

APPENDIX A

WOMEN'S EMPLOYMENT PLAN VALE INCO LONG HARBOUR PROCESSING PLANT

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1.0 WOMEN'S EMPLOYMENT

Vale Inco Newfoundland & Labrador Limited (the "Company") values gender diversity, in the belief that gender mix contributes to a healthy and productive workplace. Although efforts have been made generally to improve the participation of women in the workplace, inequity persists particularly in science, trade and technology occupations. Much of what is needed to address the challenges that women face in securing employment in non-traditional occupations requires an integrated strategy in which all stakeholders have a role to play. The Company is cognizant of the need to participate along with others, in developing concrete initiatives targeted at addressing the underlying issues which have contributed to this situation. The Company also recognizes that over time women will take up opportunities presented in non-traditional occupations. The Company is also committed to working with governments, educational institutions, women's organizations, organized labour and industry associations to advance gender diversity in the workplace and to see that more women take advantage of employment opportunities in the Canadian mining industry.

The Company developed a Women's Employment Plan for its Labrador Operations and to date has actioned several strategies to advance the employment of women in non-traditional occupations. In support of this plan a target of 15% female participation was established and to date the participation rate is tracking at 17%. The Company also established a similar plan with targets for the Hydromet Demonstration Plant in Argentia. A target of 20% female participation was established and throughout the life of the plant, the actual number of women employed at the plant ranged from 35% - 38%. As well, since 2003 the Company has invested \$110,000 for scholarships at the College of the North Atlantic with 32% of such scholarships being awarded to young women enrolled in Engineering Technology and Industrial Trades programs. The success achieved in both Labrador and Argentia is directly attributed to organizational commitment to the effort as well as the application of the strategies identified (i.e. scholarships, recruitment practices) in the Women's Employment Plans.

Construction of the processing plant is expected to take about 4 years to complete and historically women have held a small number of construction related occupations. In 2001, approximately 1% of the membership of the Newfoundland & Labrador Building Trades Council were women, and labour force survey estimates show that women held just 3.4% of building trade occupations in 2006¹. During the construction phase, the Company will establish a target of 3% for female participation in building trade occupations and recognizing that placing women in apprentice level positions is key to increasing women's participation in the building trades the Company will establish a target of 3% for female participation in apprentice positions during construction.

¹ Statistics Canada. Table 282-0008 Labour Force Survey Estimates (LFS), by North American Industry Classification System (NAICS) Sex and Age Groups, Annual (Table). CANSIM (database). Using CHASS (distribution). Version updated April 20, 2007.

Also given that women have traditionally in the past occupied a low number of positions in project design, engineering and technical related occupations the Company has established a target of 10% for women's employment in these fields.

During the operations phase of the processing plant, the Company is committed to taking appropriate measures aimed at achieving a target of 25% participation by women in the overall operations workforce. Given that approximately 85% of operations positions at the processing plant are those which women have been traditionally underrepresented the Company feels that this target is achievable within the first five (5) years of operation.

It is the intention of the Company to have a broad distribution of women across all classifications in the processing plant. The Company also does not view this target as a ceiling but rather intends, through the development and implementation of the strategies identified in the Women's Employment Plan to work towards increasing this participation target over the life of the operation in Long Harbour. The Company will also periodically review components of the plan and identify revised targets / goals that demonstrate continuous improvement across occupational groups.

Throughout this Women's Employment Plan a series of strategies and specific initiatives have been developed so as to provide a focused and measurable set of actions aimed at achieving The Company's overall target for participation by women in the processing plant construction and operations phases. These initiatives build on the following accountabilities that have been given to the Company's Human Resource Management Team:

1. To be accountable to the Executive Team for implementing women's employment initiatives.
2. Conduct a quarterly review of women's employment initiatives with the executive team.
3. Monitor women's employment by classification and occupational groups.
4. Implement a gender-based analysis for the construction and operations phases of the processing plant project.
5. Conduct training on gender based analysis for key managers.
6. Use of gender sensitive language in all internal and external communications.
7. To collect and use gender-disaggregated information to guide initiatives aimed at advancing women's employment in non-traditional occupations.
8. To work with government and non-government stakeholders to make women aware of employment opportunities, particularly in occupations where women are under represented.

