



GUARDIAN CAPITAL

ACCESSIBILITY

The Guardian Capital Group of Companies (“Guardian”) is committed to excellence in serving all Associates, clients, advisors and visitors to our offices and will provide accommodation where required to meet the needs of people with disabilities and in accordance with the Accessibility for Ontarians with Disabilities Act, 2005 (“AODA”). For more information, please see the following:

- The Guardian Group of Companies Accessibility Policy – Page 2-6
- The Guardian Group of Companies Multi-Year Accessibility Plan – Page 7-10

Please note that accessible formats of these document are available free upon request from Guardian’s Human Resources department.

Feedback Process:

Feedback regarding the way Guardian provides goods and services to people with disabilities can be made in person, via telephone, fax, e-mail or in writing to:

Human Resources
Guardian Capital Group Limited
Commerce Court West
199 Bay Street, Suite 3100 P.O. Box
201 Toronto, ON M5L 1E9
Phone: 416-364-8341 | 1-800-253-9181
Fax: 416-947-4005
Email: hr@guardiancapital.com



GUARDIAN CAPITAL

THE GUARDIAN GROUP OF COMPANIES ACCESSIBILITY POLICY

PURPOSE

The Accessibility for Ontarians with Disabilities Act (“AODA”) became law in 2005 with the aim to create a fully accessible province by 2025. The AODA outlines the rules that all businesses and organizations must follow to identify, remove and prevent barriers to accessibility in Ontario. Over 16% of Ontarians have a disability and that figure is expected to rise over the coming years as the population ages. By 2036, 47% of Ontario’s population is expected to be over 65 years of age.

Currently, there are two sets of standards under the AODA: Accessibility Standards for Customer Service (“ACS”) and Integrated Accessibility Standards Regulation (“IASR”). The ACS outlines where all organizations need to remove barriers to customer service for people with disabilities. The IASR outlines where organizations need to remove barriers to Information and Communications, Employment, Transportation and the Design of Public Space.

THE POLICY

The Company is committed to excellence in serving all of its Associates, clients, advisors and visitors to our offices and will provide accommodation where required in accordance with the AODA. Guardian is committed to meeting the needs of people with disabilities and will do so in a way that respects their dignity and independence.

- **Communication:** The Company will communicate with a person with a disability in a manner that takes into account his/her disability.
- **Assistive Devices:** Persons with disabilities will be allowed to use their own personal assistive devices to access our services and will also have access to assistive devices that may be available on our premises, including: accessible washrooms, alternate document formats, screen readers and telecommunication devices for the deaf.
- **Use of Service Animals or Support Persons:** Persons with disabilities may at all times be accompanied by their required support person and/or a service animal on the parts of our premises that are open to the public and other third parties.
- **Notice of Temporary Disruption:** We will notify our Associates, clients, advisors and visitors if there is a planned or unexpected disruption in the facilities or services usually used by persons with disabilities. This notice will be posted at the entrance of the applicable premises and on the Guardian website. The notice will include the following information:
 - the facility or service that is unavailable;
 - the reason for the disruption;
 - the anticipated duration of the disruption; and
 - alternative facilities or services, if available.

THE PRINCIPLES

The Company will use reasonable efforts to ensure that this policy and any related practices or procedures are consistent with the following core principles:

- i. Dignity: persons with disabilities should be treated as valued clients who are as deserving of effective and full service as other clients.
- ii. Independence: services must be provided without the control or influence of others, and the freedom of persons with disabilities to make their own decisions must be respected.
- iii. Integration: persons with disabilities must be able to benefit from services or products in the same place and the same or similar manner as other clients, whenever possible.
- iv. Equality of Opportunity: persons with disabilities must be given an opportunity equal to that given to others to obtain, use and benefit from services.

INTEGRATED ACCESSIBILITY STANDARDS REGULATION

Multi-Year Accessibility Plan

In order to achieve Guardian's accessibility goals, and in accordance with the provisions of the IASR and the AODA, the Company will establish, implement, maintain and document a Multi-Year Accessibility Plan outlining our commitment to accessibility, providing a strategy to prevent and remove barriers, and outlining a plan to meet the requirements under the IASR. This Plan will be available to all Associates and the public on the Guardian Capital website, and will be provided in an accessible format, upon request. The Company will review and update the Multi-Year Accessibility Plan every 5 years.

