

NEW MILLENNIUM
CAPITAL CORP.

DIRECT-SHIPPING ORE PROJECT



Women's Employment Plan for the Elross Lake Area Iron Ore Mine

November 2010

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New Millennium Capital Corp. (NML)

November 28, 2010

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1.0 INTRODUCTION AND BACKGROUND

1.1 Introduction

New Millennium Capital Corp. (NML) recognizes the importance of the Elross Lake Area Iron Ore Mine (ELA IOM, the Project) to the Province of Newfoundland and Labrador, and is committed to ensuring that the people of the province benefit directly from the associated employment and business opportunities. In ensuring that these benefits and opportunities are equally available to all Newfoundlanders and Labradorians, NML believes that the implementation of an effective Women's Employment Plan (WEP, the Plan) is essential.

Women continue to be under-represented in trades, technology, science and engineering-related occupations. In attempting to raise female participation in these fields, industry consistently faces recruitment and retention challenges. These challenges often stem from a lack of direct and active focus on creating and supporting innovative gender-equity initiatives.

NML commits to developing, implementing, and supporting initiatives aimed at increasing the number of women employed in non-traditional occupations in the ELA IOM.

This Plan will describe the gender-equity goals and initiatives that NML plans to implement throughout the life of the ELA IOM to ensure that women, including Aboriginal women, have fair and equal access to beneficial opportunities generated by the Project. In pursuing these goals, NML will work collaboratively with government, educational institutions, organized labour, community organizations, industry associations, contracting and sub-contracting companies, as well as other interest groups.

1.2 Background

1.2.1 Elross Lake Area Iron Ore Mine

NML is developing the ELAIOM, which is located in the Province of Newfoundland and Labrador some 20 km north-west of Schefferville, Quebec.

The ELAIOM is a small brownfield project of four deposits located entirely in Labrador that can be brought into production with only modest environmental impacts and relatively quickly given the infrastructure that already exists in the Schefferville area. Of the total area to be disturbed (~ 96 ha), approximately half has already been disturbed by prior mining.

The Project will involve mining run-of-mine ore (“ROM”). After crushing, washing, screening and (in winter) drying, the ROM will produce direct-shipping ore products (“DSO”). The products will be shipped by rail to the Port of Sept-Îles, Quebec.

The ELAIOM has two phases. Phase One consists of mining two of four sectors, sector 2 and sector 3, which represent about 20% of the resources. It is estimated the Project will employ a total of 150 people in the construction phase, which will be approximately 15 months in duration. Construction will, in very large part, be contracted out. During the operations of Phase One, it is estimated that the Project will employ approximately 240 people. The duration of employment will be at least 11 years.

Phase Two of the Project, which is referred to as the Future Phase, will involve mining of sectors 1 and 4. Approximately 75% of NML’s DSO resources are located in sector 4. Production in sector 4 is expected to span 10-13 years, and the life of the mineral processing facilities built in Phase One will be extended accordingly. The total duration of the DSO Project, including Phase Two, will be approximately 15 years.

NML submitted its Environmental Impact Statement (EIS) to the Government of Newfoundland and Labrador (GNL) in December 2009. The EIS includes a commitment to prepare and implement a WEP.

1.2.2 Women's Employment Plan

The Women's Policy Office has recommended that the proponent of the ELAIOM, NML, be required to submit a WEP designed to prevent, reduce or eliminate employment inequities that could potentially be, or actually are, experienced by women. This applies in particular to trades, technology, science and engineering-related occupations. The Department of Natural Resources requires that NML develop, submit, and implement this WEP. Under this requirement, this Plan has been developed for submission to the Minister Responsible for the Status of Women prior to the commencement of any construction-related activities for the Project. It was recommended the WEP include the following:

- (i) Positive policies, practices and reasonable accommodations to be instituted in the short-term for the hiring, training, promotion and retention of women;
- (ii) Short-term measures to be taken by the proponent to eliminate employment barriers;
- (iii) A timetable for the implementation of the positive policies, practices and measures to eliminate employment barriers;
- (iv) Short-term numerical goals for the hiring and promotion of women in each occupational category where under-representation exists;
- (v) Longer-term numerical goals for increasing women's representation, including a strategy for achieving set goals; and
- (vi) Plans for monitoring and public reporting on progress.¹

The Plan includes provisions relating to: a communications strategy; targets for women's employment and access to business opportunities; an implementation plan; leadership and accountability mechanisms; a monitoring, reporting and implementation schedule; and periodic evaluations and amendments. It also contains important goals for education and training, as well as for the recruitment and retention of Aboriginal women.

¹ Boland, B (January, 2009). Report on Gender Equity Requirements for NML Submission to Government of Newfoundland and Labrador EIS Submission

2.0 COLLABORATIVE APPROACH

A collaborative approach was applied to the development of the WEP, and NML will continually make efforts to collaborate with all stakeholders, understanding that collaboration is essential for effectively implementing the WEP and in supporting gender-equity initiatives.

NML recognizes that active and focused collaboration with our contractors, community groups, educational institutions, governments and labour unions, as well as other interest groups will be essential in the successful achievement of the goals of the Women's Employment Plan. Goals for collaborative efforts are outlined throughout this Plan.

2.1 Working with Our Contractors

NML will work closely with its main contractors to ensure awareness of and compliance with the WEP. The company will also include gender-equity provisions in its calls for bids and criteria for evaluating them.

In recognizing that the success of the WEP is the overall responsibility of NML, the company will work diligently to support its contractors and subcontractors in meeting their women's employment goals and requirements, while also collaborating on initiatives to further women's employment on the Project.

Detailed Leadership and Accountability mechanisms in relation to working with our contractors are outlined in Section 6.0 of this Plan.

2.2 Working with Community Groups

NML recognizes the valuable expertise community organizations, including women's and Aboriginal groups, have to offer in relation to women's employment and business access. It will build collaborative relationships with these groups to share information and knowledge, which will aid in the effective implementation of the WEP. NML will actively seek input from these groups in order to anticipate potential challenges and to develop creative solutions, as well as to gather feedback for continuous improvement.

NML commits to identifying opportunities for collaboration on initiatives with community groups, and to supporting women's employment and business-access-related programs and initiatives offered by community groups.

2.3 Working with Other Stakeholders

2.3.1 Educational Institutions

NML understands the importance of providing accurate information for raising women's awareness about opportunities in non-traditional fields, as well as for preparing them to take advantage of these opportunities. The Company commits to providing educational institutions with detailed information regarding specific occupations and skill sets that will be required for the ELAIOM, and to making this information available to the public.

NML commits to working in collaboration with educational institutions to inform women about available and upcoming training and employment opportunities. This will involve collaborating with target women to encourage them to pursue careers in non-traditional occupations, particularly within the mining industry.

2.3.2 Government

NML recognizes the progressive efforts taken by government to encourage women and Aboriginal women to pursue careers in non-traditional fields and to ensure all women are provided with fair and equal access to education and career opportunities in these fields.

NML commits to working in collaboration with government at all levels to support and move forward women's employment and business-access goals and initiatives. The WEP for the ELAIOM will be implemented in an accountable manner, which complies with government requirements. In implementing this Plan, NML will work to build upon the gender-equity and diversity culture government has been working to achieve in the industry, and in the province as a whole.

2.3.3 Labour

NML understands the key role labour unions play in achieving the goals and targets of this Plan. Working in collaboration with unions will be essential in effectively implementing the WEP.

