



NINEPOINT FINANCIAL GROUP INC.

MULTI-YEAR ACCESSIBILITY PLAN (2017-2021)

Prepared and Submitted by the Ninepoint Partners Accessibility Committee

Revised May 25, 2020

This document is available in alternative format upon request.

## INTRODUCTION

In 2005, the government of Ontario passed the accessibility for Ontarians with Disabilities Act (AODA), which requires that Ontario be an accessible province by 2015.

In 2011, the new Integrated Accessibility Standards Regulation (IASR) was enacted under the AODA to help public, private and not-for-profit organizations identify, prevent and remove barriers to accessibility. Within the IASR general requirements are being articulated in addition to specific standards being articulated in four areas, namely:

- Information and communications standards
- Employment standards
- Transportation standards (Not applicable)
- Design of public spaces (Not applicable)

This accessibility plan for 2017-2021 outlines the policies and actions that Ninepoint Financial Group Inc. (The Company) will put in place to improve opportunities for people with disabilities.

## STATEMENT OF COMMITMENT

The Company is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act (AODA) and the Integrated Accessibility Standards Regulations (IASR).

The Company will file all applicable Ministry reports.

## GENERAL

Policies and Practices embody the four AODA principles of Dignity, Independence, Integration and Equal Opportunity

Specifically:

### 1. ASSISTIVE DEVICES

The Company will:

- Ensure that methods of communication will be available in any way that is deemed reasonable

- Committed to providing service excellence in the communication of all our products to the public who may require the use of assistive devices
- The Company will train its employees to ensure that they are familiar with the various types of assistive devices

## 2. SERVICE ANIMALS

The Company will:

- People with disabilities who are accompanied by a service animal will be welcomed.
- Staff are properly trained in how to interact with people with disabilities who are accompanied by a service animal.

## 3. SUPPORT PERSONS

The Company will:

- People with disabilities who are accompanied by a support person will be welcomed.
- Staff are properly trained in how to interact with people with disabilities who are accompanied by a support person.

## 4. NOTICE OF SERVICE DISRUPTIONS

The Company will:

- In the event of a planned or unexpected disruption in access or services, notice will be posted at all public entrances and our website and internally.
- This notice will include information about the reason for the disruption, its anticipated duration and a description of alternatives, if available.

# INFORMATION AND COMMUNICATION

The Company is committed to meeting the communication needs of people with disabilities.

## 1. FEEDBACK, ACCESSIBLE FORMATS AND COMMUNICATION SUPPORTS

The Company does:

- have processes for receiving and responding to feedback which are accessible to customers with disabilities
- provide or arrange for provision of accessible formats and communication supports in a timely manner
- consult with the person making the request to determine the suitability of the accessible format or communication support
- notify the public regarding the availability of accessible formats and communication supports

## 2. ACCESSIBLE WEBSITES AND WEB CONTENT

The company will take the following steps to make their websites and content on those sites conform to WCAG 3.0, Level AA by January 1, 2021:

- Assess our website to identify areas with accessibility issues
- Make the website more accessible as needed
- Follow AODA accessibility guidelines for future website development

## EMPLOYMENT

The Company is committed to fair and accessible employment practices across every stage of the employment cycle.

### 1. RECRUITMENT GENERAL

The Company will notify employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process. This will include

- A review and, as necessary, modification of existing recruitment policies, procedures and processes
- Specify that accommodation is available for applicants with disabilities, on the Company's website and on job postings

### 2. RECRUITMENT, ASSESSMENT, AND SELECTION

The Company will notify job applicants when they are selected to participate 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 Company will consult with the applicants and provide a suitable accommodation in a manner that considers the applicant's accessibility needs due to disability. This will include:

- a review and, as necessary, modification of existing recruitment policies, procedures and processes
- inclusion of availability of accommodation notice as part of the script in the scheduling of an interview and/or assessment
- if a selected applicant requests an accommodation, consult with the applicant and arrange for provision of suitable accommodations in a manner that considers the applicant's accessibility needs due to disability

### 3. NOTICE TO SUCCESSFUL APPLICANTS

When making offers of employment, the Company will notify the successful applicant of its policies for accommodating employees with disabilities. This will include:

- a review and, as necessary, modification of existing recruitment policies, procedures and processes
- inclusion of notification of the Company's policies on accommodating employees with disabilities in offer of employment letters.

