

## ACCESSIBILITY POLICY AND PROCEDURES

Business Unit	All Alamos Gold Inc. Sites		
Department	Human Resources	Reference:	AGI-HRP-7.0.14
Process	Human Resources and Payroll	Revision	1
Issue to	Toronto Corporate Office and all sites located in Ontario	Effective	
Issued by	Vice President, Human Resources	Replaces	Version 1
Policy Owner	Vice President, Human Resources	Issued	August 31, 2015

Revision Date	Revised by	Revision Description
4.17.2020	C. Negovanlis	Revised to new format; minor edits made for consistency with other policies

## TABLE OF CONTENTS

### ACCESSIBILITY POLICY AND PROCEDURES

1. STATEMENT OF COMMITMENT (PURPOSE)
2. SCOPE
3. POLICY
  - Accessibility Advisory Committees
  - Self-Service Kiosks
  - Accessibility Plan Design
4. PROCEDURES
  - Communication
  - Assistive Devices
  - Use of Registered Service Animals and Support Persons
  - Notice of Temporary Disruption(s)
  - Training
  - Feedback Process
5. RESPONSIBILITY
6. DEFINITIONS
7. REFERENCE TO RELATED POLICIES AND PROCEDURES
8. CONFLICTS

## 1. STATEMENT OF COMMITMENT (PURPOSE)

Alamos Gold Inc. (the “Company”) is committed to creating and maintaining an accessible environment for all employees and third parties, and will provide accommodation where required, in accordance with the Accessibility for Ontarians with Disabilities Act, 2005 (the “Act”). The Company is committed to excellence in serving all third parties, including people with disabilities and will do so by preventing and removing barriers to accessibility and meeting the requirements under the Act in a timely fashion.

The Company is committed to providing its 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.

The Company relies on all of its Employees, volunteers and partners 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. SCOPE

This policy applies to all Employees, Volunteers, Contractors, Consultants, Directors and Officers of the Company located in Ontario, Canada, as well as Employees, contractors or consultants visiting from other subsidiaries of the Company.

## 3. POLICY

The Company continuously strives to conduct its business in a manner which respects the dignity and independence of third parties with disabilities. In order to accommodate disabilities, advance notice is appreciated and may be required.

---

### ACCESSIBILITY ADVISORY COMMITTEES

The Management team of any Company office or facility may choose to establish an Accessibility Advisory Committee which will coordinate the implementation of AODA accessibility standards, in conjunction with Managers, Supervisors and Employees. The Accessibility Advisory Committee will prepare accessibility reports, facilitate access for persons with disabilities to the building or premises, and address all other matters to comply with AODA standards.

The Accessibility Advisory Committee is made up of representatives of the following departments:

- Occupational Health Department;
- Safety Department;
- Human Resources Department;

The Accessibility Advisory Committee will:

- Familiarize itself with all of the relevant legislation, regulations and accessibility standards established under the AODA;
- Meet on a quarterly basis to consider new and existing accessibility issues and develop a plan for removing barriers and ensuring compliance;
- Review the Company's accessibility policies regularly, but at least once every calendar year; and
- Be consulted whenever Alamos modifies or develops new policies which might affect accessibility issues or create barriers to persons with disabilities.

---

#### SELF-SERVICE KIOSKS

Where or when there is a need for a self-service kiosk, the Company will take steps to ensure Employees consider the needs of people with disabilities when designing, procuring, or acquiring self-service kiosks.

---

#### ACCESSIBILITY PLAN DESIGN

The Company's Accessibility Policy and Procedures are designed to ensure that the Company is accessible to third parties as follows:

- **Communication:**  
It will communicate in ways that consider the needs of persons with disabilities. Corporate presentations and other, external Company documents will be provided in alternative formats, upon request. For example: large print, braille, TTY or relay service. Otherwise, it will consult with people with disabilities to determine their information and communication needs.

This does not apply to products and product labels, unconvertible information or communications and information that the Company does not control directly or indirectly through a contractual relationship. If it is determined that information or communications are unconvertible the Company shall provide the person requesting the information or communication with an explanation as to why the information or communications are unconvertible.

- **Assistive devices:**  
It will ensure that its frontline employees who deal directly with third parties are trained or are familiar with commonly used assistive devices. Moreover, it will ensure that anyone conducting business with the Company at its premises located at 181 Bay Street, Suite 3910, Toronto, Ontario is permitted and able to use any assistive devices they may require. Should accommodation be required for the use of such assistive devices, the Company asks that advance notice be provided in order to accommodate accordingly.
- **Use of registered service animals and support persons:**  
It welcomes third parties who are accompanied by a registered service animal or support person to its premises. At no time will it prevent third parties from having access to their registered service animal or

support person while on its premises. In certain circumstances, a support person may be required to complete a Company confidentiality agreement.

