

	Section: Human Resources	Subject: Accessibility Plan	
	Effective date: January 1, 2014	Revised date: March 1, 2018	Page: 1 of 12

ABOUT INVESTMENT PLANNING COUNSEL

Investment Planning Counsel, formed in 1994, is Canada’s leading full service wealth management company which supports both the IIROC and MFDA platforms through a network of Advisors located through Canada. Investment Planning Counsel offers its products and services in insurance, estate planning, banking, portfolio management and private wealth. Investment Planning Counsel is a member of the IGM Financial Inc. group of companies.

INTRODUCTION (the “AODA”)

Investment Planning Counsel is committed to meeting the expectations and intent of the *Accessibility for Ontarians with Disabilities Act, 2005* and related Regulations, as well as meeting the needs of all of our clients generally. We strive to provide financial products and services in a way that respects the dignity and independence of people with disabilities.

This document is the accessibility plan (the “**Accessibility Plan**”) for Investment Planning Counsel and outlines Investment Planning Counsel’s strategy for removing barriers to accessibility and meeting the requirements set out in the Regulations.

AODA

The **AODA** was passed by the Ontario legislature for the purpose of recognizing the history of discrimination against persons with disabilities in Ontario and benefiting all Ontarians by, among other goals, developing, implementing and enforcing certain accessibility standards.

To date, accessibility standards have been developed in the following areas:

- customer service;
- information and communications;
- employment;
- transportation; and
- the built environment.

Two Regulations have been established under the AODA, being the Accessibility Standards for Customer Service, O Reg 429/07 (the “**Customer Service Standard**”) and the *Integrated Accessibility Standards*, O Reg 191/11 (the “**Integrated Standards**” and, collectively with the Customer Service Standard, the “**Regulations**”).

The requirements under the Customer Service Standard came into force on January 1, 2012. Some of the accessibility standards under the Integrated Standards create requirements starting in 2012 while

the remaining requirements are being phased in over time until 2021. Detailed information about the due date for each requirement is included below.

PART A: GENERAL

In 2012, Investment Planning Counsel created a committee with representatives from key areas across our IGM Financial Inc. (Investment Planning Counsel, Mackenzie Investments and Investors Group). The Committee reviews the AODA and the Regulations, facilitates the implementation of a coordinated strategy for applying the accessibility standards under the Regulations and approves accessibility policies and procedures to ensure that Investment Planning Counsel is meeting our legal requirements under AODA and the Regulations.

PART B: THE CUSTOMER SERVICE STANDARDS

1. Policies, Practices and Procedures

Objectives:

- Establish policies, practices and procedures on providing financial products and services to persons with disabilities in ways that are consistent with the following principles:
 - Respect for dignity and independence
 - Integrated provision of products and services, unless an alternate measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the products or services, and
 - Equality of opportunity to access products and services

AODA Compliance Date: January 1, 2012

Actions Taken:

Investment Planning Counsel's corporate policy on Accessibility is publicly available through our website and generally provides that reasonable efforts will be made to provide access to our financial products and services in accordance with the above principles (the "**Accessibility Policy**").

Our Accessibility Policy provides for the use of assistive devices by persons with disabilities, and addresses access by support persons and service animals. The Accessibility Policy also generally describes our policy on providing notice of temporary service disruption, training and on providing our financial products and services to persons with disabilities.

A copy of the Accessibility Policy can be found on: <https://www.ipcc.ca/accessibility>

Status: A corporate policy was completed in 2012. Department processes are being reviewed on an ongoing basis to ensure that processes used by Investment Planning Counsel continue to be in compliance with the Accessibility Policy.

2. Accessible Customer Service Training

Objectives:

- Ensure that the following persons have received training on the provision of Investment Planning Counsel's financial products and services to persons with disabilities:
 - Every person involved in the provision of financial products and services on our behalf, and
 - Persons involved in developing our policies, practices and procedures governing the provision of financial products and services to members of the public or other third parties

AODA Compliance Date: January 1, 2012

Actions Taken:

Investment Planning Counsel provides training to all of our employees specifically on accessibility related matters. Investment Planning Counsel maintains records of the dates training was provided.

Status: Training was completed in 2013 for current staff at that time. Accessibility training is provided to new employee's who generally complete the training within ten days of joining the Company. Additional training will be provided to staff where necessary should relevant accessibility policies and procedures change.