In support of the Women's Employment Plan, the Company will assign accountability for overseeing the implementation of the plan to an existing position within the organization. This accountability will include responsibility for the administration and implementation of the Women's Employment Plan. In addition the Manager Human Resources will have overall accountability for the plan and workplace diversity at the senior executive

team level within the Company. This accountability and administrative arrangement will apply to the construction and operations phase of the Long Harbour Processing Plant.

The Company will implement gender-based analysis for its operation and for contractors working at various locations. A gender-based approach ensures that the development, analysis and implementation of workplace design and policies are undertaken with an appreciation of gender differences and the recognition of potential differential impacts on men and women. This includes an understanding of the nature of the relationships between men and women, and the different social realities, life expectations and economic circumstances facing women and men. The analysis of gender information and demographics as well as the identification of gender related issues that impact the advancement of women in the workplace are also incorporated into a gender-based approach.

All employees of the Company and contractors hired to support engineering, construction and project management activities related to the processing plant have a role to play in implementing the Company's Human Resources policies and programs, including those aimed at increasing the overall level of participation by women in non-traditional occupations.

Within the operations team all employees are expected to support these objectives by actively discouraging gender insensitive behavior and language; treating all individuals with respect; and co-operating with managers by participating in activities designed to increase awareness of gender sensitivity. In addition to the responsibilities of all employees, managers will be held accountable to ensure that all staff within their team are aware of the women's employment objectives and all training activities associated with the objectives; and, dealing with issues related to gender sensitivity as appropriate.

2.0 COMMUNITY BASED SUPPORT

Private sector employers are one of the component parties who must share the responsibility to find and implement initiatives that will result in a transformation of society with regard to gender equality. Since we embrace the value of gender diversity in our workplace, we have to be aware of the challenges and solutions that are being identified by others. We must also ensure that our efforts are complementary to the initiatives being pursued by others in the community and elsewhere.

To ensure the preparation of women to assume positions within its workforce, the Company recognizes that it must provide quality information in innovative ways to assist individuals, government agencies and society to address this challenge. The Company must also learn from these organizations, drawing on their experiences to identify what issues may be experienced in the workplace then use this information to implement solutions.

The Company will continue to work with government agencies, aboriginal and other women's groups, the community and educational institutions. Specifically the Company will:

1.	Provide support for Women's Job Information Workshops.
2.	Work with appropriate government and non-government stakeholders mechanisms to respond to women's issues at the community level and develop training programs that are responsive to the learning needs for women.
3.	Incorporate gender based analysis information gathered from external stakeholders into the Company's policy and workplace design decisions.
4.	Provide career information to guidance counsellors in secondary school system.
5.	Develop scholarship program targeted at secondary school students to stimulate participation in post secondary programs in the mining sector. The Company will target some scholarships to women interested in non-traditional occupations.
6.	Link with and provide support to women's organizations/networks, which support the employment of women.
7.	Encourage female employees to act as role models and to serve as part of a mentoring network.
8.	Develop a relationship with community health and educational services, women's groups and community leaders to maintain and understand the issues facing the community and women, and to ensure the assistance that the Company provides its employees complements community services.
9.	Meet with community groups and women's organizations annually to review existing and potential women's employment initiatives and strategies.
10.	Profile female employees working in non-traditional occupations in internal and external Company communications material.

3.0 COMMUNICATIONS

To support the women's employment objectives and initiatives, as outlined throughout this plan, The Company will develop and utilize the following tools as part of its communications strategy.

1.	Conduct school visits at the grade and post secondary levels to promote employment opportunities in the mining industry. When conducting such the Company will use women role models employed by the Company.
2.	Profile women in the Company's newsletter, "The Gossan" who are working in occupations in which they are under represented. Strategies utilized by the Company and available to women will also be profiled, as will successes.
3.	Work with provincial women's organizations and related government departments to develop an information kit promoting careers in the mining industry. The information would be made available at all women's organizations/community centers across the province.
4.	Reinforce key messages promoting women's employment in media interviews and presentations.
5.	Pursue speaking engagements outlining what the Company is doing to

encourage women to pursue careers in the mining industry.
6. Meet with provincial women's organizations and related stakeholders on an annual basis to review and discuss initiatives aimed at broadening the participation of women in non-traditional occupations in the mining industry.
7. Sponsor programs designed to promote women's employment (e.g. Junior Achievement Newfoundland and Labrador "Inspiring Young Women to Dream Big" program.)

