

 <b>Investment Planning Counsel™</b> FINANCIAL SOLUTIONS FOR LIFE	<b>Section: Human Resources</b>	<b>Subject: Accessibility Policy</b>	
	<b>Effective date:</b> January 1, 2012	<b>Revised date:</b> December 1, 2015	<b>Page:</b> 1 of 8

## 1. Overview

Investment Planning Counsel (“**IPC**” or the “**Company**”) is committed to ensuring access to the Company’s financial products and services to individuals with disabilities in a timely manner.

This Policy (the “**Accessibility Policy**” or the “**Policy**”) is intended to address, at a minimum, the requirements of the *Accessibility for Ontarians with Disabilities Act, 2005*, specifically the *Accessibility Standards for Customer Service Regulation* and the *Integrated Accessibility Standards* (collectively the “**AODA**”), and describes how the Company will comply with those accessibility requirements and what customers may expect from the Company.

This Policy will be implemented in accordance with the time frames for compliance established by the AODA. This Policy applies to every person who deals with members of the public or who deals with other third parties in Ontario on behalf of the Company.

This Policy and its procedures are meant to benefit a full range of individuals with disabilities as defined below. Whether a person’s disability is apparent or not, all individuals shall be treated with courtesy, made to feel welcome, and have their need for accommodation respected whenever interacting with the Company.

In this Policy an individual with a disability includes a person with any degree of physical disability, infirmity, disfigurement, mental disorder, learning disability or condition of mental impairment or developmental disability. For the complete definition of disability and other definitions see section 4 of the Policy.

## 2. General

The Company will make reasonable efforts to ensure that individuals with disabilities have the same opportunity to access the products and services which the Company provides, in the same place and in a similar way as other members of the public.

The Company will make reasonable efforts to be consistent with the following principles when establishing policies, practices and procedures in relation to enabling individuals with disabilities to have access to the Company’s products and services:

- financial products and services will be made available in a manner that respects the dignity and independence of individuals with disabilities;
- that people with disabilities may use assistive devices, guide/service animals and/or support persons to access of products and services;
- the provision of financial products and services provided to persons with disabilities will be in a manner that is integrated with the way in which such financial products and services are provided to other members of the public unless an alternative measure is necessary, whether temporarily or on a

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permanent basis, to enable an individual with a disability to access, use or benefit from a financial product or service;

- the Company will seek to give individuals with disabilities an opportunity equal to that of others to obtain, use or benefit from the Company's financial products and services.

### 3. Application of Policy

This Policy applies to the Company's services that are provided externally to the public or third parties.

The Policy applies to every person who deals with members of the public or other third parties on behalf of the Company or who develops policies, procedures or practices that relate to accessing the Company's products or services.

### 4. Definitions

For the purpose of this Policy, the following terms have the meanings indicated:

**"disability"** means

- any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
- a condition of mental impairment or a developmental disability,
- a learning disability or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- a mental disorder, or
- an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

**"guide dog"** means a dog trained as a guide for a person who is blind or visually impaired.

**"service animal"** means, for a person with a disability, an animal if:

- it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

**"support person"** means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care or medical needs or with access to products or services.

**"accessible format"** refers to formats that are alternative to standard formats and are accessible to people with disabilities. Accessible formats may include, but are not limited to, large print, recorded audio and electronic formats, braille and other formats used by persons with disabilities.

**"communication supports"** refers to supports that individuals with disabilities may need to access information. These include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communication.

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## **5. Assistive Devices**

The Company will seek to allow for an individual to be able to use their own assistive devices to access the Company's premises or its products and services, except where this may reasonably pose a security risk or a risk to the health or safety of the individual or others. An assistive device is any device that is designed, made or adapted to assist an individual with a disability in carrying out activities.

In situations where the use of an assistive device could reasonably pose a security risk or a risk to the health or safety of the individual or others, the Company may make other reasonable measures available to assist the individual with a disability in accessing premises, or being able to obtain, use or benefit from the Company's products or services. It is the responsibility of the individual with a disability to ensure that his or her assistive device is operated in a safe and controlled manner at all times.

## **6. Support Persons**

If an individual with a disability is accompanied by a support person, the Company will ensure that both people are allowed to enter the premises together and that the individual is not prevented from having access to the support person, provided the interaction between the person and their support person does not compromise the business functioning.

The Company may require a person with a disability to be accompanied by a support person when on the Company's premises, but only if a support person is necessary to protect the security, health or safety of the person with a disability or the security, health or safety of others on the Company's premises.

Given the nature of information that may be discussed in the presence of a support person accompanying or assisting an individual with a disability, the Company may require that the individual with a disability give his or her consent to the Company to discuss confidential information in the presence of the support person.