3. Feedback Process Regarding Provision of Services to Persons with Disabilities

Objectives:

- Establish a process for receiving and responding to feedback and concerns about the manner in which we provide financial products and services to persons with disabilities
- Document policies and procedures detailing the process

AODA Compliance Date: January 1, 2012

Actions Taken:

Investment Planning Counsel has a feedback and customer concerns procedure specifically for receiving and responding to feedback on how we provide financial products and services to people with disabilities. A copy of the Feedback and Customer Concerns Procedure can be found on: <https://www.ipcc.ca/accessibility>

We track all accessibility concerns we receive and ensure they are handled in accordance with our usual process for resolving customer concerns. We also track feedback related to accessibility that does not specify a concern to help ensure the needs of customers with disabilities continue to be properly addressed.

Status: Completed implementation of processes in 2012.

4. Notice of Temporary Service Disruptions

Objectives:

- Provide notice of any temporary disruption in facilities or services that people with disabilities usually use to access Investment Planning Counsel's financial products and services
- Document the steps to be taken in connection with the temporary disruption in facilities or services
- Provide a copy of that document on request
- Establish policy and procedures regarding provision of notice on temporary service disruption

AODA Compliance Date: January 1, 2012

Actions Taken: Investment Planning Counsel has a procedure in place to provide notice of a temporary disruption in the facilities or services owned or controlled by Investment Planning Counsel that are typically used by persons with disabilities.

Status: Completed implementation of processes in 2012.

PART C: INTEGRATED ACCESSIBILITY STANDARDS

GENERAL

1. Establishment of Accessibility Policies

Objectives:

- Develop, implement and maintain policies on how we will achieve accessibility through meeting the applicable requirements under the Integrated Standards

AODA Compliance Date: January 1, 2014

Actions Taken and Planned:

Investment Planning Counsel's previously published *Accessible Customer Service Policy*, which addressed the requirements of the Customer Service Standard, was renamed the "Accessibility Policy" and expanded to incorporate policies relating to the information and communication standard under the Integrated Standards.

The Accessibility Policy is available online at: <https://www.ipcc.ca/accessibility>

Status: The corporate policies are in the process of being completed and will be implemented in accordance with the time frames for compliance established by the Regulations and AODA.

2. Accessibility of Self-serve Kiosks

Objectives:

- Give consideration to accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks¹

AODA Compliance Date: January 1, 2014

Actions Taken and Planned:

Our Accessibility Policy commits Investment Planning Counsel to taking accessibility into consideration when procuring or acquiring self-service kiosks.

Status: The Accessibility Policy includes a section on self-serve kiosks and provides that regard be given to accessibility features.

3. Integrated Standards Training

Objectives:

- Ensure training is provided on the accessibility standards in the Integrated Standard and on the *Ontario Human Rights Code* to every employee, volunteer, and other persons who participate in the development of Investment Planning Counsel's policies or provide goods, services or facilities on behalf of Investment Planning Counsel
- The training should be appropriate to the duties of the employee or other person

¹ The Integrated Standards define a "kiosk" as meaning an interactive electronic terminal, including a point-of-sale device, intended for public use that allows users to access one or more services or products or both.

AODA Compliance Date: January 1, 2015

Actions Taken and Planned: Investment Planning Counsel has reviewed the requirements of the Integrated Standards and created a training course covering the material for all employees to complete within their first ten days of starting.

Status: Completed.

INFORMATION AND COMMUNICATION STANDARDS

1. Accessible feedback/complaints Processes

Objectives:

- Ensure that any process for receiving or responding to feedback is accessible to persons with disabilities by providing for accessible formats or communication supports on request

AODA Compliance Date: January 1, 2015

Actions Taken and Planned: Investment Planning Counsel has established a Feedback and Customer Concerns Procedure that is available as part of our Accessibility Policy our website at <https://www.ipcc.ca/accessibility>

In addition, Investment Planning Counsel is identifying other processes we have that enable individuals to provide feedback to us and will work to ensure that accessible formats or communication supports are available on request.

Status: Completed.