4.0 CONSTRUCTION & OPERATIONS PHASES

4.1 Construction Labour Supply

The Company recognizes that careers in trades skills provide excellent opportunities for women who are seeking employment in non-traditional occupations, although we understand that about 3.4% of building trades union members in Newfoundland and Labrador are female. To ensure that qualified women are afforded every opportunity to capitalize on the construction phase of the processing plant site, the Company has adopted a number of proactive initiatives in the Human Resources Plan. The Company has also committed to work with the Resource Development Council (RDC) and its member unions, government and other stakeholders on initiatives aimed at addressing systemic barriers that have resulted in low participation rates by women in the construction industry.

The Company has been able to negotiate language in the Special Project Collective Agreement that acknowledges the value and commitment to diversity in the workplace and does not unreasonably deny memberships to new individuals. This language is also intended to permit the Company and the RDC to implement special initiatives designed to advance the employment of women during the construction phase of the processing plant.

The Company and RDC have also negotiated a Diversity Fund which will be funded from the gross hourly package by a sum of twenty cents (\$0.20) per employee for each person hour earned. This fund will be jointly administered and managed by the Company (through the Voisey's Bay Employers Association) and RDC. It will support initiatives designed to further the principles of a diverse workforce on the construction site.

The Company has committed to the following construction phase initiatives to help address some of the systemic barriers that have resulted in low participation rates by women in the construction industry.

1. The Company plans to secure acknowledgement from all successful bidders that they are aware of the existence and importance of the Women's Employment Plan as part of its contracting protocol. This will be achieved through the placement of the following language in all tender documents as well as the final commercial contract signed by the contractor. *"The Company has developed a*

<p><i>Women's Employment Plan for the processing plant. The contractor and the Contractor's Subcontractors are required to actively support that plan and to provide equal opportunity for employment. Particular emphasis should be applied to the provision of opportunities for employment of women in those occupations and trades where such are under represented".</i></p>	
2.	Provide mandatory gender sensitivity training for all construction workers employed on the construction site in Long Harbour.
3.	Conduct information sessions with stakeholders targeted at women regarding the types of jobs and qualifications required for construction phase activities.
4.	Ensure that construction-phase contractors educate those in the workplace about appropriate behaviour and a respectful workplace.
5.	Implementation of a zero tolerance harassment policy at the construction site in Long Harbour.
6.	Work with government, women's organizations and trade unions to promote awareness of career opportunities for women in the construction industry and in the mining industry and to jointly work on initiatives aimed at addressing systemic barriers that have resulted in low participation rates by women in these industries.
7.	The Company will put in place measures to ensure any camp facilities used to support construction are accommodative of women in terms of living accommodations. Measures could include, but are not limited to, secure sections of the camp for women only, female security and female housekeeping personnel.
8.	The Company will require each main contractor to provide a plan for compliance with the Women's Employment Plan.
9.	The Company will require that contracts related to the execution of the Project in the province include an acknowledgement from successful bidders that they are aware of the existence and importance of the Women's Employment Plan.
10.	The Company will add the Women's Employment Plan to the agenda for pre-bid meetings with potential contractors prior to bid submissions being made as well as the kick off meeting with successful contractors once contracts are awarded.
11.	The Company will require that its main contractor (EPCM contractor) have a written Women's Employment Plan in place which is fully aligned with the Company's plan.

In support of promoting diversity in the workplace construction and operations contractors can support the Company's Women's Employment Plan by:

1. Communication of Diversity in the Workplace to Employees

This requirement can be achieved through the Chief Executive Officer or other appropriate Senior Executive Management personnel by:

- ◆ Regular communication to employees about initiatives in the workplace designed to support diversity in the workplace.
- ◆ Posting related diversity messages on bulletin boards and distributing flyers or notices.

