employees will be better able to electronically access potential job opportunities to allow for accommodated access to postings.</p>
Access to the application process	<p>Compile and provide resource listing for assistance with the application process and provide it with all employment applications.</p> <p>Anticipated Result: Potential applicants who may be experiencing barriers in the application process will have clear resources for assistance.</p>
Information during the recruiting process	<p>Add information regarding the Disability Management Program to all recruitment materials.</p> <p>Anticipated Result: Prospective employees will be made aware there are opportunities for accommodation.</p>

2. The Built Environment

Hudbay MBU has a complex built environment spanning two milling, one mining facility and a residential camp in Snow Lake, Manitoba as well as offices and support services in Flin Flon, Manitoba. This extensive built environment is monitored by a large Health and Safety team.

Identified Barrier	Action
Accessible offices	<p>Review of operational office areas to assess office areas that may be more readily accessible to anyone with a physical limitation and create an inventory of accessible offices and workspaces.</p> <p>Anticipated Result: The ability for Hudbay MBU to provide an accessible workspace if the location of the department is not accessible to the employee.</p>
Accessibility in camp	<p>Reviewing and improving entrances and outdoor walkways to improve access to buildings with ramps and safer and more accessible walkways.</p> <p>Anticipated Result: Improved accessibility at camp for employees with limited or reduced mobility or other access concerns.</p>
Accessibility parking	<p>Review and enforce access parking at all locations</p> <p>Anticipated Result: Improving access to buildings for employees with limited or reduced mobility.</p>

3. Information and Communication Technologies (ICT)

The workforce at Hudbay MBU is divided between a small administrative group and the much larger operations group. Improving accessibility within the category of Information and Communication Technologies is focused on improving use of access technologies by our employees and also improving the access to technologies at our worksites.

Identified Barrier	Action
Limited access to online resources for non-administrative employees	<p>Review providing a computer and printer for access in the office space of production areas.</p> <p>Anticipated Result: Increased access on site to Hudbay MBU's intranet with the access technologies available on a computer.</p>
Access technologies at workspaces	<p>Review available access and assistive technologies and distribute information as to their availability to employees.</p> <p>Anticipated Result: increased awareness among employees of the access tools and technologies for workspaces.</p>

4. Communication, other than ICT

Hudbay MBU is committed to moving forward to improve communication within our organization particularly by updating how our employees are able to access information.

Identified Barrier	Action
Accessing training and procedures	<p>Workplace and procedures are not available in a digital format to employees, this limits the use of access technology by employees to access and review those materials.</p> <p>Anticipated result: employees can use access technology like larger fonts, text-to-speech to access training and procedures.</p>
Lack of awareness of accommodations	<p>Not all employees appear to be aware that they can request an accommodation for their</p>

	<p>disability, and some supervisors are not aware of their obligation to review requests carefully and accommodate to the point of undue hardship.</p> <p>Anticipated result: An increase in positive responses from supervisors to requests for accommodation and improved employee awareness of their ability to request accommodation for disabilities.</p>
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5. The procurement of goods, services and facilities

Hudbay MBU, as a mining and processing operation, changes its footprint and facilities as operations change. This creates an opportunity to improve access to facilities and change our procurement process as our footprint changes.

Identified Barrier	Action
Identify any barriers in the area of goods and services	<p>Review with our Supply Chain department as to policies and procedures for procuring goods and services.</p> <p>Anticipated Result: An increased awareness of accessibility standards and potential barriers in the procurement process resulting in earlier identification of such barriers and implementation of changes required to address accessibility barriers.</p>
Procuring new any facilities	<p>When procuring facilities ensure they are accessible.</p> <p>Anticipated Result: As Hudbay MBU's footprint and structure and facilities change the barriers to access will be reevaluated and improved.</p>

6. The design and delivery of programs and services

Hudbay MBU as an organization provides internally focused service to our employees to provide ongoing job training and physical and mental health services.

Identified Barrier	Action
Difficulty transitioning to new worksite locations and residential camp	<p>Focus on services to improve and support employee's mental health in transitioning from one operational work location to another.</p> <p>Anticipated Result: Smoother transitions, sooner return to work outcomes, and improved mental health for Hudbay MBU employees moving to a new location and residential camp.</p>
Awareness of existing programs and services	<p>Hudbay MBU funds an Employee and Family Assessment and Referral Program to provide counselling to employees and family and internally we provide a Reoccurring Injury Program for injury and pain management, the awareness of which needs to be increased.</p> <p>Anticipated Result: More use by employees for mental health and pain management programs.</p>
Overall mental health and wellness of employees	<p>Reviewing implementing a program to train supervisors in mental health first aid and awareness to provide immediate assistance to employees at work and to be able to competently direct employees to mental health care and interventions. Reinvigorate the Wellness Committee and focus that group on creating opportunities for mental health care and wellbeing in the Snow Lake residential camp and the transitioned workforce.</p> <p>Anticipated result: Improved access for employees for both mental health and wellness and immediate interventions.</p>

7. Transportation

Hudbay MBU provides limited transportation; we contract transportation from our residential camp in Snow Lake, MB to work locations in that area, which transports most employees residing in the camp. We also provide some transportation between job locations for employees in ½ ton type trucks.