Reporting

In accordance with the requirements of the AODA, the Company will report accessibility achievements every three (3) years.

Information and Communication

The Company will ensure that the provision of information in respect of our goods, services or facilities is available in accessible formats, upon request, at no additional cost and in a timely manner.

The Company will consult with the person making the request in order to determine the suitability of an accessible format or communication support. Upon so doing, the IASR gives the Company the flexibility to decide on the most appropriate accessible format or communication support, given the needs of the person and the Company's capability to deliver.

As outlined in the IASR, if the Company determines that we are unable to convert the information or communications into an accessible format, the Company will provide a report to the person explaining why we are unable to do so and provide a summary of the content.

Web Content

As outlined in the IASR, all new web content on the Company's websites will conform to Web Content Accessibility Guidelines ("WCAG") protocols, with the exception of pre-recordings. This applies to websites and web content,

Including web-based applications that the Company controls directly or through a contractual relationship that allows for modification of the product, unless it is not practicable to conform due to the availability of commercial software or tools or both.

Training and Record Keeping

The Company will ensure that training is provided to all Associates that interact with the public or other third parties on the Company's behalf, and all those who are involved in the development of the Company's relevant policies, practices and procedures.

The training will be provided as soon as possible after hiring or engagement and on commencement of new or additional duties that require training. Training will include the following:

- A review of the purpose of the AODA and the requirements and review of the Human Rights Code as it pertains to persons with disabilities;
- A review of this policy;
- How to interact and communicate with persons with various types of disabilities;
- How to interact with persons with a disability who use an assistive device or require the assistance of a service animal or support person; and
- How to assist a person with a disability that is experiencing difficulty accessing the Company's workplace premises' and/or our services.

The Company will keep accurate and up to date training records. These records shall include the dates that the training was provided, and the individuals to whom the training was provided.

Employment Standards

By January 1, 2016, the Company will review and implement recommendations to ensure accessible employment practices, as they pertain to recruitment and selection, new hire orientation, performance management and career development. Currently the company responds to all requests for accommodation, including consultation with the individual's accessibility needs due to a disability and determination of the provision or arrangement of suitable accommodation.

Individual Accommodation Plans

If an Associate is absent from work due to disability and requires accommodation in order to return to work, the Company develops an individual accommodation plan for that individual, in consultation with disability benefits providers, where suitable and necessary.

Emergency Response Procedures

In the event that the Company makes emergency procedures, plans and public safety information available to the public, it will be provided, upon request, in an accessible format or with appropriate communication supports.

If the Company is made aware of the need for accommodation due to an Associate's disability, the Associate will be provided with an individualized workplace emergency response plan. If the Associate who receives the individualized workplace emergency response information requires assistance, the Company will provide the workplace emergency response plan to the person designated to provide assistance, upon consent from the Associate.

The Company shall provide the information required under this section as soon as practicable after becoming aware of the need for accommodation due to the individual's disability.

The Company will review the individualized workplace emergency response plans if/when the Associate moves to a different location in the organization, and/or when the Company reviews its general emergency response policies.

FEEDBACK PROCESS

We welcome feedback on this policy and its implementation. Feedback can be made in person, via telephone, fax, e-mail or in writing to:

Human Resources
Guardian Capital Group Limited
Commerce Court West
199 Bay Street, Suite 3100
Box 201 Toronto, ON M5L 1E9

Phone: 416-364-8341 | 1-800-253-9181

Fax: 416-947-4005

Email: hr@guardiancapital.com

We will respond within seven (7) business days either in writing, in person, by e-mail or telephone acknowledging receipt of feedback and will set out the action to be taken in response to any concerns. Information in accessible formats will be provided upon request.

DEFINITIONS

“Accessible formats” shall mean formats that are an alternative to standard print and are accessible to people with disabilities. Accessible formats include large print, Braille, and audio electronic formats such as DVDs, CDs, etc.

“Communications” refers to the interaction between two or more people or entities when information is provided, sent or received.