- ◆ Developing measures that will be undertaken to develop and advance diversity in the workplace.

2. Assign a Senior Official to be Responsible for Diversity

This requirement can be achieved by assigning a senior official to be responsible for diversity in the workplace. It is important that the senior official given this responsibility be known and respected throughout the organization, with significant authority and available resources to effect changes.

3. Collection of Workforce Information

This requirement can be fulfilled by collecting and recording data for all employees as well as those groups who are under represented in the workforce or contractor's workplace. Such data will be captured in the Company's Benefits Monitoring System. Contractors can also fulfill this obligation by adopting an internal plan to regularly monitor and evaluate its diversity plan/initiatives.

4. Employment Policies Review

Prior to being awarded any commercial contracts and a part of the prequalification process contractors will be required to submit their Human Resources policies to Vale Inco Newfoundland & Labrador. Such policies will be reviewed to ensure that systemic, actual, or potential barriers to employment do not exist in the ways in which the contractor traditionally recruits, selects, hires, develops and trains, promotes, retains, terminates and accommodates employees. It is also expected that policies will exist that are intended to foster a favorable and positive work environment. Positive policies and practices may include:

- ◆ Formal written policies on employment equity and non-harassment
- ◆ An employee assistance program
- ◆ Mentoring Programs
- ◆ Exit Interview procedures

5. Establishment of Targets

Contractors will be expected to adopt the Company's women's employment targets as their own and work towards and support initiatives designed to advance such.

In support of the Company women's employment plan the Company will require a commitment from its contractors and will take into account diversity considerations when awarding contracts. The Company will also make contractors aware of its Women's Employment Plan during "kick-off" meetings with contractors after tenders have been awarded.

The implementation and success of the Women's Employment Plan is the responsibility of the Company and by extension, this commitment indicates the Company's intent to ensure that components of the plan which are delegated to contractors are implemented and positioned for success.

4.2 Operations Phase

The schedule for the processing plant operations phases will see start up occur in the first quarter of 2013.

Individuals for the senior level positions and some operations level personnel at the processing plant will be recruited commencing in 2011 with the balance being recruited in 2012.

4.3 Training and Development Strategy

The Company's training and development strategy is based upon the premise that utilization of the province's human resources and its college and university systems offers the Company an excellent pool of potential employees to serve at the processing plant. The Company's assessment of the province's labour supply has confirmed that the province has an ample supply of educated and trained individuals from whom a workforce can be developed for the processing plant site. Individualized on-the-job training will enhance capabilities for specific job challenges.

The Company's strategy is focused upon selecting the appropriate candidates and then, through formal training and development, enhancing the candidates' knowledge, capacities and motivation resulting in a first rate employee team with long-term career aspirations within the Company.

The Company recognizes that women do not have significant numbers of qualified individuals in non-traditional occupations such as building trades and technology occupations. To help address this reality, the Company will support, where reasonably possible, efforts designed to increase the supply of women who have the skills required to support the project. More specifically the Company will support the College of the North Atlantic and other post secondary training organizations in their initiatives designed to encourage and recruit women into science, trades and technology based programs that support the Company's operations in the province.

4.4 Recruitment and Selection

As a general principle of progressive Human Resources management, the Company has been collecting resumes from residents of the province who are interested in employment since the Project began. Interested individuals have contacted the Company via mail, email, facsimile or in-person to the Company and Vale Inco offices. In many cases resumes have been sent directly to the Company website: www.vinl.valeinco.com

The Company currently maintains a database of all these resumes within the Human Resources Information Management system. This component is entitled the "Recruitment Manager" module of PeopleSoft's Human Capital Management software.

As job opportunities arise the Company will search its database to identify potential candidates. The Company will also advertise job opportunities in local newspapers as well as on web sites and when appropriate engage the services of recruitment search firms.

As part of its commitment to developing qualified individuals from the Province, the Company will support educational co-op programs. In addition, the Company will develop initiatives that will link with community groups and agencies that support the advancement of women in the workplace and non-traditional occupations.