NML commits to working with labour unions to ensure women have fair and equal access to employment opportunities on site. This will involve exploring and implementing progressive initiatives to remove barriers to women's access to employment opportunities, including exploration of potential female name hires as a measure to address the barriers that union seniority lists can create for women. It will also involve maintaining regular contact with labour unions to exchange information and ideas, as well as inviting them to attend and participate in annual stakeholder meetings for review and feedback on the progress of the WEP.

3.0 COMMUNICATIONS STRATEGY

Effective internal and external WEP-related communications will be essential in the successful implementation of the Plan. This involves communicating the goals and targets of the WEP both internally and externally to ensure awareness and compliance at all levels.

NML recognizes the importance of implementing strategies to communicate opportunities for women and to encourage their participation in those opportunities. An integral component of this communications strategy is identifying and collecting feedback from partnerships with women and from women's groups, as well as from other key stakeholders to ensure continuous improvement.

3.1 Internal

In implementing the WEP for the ELAIOM, it will be essential to establish an overall environment and corporate culture that promotes gender equity in all aspects of the Project. NML recognizes that effective implementation will require demonstrated senior management support for women's employment, as well as a corporate objective and commitment to employment equity. This involves ensuring that managers and employees at all levels within NML and its contracting companies are aware of, and on board with, WEP-related policies and practices.

This will require that all Project participants understand why NML is implementing a WEP, including requirements to do so and goals of the Company in doing so. The Project participants (including managers and employees) play a key role in successful implementation of the WEP, and strategic communication of the business case for equity is an important factor in integrating the WEP.

In communicating the WEP internally, NML will:

- Assign a vice-president – who should be female – to be responsible for gender equity and the overall implementation of the WEP for the ELAIOM, including all WEP-related communications
- Have the vice-president responsible for the WEP commit to ensuring the policies, goals, and initiatives of the Plan are communicated effectively to managers and employees at all levels
- Hire an employment-equity coordinator to ensure effective and focused implementation of the WEP, and to facilitate communications at all levels

- Establish a WEP Committee consisting of senior personnel, led by the responsible vice-president and employment-equity coordinator, to ensure ongoing communication
- Develop and implement a presentation and workshop regarding WEP-related policies, goals and requirements for compliance, to be delivered to all new managers and employees during orientation, and to existing managers and employees as professional development
- Include information in the WEP presentation and workshop regarding the business case for equity and benefits of increasing the participation for women in non-traditional occupations, as well as a detailed explanation why the WEP is being implemented for the ELAIOM
- Provide written material containing detailed information about the WEP to managers and employees at all levels, as well as posting related messages in frequented areas on-site
- Conduct ongoing gender-based analysis to ensure gender-inclusive language is used in all written and verbal internal communications

In effectively implementing the WEP, it will be important to ensure managers and employees receive ongoing information about the program's implementation. It will also be necessary to gather ongoing feedback from managers and employees – particularly women – about the implementation of the Plan. This will help to identify areas of success and areas that require improvement. Measures relating to continuous improvement will be detailed further in Section 8.0 of this Plan.

In order to establish ongoing communication, NML will:

- Provide ongoing information to managers and employees regarding gender initiatives that are being taken and supported by NML and its contracting companies
- Include WEP-related information and updates in internal bulletins and notices
- Include WEP-related updates in regular meetings and training sessions
- Hold quarterly, internal-update and feedback sessions to identify areas of success and potential for improvement
- Survey managers and employees – particularly female employees – quarterly to gather feedback and identify areas of success and potential for improvement

- Conduct exit interviews with managers and employees to gather WEP-related feedback and to identify potential ideas for continuous improvement
- Establish communication mechanisms whereby managers and employees can ask WEP-related questions and provide feedback to the employment-equity coordinator on an ongoing basis, for example through a WEP designated e-mail account and site visits
- Provide ongoing information to managers and employees regarding gender initiatives supported by NML and its contracting companies

Communicating with women about internal opportunities for training and advancement in an inclusive and effective manner will be central to implementing the WEP. In recognition of this, NML will:

- Highlight success stories of women in occupations in which they are typically under-represented, and provide information regarding opportunities for training and advancement in internal bulletins, notices, posters and on the Company's website
- Post information regarding opportunities for training and advancement in areas frequented by women, including female washrooms and change rooms
- Use gender-inclusive language and illustrations in postings regarding internal opportunities
- Hold regular internal-information and networking sessions for women on-site to provide opportunities for information sharing

3.2 External

Effectively communicating WEP-related initiatives will involve ensuring that key stakeholders and the public are aware of the Project's culture of gender equity. Demonstrating that NML and its contracting companies are inclusive employers will require a variety of strategies, including:

NML recognizes that in order to communicate opportunities directly to women, it will be necessary to implement a variety of outreach activities. These will include:

- The use of gender-inclusive text and illustrations in all external communications, including promotional/informational material and advertisements
- Providing information and updates regarding the WEP in external bulletins, news releases, media communications and on the Company's website
- Highlighting success stories of women in occupations where they are typically under-represented – providing information regarding public opportunities for training and employment in external bulletins, news releases, media communications and on the Company's website
- The use of gender-inclusive text and illustrations in job advertisements
- Holding public information and networking sessions targeted at women in partnership with women's groups and Aboriginal groups
- Providing training and employment-opportunity-related information to women's groups and Aboriginal groups, communicating opportunities to Aboriginal women in their own communities with a special focus on Inuit and Innu women
- Supporting and participating in community initiatives that promote opportunities for women, particularly in occupations in which women are under-represented
- Posting information regarding opportunities for training and employment in public areas and locations frequented by women, including appropriate areas in educational institutions
- Providing gender-inclusive information regarding training and employment opportunities to guidance counsellors in schools, as well as to employment assistance services providers
- Participating in career fairs, as well as visiting grade schools and post-secondary institutions to promote employment opportunities in the mining industry. Female role models employed by NML and its contracting companies will be included in these activities.

In effectively implementing the WEP, it will also be necessary to gather ongoing feedback from women's organizations and other key stakeholders. This will help identify areas of success, and areas that require improvement. It will also aid in building partnerships aimed at promoting the participation of women in non-traditional occupations in the Project and the mining industry more generally. In order to establish regular communications and opportunities for feedback with stakeholder groups, NML will:

- Provide ongoing information to women's organizations and other key stakeholders regarding gender initiatives that are being taken and supported by NML and its contracting companies
- Forward WEP-related information and updates in bulletins and notices directly to women's organizations and other stakeholder groups
- Welcome feedback and include WEP-related updates in regular stakeholder meetings
- Hold annual group-update and feedback sessions with all stakeholders to identify areas of success and potential for improvement
- Establish communication mechanisms whereby stakeholder groups can ask WEP-related questions and provide ongoing feedback directly to the employment-equity coordinator

4.0 WOMEN'S EMPLOYMENT, TRAINING, AND BUSINESS ACCESS

Quantitative and qualitative goals and targets have been established in relation to women's employment, training and business access. They are also in place for recruitment, selection, retention and promotion of women. Goals and targets are necessary if gender-equity initiatives are to be effective and measurable.