If an individual with a disability has concerns about discussing confidential information in the presence of the support person, he or she may ask the support person to leave during the discussion of the confidential information.

## **7. Service Animals**

An individual with a disability who is accompanied by a guide dog or a service animal will be permitted to enter premises owned or leased by the Company that are open to the public and will be permitted to keep the animal with him or her unless otherwise excluded by law. "No pet" policies do not apply to guide dogs and service animals. In the event that a guide dog or service animal's access may be excluded by law, the Company will make reasonable efforts to arrange alternative ways for the individual to obtain, use or benefit from the Company's products and services.

The individual with a disability is responsible for the care and control of the service animal at all times.

### **Recognizing a Service Animal:**

If it is not readily apparent that the animal is being used by an individual for reasons relating to his or her disability, the Company may request verification from the individual.

Verification may include:

- A letter from a physician or nurse confirming that the person requires the animal for reasons related to the disability;
- A valid identification card signed by the Attorney General of Canada; or
- A certificate of training from a recognized guide dog or service animal training school.

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## **8. Notice of Service Disruption**

The Company will, when reasonable, provide notice in the event of a disruption in the facilities or services owned or controlled by the Company that are usually used by individuals with disabilities. The Company's landlord or facilities representative will take reasonable steps to report such disruption in a timely manner through appropriate information channels.

The Company will strive to provide notice as soon as possible of any unexpected disruption of access or use of facilities or services.

### Notification Information:

In the event of a temporary disruption, notification of the disruption will include the following information:

- a description of the nature of the disruption;
- information about the reason for the disruption;
- how long the disruption is expected to last; and
- a description of alternate facilities or services which may be accessed in the interim.

## **9. Self-service Kiosks**

If the Company purchases self-service kiosks that allow public users to access the Company's financial products or services, regard will be given to the accessibility features of such self-service kiosks and preference will be given to self-service kiosks that are accessible.

## **10. Information and Communication**

When communicating with an individual with a disability, the Company will do so in a manner that takes into account the individual's disability. Upon request, the Company will endeavour to provide, or arrange to provide, communications in accessible formats and communication supports to a person with a disability in order to facilitate access to the Company's financial products and services. The Company will do this in a timely manner that takes into account the person's accessibility needs due to his or her disability and at a cost that is no more than the regular cost charged to other persons.

On request and where applicable, the Company will provide emergency procedures, plans and public safety information that is available to the public in an accessible format or with appropriate communication supports as soon as practicable.

The Company will, except where impracticable, ensure that its internet websites that are accessible to members of the public conform with the applicable requirements of the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 by the dates specified in the AODA.

## **11. Accessibility Plan**

The Company will establish, maintain and document a multi-year accessibility plan to outline its strategy to prevent and remove barriers and meet its requirements under certain AODA standards. The accessibility plan will be reviewed and updated as required, but not less frequently than every five years, and will be posted online. Upon request, the Company will provide a copy of the accessibility plan in an accessible format.

## **12. Employment Standard**

The Company will notify employees and the public that accommodation is available for persons with disabilities during the recruitment process. Job applicants who are individually selected for an interview will be notified that accommodations are available upon request. Successful applicants will be notified

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about the Company's policies for accommodating employees with disabilities as part of their offer of employment.

If a selected participant requests accommodation, the Company shall consult with the applicant and provide, or arrange for the provision of, a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

The Company will inform employees of the policies used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. The Company will provide this information to new employees as soon as reasonable after they begin their employment and will provide updated information to all employees whenever there is a change to the existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.

The Company will work with the employee, upon request, to provide or arrange for the provision of accessible formats and communication supports for:

- a) Information that is needed in order to perform the employee's job; and
- b) Information that is generally available to employees in the workplace.

The Company will take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans when providing career development, performance management and when considering redeployment.

The Company will work with the employee making the request in determining the suitability of an accessible format or communication support.

### **13. Workplace Emergency Response Information**

The Company will provide individualized workplace emergency response information to an employee who has a disability, if the disability is such that the individualized information is necessary and if the employee makes the Company aware of the need for accommodation due to the employee's disability. The Company will provide this information as soon as practicable after becoming aware of the need for accommodation.

When an the Company employee requires assistance, the Company will, with the consent of the employee, provide the workplace emergency response information to the person designated by the Company to provide assistance to the employee.

The Company will review the individualized workplace emergency response information developed for a Company employee when the employee moves to a different location within the Company, when the employee's overall accommodation needs or plans are reviewed and when the Company reviews its general emergency response policies.

A written process for the development and maintenance of documented individual accommodation plans will be developed for employees with disabilities. If requested, these plans will include information regarding accessible formats and communication supports and any other accommodation that the employee requires due to their disability.