2. Accessible Formats and Communication Supports

Objectives:

- Provide alternative formats or communication supports for persons with disabilities, upon request
- Provide these alternative formats or communication supports in a timely manner and at the same cost charged to other persons
- Consult with the person making the request to determine the suitability of an accessible format or communication support

AODA Compliance Date: January 1, 2016

Actions Taken and Planned: Investment Planning Counsel has identified information formats and delivery methods we currently use, and developed consistent processes for providing or arranging for suitable alternative formats or communication supports. By providing our contact information for additional information and formatting requests, Investment Planning Counsel has met the WCAG 2.0 compliance standards.

Status: Completed.

3. Accessible Websites and Web Content

Objectives:

- Make all of our internet websites (and any non-exempt content on those websites) conform with certain sections of the World Wide Web Consortium’s Web Content Accessibility Guidelines (“WCAG”) 2.0

AODA Compliance Date:

- January 1, 2014: All new internet websites² must conform with WCAG 2.0 Level A
- January 1, 2021: All internet websites must conform with WCAG 2.0 Level AA

Actions Taken and Planned Plans: Investment Planning Counsel has begun evaluating key websites accessible to the public against the WCAG 2.0. In developing new internet websites and refreshing existing internet websites, Investment Planning Counsel takes into account the applicable WCAG requirements.

Status:

- Completed internet websites conformity with WCAG 2.0 Level A
- Completed internet websites conformity with WCAG 2.0 Level AA

EMPLOYMENT STANDARDS

1. Recruitment, Assessment and Selection Process

Objectives:

- Notify employees and the public about the availability of accommodations for applicants with disabilities in the recruitment processes
- Notify selected job applicants, during the recruitment process, that accommodations are available upon request in relation to materials or processes to be used
- If, during the recruitment process, a selected applicant requests an accommodation, consult with the applicant and provide or arrange for the provision of a suitable accommodation that takes into account the applicant’s accessibility needs

AODA Compliance Date: January 1, 2016

Actions Taken and Planned: Investment Planning Counsel has reviewed existing recruitment and hiring practices, and the requirements of the Integrated Standards to determine how we can best meet these requirements. Applicants are notified about the availability of accommodation in all job postings, employment agreement communications and during the onboarding process.

Status: Completed.

² The Integrated Standards define a “new internet website” as meaning either an internet website with a new domain name, or an internet website with an existing domain name undergoing a significant refresh.

2. Notice to Successful Applicants

Objectives:

- When making an offer of employment, notify the successful applicant of our policies for accommodating employees with disabilities

AODA Compliance Date: January 1, 2016

Actions Taken and Planned: Investment Planning Counsel has reviewed current recruitment and hiring practices and the requirements of the Integrated Standards to determine how we can best meet this requirement before the AODA compliance date. To date we have included a notice in our employment agreement communication advising successful applicants of our policies for accommodating employees with disabilities.

Status: Completed.

3. Emergency Procedures, plans or public safety information

Objectives:

- Prepare emergency procedures, plans or public safety information and make available in an accessible format or with appropriate communication supports, as soon as possible, upon request

AODA Compliance Date: January 1, 2012

Actions Taken and Planned: Investment Planning Counsel's Accessibility Policy includes its commitment to providing emergency procedures to the public as soon as possible. Investment Planning Counsel will work with the individual making the request to ensure that accessible format and communication supports are suitable.

Status: Completed.

4. Informing Employees of Supports

Objectives:

- Inform employees of our policies to support employees with disabilities, including policies on the provision of job accommodation
- Provide new employees with this information as soon as practicable after they begin their employment
- Provide updated information whenever there is a change in policy

AODA Compliance Date: January 1, 2016

Actions Taken and Planned: Investment Planning Counsel has reviewed existing practices regarding new employees and employee communications, and the requirements of the Integrated Standards, to determine how we can best meet these requirements. Employees are notified of our policies through AODA training and during the onboarding process. Employees are required to

read through all policies on the Hub within the first ten days of joining and sign off to Human Resources that they have completed this.

Status: Completed.

5. Accessible Formats and Communication Supports for Employees

Objectives:

- On request by an employee with a disability, consult with that employee to arrange for accessible formats and communication supports for information that is needed to allow that employee to perform his or her job and information that is generally available to employees in the workplace
- Consult with the employee in determining the suitability of an accessible format or communication support

AODA Compliance Date: January 1, 2016

Actions Taken and Planned: Investment Planning Counsel has reviewed existing accommodation policies and the requirements of the Integrated Standards to determine how we can best meet these requirements. An Accommodation Plan has been developed to ensure employees are consulted with to build an Individual Accommodation Plan that meets their needs.