4.1 Women's Employment

Targets for women's employment have been established for the construction phase and operations phase of the ELAIOM. They are projected based on the availability of qualified women within the labour market in relevant occupations, and reflect the nature of employment in the ELAIOM as a fly-in/fly-out mining operation. This reflection is based on observations and experiences of other fly-in/fly-out mining operations in Newfoundland and Labrador and elsewhere.

Establishing targets involved considering the labour that will be required during various phases of the Project in relation to the labour available in the short-term and long-term future, as based on Statistics Canada employment equity-data and post-secondary graduation rates by sex.

In recognizing the importance of increasing women's participation in construction trades, the targets put forth for the construction phase in the tables to follow will apply to the participation of women in apprentice positions as well. The Office to Advance Women Apprentices' registry database was referenced in setting these targets.

4.1.1 Targets for Construction/Preparation Phase

Table 1: Labour Supply by Sex for Construction/Preparation Phase
(Excluding Traditional Clerical, Sales, and Services Occupations)

National Occupational Categories (NOC) for Construction Phase	Total Labour Needed	Available in NL in 2006 ²			
		Men		Women	
		#	%	#	%
Middle and Other Managers	10	845	93.4%	60	6.6%
0711 Superintendent	1	560	94.1	35	5.9
721x Supervisor	3	80	84.2	15	15.8
721x Forepersons	6	205	97.6	10	4.8
Professional Occupations in Natural and Applied Sciences	6	730	76.4%	225	23.6%
2131 Engineer	5	580	84.7	100	14.6
2211 Chemist	1	150	53.6	125	44.6
Technical Occupations Related to Natural and Applied Sciences	21	320	71.2%	130	28.8%
225x Technician	20	50	83.3	10	16.7
2263 Health and Safety Officer	1	270	68.4	120	30.4
Trades, Transport and Equipment Operators and Related Occupations	80	12,545	98.4%	200	1.6%
7242 Electrician	6	660	98.5	10	1.5
7251 Plumber	5	500	99.0	5	1.0
7265 Welder	4	1805	99.4	10	0.6
7271 Carpenter	20	4800	98.9	60	1.2
7264/7611 Steel Erector	15	740	99.3	10	1.3
7311 Millwright	4	1115	97.0	40	3.5
733x Plant Mechanic	20	180	97.3	10	5.4
7372 Blasting*	*	65	100	-	-
7421 Machinery Operator	6	2680	98.2	55	2.0
Trade Helpers, Construction Labourers, Related Occupations	28	4140	88.6%	535	11.4%
7611 Plant Worker	10	3925	88.3	520	11.7
7612 Plant Labour	18	215	93.5	15	6.5
Technical and Skilled Occupations in Health	*	305	60.4%	200	39.6%
3234 Ambulance/First-aid*	*	305	60.4	200	39.6
Total	145	18,885	93.3%	1,350	6.7%

*will be subcontracted

² Statistics Canada (2006). Employment Equity Data Report. (Statistics adapted to represent relevant NOC's)

Table 2: 2006-2010 Graduation Rates by Sex for Construction/Preparation Phase
(Technical and Trades, Transport, and Equipment Operators and Related Occupations)

National Occupational Categories (NOC) for Construction Phase	% Female Grads 2006-10	Graduates 2006 ³				Graduates 2007-2010 ⁴			
		Men		Women		Men		Women	
		#	%	#	%	#	%	#	%
Technical Occupations Related to Natural...									
225x Technician	71%	13	26.5%	36	73.5%	42	29%	103	71%
Trades, Transport and Equipment Operators...	7.1%	612	94.7%	34	5.3%	1199	92%	104	8%
7242 Electrician	8.3	193	94.2	12	5.8	581	91.0	53	9.0
7251 Plumber	2.7	68	95.8	3	4.2	40	100	0	0.0
7265 Welder	8.2	118	95.2	6	4.8	282	90.4	30	9.6
7271 Carpenter	7.0	164	93.7	11	6.3	115	92.0	10	8.0
7264/7611 Steel Erector	-	-	-	-	-	-	-	-	-
7311 Millwright	4.9	69	97.2	2	2.8	181	94.3	11	5.7
733x Plant Mechanic	-	-	-	-	-	-	-	-	-
7372 Blasting**	-	-	-	-	-	-	-	-	-
7421 Machinery Operator	-	-	-	-	-	-	-	-	-

*will be subcontracted

* A Driller Blaster program can be offered as contract training through CNA upon request

³ Department of Education, Government of Newfoundland and Labrador (2008). Career Search 2008: Employment Experience and Earnings of 2006 Graduates – College of the North Atlantic and Private Training Institutions

⁴ College of the North Atlantic 2007-2010 Graduate Data from all provincial campuses

Table 3: Targets for Women’s Employment for Construction/Preparation Phase

National Occupational Categories (NOC) for Construction Phase	Total Labour Needed	Available Women 2006 ³		Female Graduates 2006-10 ⁴		Short-Term Targets		Long-Term Targets	
		#	%	#	%	#	%	#	%
Middle and Other Managers	10	60	6.6%	-	-	1	10%	2	20%
0711 Superintendent	1	35	5.9	-	-				
721x Supervisor	3	15	15.8	-	-				
721x Forepersons	6	10	4.8	-	-				
Professional Occupations in Natural and Applied Sciences	6	225	23.6%	-	-	1	16.6%	2	33%
2131 Engineer	5	100	14.6	-	-				
2211 Chemist	1	125	44.6	-	-				
Technical Occupations Related to Natural and Applied Sciences	21	130	28.8%	139	71%	7	33%	8	40%
225x Technician	20	10	16.7	139	71.0				
2263 Health and Safety Officer	1	120	30.4	-	-				
Trades, Transport and Equipment Operators	80	200	1.6%	153	7.1%	4	5%	6	7%
7242 Electrician	6	10	1.5	65	8.3				
7251 Plumber	5	5	1.0	3	2.7				
7265 Welder	4	10	0.6	36	8.2				
7271 Carpenter	20	60	1.2	21	7.0				
7264/7611 Steel Erector	15	10	1.3	-	-				
7311 Millwright	4	40	3.5	13	4.9				
733x Plant Mechanic	20	10	5.4	-	-				
7372 Blasting*	*	-	-	-	-				
7421 Machinery Operator	6	55	2.0	-	-				
Trade Helpers, Construction Labourers, Related Occupations	28	535	11.4%	-	-	3	11%	5	18%
7611 Plant Worker	10	520	11.7	-	-				
7612 Plant Labour	18	15	6.5	-	-				
Technical and Skilled Occupations in Health	*	200	39.6%	-	-	*	40%	*	40%
3234 Ambulance/First-aid*	*	200	39.6	-	-				
Total	145	1350	6.7%	-	-	16	11%	23	15%

3 & 4 See footnotes page 13 for sources.