The hiring process that the Company and contractors utilize must ensure that fair and equitable access is provided to all eligible candidates. Further, all employees must accept the importance and value of gender diversity in establishing a healthy productive workplace. In support of this the Company will implement the following initiatives:

1. Develop hiring processes that will provide fair access for all candidates.
2. Identify candidates who support the value of gender diversity.
3. Give equal value to qualifications and work experience regardless of gender.
4. Having hiring teams made up of men and women who support the value of gender diversity.
5. Utilize gender sensitive language in advertisements, written and verbal assessment tools and other materials utilized in the hiring process.
6. Educate hiring managers in recruitment processes to ensure sound practices free of gender biases.
7. Task recruitment teams to identify opportunities to hire women in under represented occupations when women candidates meet the requirements of the positions being recruited.
8. Ensure job advertisements state that the Company is an equal opportunity employer and will show women engaged in work (i.e. under represented occupations) when graphics/pictures are utilized.
9. Distribute job advertisements to various women's agencies and organizations for information purposes.
10. Participate in career fairs and school visits. Utilize women employed in non-traditional occupations to support such efforts.
11. Provide work term opportunities to women enrolled in cooperative education programs in the science, trades and technology fields.
12. Where available, seek funding from federal or provincial sources for apprenticeship programs designed to increase the number of female apprentices in non-traditional occupations.
13. Ensure that individuals involved in the recruitment process are familiar with applicable Human Rights legislation through the dissemination of published educational material.

4.5 Career Planning

Career planning, succession planning and talent management are the three core components of the Company's overall succession and career planning strategy. Accountability for career planning rests with the individual employee and may not necessarily translate into advancement in the workplace. This would be highly dependent upon the additional training pursued by the employee as well as the other internal candidates being considered for advancement.

The Company will support women internally (i.e. policies, funding, training) as they express interest to advance in the workplace. Not only will the advancement of women to more responsible and challenging positions provide personal benefits, it will also serve to place women in positions that can benefit the female employee population as a whole. Achievements for women will provide role models for others and place women in decision-making roles in the organization. In these roles, women may contribute to the information emanating from employee committees, information that will be used in policy development. In line with the value placed on gender diversity, it is important that this diversity exists at all levels in the organization. Recognizing the realities, therefore, the Company must implement actions that will bring this measure of diversity to fruition. One of the goals of the career and succession planning process is the development of individuals for leadership and management positions including women.

To further assist women in career advancement in the workplace the Company will:

1. Assist all employees in career planning.
2. Implement a talent management program designed to identify potential employees for higher-level positions and advance women within the organization.
3. Implement succession planning in an attempt to identify opportunities to improve gender diversity at all levels in the workplace.
4. Encourage employees to improve their knowledge and skills in line with the Company's overall approach to employee development.
5. Support employees' development initiatives where those initiatives are aligned with Vale Inco's business needs, including financial support, employment counselling, time to attend training programs, mentoring programs and developmental work assignments.
6. Develop a mentoring system for women.
7. Establish a career network that provides support to encourage career growth and planning for female employees.
8. Support training costs for women engaging in training to qualify them for career advancement or work in science, trades and technology related occupations.
9. Offer personal development courses in the workplace.

