



**Investors Group  
Accessibility Policy (the “Policy”)**

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## Overview and Statement of Organizational Commitment

Investors Group (the “Company”) is committed to meeting the needs of all individuals. We strive to respect the dignity and independence of people with disabilities in a timely manner, and at a minimum, consistent with the requirements of the *Accessibility for Ontarians with Disabilities Act, 2005* and related standards and regulations (collectively, the “AODA”).

This Policy specifically addresses the requirements of *AODA* and describes how the Company will comply with those requirements and what individuals may expect from the Company. AODA does not replace or limit any requirements that have been established under human rights or other legislation.

The Policy applies to all Investors Group employees in Ontario and those licensed to work in Ontario including Consultants, Associate Consultants, Division Directors and Regional Directors (who are all independent contractors under contract with Investors Group). In the case of Consultants and their assistants, while Investors Group has no jurisdiction over their employment relationship, they are also subject to this Policy. Consultants, their assistants, Associate Consultants, Division Directors and Regional Directors are hereinafter referred to as the “Consultant Network”. The Policy also applies to management with oversight responsibilities and others who deal with members of the public (including third parties) in Ontario on behalf of the Company, regardless of their location.

The Policy is meant to benefit individuals with a wide range of disabilities, as defined below. Whether a person’s disability is apparent or not, all individuals shall be treated with courtesy and have his or her need for accommodation respected.

In the Policy, an individual with a disability includes those 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 the Definitions Section at the end of this document.

## General

The Company will adhere to the following principles when establishing policies, practices and procedures in relation to engaging with individuals with disabilities:

- products and services will be made available in a manner that respects dignity and independence; and provides an opportunity equal to that of others
- the provision of products and services will be in a manner that is integrated in how they are provided to all members of the public unless an alternative measure is necessary, whether temporarily or on a permanent basis, to enable an individual with a disability to access, use or benefit from a product or service of the Company
- the Company will seek to provide fair and accessible employment practices



## Assistive Devices

An individual will be able to use their own assistive devices to access the Company's premises, systems, products and services, except where this may reasonably pose a security or health risk to 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 or health risk, the Company may make other reasonable measures available to assist the individual with the disability. 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.

## Support Persons

An individual with a disability who is accompanied by a support person will be permitted to enter the Company's premises as appropriate with his or her support person.

An individual with a disability, who is accompanied by a support person, will not be prevented from having access to his or her support person while on the Company's premises unless this access creates a security, health or safety risk.

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 others on the premises.

Given the nature of information that may be discussed in the presence of a support person, 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 any discussion.

## Service Animals

An individual with a disability who is accompanied by a service animal will generally be permitted to enter premises owned or leased by the Company with the service animal and keep the animal with him or her. In the event that a service animal's access may be excluded by law, the Company will make reasonable efforts to arrange alternative access.

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

## **Information and Communication**

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

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

The Company will, except where not practical, ensure that its new internet websites and web content on those sites conform to the applicable requirements of the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 as required.

## **Accessibility Plan**

The Company has a multi-year accessibility plan, available on the Company website, to prevent and remove barriers and meet requirements under certain AODA standards. The accessibility plan is reviewed and updated as required, but not less frequently than every five years.

## **Employment**

The Company will notify employees, the Consultant Network and the public that accommodation is available for persons with disabilities during the recruitment process. Applicants who are individually selected for an interview will be notified that accommodations are available upon request. Successful applicants will be notified about the Company's policies for accommodating individuals with disabilities as part of their offer. If a selected individual 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 and the Consultant Network of the policies used to support individuals with disabilities, including policies on the provision of role accommodations that take into account an individual's accessibility needs due to disability. The Company will provide this information to new employees and new members of the Consultant Network as soon as reasonably possible after they start and provide updated information to all employees and the Consultant Network whenever there is a material change to the existing policies on the provision of role accommodations that take into account an individual's accessibility needs due to disability.



The Company will work with the employee or member of the Consultant Network, 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 individual's role; and
- b) Information that is generally available to employees and the Consultant Network in the workplace.

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

The Company shall provide individualized workplace emergency response information to the Company's employees and members of the Consultant Network who have a disability, if the disability is such that the individualized information is necessary, and if the Company's employee or member of the Consultant Network makes the Company aware of the need for accommodation due to the individual's disability. The Company shall provide this information as soon as practicable after becoming aware of the need for accommodation.

Where an employee or member of the Consultant Network requires assistance, the Company shall, with the consent of the individual, provide the workplace emergency response information to the person designated by the Company to provide assistance.

The Company shall review the individualized workplace emergency response information developed when the employee or member of the Consultant Network moves to a different location at the Company, when the individual's overall accommodations 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 or members of the Consultant Network with disabilities. If requested, these plans will include information regarding accessible formats and communication supports.

The Company will have in place a documented return to work process for employees or members of the Consultant Network returning to work due to disability and requiring disability-related accommodations. This return to work process will outline the steps that the Company shall take to facilitate the return to work.

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

## **Training**

The Company will ensure that employees, the Consultant Network, management with oversight responsibilities and others who deal with members of the public (including third parties) on behalf of the Company (regardless of their location), to whom this Policy applies, are offered training on AODA requirements and where appropriate, any human rights legislation pertaining to individuals with disabilities.



## Notice of Service Disruption

The Company will, when possible, provide notice in the event of a disruption in the facilities or services usually used by individuals with disabilities.

## Self-Service Kiosks

If the Company purchases self-service kiosks that allow public users to access the Company's financial products or services, including credit/debit payment machines, 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.

## Feedback and Concerns

Feedback regarding the Company's application of this policy may be made in writing, by e-mail, telephone, in person, or any format that better meets the communication needs of the person providing it.

The Company will ensure that every process for receiving and responding to feedback is accessible to persons with disabilities. It will do this by providing or arranging for the provision of accessible formats and communication supports upon request.

Further information on how to provide feedback and the actions the Company will take on receiving notice of a concern is available from the Company's website:

<http://www.investorsgroup.com/en/contact-us/Contact-us>

## Review

This Policy shall be reviewed and approved from time to time and updated as necessary.

## Definitions

For the purpose of this Policy, the following terms, as set out in the AODA have the meanings:

“**disability**” means

- a) 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,
- b) a condition of mental impairment or a developmental disability,
- c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- d) a mental disorder, or
- e) an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997 (Ontario)*.

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

- a) it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- b) 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 goods or services.