4.1.2 Targets for Operations Phase

Table 4: Labour Supply by Sex for Operations Phase
(Excluding Traditional Clerical, Sales, and Services Occupations)

National Occupational Categories for Operations Phase	Total Labour Needed	Available in NL in 2006			
		Men		Women	
		#	%	#	%
Middle and Other Managers	8	575	90.6%	60	9.4%
0211 Engineering Manager	1	200	95.2	10	4.8
0212 Chief Chemist	1	70	77.8	20	22.2
0811 Primary Production Managers	3	225	93.8	15	6.3
0721 Facility Operation and Maintenance Manager	3	80	84.2	15	15.8
Skilled Administrative and Business Occupations	4	420	75.7%	135	24.3%
1472 Warehouse Clerk	4	420	75.7	135	24.3
Professional Occupations in Natural and Applied Sciences	10	665	86.9%	100	13.1%
2131 Environmental Engineer	1	580	84.7	100	14.6
2142 Metallurgist Engineer	1	30	100	-	-
2143 Mining Engineers	8	55	100	-	-
Technical Occupations Related to Natural and Applied Sciences	19	1075	73.1	395	26.9%
2211 Assay Technician	6	150	53.6	125	44.6
2212 Geological and Mineral Technologists and Technicians	8	320	78.0	95	23.2
2232 Maintenance Planner	1	100	100	-	-
2253 Model Designer	2	235	79.7	55	18.6
2263 Health and Safety Personnel	2	270	68.4	120	30.4
Intermediate Sales and Service Occupations	5	4355	71%	1780	29%
6651 Security Officer	1	1080	72.2	415	27.8
6663 Janitor and Maintenance	4	3275	70.5	1365	29.4
Trades, Transport and Equipment Operators and Related Occupations	76	12,515	98.3%	220	1.7%
7211 Supervisors, Machinists and Related	5	20	100	-	-
7241 Electricians (Except Industrial and Power System)	4	1340	98.9	20	1.5
7242 Industrial Electrician	8	660	98.5	10	1.5
7265 Welder	4	1805	99.4	10	0.6
7311 Millwright	4	1115	97.0	40	3.5
733x Mechanic (6+6; 2+2)	16	270	98.2	5	1.8
7361 Train Coordinator	2	10	100	-	-
7372 Drillers and Blasters*	4+*	65	100	-	-
7411 Truck Operator	12	4335	97.3	115	2.6
7421 Heavy Equipment Operators	13	2680	98.2	55	2.0
7612 Labour (Service Truck, etc.)	4	215	93.5	15	6.5
Supervisors Mining, Oil, and Gas	3	205	97.6%	10	4.8%
8221 Supervisors Mining and Quarrying	3	205	97.6	10	4.8
Intermediate Occupations in Primary Industry	6	170	75.6%	50	22.2%
8614 Sample Preparation Technician	6	170	75.6	50	22.2
Occupations Unique to Processing, Manufacturing, and Utilities	21	155	83.8%	30	16.2%
9211 Supervisors Mineral and Metal Processing	5	15	100	-	-
9411 Machine Operators, Mineral and Metal Processing	12	90	90.0	10	10.0
9611 Operator Helper/Labour	4	50	71.4	20	28.6
Technical and Skilled Occupations in Health	*	305	60.4%	200	39.6%
3234 Ambulance/First-aid*	*	305	60.4	200	39.6
Total	152	20,440	87.3%	2,980	12.7%

*will be subcontracted

Table 5: 2006-2010 Graduation Rates by Sex for Operations Phase
(Trades, Transport, and Equipment Operators and Related Occupations)

National Occupational Categories (NOC) for Operations Phase	% Female Grads 2006-10	Graduates 2006 ⁵				Graduates 2007-2010 ⁶			
		Men		Women		Men		Women	
		#	%	#	%	#	%	#	%
Technical Occupations Related to Natural...									
225x Technician	71%	13	26.5%	36	73.5%	42	29%	103	71%
Trades, Transport and Equipment Operators...	7.8%	673	94.3%	41	5.7%	1271	91.2	124	8.8%
7211 Supervisors, Machinists and ...	-	-	-	-	-	-	-	-	-
7241 Electrician	13.3	13	86.7	2	13.3	-	-	-	-
7242 Industrial Electrician	8.3	193	94.2	12	5.8	581	91.0	53	9.0
7265 Welder	8.2	118	95.2	6	4.8	282	90.4	30	9.6
7311 Millwright	4.9	69	97.2	2	2.8	181	94.3	11	5.7
733x Mechanic	-	-	-	-	-	-	-	-	-
7361 Train Coordinator	-	-	-	-	-	-	-	-	-
7372 Drillers Blasters**	-	-	-	-	-	-	-	-	-
7411 Truck Operators	-	-	-	-	-	-	-	-	-
7421 Heavy Equipment Operators	8.8	280	93.6	19	6.4	227	89.5	30	11.6
7612 Labour	-	-	-	-	-	-	-	-	-

*will be subcontracted

* A Driller Blaster program can be offered as contract training through CNA upon request

⁵ Department of Education, Government of Newfoundland and Labrador (2008). Career Search 2008: Employment Experience and Earnings of 2006 Graduates – College of the North Atlantic and Private Training Institutions

⁶ College of the North Atlantic 2007-2010 Graduate Data from all provincial campuses

Table 6: Targets for Women's Employment for Operations Phase

National Occupational Categories (NOC) for Operations Phase	Total Labour Needed	Available Women 2006 ³		Female Graduates 2006-2010 ⁴		Short - Term Targets		Long - Term Targets	
		#	%	#	%	#	%	#	%
Middle and Other Managers	8	60	9.4%	-	-	1	13%	2	25%
0211 Engineering Manager	1	10	4.8	-	-				
0212 Chief Chemist	1	20	22.2	-	-				
0811 Primary Production Managers	3	15	6.3	-	-				
0721 Facility Operation and Maintenance Manager	3	15	15.8	-	-				
Skilled Administrative and Business Occupations	4	135	24.3%	-	-	1	25%	2	50%
1472 Warehouse Clerk	4	135	24.3	-	-				
Professional Occupations in Natural and Applied Sciences	10	100	13.1%	-	-	1	10%	2	20%
2131 Environmental Engineer	1	100	14.6	-	-				
2142 Metallurgist Engineer	1	-	-	-	-				
2143 Mining Engineers	8	-	-	-	-				
Technical Occupations Related to Natural and Applied Sciences	19	395	26.9%	139	71%	6	32%	7	40%
2211 Assay Technician	6	125	44.6	-	-				
2212 Geological and Mineral Technologists and Technicians	8	95	23.2	139	71.0				
2232 Maintenance Planner	1	-	-	-	-				
2253 Model Designer	2	55	18.6	-	-				
2263 Health and Safety Personnel	2	120	30.4	-	-				
Intermediate Sales and Service Occupations	5	1780	29%	-	-				
6651 Security Officer	1	415	27.8	-	-				
6663 Janitor and Maintenance	4	1365	29.4	-	-				
Trades, Transport and Equipment Operators	76	220	1.7%	180	7.8%	6	8%	8	10%
7211 Supervisors, Machinists and Related	5	-	-	-	-				
7241 Electricians (Except Industrial and Power System)	4	20	1.5	2	13.3				
7242 Industrial Electrician	8	10	1.5	65	8.3				
7265 Welder	4	10	0.6	36	8.2				
7311 Millwright	4	40	3.5	13	4.9				
733x Mechanic (6+6; 2+2)	16	5	1.8	-	-				
7361 Train Coordinator	2	-	-	-	-				
7372 Drillers and Blasters*	4+*	-	-	-	-				
7411 Truck Operator	12	115	2.6	-	-				
7421 Heavy Equipment Operators	13	55	2.0	49	8.8				
7612 Labour (Service Truck, etc.)	4	15	6.5	-	-				
Supervisors Mining, Oil, and Gas	3	10	4.8%	-	-	1	33%	1	33%
8221 Supervisors Mining and Quarrying	3	10	4.8	-	-				
Intermediate Occupations in Primary Industry	6	50	22.2%	-	-	1	17%	2	33%
8614 Sample Preparation Tech...	6	50	22.2	-	-				
Occupations Processing, Manufacturing, and Utilities	21	30	16.2%	-	-	4	19%	5	24%
9211 Supervisors Mineral and Metal Processing	5	-	-	-	-				
9411 Machine Operators, Mineral and Metal Processing	12	10	10.0	-	-				
9611 Operator Helper/Labour	4	20	28.6	-	-				
Technical and Skilled Occupations in Health	*	200	39.6%	-	-	*	40%	*	40%
3234 Ambulance/First-aid*	*	200	39.6	-	-				
Total	152	2,980	12.7%	-	-	22	15%	31	20%

3 & 4 See footnotes page 13 for sources.