Identified Barrier	Action
Access into surface vehicles for those with limited or impaired mobility	<p>Review providing easier access into surface vehicles for those with impaired mobility to step up into vehicles.</p> <p>Anticipated Result: We will determine which vehicles and areas may require assistance into vehicles and provide a solution for easier access where needed.</p>

The Accessibility Future at Hudbay MBU: Reporting and updating into the future

The Accessibility Act requires more than just a one time effort at reviewing access for employees, it requires that the employer participate in a three year cycle of annual review and improvement of the Accessibility Plan as goals are achieved and new barriers are identified in the process.

Going forward for the current three year cycle:

In 2024 Hudbay MBU will compile and publish a report on the implementation of our Accessibility Plan in 2023, this report will include the feedback we received on the plan from our employees and include both how we took that into consideration, and how we acted on that feedback.

In 2025 Hudbay MBU will publish a progress report building on the feedback received over the previous year and once again how we used that to enrich our Accessibility Plan.

This three year cycle will repeat on an ongoing basis, with an updated plan and then two years of annual progress reports. This will encourage Hudbay MBU to be continuously aware of barriers to access as they arise and rise to the challenge of removing them.

Appendix “A”

Federal Legislation

An Act Respecting The Hudson Bay Mining and Smelting Co., Limited, S.C. 1947, c. 62;
amended by S.C. 1987, C.52

Canada Labour Code, R.S.C. 1985, c.L-2
SOR/2020-130 Work Place Harassment and Violence Prevention Regulations

Canada Shipping Act, 2001

Canada Transportation Act, S.C. 1996, c. 10, as amended
Railway Employee Qualification Standards Regulations SOR/87-150

Canadian Transportation Accident Investigation and Safety Board Act S.C. 1989, c. 3
Transportation Safety Board Regulations SOR/2014-37)

Criminal Code of Canada, R.S.C. 1985, as amended

Explosives Act, R.S.C. 1985, c. E-17
Explosives Regulations 2013, SOR/2013-211

Hazardous Product Act, R.S.C. 1985, c. H-3
Hazardous Products Regulation, SOR/2015-17

Motor Vehicle Safety Act, S.C. 1993, c. 16

Nuclear Energy Act, R.S.C. 1985, c.A-16 (Formerly - Atomic Energy Control Act)

Non-smokers' Health Act 1985, c. 15 (4th Supp.)

Pest Control Products Act, SC2002, c 28

Railway Safety Act 1985, c. 32 (4th Supp.) R-4.2
Mining Near Lines of Railways Regulations SOR/91-104

National Fire Code of Canada - 2015

Canadian Electrical Code Current Edition - Part 1 (adopted by the Manitoba Electrical Code)

National Building Code of Canada (adopted by the Manitoba Building Code)

National Plumbing Code of Canada (adopted by the Manitoba Building Code)

National Energy Code of Canada for Buildings (adopted by the Manitoba Building Code)

1997 Nuclear Safety and Control Act

Radiation Protection Regulations (SOR/2000-203)

Manitoba Legislation

Apprenticeship Certification Act, C.C.S.M. c. A110

Apprenticeship and Trades Qualifications — General Regulation 154/2001
Trade of Boilermaker Regulation 66/87 R
Trade of Bricklayer Regulation 15/2006
Trade of Carpenter Regulation 69/87 R
Trade of Boom Truck Hoist, Mobile Crane and Tower Crane Operator Regulation 2/2018
Trade of Heavy Duty Equipment Technician Regulation 18/2004
Trade of Industrial Electrician Regulation 13/2006
Trade of Instrumentation and Control Technician Regulation 200/2013
Trade of Welder Regulation 101/2010
Trade of Machinist Regulation 184/2001
Trade of Automotive Service Technician Regulation 6/2011
Trade of Painter and Decorator Regulation 130/2007
Trade of Refrigeration and Air-Conditioning Mechanic Regulation 229/97
Trade of Steamfitter-Pipefitter Regulation 13/2004

The Buildings and Mobile Homes Act, C.C.S.M. c. B93

Manitoba Building Code, Man Reg 31/2011
Manitoba Plumbing Code, Man Reg 32/2011

The Dangerous Goods Handling and Transportation Act C.C.S.M. c. D12

Dangerous Goods Handling and Transportation Regulation 55/2003
Hazardous Waste Regulation 195/2015
PCB Storage Site Regulation 474/88
Storage and Handling of Petroleum Products and Allied Products Regulation 188/2001

