

WORLD FINANCIAL GROUP OF CANADA, INC.

WORLD FINANCIAL GROUP INSURANCE AGENCY OF CANADA INC.

WFG SECURITIES INC.

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES **CUSTOMER SERVICE ACCESSIBILITY POLICY**

Introduction

The *Accessibility for Ontarians with Disabilities Act* (“AODA”) became law in 2005, and is intended to establish a process to develop, implement, achieve and enforce mandatory accessibility standards in Ontario, with the goal of increasing access to goods, services, facilities, accommodation, employment, buildings, structures and premises by January 1, 2025 for individuals with disabilities. Under the AODA, the Ontario government has created mandatory standards in five (5) key areas, including:

1. Customer Service
2. Information and Communications
3. Employment
4. Transportation
5. Built Environment

The “Customer Service” area of regulation was passed in 2008 and is addressed in the Accessibility Standards for Customer Service (Ontario Regulation 429/07). It deals with the customer service aspects of offering goods or services to customers who have various disabilities. All private sector organizations must comply with the Customer Service Standard and, in doing so, they must implement a Policy such as this one.

Objectives

World Financial Group Canada Inc., World Financial Group Insurance Agency of Canada Inc. and WFG Securities Inc. (“the Companies”) are committed to providing accessible customer service to persons with disabilities. The purpose of this Policy is to establish how the Companies will provide access to goods or services to the public and other third parties that do business with the Companies (“Customers”) with disabilities in a manner that is consistent with the principles of independence, dignity, integration and equality of opportunity, and that is in compliance with Ontario Regulation 429/07 (the “Customer Service Standard”) under the AODA.

Policy Statement

The Companies recognize the importance of:

- Providing access to goods and services for individuals with disabilitiesⁱ
- Openly communicating and responding to the needs of Customers with disabilities in order to provide them with excellent customer service; and
- Complying with the mandatory Customer Service Standard addressed under the AODA.

Application

This policy applies to all the Companies' employees, contractors, and other individuals engaged in business on behalf of WFG-Canada, including but not limited to senior management, managers, supervisors, full-time employees, part-time employees, temporary staff, off-site employees, and telephone support employees, ("Employees and Contractors").

Communication

Employees and Contractors will communicate with Customers with disabilities in a manner that takes into account their disabilities. Employees and Contractors will consider how a Customer's disability may affect the way he or she expresses, receives or processes communications and, where possible, they will ask the Customer how to best communicate with him or her. Customers are encouraged to identify any barriersⁱⁱ to communication that they are experiencing to assist the Companies in meeting this commitment.

Assistive Devices

Persons with disabilities who use assistive devices are encouraged to use their devices as necessary in order to use or benefit from the services provided by the Companies. Assistive devices that may be used by individuals with disabilities will be welcome on the Companies premises open to the public or to other third parties, including but not limited to canes, crutches, walkers, wheelchairs, scooters, oxygen tanks, screen readers, listening devices, speech amplification devices, magnification devices, note-taking devices, and communication boards. The Companies will take steps to ensure that Employees and Contractors are trained as to be familiar with various assistive devices that may be used by Customers. Each situation will be assessed on a case by case basis and every effort will be made to ensure that services are accessible.

Service Animals

The Companies welcome guide dogsⁱⁱⁱ or other animals that serve^{iv} individuals with disabilities in those areas of the Companies premises that are open to Customers and will permit the Customer to keep the service animal with him or her, except for those animals that are otherwise excluded by law from the premises. In the event that a service animal is otherwise excluded by law from the premises, the Companies will provide the applicable Customer with an alternative method of obtaining, using or benefitting from its goods or services.