4.1.3 Recruitment and Selection

In recruiting and directly targeting women, in relation to employment opportunities, NML will apply the initiatives described in the Communications Strategy in Section 3.0 of this Plan. In addition to communicating opportunities to women, however, NML recognizes the importance of ensuring the recruitment and selection process is free of systemic barriers for women. To this end, NML will:

- Ensure those in hiring positions in NML and its contracting companies have received gender-awareness and cultural-awareness training prior to screening resumes and selecting candidates
- Establish a corporate culture that is free of gender-related biases and discrimination in relation to the hiring of women, including ensuring that maternity and parental leave is not a consideration in the hiring process
- Ensure gender balance on hiring committees when possible
- Develop a list of criteria for résumé screening and candidate selection, which takes into account that women generally have less experience than men in occupations where they are under-represented
- Take gender-identifying information into account in the hiring process to achieve targets for women's employment and in gathering data for monitoring purposes
- When faced with résumés of an equally-qualified male and female candidate, give priority to the female candidate as a special measure until targets have been met
- Explore opportunities to apply special measures to hire qualified women when hiring from union lists until targets have been met, such as allocating a certain number of name hires for women candidates

4.1.4 Retention and Promotion

NML recognizes that systemic barriers often lead to low retention rates of women in occupations in which they are typically under-represented. In order to retain female employees, NML will implement the initiatives outlined throughout this Plan, particularly those described in the Implementation Plan in Section 5.0.

In directly targeting women, in relation to internal promotion and advancement opportunities, NML will apply the initiatives related to Education and Training described in Section 4.2 of this Plan, as well as those outlined in the Communications Strategy in Section 3.0 of this Plan. In addition to communicating internal opportunities to women, NML recognizes the importance of ensuring the promotion process is free of systemic barriers for women. To this end, NML will:

- Establish a corporate culture that is free of gender-related biases and discrimination in relation to the promotion of women, including ensuring that maternity and parental leave is not a consideration in the hiring process
- Identify alternative qualifying characteristics, aside from years of experience, to use as selection criteria in the promotion process to ensure women have an equal chance to men of being promoted
- Take gender-identifying information into account in the promotion process to achieve targets for women's employment and in gathering data for monitoring purposes
- When faced with equally-qualified male and female candidates for promotion, give priority to the female candidate as a special measure to achieve a gender balance in senior-level, leadership, and supervisory positions

4.1.5 Cultural Considerations: Recruitment and Retention of Aboriginal Women

NML recognizes that Aboriginal peoples generally hold strong cultural values of community and spirituality. The Company will take cultural values into account in the recruitment and retention of Aboriginal women. NML will apply these values to the WEP – particularly the Communications objectives described in Section 3.0 of this Plan – as well as the Implementation objectives outlined in Section 5.0. This will be achieved non-exclusively through:

- The use of gender- and culturally-inclusive text and illustrations in all external communications, including promotional/informational material and advertisements
- The use of gender- and culturally-inclusive text and illustrations in job advertisements
- Support of education and training programs offered by women’s and Aboriginal groups to encourage Aboriginal women to pursue employment in non-traditional occupations
- Inclusion of Aboriginal women employees in the recruitment of other Aboriginal women and in informing the Aboriginal community of employment opportunities in order to provide leadership and offer support
- Highlighting success stories of Aboriginal women in occupations in which they are typically under-represented, and providing information regarding public opportunities for training and employment in internal and external bulletins, as well as other means of communication as appropriate
- Establishing a mentorship model with a focus on effective skills development and inclusiveness, pairing Aboriginal women with Aboriginal women mentors when possible
- Ensuring a sense of community and belonging by designating areas on-site for Aboriginal women to utilize for cultural, recreational and social activities – and gather feedback from women in relation to desired activities offered
- Including cultural-awareness training in orientation and as professional development for all new and existing managers and employees
- Recognizing Aboriginal women are the primary caregivers of young and elder members of their communities, by partnering with government, women’s and Aboriginal groups to explore initiatives to provide support to families and communities
- Holding regular update and feedback sessions with Aboriginal women employees and Aboriginal groups to identify areas of success and potential for improvement
- Building relationships with respected members of Aboriginal communities, including elders and spiritual leaders, to gather feedback and guidance in relation to culturally-sensitive and inclusive policies, procedures and accommodations

4.2 Education and Training

NML recognizes the importance of education and training to develop a pool of qualified women from which to recruit, and in preparing women to take advantage of employment opportunities on the ELAIOM. To promote education and training opportunities to women, NML will:

- Support education and training programs offered by women’s organizations and community groups that encourage women to pursue employment in non-traditional occupations
- Promote education and training for women by profiling female role models in non-traditional occupations on information materials and at presentations to schools
- Partner with local educational institutions, such as College of the North Atlantic, to provide scholarships for women entering non-traditional training in the mining sector at the post-secondary level
- Provide educational institutions with detailed information regarding specific occupations and skill sets required for the ELAIOM, and make this information available to the public to allow individuals to become qualified for related opportunities

NML recognizes the need to provide individualized and specialized training to employees to enhance their skills and knowledge for employment on the ELAIOM. To provide women with the specific skills required in particular occupations on the Project, NML will:

- Provide individualized on-the-job training to employees as required, ensuring that training opportunities are equally available to men and women, and tailored to the needs of women
- Establish a mentorship model with a focus on effective skills development, pairing women with female mentors when possible
- Develop qualified employees as trainers and mentors, focusing in particular on female mentors when possible
- Develop an individualized training and skills-development program for apprentices, and match women apprentices with effective mentors, female when possible
- Provide safety training to female employees, while recognizing women generally have less experience in non-traditional occupations and may require additional training
- Allow employees to train for more senior positions than they currently hold to encourage advancement and provide opportunities for promotion

4.3 Business Access

NML recognizes the importance of encouraging women to take advantage of business opportunities related to the ELAIOM, as well as the need to ensure women have fair and equal access to such opportunities. To this end, NML will:

- Develop a communication, promotion and awareness strategy to promote opportunities pertaining to the ELAIOM, with a focus on women entrepreneurs
- Highlight a section on NML's website welcoming women entrepreneurs to participate in the bidding process for procurement services
- Offer an interactive Q&A session on the website to facilitate queries regarding the procurement process
- Facilitate information and networking sessions for women regarding the procurement process, explaining the bidding process with an emphasis on clear procedures and guidance
- Partner with relevant community organizations to facilitate information sessions targeted specifically at women
- Profile successful women entrepreneurs in print materials and encourage their participation in information and networking sessions as role models to share their experiences
- Ensure that procurement-related information is presented using clear language and in a non-intimidating manner in both written materials and verbal presentations
- Place advertisements and run stories in local media outlets expressing that women are welcome and invited to participate in the procurement process
- Place advertisements in local media outlets expressing the intent to facilitate procurement sessions for women, and invite women to attend
- Liaise with community organizations and business associations to avail of their networks and contact lists in promoting the message that women are welcome to participate in the procurement process
- Research an inventory of women-owned and -managed businesses in the province and place them on a regular contact list in relation to ELAIOM opportunities
- Adopt a supplier diversity culture, and track progress towards supplier diversity (women-owned businesses), with an emphasis on continuous growth