Status: Completed.

6. Workplace Emergency Response Information

Objectives:

- Provide individualized workplace emergency response information to each employee who has a disability if that employee needs it and if Investment Planning Counsel is aware of the need for accommodation due to that employee's disability
- Provide the required emergency response information as soon as practicable after Investment Planning Counsel becomes aware of the need for an accommodation due to an employee's disability
- Review individualized workplace emergency response information when required

AODA Compliance Date: January 1, 2012

Actions Taken and Planned: Employees can complete an Individual Accommodation Plan available online on Investment Planning Counsel's Hub. This form can be submitted to the Human Resources department requesting individualized workplace emergency response assistance or information. The Human Resources department works in conjunction with the Joint Health and Safety Committee, Facilities department and the employee to ensure that appropriate emergency response measures are in place for that employee.

Status: Completed.

7. Documented Individual Accommodation Plans

Objectives:

- Establish written processes for the development of a documented individual accommodation plan for employees with disabilities that meets the requirements described in the Integrated Standards

AODA Compliance Date: January 1, 2016

Actions Taken and Planned: Investment Planning Counsel has reviewed existing accommodation policies and the requirements of the Integrated Standards to ensure that we meet this requirement. Individual Accommodation Plans have been created for all employees who have requested one or identified a need for accommodation.

Status: Completed.

8. Return to Work Process

Objectives:

- Develop and have in place a documented return-to-work process for employees who have been absent from work due to disability and require disability-related accommodations in order to return to work
- Return to work process must outline the steps Investment Planning Counsel will take to facilitate the return to work of these employees and use documented individual accommodation plans

AODA Compliance Date: January 1, 2016

Actions Taken and Planned: Investment Planning Counsel has reviewed existing return to work practices and the requirements of the Integrated Standards and included the return to work process in our Short-term Disability Policy. Human Resources works with the employee returning from the leave to ensure that their disability-related accommodations are in place upon their first day back to work.

Status: Completed.

9. Performance Management

Objectives:

- In performance management processes, take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans
- Performance management in this context means activities related to assessing and improving employee performance, productivity and effectiveness

AODA Compliance Date: January 1, 2016

Actions Taken and Planned: Investment Planning Counsel has reviewed existing performance management practices and the requirements of the Integrated Standards to ensure we have met the AODA requirements before the compliance date. Human Resources has developed individual

accommodation plans and created an objective performance appraisal process. This process ensures that managers create SMART goals for their employees that assesses performance on pre-determined objective criteria.

Status: Completed.

10. Career Development and Advancement

Objectives:

- Take into account the accessibility needs of employees with disabilities and well as any individual accommodation plans when providing career development and advancement opportunities to employees

AODA Compliance Date: January 1, 2016

Actions Taken and Planned: Investment Planning Counsel has reviewed existing career development and advancement practices and the requirements of the Integrated Standards to ensure we have met the AODA requirements before the compliance date. Human Resources has provided accessible professional development across different channels employees use including the Hub's professional development page, the Learning Center and in-class learning sessions. Professional development criteria is also included in the semi-annual and annual performance appraisal objectives.

Status: Completed.

11. Redeployment

Objectives:

- Take into account the accessibility needs of employees with disabilities as well as individual accommodation plans when reassigning employees within the company as the result of the elimination of a particular job or department

AODA Compliance Date: January 1, 2016

Actions Taken and Planned: Investment Planning Counsel has reviewed the requirements of the Integrated Standards to ensure we have met the AODA requirements before the compliance date. In the case that an employee with a disability is moving into a new role, Human Resources works with the Facilities department and managers to ensure that their accommodation plan is upheld in the new role.

Status: Completed.

BUILT ENVIRONMENT STANDARDS

Objectives:

- The Built Environment Standards in the Integrated Standards are designed to remove barriers in public spaces, such as outdoor public eating areas, walk ways and accessible parking on and off street

- These standards for the design of public spaces apply to new constructions and major changes to existing features

AODA Compliance Date: January 1, 2017

Actions Taken and Planned: Investment Planning Counsel is currently reviewing the requirements of the Integrated Standards to determine how they apply and how we can best meet these requirements before the AODA compliance date.

Status: In progress.