

# **NORTH**▲ **COVER**

## **Accessibility Policy**

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# Document control

## Version control

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## Commercial in confidence

This document is confidential in nature and is the property of Greenstone Financial Services Canada Inc (the Group).

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# 1. Introduction

## 1.1 Purpose of this policy

This policy sets out the approach Greenstone Financial Services Canada Inc (the Group) will take to meet the needs of people with disabilities and will do so by preventing and removing barriers to accessibility as mandated by the accessibility requirements under the Ontarians with Disabilities Act, 2005 (“AODA”) in Ontario.

This goal is part of the Group’s commitment to providing equal treatment and opportunity to people with disabilities with respect to accessing services, accommodation and employment in a way that promotes integration and full participation.

## 1.2 Commitment

The Group are committed to ensuring equal access and participation for people with disabilities.

We strive to:

- treat people with disabilities in a way that allows them to maintain their dignity and independence; and
- give people with disabilities the same opportunity to access our services and allowing them to benefit from the same services, in the same place and in a similar way as other clients.

We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the Accessibility for Ontarians with Disabilities Act and Ontario’s accessibility laws.

## 1.3 Scope

This policy applies to all employees, interns/volunteers or persons acting on behalf of the Group (altogether, “employees”) in whatever capacity they are acting. This includes where employees are acting on behalf of non-Group labelled entities within Canada.

## 1.4 Relevant legislative and regulatory sources

Legislation or regulation	Relevance
Accessibility for Ontarians with Disabilities Act, 2005	Ensures employers comply with employment-related standards aimed at increasing accessibility and eliminating or minimizing barriers to employment for persons with disabilities.
Workplace Safety and Insurance Act	Provide benefits, medical care and rehabilitation services to individuals who suffer workplace injuries or contract occupational diseases.
Ontario Human Rights Code	Ensures employees (and candidates for employment) have a right to equal treatment in employment without discrimination.

## 2. Responsibilities and accountabilities

Role	Responsibility
Employees	All employees are expected to uphold this policy and to work together to eliminate or minimize barriers to employment for persons with disabilities.
Managers	All managers are to adhere to this policy and are responsible for ensuring that measures and procedures are followed by employers and that employees have the information they need.
Executive team	Must ensure management are held accountable for adhering to this policy and are aware of their obligations towards maintaining this policy at all times.

## 3. Workplace emergency responsibility information

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

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

The Group will review the individualized workplace emergency response information when the employee moves to a different location in the Group, when the employee's overall accommodation needs are reviewed and when the Group reviews its general emergency response practices.

## 4. Training

We provide accessibility training on the following topics to all of our employees, interns, volunteers and third parties who could reasonably be expected to interact with the public on behalf of the Group, and to those who are involved in the development, approval, monitoring or implementation of the Group's related policies and procedures:

- the principles and purpose of the AODA and the requirements of the Integrated Accessibility Standards Regulation;
- 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 or a support person;
- how to learn about the use of various assistive devices;
- what to do if a person with a disability is having difficulty in accessing the Group's goods and services;
- the Group's policies, practices and procedures relating to accessibility; and
- the Ontario Human Rights Code provisions pertaining to disability.

## 5. Recruitment

### 5.1 Notification

We notify job applicants and the public that accommodation can be made during recruitment and hiring.

We will notify staff that supports are available for those with disabilities. For example, if a qualified individual with a disability needs a reasonable accommodation to use or access the Group's online system, or during the interview and selection process, that individual should contact [HR@greenstonefs.ca](mailto:HR@greenstonefs.ca)

Employees will be made aware of this information. When making offers of employment, the Group includes a notice of policies on accommodation for employees with disabilities.

### 5.2 Recruitment, assessment or selection process

The Group will notify job applicants, when they are individually selected to participate further in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.

If a selected applicant requests an accommodation, the Group will 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.

### 5.3 Notice to successful applicants

When making offers of employment, the Group will notify the successful applicant of its policies for accommodating employees with disabilities.

## 6. Informing employees of supports

The Group will inform employees of its policies (and any changes to those policies) used to support employees with disabilities, including but not limited to policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practicable after commencing employment.

### 6.1 Accessible formats and communication supports for employees

Upon the request of an employee with a disability, we will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform the employee's job, and information that is generally available to other employees, to the point of undue hardship. In determining the suitability of an accessible format or communication support, the Group will consult with the employee making the request.