- **Notice of Temporary Disruption(s):**

It will provide notice to third parties with disabilities in the event of a planned or unexpected disruption of services or office facilities.

- **Training:**

The Company's Human Resources team will provide training to all Employees who deal with third parties on behalf of the Company. Training will also be provided to the decision makers of the Company, including the Executive Team and the Board of Directors.

- **Feedback Process:**

Feedback is an integral part to achieving excellence when serving all third parties including people with disabilities. The Company will establish a process for receiving feedback on this policy.

## 4. PROCEDURES

### COMMUNICATION

**Audio/Oral:** When communicating with people who are deaf, oral deaf, deafened or hard of hearing, Employees may need to use a registered TTY/teletypewriter, such as the Bell Relay Service (the "Relay Service").

Outlined below are instructions on how to use the Relay Service:

- Phone the Relay Service number: 1-800-855-0511.
- Tell the operator your name, the name of the person you are calling, and the number you wish to reach.
- The operator will make the call for you. Speak to the operator as if you were talking directly to the person you are calling. For example, say "Hi, how are you doing?" Do not say: "Tell him I said hello".
- Remember to say "Go ahead" when you finish speaking, so the person you are speaking to will know it is their turn to speak.

If you normally speak very quickly, the operator may ask you to speak slower so your message can be typed while you are speaking.

Additional information on how to use the Relay Service can be found at:

[http://www.bell.ca/Accessibility\\_services/Bell\\_Relay\\_service](http://www.bell.ca/Accessibility_services/Bell_Relay_service)

**Visual/Written:** When a request is received via the Accessibility Coordinator, alternate formats of Company presentations will be arranged. The Accessibility Coordinator will ask the individual (third party) if they require information/documentation in an alternate format. Documents or the information contained in the documents can be provided in the following formats: large print or Braille.

If the document(s) were prepared by an external provider on behalf of the Company, the Accessibility Coordinator will contact the external provider who, in turn, will provide the alternate format(s), as requested. The external provider will make reasonable efforts to provide the alternate format document within 10 business days. In the event that the requested alternate-format document cannot be provided within 10 business days, the Accessibility Coordinator will advise of the revised timeline.

---

## ASSISTIVE DEVICES

Should a third party require accommodation for use of their assistive device(s) when visiting the corporate office, they will be instructed to contact the Accessibility Coordinator at:

3910 – 181 Bay Street  
Toronto, Ontario M5J 2T3  
P. 416-368-9932  
E. [Accessibility@alamosgold.com](mailto:Accessibility@alamosgold.com)

---

## USE OF REGISTERED SERVICE ANIMALS AND SUPPORT PERSONS

The Company acknowledges that a registered service animal and/or a support person is required to protect the health and safety of the third party, in the following circumstances:

- When there is a significant risk to the health and safety of the person with a disability or others (the mere possibility of risk is insufficient cause);
- When the risk is greater than the risk associated with other non-disabled customer(s)/guest(s);
- When the risk cannot be eliminated or reduced by other means;
- When the assessment of the risk is based on consideration of the duration of the risk, the nature and severity of the potential harm, the likelihood that the potential harm will occur, and the imminence of the potential harm.

In some cases, a support person may have to agree to rules or requirements that are in accordance with the Company's business practices.

Where confidentiality is a concern due to the nature of the information being provided to the third party, the Company may require the support person to sign a confidentiality agreement. As an option, in some situations, it may be suitable for a support person to wait in a separate area while a third party's confidential matters are addressed.

---

## NOTICE OF TEMPORARY DISRUPTION(S)

When/where possible, the Company will post a notification on the "*Contact Alamos*" page of its corporate website and on the corporate intranet site, the Vault, regarding the disruption. The notice shall include information regarding the reason for the disruption, anticipated duration of the disruption, and a description of any alternative facilities or services, as applicable. While the Company cannot provide the same guarantee in emergency temporary disruption situations, every reasonable effort will be made to provide adequate notice.

---

## TRAINING

Employees will receive the Accessibility Training as soon as practical as part of their new hire orientation and on an ongoing basis, as changes are made to relevant policies or procedures. Training records will be maintained by the HR team and will include the name of each employee trained, as well as the date on which training was completed.

Training content will address the purpose and requirements of the AODA legislation and specifically on how to:

- Interact and communicate with people with various types of disabilities;
- Interact with people who require the assistance of a registered service animal or a support person, or use assistive devices;
- Use equipment or devices available on-site or otherwise that may help with providing services to people with disabilities; and
- Assist third parties or guests who may experience difficulty accessing our corporate content or public events.

---

## FEEDBACK PROCESS

Feedback on the Company's Accessibility Policy and Procedures can be made in person, via e-mail, telephone, fax, or in writing to:

Accessibility Coordinator  
3910 – 181 Bay Street  
Toronto, Ontario M5J 2T3  
P. 416-368-9932  
E. [Accessibility@alamosgold.com](mailto:Accessibility@alamosgold.com)

The Accessibility Coordinator will respond within 7 business days either in writing, by e-mail or telephone acknowledging receipt of the feedback. The Accessibility Coordinator will provide the proposed resolution in a timely manner.

