

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 small services and operating 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 MBU currently employs approximately 710 unionized employees. In addition to the unionized employees, there are approximately 260 employees working in non-unionized roles.

Executive summary

A fundamental value at Hudbay MBU is the safe return to work and the accommodation at work for employees with disabilities, temporary, permanent, or episodic. Our Disability Management program oversees the return to work program as well as assisting 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 in 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

Peer to Peer support

To engage in the consultation process for 2026 Hudbay’s Director of Human Resources and Industrial Health Nurse assessed the needs of Hudbay’s workforce for improved front line mental health care. They determined that there was a significant issue for our employees to remain well and at work when confronting a mental health concern. As well, Hudbay MBU’s region of operations, Northern Manitoba, and the industry, underground mining and milling, both

increase the need for mental health care and programs for our employees. Research indicates that individuals engaged in underground mining have higher rates of depression, anxiety and suicide. Northern Manitoba also consistently reports higher rates of mental health issues than the Canadian average.

To that end Hudbay MBU engaged a consultant specializing in Peer Support programs to engage with operations and the employees. The consultant toured operations, our residential camp, and communities to get an overview of the environment that our employees work and live in. They also questioned employees broadly about their needs and experiences working and living in the Hudbay MBU environment. Post-review the consultant is developing a peer support training program and will return to train 8 to 10 selected employees to be peer counsellors to meet Hudbay MBU's needs. The implementation of the program is meant to ensure that there are peer counsellors on site at work and in the residential camp for immediate and necessary care and the complement the existing EFAP programs for employees. This is to ensure that there is a safe environment for employees with mental health challenges that support care and remaining in the workplace. The program's implementation will start with training the Peer Supports in June 2026.

Enhanced Alcohol and Drug Assessment and Referral

As an additional consultation process Hubay's Industrial health Nurse and Industrial Health Nurse and the Labour Relations Coordinator reviewed the ongoing need for enhanced Alcohol and Drug assessments, referral and treatment. They engaged Greenshield Health who had their psychology team review Hunday's metrics and need for improved care for current employees and benefits for terminated employees.

Their review found that there was a significant need for improved assessment and referral to in-patient care for Northern Manitoba as the area is currently underserved. As a result of the assessment Hudbay MBU has instituted an additional program through Greenshield for substance use disorder care. If a current employee requires care for Substance Use Disorder or if they are terminated for using alcohol or drugs while on Hudbay property, they are referred to enhanced care through the Greenshield EFAP portal already available for Hudbay employees. The anticipated result is improved services for current employees and increased likelihood and terminated employees will be able to be reinstated once they have completed the care that the program makes more readily available to them.

Accessibility Committee

To further engage in the consultation process Hudbay MBU formed a Committee of employees to review the requirements for creating an Accessibility Plan and to identify barriers and access issues that arose for them in the workplace. The entire community of Hudbay MBU employees was invited to attend. The committee was composed of the Disability Management Coordinator, the Industrial Health Nurse, the Labour Relations Coordinator, and three volunteer employees in operations. Outside of Hudbay MBU's employees, a counselor from the Employee and Family Assistance Program was also part of the committee. The Committee then had opportunity to review the final plan.

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 Hubday MBU's goals for accessibility must be mindful of our Health and Safety obligations.

Hubday 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.

Hubday MBU's Accessibility Plan will be guided by our Core Values and Hubday 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:

- Hubday MBU's core values, which are: Dignity and Respect, Caring, Openness, Trustworthiness.
- Hubday 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@hudbayminerals.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 an annually updated 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>Annually update information regarding the Disability Management Program and third party assistance in applying to Hudbay Minerals MBU in 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 a Fabrication Shop, offices, and support services in Flin Flon, Manitoba. This extensive built environment is monitored by a large Health and Safety team.

Identified Barrier	Action
Accessibility in camp	<p>Annually review and improve 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>
Improved Access parking	<p>Ensure all accessible spots are also plug-in spots for winter accessibility and use.</p> <p>Anticipated Result: Improved accessibility parking year round.</p>
Improved access to parking accessibility information	<p>Distribute information on applying for access parking placards.</p> <p>Anticipated Result: Improving accessibility to on-site parking and to off-site access parking in our communities.</p>
Accessibility showers and washroom facilities	<p>Continuing review of the accessibility for showers and toilets at the workplace.</p> <p>Anticipated result: Improved access to facilities.</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
Access technologies at workspaces	Annually review available access and assistive technologies and distribute information as to their availability to employees. Anticipated Result: increased awareness among employees of the access tools and technologies for workspaces.

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 widely 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>
Access to orientation materials and new trainee materials	<p>Incoming employees and contractors coming to Hudbay MBU for the first time are not aware that there are accessibility options available – this needs to be made apparent in the early stages of orientation so they can reach out and ask for necessary accommodations.</p> <p>Anticipated result: Improved uptake in access technology and requests for assistance and improved comprehension of Health and Safety instruction which is necessary for everyone’s safety.</p>
Lack of awareness of accommodations	<p>Annual communication regarding accessibility and the Disability Management program.</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>

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>Annual 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 re-evaluated 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
Mental Health and wellness and access to care	<p>Focus on services to improve and support employee's mental health in particular implementation of the Buddy-Up program to focus on men's mental health.</p> <p>Peer to Peer support program is being implemented to further address immediate access to resources and support for mental health care for all employees. The training process for the Peer Supports will start in June 2026.</p> <p>These will also complement the two existing (in person or virtual) EFAP programs available to employees.</p> <p>Anticipated result: An overall de-stigmatization of mental health and improved access to supports.</p>
Awareness of existing programs and services	<p>Regular rollouts of information on the Hudbay MBU funded programs like the Employee and Family Assessment and Referral Program and the Greenshield program to provide counseling to employees and family and that internally we provide a Reoccurring Injury Program for injury and pain management. Maintaining the Wellness Boards located in each department to distribute information on existing and upcoming programs.</p> <p>Anticipated Result: More use by employees for mental health and pain management programs.</p>
Recognizing and managing mental health issues	<p>Implementing a program to train supervisors in mental health care and de-stigmatization of mental health in the workplace via The Working Mind program.</p> <p>Anticipated result: Improved front line recognition of mental health issues and management and better accommodation at work</p>

	for employees with mental health concerns.
Prevalence of substance use disorders	<p>Implementing enhanced access to substance use disorder treatment for current employees and for employees who have been dismissed due to violation of safety policy regarding substance use while at the workplace, with the goal of reinstatement of their employment once they have completed care and can meet safety requirements to be on site at the workplace once again.</p> <p>Anticipated result: Improved uptake of substance use program for current employees and using that program to supplement existing programs in the area, and improved return to work even for dismissed employees once they have carried out their care.</p>

7. Transportation

Hubday 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	Ongoing review concerning providing easier access into surface vehicles for those with impaired mobility to step up into vehicles. Anticipated Result: We will determine which vehicles and areas may require assistance into vehicles and provide a solution for easier access where needed.

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

The Accessibility Act requires more than just a onetime 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 2027 Hubbay MBU will compile and publish a report on the implementation of our Accessibility Plan in 2026, 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 2028 Hubbay 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 Hubbay 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