“Communication supports” shall mean methods to assist communication for people with disabilities who may need to access information. Some examples include plain language formats, sign language, as well as reading out loud, captioning or using written notes to communicate.

“Information” refers to knowledge, data and facts that convey meaning and that exist in any format such as text, audio, digital or images.

“Individualized workplace emergency response information” refers to the information prepared by employers, in consultation with their employees who have disabilities, to help them prepare for emergencies such as fire, severe weather and power outages.

“People with Disabilities” shall mean those individuals who have a disability. “Disability” as defined under the Ontario Human Rights Code is:

- (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 coordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or in 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.

“Web Content Accessibility Guidelines (WCAG)” is an international standard for making websites and web content accessible to people with a wide range of disabilities.



GUARDIAN CAPITAL

THE GUARDIAN CAPITAL GROUP OF COMPANIES MULTI-YEAR ACCESSIBILITY PLAN

INTRODUCTION

Guardian Capital (“Guardian”) is committed to meeting the objectives and requirements outlined in the *Accessibility for Ontarians with Disabilities Act, 2005* (the “AODA”) and the applicable regulations, and to making our workplace meet the needs of persons with disabilities through the implementation of the requirements of the Act and its applicable regulations.

STATEMENT OF COMMITMENT

Guardian is committed to creating and maintaining an equitable and integrated environment whereby every employee and job applicant receives equal opportunity with respect to employment and receives accommodation where required, in accordance with the provisions of the AODA and the *Integrated Accessibility Standards Regulation (191/11)* (the “IASR”).

Guardian is committed to providing access to our facilities and delivering excellent customer service to clients and visitors to the firm in a manner that respects the dignity and independence of people with disabilities.

INTEGRATED ACCESSIBILITY STANDARDS REGULATION (“IASR”) – ONTARIO REGULATION 191/11

In accordance with the IASR, the Accessibility Policy was developed to address how Guardian will achieve accessibility and meet with the requirements of the IASR. The Multi-Year Accessibility Plan was developed in accordance with the regulation and it outlines our strategy to address the current and future accessibility goals.

The Accessibility Policy and Multi-Year Accessibility Plan are available to employees on our Public Folders under Corporate Policy and will be available to the public on the firm’s new website at www.guardiancapital.com, and can be provided in an accessible format upon request. In accordance with the requirements of the AODA and IASR, Guardian will report accessibility achievements every 3 years, and will review and update the Multi-Year Accessibility Plan every 5 years, with the first update to occur by the end of 2019.

The regulations applicable to our business, in accordance with the AODA and IASR, are as follows:

- customer service standard;
- workplace emergency response information;
- information and communications;
- training; and,
- employment practices.

CUSTOMER SERVICE STANDARD – ONTARIO REGULATION 429/07

COMMITMENT

Guardian's Customer Service Standard states Guardian's commitment to providing access to our facilities and delivering excellent service at all times in a way that respects the dignity and independence of all of our clients and visitors.

ACTIONS TAKEN

The following measures have been implemented by Guardian:

- Development and distribution of the Accessibility Policy and the AODA Training document which outlines the Customer Service Standard policy. Both of these documents will be available on the firm's Public Folders and the new website;
- Frontline employees who interact directly with clients and visitors are trained and familiar with various assistive devices;
- Clients and visitors who are accompanied by a registered service animal or support person are accommodated and permitted to access areas of our premises open to the public. If clients and visitors are accompanied by a support person, the support person will be accommodated;
- Assistive devices can be provided to clients and visitors who are hearing and visually impaired upon request;
- Notice is provided to clients and visitors with self-disclosed disabilities in the event of a planned or unexpected disruption to services or office facilities. Where possible, we post a notification on Guardian's website regarding the disruption. The notice includes the reason for the disruption, how long the disruption is expected to last, and a description of any alternative facilities or services available (where applicable);
- Training is provided to all employees on the purpose and requirements of the AODA legislation;
- Guardian has and will continue to develop feedback processes to respond to inquiries and suggestions by phone, email, mail or in person;
- Guardian submitted compliance reports to the Province indicating we had addressed the requirements of the Regulation. We continue to ensure compliance with the Customer Service Standard; and
- Training is provided to all employees during the new hire orientation process and on an ongoing basis when changes are made to relevant policies and procedures. Training records are maintained and include the dates of the training and the people trained.