4.6 Succession Planning

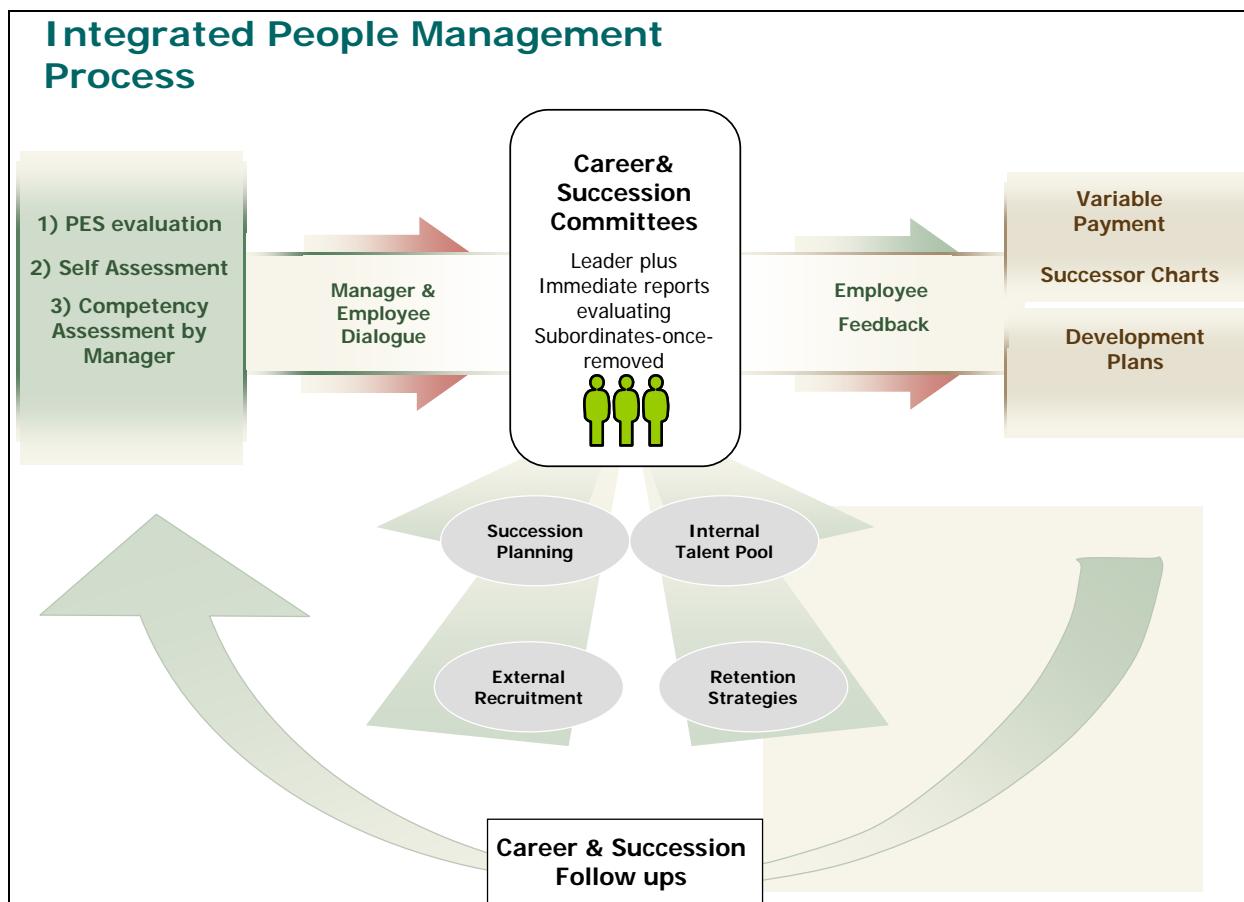
From a human resources perspective, the overall objective of any succession planning initiative is to ensure that personnel of sufficient numbers and quality are available to fill business needs when required and to maintain alignment between business goals and

human capital needs. Effective succession and career planning also permits an organization to maintain pace with changes in business, industry, and the overall marketplace.

To achieve these objectives, the Company has adopted Vale Inco's succession planning process that:

- Addresses the needs of the organization as it ages and employees leave;
- Assists with preparing the organization for unexpected events;
- Ensures that the Company has the right personnel to function at peak efficiency; and
- Facilitates the development of residents of Newfoundland & Labrador such that they can advance in the Company's workplace.

A graphic of the Company's succession planning model is printed below:



Succession planning is the responsibility of the Company, whereby the Company identifies key leadership and technical positions within its organization that require succession plans and then develops internal candidates to fulfill these roles in the future. At this point talent management initiatives would engage and internal candidates are identified for succession opportunities and personal development activities would

commence. These activities could include additional training, job shadowing, or placement in other operations for development purposes. Each individual identified as part of a succession planning effort will be assigned a mentor who will provide guidance and feedback.

4.7 Retention

The Company is confident that the career opportunities, challenges and competitive compensation offered by the processing plant site will result in minimum voluntary turnover. The internal mentoring and Human Resources driven employee review programs will ensure that there is a match between capabilities and needs within the organization.