Support Persons

The Companies welcome persons who support individuals with disabilities to accompany them onto the Companies premises open to the public or other third parties. The Companies will ensure that Customers who so require have access to their support persons while on the premises. Such support persons need not be paid, professional support workers. They may be volunteers, family members or friends who provide support to the Customer. Support persons will be asked to follow the rules and requirements that are specific to the goods and services provided by the Companies. The Companies will seek the consent of the Customer before confidential information is discussed in front of the support person. In some instances, support persons may be asked to sign a Confidentiality Agreement. The Companies will require a support person to accompany a Customer when on the premises when it determines that such an arrangement is necessary to protect his or her health and safety or that of others on the premises.

Temporary Unavailability of Access to Goods or Services for Customers with Disabilities

In the event that a facility, service or system offered by the Companies to Customers with disabilities^v is expected in advance to become temporarily unavailable, in whole or in part, the Companies will provide advance notice of the disruption on the entrance to their offices and as may otherwise be reasonable in the circumstances, at a reasonable time in advance of the disruption and during the disruption. If the disruption is unexpected, the notices in the forms outlined above will be provided as soon as the anticipated disruption becomes known to the Companies. The notices will:

- Explain the reason for and anticipated length of the disruption^{vi}; and
- Provide a description of and indicate the location of an alternative option or service that is accessible to individuals with disabilities, if available.

Employee and Contractor Training

All Employees and Contractors who interact with Customers on the Companies' behalf or who are involved in developing the Companies policies, practice and procedures on the provision of goods and services will:

- Be provided with an overview of the AODA, including its purpose, and the Customer Service Standard as well as the Company's plan for providing accessible customer service;
- Be trained how to interact, communicate and assist people with various disabilities, and in particular, people with assistive devices, and those who require the assistance of a guide dog, service animal or support person;
- Be made aware of the policies and procedures created by the Companies in accordance with the Customer Service Standard; and
- Be trained how to help a person with a disability who is having difficulty accessing the Companies goods or services.

This training will also be provided on an ongoing basis as soon as practicable:

- To new Employees and Contractors as part of their initial orientation;
- To Employees and Contractors who are assigned duties that include interaction with Customers on the Companies behalf or who are involved in developing the Companies policies, practices and procedures on the provision of goods and services; and
- Whenever the Companies policies change with respect to customer service accessibility for individuals with disabilities, to all Employees and Contractors who interact with Customers on the Companies' behalf or who are involved in developing the Companies policies, practices and procedures on the provision of goods or services.

The Companies will keep a log of all the training it will provide, documenting who was trained, on what and when.

Customer Access to This Policy and Related Documents

A notice advising Customers how they can request a copy of this Policy, all related documents and all documents required by the Customer Service Standard will be posted on the Companies' website. The Companies will strive to provide Customers with disabilities who request a copy of this Policy with a format that takes into account their disability.

Feedback Process

The Companies invite feedback on the way that it provides goods or services to individuals with disabilities. Those who wish to provide such feedback are encouraged to do so:

- In person;
- By telephone;
- In writing by mail, fax or e-mail;
- Otherwise.

All feedback will be directed to Human Resources. Any feedback that is in the nature of a complaint will be addressed promptly. The provider of the feedback will be provided with a response in the format requested (or the most appropriate format, which takes into account his or her disability, where no request was made).

The feedback process will be posted on the Companies' website and in a notice that will be posted at the entrance to the Companies' premises.

ⁱ “Disability” is defined in the AODA as

- (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 more than 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*.

ⁱⁱ “Barrier” means anything that prevents a person with disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice.

ⁱⁱⁱ The Customer Service Standard defines a “guide dog” as a guide dog defined in Section 1 of the *Blind Persons’ Rights Act, R.S.O. 1990, Chapter B.7, (S.III)*. A guide dog is defined as a dog trained as a guide for a blind person and having the qualifications prescribed by the regulations.

^{iv} The Customer Service Standard provides that an animal is a “service animal” (a) if it is readily apparent that the animal is used by the person for reasons relating to his/her disability; or (b) if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability (S. 4(9)).

^v For example, a ramp, escalator, elevator, accessible washroom, amplification system, note-taking or TTY (Telephone Teletype) services.

^{vi} For example, repair or scheduled maintenance for an anticipated duration of two days.