The Company will have in place a documented return to work process for employees returning to work due to disability and requiring disability-related accommodations. This return to work process will outline the steps that the Company will take to facilitate the return to work and will include individual accommodation

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plans as part of the process. This return to work process will not replace or override any other return to work process created under any other statute.

#### **14. Built Environment**

Where the Company owns real property that includes public spaces and undertakes to build new structures or make major changes to existing structural features, the Company is committed to meeting the design and accessibility requirements of the AODA within the time frames specified.

#### **15. Training**

The Company will ensure that employees who deal with members of the public or other third parties in Ontario on behalf of the Company, or who participate in developing policies, practices or procedures governing the provision of products or services, receive training on the provision of the Company's products and services to individuals with disabilities.

##### Training Provisions:

As reflected in the Regulation, training will include the following:

- The purpose of applicable accessibility legislation and regulations and the requirements made thereunder;
- How to interact and communicate with people with various types of disabilities;
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal, guide dog or a support person.
- How to use assistive devices that may be available on the premises of the Company or are otherwise provided by the Company that may help with the provision of products or services to a person with a disability
- What to do if a person with a disability is having difficulty accessing the Company's products and services.

##### Training Schedule:

Each Employee or representative of the Company providing financial products or services to the customers on the Company's behalf will receive training as soon as reasonably possible after assuming a role that requires training.

##### Record of Training:

The Company will keep a record of training that includes the dates training was provided and the name of individuals who participated in the training.

#### **16. Feedback and Concerns**

The Company welcomes any feedback regarding the methods it uses to provide products and services to individuals with disabilities. Feedback may be made by e-mail, letter, telephone, in person, or in another way that better meets the communication needs of the person providing the feedback.

If an individual has feedback or concerns about the way the Company provides access to its products and services by individuals with disabilities, they may be directed to:

Website and contact form: <http://www.ipcc.ca/contactus.aspx>

Email: [hr@ipcc.ca](mailto:hr@ipcc.ca)

Telephone: 1-877-212-9799

Fax: 905-212-9158

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The Company will forward all feedback, including concerns, to the appropriate business unit for a response and will make best efforts to provide a response in the same format in which the feedback was received in a timely manner.

Individuals who wish to provide feedback in person at the Company's corporate headquarters may do so by completing an onsite customer feedback form available through Corporate Services or attached as Appendix A to this Policies and Procedures Guide.

## **17. Review**

This Policy shall be reviewed and revised from time to time. When new or revised standards are developed under the AODA, this Policy will be reviewed and updated as may be necessary to ensure consistency with such standards.

## **18. Notice of Availability and Format of Documents**

The Company shall notify customers that the documents related to the Regulation are available upon request and in a format that takes into account the customer's disability. Notification will be provided by posting the information on the Company's website or any other reasonable method. When providing these documents to a person with a disability, the Company will endeavor to provide the document, or the information contained in the document, in a format that takes the person's disability into account.

## **19. Modifications to This or Other Policies**

Investment Planning Counsel is committed to developing customer service policies and procedures that respect and promote the dignity and independence of people with disabilities. Therefore, no changes will be made to this policy before considering the impact on people with disabilities.

Any Company policy that does not respect and promote the dignity and independence of persons with disabilities will be modified or removed.

**APPENDIX A**  
**Accessibility for Ontarians with Disabilities**  
**Customer Feedback Form**

Thank you for visiting Investment Planning Counsel (“IPC”). We value our customers and strive to meet everyone’s needs. This form is intended to provide a consistent format for receiving feedback information, but is not meant to be the exclusive format for receiving feedback.

Please complete and return this form so we can continue to improve our services.

Date: \_\_\_\_\_ Format Received: \_\_\_\_\_

Did we respond to your customer service needs today?

☐ YES ☐ NO

Was our customer service provided to you in an accessible manner?

☐ YES ☐ SOMEWHAT ☐ NO (*please explain below*)

Did you have any problems accessing our product and services?

☐ YES ☐ SOMEWHAT ☐ NO (*please explain below*)

**Subject:** \_\_\_\_\_

**Description:** \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Contact Information (optional):**

Name: \_\_\_\_\_ Telephone Number: \_\_\_\_\_

Address: \_\_\_\_\_

E-Mail: \_\_\_\_\_

Filled out by Staff? ☐ YES ☐ NO Staff Person: \_\_\_\_\_

Thank you,  
IPC Management Team

The personal information that you have provided us to enable us to respond to your feedback or complaint will only be used for that purpose. You will not be placed on any mailing lists, nor will your information be released to any third party, except as may be authorized by law. The authority for obtaining this information complies with Section 28(2) of the Municipal Freedom of Information and Protection of Privacy Act.

Questions about this form can be directed to **IPC Corporate Services re: AODA - 2680 Skymark Avenue, Suite 700, Mississauga, Ontario, L4W 5L6**