

Ontario AODA Disability Accommodation Guideline

Effective February 1, 2024 (Revised June 1, 2026)

Introduction

Newmont is committed to providing a workplace environment that is inclusive and respects the dignity of those in our workforce, including employees with disabilities.

Newmont is also committed to meeting its obligation to accommodate the needs of employees with disabilities as required by the Ontario *Human Rights Code* and the *Accessibility for Ontarians with Disabilities Act, 2005*.

This Newmont Disability Accommodation Guideline (the "Accommodation Guideline") is intended to ensure that all employees are aware of their rights and responsibilities with respect to accommodation, and sets out a process for Newmont and its employees to follow where reasonable accommodation is sought on the basis of disability.

Scope

This Accommodation Guideline applies to all employees within the Newmont group of companies who are working at sites and/or locations in Ontario (including, but not limited to, any legacy sites), as well as those who are working remotely from their homes in Ontario.

Further, this Accommodation Guideline applies in all aspects of employment, including, but not limited to, recruitment, training, promotions, transfers, working arrangements, compensation, and benefits.

Responsibilities

Accommodation is a shared responsibility.

Newmont is responsible for:

- Eliminating barriers that prevent employees from accessing or being included in the workplace on the basis of disability.
- Ensuring that employees and job applicants are advised of their right to seek accommodation on the basis of disability.
- Dealing with requests for accommodation in a timely and sensitive manner.
- Maintaining privacy, to the extent possible, by treating accommodation requests as confidential.
- Identifying suitable accommodations.
- Providing individual accommodation, up to the point of undue hardship.
- Providing individualized accommodation plans, when required.
- Informing an employee of the reasons if their accommodation request is denied.
- Ensuring that this process is implemented in the workplace.

Ontario AODA Disability Accommodation Guideline

Effective February 1, 2024 (Revised June 1, 2026)

Supervisors are responsible for:

- Treating all employees and job applicants with dignity and respect.
- Dealing with requests for accommodation in a timely, confidential and sensitive manner.
- Referring accommodation requests to the applicable Human Resources Department.
- Participating in discussions of accommodations options.
- Facilitating the implementation of any accommodation offered.
- Monitoring any accommodation provided to ensure continued effectiveness.
- Ensuring this process is implemented in the workplace.

Employees are responsible for:

- Requesting accommodation from Newmont, when needed.
- Helping to identify potential accommodation options.
- Cooperating with Newmont in the search for and implementation of reasonable accommodation.
- Providing documentation to support their request for accommodation, including information about restrictions or limitations.
- Accepting an offer of reasonable accommodation that meets their needs, even if it is not their preferred accommodation option.
- Providing medical updates, if requested by Newmont
- Advising Newmont if their accommodation needs change or accommodation is no longer needed.

Unionized employees may engage their union representative to assist them in the accommodation process.

Process for Requesting Accommodation

Job Applicants

Job applicants will be advised of Newmont's disability accommodation process. Where a job applicant makes a request for accommodation, Newmont will evaluate the request and may seek more information from the job applicant to facilitate the accommodation. If the request for accommodation is denied, the job application will be provided with written reasons for the decision, unless an alternative format has been requested by the job applicant.

Employees

The need for accommodation may be identified through a request by an employee or through an observation by a supervisor that it is reasonably apparent that an employee may have a disability that is interfering with the employee's job duties.

Employees who believe that they require accommodation due to disability are responsible for requesting accommodation from their Human Resources Department. Newmont encourages employees to make their request in writing and to include relevant information, such as:

Ontario AODA Disability Accommodation Guideline

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- A description of the accommodation that is being sought.
- The reason accommodation is needed.
- How the requested accommodation will assist in the performance of job functions.

In scenarios where an employee has not requested accommodation, but it is reasonably apparent that the employee may have a disability that requires accommodation, the employee's supervisor may approach the employee to determine whether the employee wishes to request accommodation under this process.

If the employee makes an oral request for accommodation, their Human Resources Department will document the request, including the employee's name, position and date of the request, as well as any details and accommodation options suggested by the employee.

Newmont may require more information related to the employee's accommodation request, including provision of a note from the employee's doctor or other treating medical professional, if any of the following apply:

- The employee's disability is not obvious.
- The accommodation request does not clearly indicate a need related to disability.
- More information on the employee's limitations or restrictions is needed to determine appropriate accommodation.
- There is an objective reason to question the legitimacy of the employee's request for accommodation.

Failure to respond to such requests for information may delay the provision of accommodation.

Where there is reason to question the adequacy or reliability of the information provided by the employee's doctor or other treating medical professional, Newmont may require the employee to attend an appointment at the on-site Health Clinic (as applicable) and/or have an independent medical examination at a medical health care professional of Newmont's choosing, at Newmont's expense.

Response to Accommodation Requests

Accommodations are individualized to reflect the employee's particular needs and circumstances, short of causing undue hardship. The employee's accommodation preferences will be considered but are not determinative.

Individual accommodation plans will include:

- if requested, any information regarding accessible formats and communication supports provided;
- if required, individualized workplace emergency response information; and
- any other accommodation that are to be provided.

Ontario AODA Disability Accommodation Guideline

Effective February 1, 2024 (Revised June 1, 2026)

Where necessary, interim accommodation may be provided while longer term solutions are developed. An employee's accommodation needs or Newmont's organizational requirements may change over time and, as such, any accommodation provided will be monitored and may require adjustments to improve effectiveness or efficiency, or to protect the employee from risk of injury or exacerbation of their health condition.

Where an accommodation request is approved, the employee may request their individualized accommodation plan in an accessible format.

Where an accommodation request is denied, Newmont will advise the employee of the reasons for the decision in writing, unless an alternative format has been requested by the employee.

Return to Work Process

Newmont is committed to facilitating the safe return to work of employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work. The return to work process is a cooperative process, and includes the following:

- Human Resources and/or the Health Clinic on site (as applicable) will provide the employee with information about its accommodation and return to work processes;
- Human Resources and/or the Health Clinic on site (as applicable) and the employee, will maintain contact during the leave;
- The employee will provide regular updates about their progress, which may include information from their medical professional about their limitations, restrictions and ability to return to work;
- Human Resources and/or the Health Clinic on site (as applicable) and the employee, will work together to develop a written Return to Work/Individualized Accommodation Plan. The Return to Work/Individualized Accommodation Plan will be updated as needed.

Confidentiality

Confidentiality will be maintained, consistent with the needs of the accommodation process. Personal information will only be disclosed to those with a demonstrated need to know for the purposes of determining or providing accommodation or as required by law.

No Reprisals

No reprisal or penalty will be taken against a person for requesting accommodation in good faith.

Ontario AODA Disability Accommodation Guideline

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Administration

This Accommodation Guideline supersedes and cancels any previous policy, procedure, standard, guideline or other document pertaining to the matters set out herein, including, but not limited to, *Policy L-37 Accessibility For Ontarians With Disabilities Policy*.

This Accommodation Guideline will be reviewed and updated from time to time. Newmont expressly reserves the right to change, modify or delete the provisions of this Accommodation Guideline without notice.

Newmont is responsible for the administration of this Accommodation Guideline. If employees have questions regarding this Accommodation Guideline, they may contact their applicable Human Resources Representative.