The Drivers and Vehicles Act, C.C.S.M. c. D104

Driver's License Regulation, Man Reg. 47/2006, as amended.
Inspection of Motor Vehicles for Registration Purposes Regulation, Man Reg. 45/2006, as amended.
Vehicle Registration Regulation, Man Reg, 57/2006.
Written-off, Irreparable and Salvageable Motor Vehicles Regulation, Man Reg 41/2006

The Electrician's License Act, C.C.S.M. c. E50

Electricians Licensing Regulation, Man Reg. 186/87, as amended

The Elevator Act, C.C.S.M. c. E60

Elevator Regulation, Man Reg. 97/87, as amended

The Fatal Accidents Act, C.C.S.M. c. F50

The Fatality Inquiries Act C.C.S.M. c. F52

The Fires Prevention and Emergency Response Act, C.C.S.M. c. F80
Manitoba Fire Code, Man Reg. 155/2011

The Gas and Oil Burner Act, C.C.S.M. c. G30
Gas and Oil Burner Regulation, Man Reg. 104/87, as amended

The Highway Traffic Act, C.C.S.M. c. H60
Bills of Lading and Uniform Conditions of Carriage Regulation, Man Reg. 16/2019
Bridge Restrictions and Closures Regulation, Man Reg. 78/95, as amended
Commercial Vehicle Trip Inspection Regulation, Man Reg. 95/2008
Drivers Hours of Service Regulation, Man Reg. 72, 2007
Driver's License Regulation, Man Reg. 180/2000 as amended.
Highway Speed Regulation, Man Reg. 204/92, as amended
Charges for Licenses, Registrations, Permits and Other Services Regulation, Man Reg 42/2006
Safety Fitness Criteria and Certificates Regulation, Man Reg. 93/2015.
Periodic Mandatory Vehicle Inspection Regulation, Man Reg 76/94, as amended
Seat Belt Exemptions and Other Seating-Related Exemptions Regulation (259/2014)
Cargo Securement Regulation Man Reg 37/2005
Vehicle Equipment, Safety and Inspection Regulation Manitoba Reg 31/2019
Tolerances in Gross Weight of Certain Vehicles Regulation 422/87 R
Traffic Control Devices Regulation, Man Reg 13/2019
Vehicle Air Bag Regulation, Man Reg 47/2002
Vehicle Weights and Dimensions on Classes of Highways Regulation, Man Reg 155/2018

The Manitoba Hydro Act, C.C.S.M. c. H190
Manitoba Electrical Code, Man Reg. 76/2018

The Labour Relations Act, C.C.S.M. c. L10

The Mines and Minerals Act, C.C.S.M. c. M162
Drilling Regulation, 1992, Man Reg. 63/92, as amended.

The Off-Road Vehicles Act, SM 1987-88, c. 64

The Personal Health Information Act
Personal Health Information Regulation 245/97

The Private Investigators and Security Guards Act
Private Investigators and Security Guards Regulation

The Steam and Pressure Plants Act, C.C.S.M. c. S210
Steam and Pressure Plants Regulation, Man Reg. 108/87, as amended

The Workers Compensation Act, C.C.S.M. c. W200
Employer's Information Regulation

The Workplace Safety and Health Act, C.C.S.M. c. W210

Administrative Penalty Regulation, Man Reg. 89/2014
Operation of Mines Regulation, Man. Reg. 212/2011
Workplace Safety and Health Regulation 217/2006

Saskatchewan Legislation

All Terrain Vehicles Act
All Terrain Vehicles Regulation

The Saskatchewan Employment Act SS 2013 c S-15.1

Electrical Inspection Act, 1993, S.S. c. E-6.3
Electrical Code Regulations, 2008, E-6.3 Reg 7
Electrical Inspection Regulations, Chapter E-6.3, Reg. 1

Electrical Licensing Act, S.S. 1988-89 c.E-7.2

The Traffic Safety Act, S.S. 2004, c. T-18.1
Commercial Vehicle and Drivers (Record-Keeping) Regulations, Chapter H-3.1 Reg 22
The Commercial Vehicles Hours of Service Regulations, Chapter H-3.1 Reg 12
Vehicle Classification and Registration Regulations, Chapter H-3.1 Reg 3, as amended

Mineral Resources Act, 1985, S.S. c. M-16.1
Seismic Exploration Regulations, 1999, Chapter M-16.1 Reg 2

Railway Act, S.S. 1989-90 c.R-1.2

Workers' Compensation Act, 2013, S.S. 2013 c.W-17.11