WORKPLACE EMERGENCY RESPONSE INFORMATION

COMMITMENT

Guardian is committed to providing individualized workplace emergency response information to employees and visitors who have a disability where the nature of the disability is such that accommodation is required.

ACTIONS TAKEN

The following measures have been in place since 2012:

- Completion of a building evacuation form by all employees who are not physically capable of descending the building stairwell in the event of an evacuation. Instructions and procedures have been communicated to individuals who have a disability, as required; and
- Where required and with the disabled individual's prior consent, the individualized workplace emergency response plans are provided to emergency response providers, and to designated employees responsible in emergency situations for the evacuation of the workplace.

INFORMATION AND COMMUNICATION STANDARD

COMMITMENT

Guardian is committed to making company information and feedback processes accessible to people with disabilities.

ACTIONS TAKEN

Feedback, Accessible Formats and Communication Supports

- Feedback processes are accessible by providing or arranging for the provision of, upon request, accessible formats and communication supports. The provision of accessible formats and communication supports to persons with disabilities will be done in a timely manner, taking into account the individual's accessibility needs, and at no extra cost above what is charged to other persons.
- Guardian will be publishing information regarding the availability of accessible formats and communication supports on the firm's new website.

PLANNED ACTION

Accessible Websites and Web Content

- All new content on the firm's new website will conform to Web Content Accessibility Guidelines ("WCAG") 2.0, Level A.
- All new content on the firm's new website will conform to WCAG 2.0, Level AA protocols by January 2021.
- Ability to comply with AODA will be incorporated into the selection criteria for vendors for technology, website and software development initiatives.

EMERGENCY PROCEDURE, PLANS OR PUBLIC SAFETY INFORMATION

In the event that Guardian makes emergency procedures, plans and public safety information available to the public, it will be provided, upon request, in an accessible format or with appropriate communication supports.

TRAINING COMMITMENT

Guardian is committed to providing training to all firm members and temporary employees who provide services on the firm's behalf with respect to the requirements of the IASR and the Ontario Human Rights Code (the "Code"), as it relates to people with disabilities.

PLANNED ACTION

In accordance with the IASR, Guardian has:

- ◆ Reviewed and determined the appropriate training requirements in the Code and the IASR and establish a format for delivery of training to all employees and temporary employees who provide services on the firm's behalf;
- ◆ Ensured that training is provided to all employees and temporary employees who provide services on the firm's behalf as soon as practicable and on any changes to the prescribed policies on an ongoing basis; and
- ◆ Maintain a detailed record of the training provided.

EMPLOYMENT PRACTICES

COMMITMENT

Guardian is committed to providing accessible formats and communication supports with respect to employment practices.

ACTIONS TAKEN

- If an employee is absent from work due to disability and requires accommodation in order to return to work, Human Resources develops an individual accommodation plan for that individual, in consultation with the insurance company (if applicable) and the employee's manager. If necessary we will utilize the expertise of an outside consultant such as Homewood Health Inc.
- Specify that accommodation is available for applicants with disabilities during the recruitment and selection process.
- Provide information in candidate communications that accommodations are available upon request in relation to the materials or processes to be used.
- Inform applicants about the firm's approach to accessibility and the process to request accommodation due to a disability at the time of the job offer.
- If an employee or new hire with a disability makes a request for accommodation, we will consult with the individual and determine the provision or arrangement of suitable accommodation in a manner that takes into account the applicant's accessibility needs due to a disability.
- Inform current employees and new hires of policies supporting employees with disabilities.
- Review and update, if necessary, our established process for the development of individual accommodation plans for employees with disabilities. When requested by an employee with a disability, consult with the employee to provide or arrange for provision of suitable accessible formats and communication supports needed to perform the employee's job.
- When providing performance management information to an employee with a disability, the firm will take into account the accessibility needs of the employee and as applicable, individual accommodation plans.
- When providing career development information to an employee with a disability, the firm will take into account the accessibility needs of the employee, and as applicable, individual accommodation plans.