Through consultation with Newfoundland and Labrador Organization of Women Entrepreneurs (NLOWE), NML understands that information and statistics relating to the availability of women-owned and -managed businesses in non-traditional sectors is not currently available. Based on this lack of data, it is not possible to set targets for business access at this time. To this end, NML will:

- Work collaboratively with NLOWE to gather information and statistics relating to the availability of women-owned and -managed businesses in non-traditional supplier sectors
- Support NLOWE, government, and other organizations in efforts to gather information and statistics relating to business access targets for women
- Set targets for business access for women as soon as necessary information and statistics become available

5.0 IMPLEMENTATION PLAN

Often, there is a gap between gender-equity policies and the actual implementation of these policies. Effective implementation of the WEP will require a thorough implementation plan. In order to ensure active and focused implementation, NML will:

- Have the WEP Committee meet on a quarterly basis
- Explore the possibility of including union representatives on the WEP Committee to ensure collaborative implementation efforts
- Have external interest groups, such as WRDC, directly advise the WEP Committee for application of outside expertise to implementation, when necessary
- Gather ongoing feedback from managers, employees, women's groups, and other stakeholders to establish policies, procedures and initiatives that will ensure effective implementation of the WEP

An important aspect of implementing the WEP is the reduction of barriers to employment for the advancement of women. The goal of the implementation plan will be to minimize systemic barriers in all aspects of ELAIOM.

This plan will address such matters as: revising recruitment and retention policies, if required; on-site training and orientation; accommodation; and, support services at all work sites. NML will:

- Conduct gender-based analysis on recruitment and retention policies to ensure they are free of systemic barriers and to promote equal access to opportunities for women. If barriers are identified, policies will be revised accordingly for elimination
- Include a gender-awareness training session in the WEP presentation and workshop to be delivered to all new managers and employees during orientation, and to existing managers and employees as professional development
- Include information regarding respectful-workplace, anti-discrimination, anti-harassment and anti-violence policies and procedures in orientation and professional-development training for all managers and employees

- Post respectful-workplace, anti-discrimination, anti-harassment and anti-violence policies and procedures in frequented areas on site, emphasizing zero-tolerance
- Appoint a neutral person – with no influence over the women’s position of employment – as on-site officer(s) with whom employees can consult on gender-equity and respectful-workplace-related issues in a confidential and procedural manner
- Assign overall responsibility for gender equity and respectful-workplace-related issues to the vice-president responsible for the WEP and the employment equity coordinator
- Ensure there are female-only washroom/change room facilities in all areas of the site, providing personal privacy and appropriate accommodations
- Ensure living and sleeping quarters provide personal privacy and appropriate accommodations for all employees
- Designate areas on-site for women to utilize for recreational and social activities, and gather feedback from women in relation to desired activities offered
- Gather ongoing feedback from female employees to ensure accommodations are sufficient and appropriate – making reasonable improvements as needed
- Provide employees with gear that fits properly, as a key priority and requirement during training/orientation, recognizing that safety gear is most often designed for the male anatomy, in generic sizes, that do not take individual differences into account
- Establish family-friendly policies and procedures, such as family-related leave. Assess employee’s needs through focus groups or surveys – understanding any family issues will allow appropriate practices to evolve; build as much flexibility as possible into policies to accommodate the needs of under-represented groups such as women; encourage support networks
- Explore options for providing flexible rotation schedules to accommodate family responsibilities, including shorter rotational schedules through job-sharing arrangements
- Explore options for partnering with day-care facilities, government and community organizations to assist employees with finding affordable childcare in their community

6.0 LEADERSHIP AND ACCOUNTABILITY MECHANISMS

This component of the WEP outlines leadership within NML and includes accountability mechanisms to ensure compliance by contractors.

The implementation of the WEP is the overall responsibility of NML. In terms of leadership and accountability, NML will:

- Assign the responsibility of employment-equity results to a vice-president, who should be female. This vice-president will oversee the implementation of the WEP, and ensure compliance by NML employees and contractors. This accountability will apply to the construction and operations phases of the project
- Support its contractors and subcontractors in meeting their women's employment goals and requirements, while also collaborating with them on initiatives to further female employment on the Project
- Highlight champions and leaders within NML and its contracting companies; profile contracting companies who demonstrate leadership in terms of the goals and initiatives of the WEP at the annual stakeholder meeting

NML will work closely with its main contractors to ensure awareness of, and compliance with, the WEP. The Company will require a commitment to employment equity from its contractors, and will take this into account when awarding contracts. NML will include gender-equity provisions in its criteria for bids, and require that contracts related to the execution of the ELAIOM include acknowledgement from successful bidders that they are aware of the existence and importance of the WEP. Related bid criteria for contracting companies will include:

- Employment and training opportunities available within the company for women in relation to the ELAIOM contract
- The number of women currently employed in specific occupations
- The target number of women they plan to employ in specific occupations for the ELAIOM
- Plans to ensure a supportive, inclusive and respectful environment for women
- Plans to support business access for women
- Women's employment- and business-access-related initiatives that they are currently involved in and/or support, as well as those that they plan to become involved in and/or support

NML will also require that each main contractor to the ELAIOM provide a commitment and plan for compliance with the WEP. The main contractors will be required to ensure their subcontractors are aware of, and in compliance with, the WEP. This compliance will be overseen by NML, who holds overall responsibility for the implementation of the WEP, including the goals and targets outlined within it.

7.0 MONITORING, REPORTING, AND IMPLEMENTATION SCHEDULE

NML will monitor and report on WEP targets and goals on a monthly, quarterly and annual basis. This will be accomplished in the following manner:

- NML and each of the project contractors will be responsible for internal monitoring to measure success in meeting female employment targets
- NML will gather internal employment data, including breakdown by sex and race in relation to hiring, occupation, training and promotion on a monthly, quarterly and annual basis
- Project contractors will be required to gather and submit employment data to NML on a monthly, quarterly and annual basis
- The results of the employment data will be compiled, submitted to the Government of Newfoundland and Labrador and released publicly in monthly, quarterly and annual ELAIOM Women's Employment Plan reports
- The monthly reports will indicate the progress achieved on the WEP employment targets
- The quarterly reports will also provide updates on key WEP activities and initiatives
- The annual reports will provide to-date status and progress updates on all of the WEP commitments, including special initiatives, programs, and business access initiatives

NML will use the following schedule as a timeline for implementing the goals and targets outlined in this Plan. Timelines associated with women's employment targets reflect that short-term targets will be implemented upon commencement of each phase; and, this implementation will be ongoing as hiring takes place. Timelines for long-term women's employment targets reflect the need to allow time to build a pool of qualified female candidates from which to recruit. This is anticipated to be accomplished through NML's education and training initiatives, as well as through a general increase in the promotion of non-traditional careers to women.