### 6.2 Employee supports

Our performance management and career development processes will take into account the accessibility needs of all employees. The Group will inform employees of its policies (and any changes to those policies) used to support employees with disabilities, including but not limited to policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practicable after commencing employment.

## 7. Accessibility standards for customer service

### 7.1 Communication

The Group will communicate with persons with disabilities in ways that take into account their disability.

### 7.2 Assistive devices

The Group is committed to serving persons with disabilities who use devices to obtain, use or benefit from our services. The Group will also ensure that employees are trained and familiar with various assistive devices that may be used by persons with disabilities while accessing our services.

### 7.3 Service animals and support persons

The Group is committed to welcoming persons with disabilities who are accompanied by a service animal on the parts of the premises that are open to the public. The Group will provide assistive devices where reasonable and necessary.

### 7.4 Training

The Group will train employees about key principles and accessibility strategies to ensure that communication with persons with disabilities is respectful and done in a manner that takes into account such persons' disabilities. This training will be provided after commencing employment with the Group or as soon as practicable and will include the following:

- an overview of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Accessibility Standards for Customer Service;
- how to interact with persons with disabilities who use an assistive device or require the assistance of a service animal or a support person;
- how to use the equipment or devices available on site or otherwise that may help with providing services to persons with disabilities; and
- what to do if a person with a disability is having difficulty in accessing the Group's services.

Revised training will be provided in the event of changes to legislation, procedures and/or practices. The Group will also maintain a record of training provided.

### 7.5 Notice of temporary service disruptions

The Group will communicate with persons with disabilities in ways that take into account their disability.

Where there is a temporary disruption at the office, reasonable steps will be taken to advise persons with disabilities who might be affected by the disruption. In particular, the Group will identify the reason for the disruption, its duration, and information about alternative services.

### 7.6 Feedback on client service

The Group welcomes feedback on the ways in which it provides its client service to persons with disabilities. Individuals are encouraged to provide their feedback directly from whom they received the service, and the feedback may be provided in person, by telephone, in writing or by electronic text.

Wherever possible, feedback regarding client service for persons with disabilities will be responded to by the person to whom it has been directed. Where the feedback is of a more general nature, the Director of the People team, will be responsible for investigating the matter and determining the actions to be taken. In all cases, every effort will be made to respond to the feedback in a timely and effective manner.

The Group welcomes feedback through its email address at [HR@greenstonefs.ca](mailto:HR@greenstonefs.ca)

## 8. Breaches of the policy

Where an employee materially breaches or is reasonably suspected of having materially breached this policy, the employee will be given an opportunity to explain his or her actions. A material breach of this policy may result in disciplinary action, up to and including dismissal.

## 9. Definitions

Any definitions listed in the following table apply only to the Accessibility Standards for Customer Service policy, its related procedures, and appendices, with no implied or intended use beyond those documents.

<b>Assistive devices</b>	supports made available to a client or customer, such as, real-time captioning services (onscreen typing of what speakers are saying), sign-language interpreters or deaf-blind interpreters, teletypewriter (TTY) to communicate with clients who are deaf, hard of hearing, have speech impairments or are deaf-blind.
<b>Disability</b>	<ol style="list-style-type: none"><li>1. 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;</li><li>2. a condition of mental impairment or a developmental disability;</li><li>3. a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;</li><li>4. a mental disorder; or</li><li>5. an injury or disability for which benefits were claimed or received under the insurance plan established under any provincial workplace safety or insurance act.</li></ol> <p>The definition includes disabilities of different severity, visible as well as non-visible disabilities.</p>
<b>Personal assistive devices</b>	for the purpose of this policy, personal assistive devices are personal supports used by persons with disabilities that enable them to carry out the activities of daily living. Power-mobility devices (power wheelchairs or scooters) are regarded as personal assistive devices.
<b>Service animals</b>	used by people with many different kinds of disabilities. Examples of service animals include dogs used by people who are blind, hearing alert animals for people who are deaf, deafened or hard of hearing, and animals trained to alert an individual to an oncoming seizure and lead them to safety.
<b>Support person</b>	accompanies a person with a disability, in order to help with communication, mobility, personal care or medical needs or with access to goods or services. A support person may be a paid professional, a volunteer, family member or friend.