The Company will develop a strategy to address the challenge of employee retention in the long-term in accordance with the Company's overall Human Resources philosophy.

While the statistics are difficult to access, it is commonly known that the major challenge for employers and workers is the retention of women in male dominated industries and occupations. A key ingredient to improve the situation is again the effectiveness of the gender analysis information where women and men working together contribute to policy and workplace conditions decision-making. The Company's plan for gender diversity starts with the premise that both men and women must be involved in building a welcoming and productive workplace.

To support the retention of women in the Company's operations the Company will incorporate the following actions into its human resource management practices:

1. Ensure that the gender analysis conducted through Women's Job Information and Search and Recognition Workshops is considered in project design and policy development.
2. Provide time, meeting places and support for employees' committees to develop and advise management on policy development and implementation (this initiative will continue the gender analysis throughout the operation phase of the project).
3. Implement an employee and family assistance program to address specific concerns of employees and their immediate families.
4. Work with contractors to ensure consistency in policy development and implementation.
5. Hire qualified women to be developed as trainers and mentors where possible.
6. Provide confidential exit interviews for employees who terminate their employment with the Company and incorporate results where appropriate, in recruitment and retention programs.
7. Ensure that the compensation system provides for equal pay for equal work.
8. Develop and support a women's mentoring network.
9. Develop a series of competencies that support diversity in the workplace and incorporate into job descriptions.

5.0 COMPENSATION AND BENEFITS

The Company compensation program for employees is based on current practices of its parent company as well as labour market analysis (including the local labour market). The structure planned for the processing plant encompasses the following elements: base pay, statutory benefits, health and medical benefits, retirement benefits and a variable pay component. Each position's base pay is based on current salary rates within the Company, and labour market analysis. It is planned that pay periods at the Commercial processing plant will be bi-weekly or semi-monthly depending on the position. The Company provides every permanent employee comprehensive medical, dental and life insurance coverage in a Flexible Benefits Program that allows employees the ability to choose different levels of insurance coverage depending on their needs.

The retirement program is comprised of two components: a defined contribution pension plan (DCPP) and a retirement savings plan (RSP). The Company contributes to the DCPP on behalf of eligible employees and individuals may elect (voluntary) to contribute to the RSP through payroll deduction. If employees do participate in the RSP the Company matches a portion of the employee's contribution. All of these elements combine into a total rewards program that is competitive with other companies in Newfoundland and Labrador as well as with similar types of mining and processing operations in Canada.

6.0 WORKPLACE POLICIES

The Company's Human Resource policies and procedures are grounded in "People Values". We believe that through leadership and personal responsibility employees can participate, contribute and grow with the Company by:

- Providing and requiring safe conditions and practices;
- Acting fairly and with integrity in all we do;
- Meeting or exceeding customer expectations;
- Respecting others and their contribution;
- Supporting diversity;
- Working together;
- Practicing quality communications;
- Pursuing training, development and life-long learning; and
- Continuously improving everything we do.

In support of creating a welcoming and respectful workplace for women as well as recognizing the impact that its workplaces can have on the family unit, the Company will adopt a number of policies and initiatives that incorporate the Company's commitment to "People Values" and are designed specifically to support women in the workplace.

The Company has adopted for all of its workplaces a respectful workplace policy that includes a zero tolerance for any harassment activity and provides for mandatory

gender sensitivity training for all employees. In cases of alleged harassment, the employee who is subjected to harassment will be provided a period of paid leave for the duration of the investigation should such be appropriate. Communication skills will also be covered during orientation and gender sensitive language will be encouraged throughout the organization.

The Company will also work with the Department of Health, Eastern Health Corporation and other community organizations to ensure a violence free workplace. The on-site medical clinic will also play a role in disseminating information and responding to reported incidents. Information on the Company's policy and programs will be covered during the mandatory site orientation sessions and literature will be made available to workers in prominent locations throughout the workplace.

Recognizing the outside demands placed on employees in today's workplace as a result of family commitments, the Company will adopt family-friendly policies such as an employee and family assistance program and leave (paid and unpaid) to attend to family matters. Such policies and programs will be designed to assist employees in finding a balance between work and family life. Mandatory gender sensitivity training will be required for all employees.