#### 4. INFORMING EMPLOYEES OF SUPPORTS

The Company will inform all employees of policies that support employees with disabilities, including, but not limited to, policies on the provision of job accommodations that consider an employee's accessibility needs due to a disability. This will include:

- informing current employees and new hires of the Company's policies supporting employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's needs due to a disability
- providing information under the section as soon as practicable after the new employee begins employment, specifically in the orientation process
- keeping employees up to date on changes to existing policies on job accommodations with respect to disability
- where an employee with a disability so requests it, the Company will provide or arrange for provision of suitable accessible formats and communications supports for
  - information that is needed in order to perform the employees' job
  - information that is generally available to employees in the workplace
- in meeting the obligations to provide the information that is set out in the paragraph above, the Company will consult with the requesting employee in determining the suitability of an accessible format or communication support

#### 5. TRAINING

The Company will provide training to employees and will maintain a record of dates when the training was provided and the names of individuals to whom it was provided.

#### 6. WORKPLACE EMERGENCY RESPONSE INFORMATION

Where the Company is aware that an employee has a disability and that there is a need for accommodation, individualized workplace emergency response information will be provided to the employee as soon as practicable if such information is necessary given the nature of the employee's disability.

#### 7. DOCUMENTED INDIVIDUAL ACCOMMODATION PLANS/RETURN TO WORK PROCESSES

The Company's existing policies include steps that the company will take to accommodate an employee with a disability and to facilitate an employee's return to work after absenteeism due to disability.

The Company will review and assess the existing policies to ensure that they include a process for the development of documented individual accommodation plans for employees with a disability, if such plans are required.

The Company will ensure that the process for the development of documented individual accommodation plans includes the following elements, in accordance with the provisions of the IASR:

- include the process the way the employee requesting accommodation can participate in the development of the plan
- include in the process the means by which the employee is assessed on an individual basis
- include in the process the way the Company can request an evaluation by an outside medical or other expert to assist in determining if and how accommodation can be achieved. This request is at the company's expense, excluding but not limited to, doctor's fees for form completion associated with leave of absences.
- steps are in place to protect the privacy of the employee's personal information
- outline the frequency in which individual accommodation plans will be reviewed and updated and the way this will be done
- provide the employee with the reasons for the denial if an individual accommodation plan is denied
- include in the process the means of providing the individual accommodation plan in a format that considers the employee's accessibility needs
- if individual accommodation plans are established, ensure that they include
  - individualized workplace emergency response information that is required
  - any information regarding accessible formats and communication supports that have been provided or arranged, in order to provide the employee with
  - information that is needed in order to perform the employees' job
  - information that is generally available to employees in the workplace
- identify any other accommodation that is to be provided to the employee.

The Company will ensure that the return to work process as set out in its existing policies outlines the steps the company will take to facilitate the employee's return to work after a disability-related absence, outlines the development of a written individualized return to work plan for such employees, and requires the use of individual accommodation plans, as discussed above, in the return to work process.

## 8. PERFORMANCE MANAGEMENT AND CAREER DEVELOPMENT

The Company will take in to account the accessibility needs of employees with disabilities, as well as individual accommodation plans

- when using its performance management process in respect of employees with disabilities
- when providing career development and advancement to its employees with disabilities

IN ACCORDANCE WITH THE IASR, THE COMPANY WILL:

- review, assess and, as necessary, modify existing policies, procedures and practices to ensure compliance with the IASR
- take the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account when
  - assessing performance
  - managing career development and advancement
- consider the accessibility needs of employees with disabilities when providing career development and advancement to its employees with disabilities, including notification of the ability to provide accommodations on internal job postings

## INDIVIDUAL EMERGENCY RESPONSE INFORMATION

The Company will provide all employees with disabilities an individualized plan for when emergency situations arise.

## MODIFICATIONS TO THIS OR OTHER POLICIES

The Company is committed to developing policies that respect and promote the dignity and independence of people with disabilities. No change will be made to these policies before considering the impact on people with disabilities.

This multi-year Accessibility Plan will be reviewed and/or updated at least once every five (5) years.

## FEEDBACK PROCESS AND QUESTIONS ABOUT THIS POLICY

Feedback can be provided to The Company by phone, mail, fax, email or by other means upon request. Complaints will be addressed in accordance with our regular complaint management procedures.

Phone	Mail	Email
Ninepoint Partners representatives are available to speak to you from 8:30 a.m. to 5:00 p.m. EST, Monday to Friday Toll-free: 1.888.362.7172 Telephone: 416.362.7172 Fax: 416.628.2397 TTY: 1 800-855-0511	Ninepoint Partners LP Attention: Accessibility 200 Bay Street Suite 2700, P.O. Box 2700 Toronto, ON M5J 2J1	Send us a message at <a href="mailto:muhlman@ninepoint.com">muhlman@ninepoint.com</a>

This document is available in accessible formats upon request.