Table 5: Timetable for Implementation of Goals and Targets

Goal/Target Type	Construction/Preparation Phase			Operations Phase		
	Upon Commencement	By Year 2	Throughout Duration	Upon Commencement	By Year 5	Throughout Duration
Internal Communications	X		X	X		X
External Communications	X		X	X		X
Short-Term Target Hires	X		X	X		X
Long-Term Target Hires		X			X	X
Education and Training	X		X	X		X
Business Access	X		X	X		X
Implementation Plan	X		X	X		X
Leadership and Accountability	X		X	X		X
Monitoring and Reporting			X			X
Continuous Improvement			X			X

Please see Appendix B for checklist and implementation schedule for WEP goals and actions.

8.0 CONTINUOUS IMPROVEMENT

Periodic evaluations and amendments are required to promote continuous improvement to the WEP and to achieve a representative workforce within a reasonable period. In aiming for continuous improvement, NML will:

- Monitor Project employment data on an annual basis and assess it relative to the targets identified in the WEP. If necessary, the Company will review and revise its approach, initiatives, targets, and goals
- Conduct an annual review process that takes into account input from managers and employees, as well as other ELAIOM proponents and key stakeholders, in part through mechanisms described in the Communications Strategy in Section 3.0 of this Plan
- Hold an annual meeting with all relevant stakeholders to review progress on the WEP, and to gather stakeholder feedback and best practices
- Meet with government annually, to evaluate progress and identify areas for continued improvement
- Review targets for women's employment on an annual basis, in relation to the availability of qualified women in the labour force, based on Statistics Canada employment-equity data and post-secondary graduation rates by sex. Revisions to targets will be made accordingly as availability of qualified women increases
- Review and revise business access targets and initiatives as progress occurs with the identified business access activities

Appendix A

List of Consultation Participants

List of Consultation Participants

Women/ Community Organizations (Individual Consultations)

- Newfoundland and Labrador Organization of Women Entrepreneurs (NLOWE)

NLOWE
2nd Floor Regatta, Plaza 11
84-86 Elizabeth Avenue
St. John's, NL

- Women in Science and Engineering (WISE)

Faculty of Engineering
Memorial University
St. John's, NL

- Women Interested in Successful Employment (WISE)

WISE
Viking Building; Suite 306
136 Crosbie Rd.
St. John's, NL
A1B 3K3

Government (Focus Group)

- Department of Natural Resources, (Minister Responsible for the Status of Women)

Department of Natural Resources
50 Elizabeth Avenue
P.O. Box 8700
St. John's, NL
A1B 4J6

- Provincial Advisory Council on the Status of Women (PACSW)

Provincial Advisory Council on the Status of Women
15 Hallett Cres. Suite 103
St. John's, NL
A1B 4C4

- Women's Policy Office

Women's Policy Office
Government of Newfoundland and Labrador
P.O. Box 8700
St. John's, NL
A1B 4J6

Aboriginal Peoples (Individual Consultations)

- Métis Nation: Labrador
NunatuKavut (Métis Nation)
Goose Bay, NL
- Inuit Employment Coordinator: Labrador Mine
Board Member WRDC
Station C
Happy Valley-Goose Bay, NL
A0P 1C0

Training Institutions (Individual Consultations)

- College of the North Atlantic (CNA)

Prince Philip Drive Campus
1 Prince Philip Dr
P.O. Box 1693
St. John's, NL
A1C 5R7

Happy Valley- Goose Bay Campus
219 Hamilton Rd.
P.O. Box 1720 Stn. B
Happy Valley-Goose Bay, NL
A0B 1E0

- Memorial University of Newfoundland

Faculty of Engineering and Applied Science
Memorial University
St. John's, NL
A1B 3X5

Faculty of Business Administration
Memorial University
St. John's, NL
A1B 3X5

Unions (Individual Consultations)

- International Brotherhood of Electrical Workers

IBEW Local 2330
1082 Thorburn Rd. 21463
Portugal Cove-St. Philips, NL

- NL Regional Council of Carpenters, Millwrights & Allied Workers, Local 579:
Office to Advance Women

Office to Advance Women's Apprentices
89 McNamara Dr.
Paradise, NL
A1L 3W2

Industry Associations (Individual Consultations)

- Mining Industry Human Resources Council

Mining Industry Human Resources Council (MIHR)
260 Hearst Way Suite 401
Kanata, ON

- Newfoundland and Labrador Chamber of Mineral Resources

Chamber of Mineral Resources Inc.
P.O. Box 21463
St. John's, NL
A1A 5G6

Female Tradespeople (Individual Consultations)

- 4th Year Apprentice Electrician
- Journeyman Electrician

Note: Both these women are working in fly-in, fly-out mines at present.

Appendix B

Goals and Actions Checklist and Implementation Schedule

WOMEN'S EMPLOYMENT PLAN
Goals and Actions
Checklist and Implementation Schedule*

INSTRUCTIONS

- Indicate for each Action the Year(s)/Quarter(s) in which they will be implemented. For guidance, please refer to Section 5.0 -
- Implementation Plan of the WEP, Table 5 – Timetable for Implementation of Goals and Targets.

GOALS/ACTIONS	CONSTRUCTION PHASE		OPERATIONS PHASE					
	Yr 1	Yr 2	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Through out
RESPONSIBLE STAFF								
Assign responsibility of the overall implementation of the WEP to a vice-president, who should be female								
Hire an employment equity coordinator to ensure effective and focused implementation of the WEP								
Establish a WEP Committee consisting of senior personnel, led by the responsible vice-president and employment equity coordinator								
COMMUNICATIONS								
INTERNAL COMMUNICATIONS								
Communicate WEP Internally								
Develop internal WEP-related communications strategy based on guidelines put forth in WEP								

GOALS/ACTIONS	CONSTRUCTION PHASE		OPERATIONS PHASE					
	Yr 1	Yr 2	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Through out
Develop criteria for conducting gender-based analysis on an ongoing basis to ensure that gender-inclusive language in all communications								
Develop and implement a presentation and workshop regarding WEP to be delivered during orientation and as professional development								
Provide written material containing detailed information about the WEP to all managers and employees, and post related messages								
Establish Ongoing Communication								
Establish communication mechanisms whereby managers and employees can ask WEP-related questions and provide feedback								
Develop mechanisms to survey managers and employees gather feedback to identify areas of success and potential for improvement								
Communicate Internal Opportunities to Women								
Develop and use gender-inclusive language and illustrations in postings regarding internal opportunities								

GOALS/ACTIONS	CONSTRUCTION PHASE		OPERATIONS PHASE					
	Yr 1	Yr 2	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Through out
Hold regular internal information and networking sessions for women on site to share information								
EXTERNAL COMMUNICATIONS								
Demonstrate Culture of Gender Equity								
Develop external WEP-related communication strategy based on guidelines put forth in WEP								
Develop gender-inclusive text and illustrations in all external communications, including promotional/informational material								
Develop mechanisms to provide information/updates regarding WEP in external bulletins, media communications, and on NML website								
Communicate External Opportunities to Women								
Hold public information and networking sessions targeted at women in partnership with women's groups and Aboriginal groups								
Provide training and employment opportunity-related information to women's groups, Aboriginal groups, and counselors								