Should a third party, or Employee require more information on this or any other Accessibility Policy, or should they wish to receive a copy of any of the policies or other records required by the AODA, they should contact:

### *For Young-Davidson:*

- Al French, Human Resources Superintendent, Alamos Gold Inc.
- Phone: 705-565-9800 ext. 2235
- Email: [Al.French@alamosgold.com](mailto:Al.French@alamosgold.com)

### *For Island Gold:*

- Tracy Topolie, Human Resources Superintendent, Alamos Gold Inc.
- Phone: 705-884-2805 x 2328
- Email: [tracy.topolie@alamosgold.com](mailto:tracy.topolie@alamosgold.com)

### *For the Toronto office:*

- Cristienne Aceto, Manager, Human Resources, Alamos Gold Inc.
- Phone: 416-368-9932 ext.5460
- Email: [Cristienne.Aceto@alamosgold.com](mailto:Cristienne.Aceto@alamosgold.com)

## 5. RESPONSIBILITY

In accordance with the Act, the Company will file an Accessibility Compliance Report with Access Ontario every three (3) years.

## 6. DEFINITIONS

---

### ACCESSIBILITY COORDINATOR

An Employee(s) of the Company responsible for ensuring that all requirements by a third party, with respect to accessibility, are fulfilled. They act as the liaison between the third party and the Company to ensure all requests, feedback and complaints are handled in accordance with this policy.

---

### COMPANY

Alamos Gold Inc. a corporation existing under the laws of the Province of Ontario, having its head office located at Brookfield Place, 181 Bay Street, Suite 3910, Toronto, Ontario M5J 2T3.

---

### CONTRACTOR / CONSULTANT

Refers to any company or individual with which the Company has contracted to perform a service on Company Premises or as a representative of the Company. This would include contractors, their employees, sole provider contractors or consultants, and subcontractors and their employees.

---

### DIRECTOR

An appointed or elected member of the Board of Directors of the Company

---

### DISABILITY

Section 10 (1) of the Human Rights *CODE* of Ontario defines “disability” as follows:

“because of disability” means for the reason that the person has or has had, or is believed to have or have had,

1. 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 on a wheelchair or other remedial appliance or device,
2. a condition of mental impairment or a developmental disability,
3. a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
4. a mental disorder, or
5. an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997

“Disability” should be interpreted in broad terms. It includes both present and past conditions, as well as a subjective component based on perception of disability. Although sections 10(a) to (e) set out various types of conditions, it is clear that they are merely illustrative and not exhaustive. Protection for persons with disabilities under this subsection explicitly includes mental illness, developmental disabilities and learning disabilities. Even minor illnesses or infirmities can be “disabilities,” if a person can show that she was treated unfairly because of the perception of a disability. Conversely, persons with an ailment who cannot show they were treated unequally because of a perceived or actual

disability will be unable to meet even the PRIMA FACIE test for discrimination. It will always be critical to assess the context of the differential treatment to determine whether discrimination has taken place, and whether the ground of disability is engaged.

---

#### EMPLOYEE

A person, including an Officer of the Company, employed by the Company, who performs work for wages.

---

#### OFFICER

An appointed member of the Alamos Gold Inc. leadership team with, for example, a job title of Vice President (VP) or higher, who is responsible to manage the daily business of the Company and carry out policies as set by the Board of Directors.

---

#### MANAGEMENT

Collectively defined as all directors, executives and Managers for the purpose of this policy

---

#### MANAGER / SUPERVISOR

An Employee or Officer of the Company who is both accountable and responsible for the performance management and overall supervision of a subordinate Employee(s)

---

#### THIRD PARTIES

A guest of the Company including, but not limited to, vendors, investors, bankers, brokers, candidates, auditors, delivery/courier personnel and consultants.

---

#### THE ACCESSIBILITY FOR ONTARIANS WITH A DISABILITIES ACT (AODA, THE "ACT")

AODA is a provincial act that came into force in 2005 which sets out a clear goal and timeframe to make Ontario accessible by 2025. The Act applies the same definition of *disability* as defined in the Ontario Human Rights Code (OHRC). AODA is defined by five (5) standards in order to identify, remove and prevent barriers. Those five standards are:

1. Accessible Customer Service;
2. Accessible Transportation;
3. Accessible Information and Communications;
4. Accessible Public Spaces;
5. Accessible Employment.

---

#### VOLUNTEER

Any person who voluntarily undertakes a service on behalf of the Company.

## 7. CONFLICTS

To the extent that anything in this policy conflicts with a requirement under governing federal or provincial legislation, the governing legislation will apply.