The Company has adopted a zero tolerance policy for drugs or alcohol at all of its worksites. To facilitate the communications process and further enhance the participation of women in the workplace there will be female representation on all workplace committees. The Company will ensure that all tools, equipment, and clothing provided by the Company will be suitable for the use by women and workplace practices will be gender neutral.

With respect to specific workplace policies related to female employees, the Company will adopt the following initiatives to ensure that workplace issues affecting women at the processing plant are adequately addressed:

1. Develop and implement a respectful workplace policy that contains a zero tolerance for any form of harassment.
2. Provide mandatory gender sensitivity training for all operations based employees and where applicable, employees of its contractors.
3. Use of gender sensitive language throughout all activities.
4. Require all supervisors to participate in employee issue resolution, and conflict resolution training as part of the management development program.
5. Ensure representation by women on all workplace committees where interest exists.
6. Ensure that all tools, equipment, and clothing provided by the Company will be suitable for use by women.
7. Offer an Employee and Family Assistance Program that contains as part of its services personal and/or family counselling.

7.0 HUMAN RESOURCES INFORMATION MANAGEMENT SYSTEM

In support of the project and the development of its human resources the Company has implemented the PeopleSoft Human Capital Management solution. This strategic solution provides the tools to deliver more effective customer service to our workforce through web based employee and manager self service applications, as well as the capacity/functionality to analyze our workforce and support workforce planning for future needs in our operational environments. PeopleSoft's Human Capital Management solution includes the following:

- Human Resources Management
 - Employee Management
 - Benefits Management
 - Compensation Management
 - Competency Management
 - Performance Management
 - History/Turnover Analysis
 - Job Information
 - Position Control
 - Recruitment
 - Training
 - Employee Relations
- Payroll
 - Time Accounting
 - Time and Labour Tracking
- Employee Self-Service
- Manager Self-Service

The PeopleSoft Human Capital Management Solution offers this support as it provides multiple touch points (with the Company) accessible by staff. This solution permits the Company to streamline its Human Resources systems and processes as well as deploy self-service across the organization, to speed transactions and improve productivity.

8.0 REPORTING AND MONITORING

8.1 Reporting

During construction a project management reporting system will be utilized whereby all companies hired to support the Voisey's Bay project will report monthly to the Company. The Company will then compile this information and produce monthly and quarterly Industrial Employment Benefits Agreement (IEBA) Reports for the Government of Newfoundland and Labrador. These reports provide extensive data on employment on all facets of the project, including a breakdown by gender and job category. The Company will continue to use this project management reporting system to report on the

objectives of this plan, including those initiatives aimed specifically at supporting the employment of women. The Company will continue to report as per the requirements of the IEBA including occupational data by National Occupational Codes.

8.2 Monitoring

The Company has numerous commitments that it is expected to deliver on over the life of the project. To ensure that the Company is able to monitor its performance on meeting these commitments databases have been established, along with the implementation of Peoplesoft Human Capital Management System. The Company provides monthly and quarterly reports to the Province in accordance to its IEBA commitments. These reports provide information that allows the Province to monitor employment on all major project components including the processing plant.

The Company will also review the women's employment objectives annually and revise them as needed. This review process will incorporate input from senior management, human resources staff, employee advisory committees, and, where appropriate, external stakeholders. The Company will conduct an annual meeting with stakeholders to review progress on the Women's Employment Plan, obtain feedback from such stakeholders and review best practices around the advancement of women in under represented occupations. The Company will also meet annually, at a minimum, with government to discuss progress on the plan.

To summarize, the Company will implement the following initiatives to monitor its women's employment objectives:

1. Utilize PeopleSoft's Human Capital Management system in the gender analysis process.
2. Conduct an annual review of the Women's Employment Plan.
3. Establish internal reporting mechanism to capture recruitment and hiring data on women (i.e. resumes received, number of women interviewed).
4. Use the Benefits Monitoring System to monitor the Company and contractor performance.
5. Annually review the status of all strategies identified in the Women's Employment Plan.