GOALS/ACTIONS	CONSTRUCTION PHASE		OPERATIONS PHASE					
	Yr 1	Yr 2	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Through out
Establish Regular Communication with Stakeholder Groups								
Forward WEP-related information and updates in bulletins and notices directly to women’s organizations and other stakeholder groups								
Establish communication mechanisms whereby stakeholder groups can ask WEP-related questions and provide ongoing feedback								
WOMEN’S EMPLOYMENT								
SHORT-TERM TARGET HIRES								
Implement short-term target hires for each phase								
LONG-TERM TARGET HIRES								
Implement long-term target hires for each phase								
RECRUITMENT AND SELECTION								
Directly Target Women in Relation to Employment Opportunities								
Refer to and implement initiatives described in Communications section of WEP								
Ensure Recruitment and Selection Process is Free of Systemic Barriers for Women								
Establish a corporate culture that is free of gender-related biases and discrimination in relation to the hiring of women								

GOALS/ACTIONS	CONSTRUCTION PHASE		OPERATIONS PHASE					
	Yr 1	Yr 2	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Through out
Ensure that those in hiring positions receive gender awareness training and cultural awareness training prior to resume review/interviews								
Develop a list of criteria for résumé screening and candidate selection that takes into account that women generally have less experience								
Explore opportunities to apply special measures to hire qualified women when hiring from union lists until targets have been met								
RETENTION AND PROMOTION								
Retain Female Employees								
Refer to and implement initiatives described in the Implementation section of WEP								
Directly Target Women in Relation to Promotion Opportunities								
Refer to and implement initiatives described in Education and Training section and Communications Strategy section of WEP								

GOALS/ACTIONS	CONSTRUCTION PHASE		OPERATIONS PHASE					
	Yr 1	Yr 2	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Through out
Ensure that Retention and Promotion Process is Free of Systemic Barriers for Women								
Establish a corporate culture that is free of gender-related biases and discrimination in relation to the promotion of women								
Identify alternative qualifying characteristics aside from years of experience to use as selection criteria in the promotion process								
Take gender-identifying information into account in the promotion process in pursuit of achieving targets and gathering monitoring data								
CULTURAL CONSIDERATIONS: ABORIGINAL WOMEN								
Take Cultural Considerations into Account in the Recruitment and Retention of Aboriginal Women								
Develop and use gender-and culturally-inclusive text and illustrations in all external communications								
Include cultural awareness training in orientation and as professional development for all new and existing managers and employees								

GOALS/ACTIONS	CONSTRUCTION PHASE		OPERATIONS PHASE					
	Yr 1	Yr 2	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Through out
Ensure a sense of community and belonging by designating areas on site for Aboriginal women to utilize for cultural and social activities								
Hold regular update and feedback sessions with Aboriginal women employees and Aboriginal groups								
Support education and training programs to encourage Aboriginal women to pursue employment in non-traditional occupations								
EDUCATION AND TRAINING								
Promote Education and Training Opportunities to Women								
Support education and training programs offered to encourage women to pursue employment in non-traditional occupations								
Promote education and training for women through profiling female role models in non-traditional occupations in information materials								

GOALS/ACTIONS	CONSTRUCTION PHASE		OPERATIONS PHASE					
	Yr 1	Yr 2	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Through out
Provide educational institutions with detailed information regarding specific occupations and skill sets that will be required for the ELAIOM								
Provide Women With the Specific Skills Required for ELAIOM								
Provide individualized on-the-job training to employees as required, ensuring that training is tailored to the needs of women								
Establish a mentorship model with a focus on effective skills development, pairing women with female mentors when possible								
Allow employees to train for more senior positions than they currently hold in order to encourage advancement and promotion								
BUSINESS ACCESS								
Encourage Women to Take Advantage of ELAIOM Business Opportunities								
Ensure that Women Have Fair and Equal Access to Opportunities								
Develop a communication, promotion and awareness strategy to promote opportunities directly to women entrepreneurs								

GOALS/ACTIONS	CONSTRUCTION PHASE		OPERATIONS PHASE					
	Yr 1	Yr 2	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Through out
Place advertisements and run stories in local media outlets expressing that women are welcome and invited to participate in procurement								
Highlight a section on NML's website welcoming women entrepreneurs to participate in the bidding process for procurement								
Partner with relevant community-organizations to facilitate information sessions targeted specifically at women								
Ensure that procurement-related information is presented using clear language and in a non-intimidating manner in all materials								
Adopt a supplier diversity culture, and track progress towards supplier diversity, with an emphasis on continuous improvement								
Gather Information and Statistics Relating to Women-Owned and-Managed Businesses								
Work collaboratively with NLOWE to gather information and statistics relating to non-traditional supplier sectors								
Support NLOWE, government, and other organizations in efforts to gather information and statistics relating to business access for women								

GOALS/ACTIONS	CONSTRUCTION PHASE		OPERATIONS PHASE					
	Yr 1	Yr 2	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Through out
Set targets for business access for women as soon as necessary information and statistics become available								
IMPLEMENTATION PLAN								
Ensure Active, Focused, and Effective Implementation								
Have the WEP Committee meet on a quarterly basis, and explore the possibility of including union representatives on the WEP Committee								
Gather ongoing feedback from managers, employees, women’s groups, and other stakeholders to ensure effective implementation								
Minimize Systemic Barriers in all Aspects of ELAIOM								
Conduct gender-based analysis on recruitment and retention policies to ensure that they are free of systemic barriers								
Include information regarding respectful workplace, anti-discrimination, and anti-harassment in orientation and print materials								

GOALS/ACTIONS	CONSTRUCTION PHASE		OPERATIONS PHASE					
	Yr 1	Yr 2	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Through out
Ensure that there are female-only washroom/change room facilities in all areas of the site, provide privacy and appropriate accommodations								
Include providing employees with gear that fits properly as a key priority and requirement during training/orientation								
Establish family-friendly policies and procedures, and explore options for flexible rotation schedules to accommodate family responsibilities								
LEADERSHIP AND ACCOUNTABILITY								
Demonstrate Leadership and Accountability Within NML								
Assign the responsibility of employment equity results and compliance by NML employees to a vice-president, who should be female								

GOALS/ACTIONS	CONSTRUCTION PHASE		OPERATIONS PHASE					
	Yr 1	Yr 2	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Through out
Support contractors and subcontractors in meeting women's employment goals and requirements, and collaborate with them								
Ensure Compliance by Contractors								
The Company will require a commitment to employment equity from its contractors, and take this into account when awarding contracts								
NML will include gender equity provisions in its criteria for bids, and require acknowledgement of compliance with/importance of WEP								
MONITORING AND REPORTING								
Monitor and Report on WEP Targets								
Develop mechanisms for gathering/ monitoring internal employment and promotion data on a quarterly and yearly basis								
Develop mechanisms for project contractors to gather and submit employment data to NML on a quarterly and annual basis								

GOALS/ACTIONS	CONSTRUCTION PHASE		OPERATIONS PHASE					
	Yr 1	Yr 2	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Through out
CONTINUOUS IMPROVEMENT								
Aim for Continuous Improvement through Periodic Evaluations and Amendments								
Develop mechanisms to monitor Project employment data on an annual basis and assess it relative to the targets identified in the WEP								
Review targets for women's employment on an annual basis in relation to data indicating availability of qualified women in the labour force								
Develop/conduct an annual review process that takes into account input from managers and employees, as well as other key stakeholders								