

# **ACCESSIBLE CUSTOMER SERVICE AND ACCESSIBLE WORKPLACE POLICY AND STATEMENT OF COMMITMENT**

August 2022

# AGF Accessible Customer Service and Accessible Workplace Policy and Statement of Commitment

This policy and plan formalizes the commitment of AGF Management Limited ("AGF") to accessibility, and outlines the steps that AGF will take to remove barriers and improve opportunities for people with disabilities through compliance with the Integrated Accessibility Standards Regulation (the "**Integrated Standard**").

## AGF's Commitment

AGF is committed to providing and maintaining a respectful environment, where there are no known barriers for people with Disabilities. Whether a person's Disability is apparent or not AGF is committed to providing everyone with the same opportunities and access to our workplace, employment opportunities, and services.

In fulfilling our commitment, we will identify and remove obstacles to accessibility for all persons with Disabilities, putting in place policies, practices, and procedures to ensure that all persons are treated in a manner that maintains their dignity and independence. AGF believes in integration and equal opportunity, is 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 the accessibility requirements under the *Accessibility for Ontarians with Disabilities Act, 2005*.

We further commit to providing people with Disabilities the same opportunity to access our services in the same place, and in a similar way, as other customers, and employees.

AGF is committed to meeting the requirements of the *Accessibility for Ontarians with Disabilities Act, 2005* (the "AODA") and similar or related standards and regulations. While the AODA is specific to the province of Ontario, we believe in holding ourselves to the highest provincial standard across our workplaces within Canada. Where there are differences between this policy and the applicable provincial legislation, provincial legislation will, at a minimum, be adhered to and applied.

## Definitions

As used in this policy:

**"AGF or AGF Companies"** AGF Management Limited including its affiliated entities as set out in Schedule D (being entities in which AGF controls or owns, directly or indirectly, more than 50% of the outstanding shares or ownership interests).

**"Disability" or "Disabilities"** means:

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, and 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 Service Animal or on a wheelchair or other remedial appliance or device,

A condition of mental impairment or a developmental Disability;

A learning Disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;

A mental disorder, or;

An injury or Disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

**"Service Animal"** means an animal acting as a Service Animal for a person with a Disability.

**"Support Person"** means in relation to a person with a Disability, another person who accompanies him or her to help with communication, mobility, personal care, or medical needs or with access to goods or services.

**"Assistive Device"** means a device used to assist a person with a Disability in carrying out activities or in accessing the services of persons or organizations.

**"Employee(s)"** includes all current and former employees, individuals who apply to be an employee of AGF, temporary employees, directors, officers, consultants, apprentices, volunteers, students, contractors, and agents of AGF.

## Application of the Policy

This Policy applies to anyone who works at AGF which includes; employees, contractors, volunteers (paid and unpaid), casual and part-time employees. Individuals who are contracted to work at AGF through an agency are also expected to abide by this policy. The group of people are referred to as 'employees' in this policy.

The policy covers the following major areas:

- Roles and Responsibilities;
- Policy Principles;
- The Customer Service Standard;
- The Employment Standard;
- The Design of Public Spaces Standard;
- Modifications to this or other policies;
- Feedback Process;
- Investigation and Reporting; and
- Review and Approval.

## Roles and Responsibilities

Meeting the accessibility needs of people with Disabilities is every employee's responsibility and

every employee is responsible for understanding this Policy. Every employee is also expected to be compliant with policy reviews and/or required training. The following list of responsibilities is not intended to be exhaustive:

## Policy Principles

AGF will ensure that this policy and any related practices or procedures are consistent with the following core principles:

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

## The Customer Service Standard

Employees at AGF are expected to create an environment and provide services to people with Disabilities in a manner that allows them to access our products and services with dignity and respect. AGF is committed to excellence in serving all its customers, including those with Disabilities, and will do so in the following ways:

### Information and Communication

We will communicate with people with Disabilities in ways that consider their Disability. Our commitment spans all communications, including the provision of emergency procedures, plans and public safety information and ensuring that our websites and web content meet the Integrated Accessibility Standards.

Employees will participate in the training provided which will cover the best ways to interact with individuals with a Disability considering their specific Disability as well as how best to communicate with customers with a Disability.

### Assistive Devices

We are committed to serving people with Disabilities who use Assistive Devices to obtain, use or benefit from our services. We will ensure that employees are trained and familiar with various Assistive Devices that may be used by customers with Disabilities while accessing our services, such as accessible toilets/elevators, specialized seating plans at onsite meetings/events, office computer equipment, printed documents, and handwritten note taking for communication.

AGF is open to consulting with customers regarding any reasonable accessibility needs upon request.

## **Billing and Statements**

We are committed to providing accessible invoices and statements to all our customers. For this reason, they will be provided in the following formats upon request: hardcopy, softcopy, and e-mail (where appropriate). AGF is open to consulting with customers regarding any reasonable accessibility needs upon request.

We will answer any questions customers may have about the content of the invoice or statement in person, by telephone, email or other means that meets the customer's accessibility requirements and protects the confidentiality and privacy of their information.

## **Use of Service Animals and Support Persons**

We are committed to welcoming people with Disabilities who are accompanied by a Service Animal on the parts of our premises that are open to the public and other third parties unless the Service Animal is otherwise excluded by law. If a Service Animal is excluded, we will explain to the customer why exclusion is necessary and explore alternative measures of accommodation. If it is not readily apparent that the animal is a Service Animal, we may ask the person with a Disability for a letter from a physician or nurse confirming that the person requires the animal for reasons relating to his or her Disability.

We are committed to welcoming people with Disabilities who are accompanied by a Support Person. Any person with a Disability who is accompanied by a Support Person will be allowed to enter the parts of our premises that are open to the public and other third parties with his or her Support Person. At no time will a person with a Disability who is accompanied by a Support Person be prevented from having access to his or her Support Person while on our premises.

We will also ensure that all staff, volunteers, and others dealing with the public are trained in how to interact with people with Disabilities who are accompanied by a Service Animal or Support Person.

## **Notice of Temporary Disruption**

AGF will provide customers with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with Disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available. The notice will be placed at all public entrances and service counters on our premises as well as on our website.

## **Training for Staff**

AGF will provide training to all employees and those who are involved in the development and approvals of customer service policies, practices, and procedures. Training will be appropriate to the duties of the employee and will cover both the *Human Rights Code* as it relates to persons with a Disability, and the AODA (and its Integrated Accessibility Standards regulation). Training is provided

annually (or when changes are made to the applicable policy, practice, or procedure) as well as part of AGF's on- boarding process, where the training will take place as early as practical following the commencement of work.

Training will include the following:

- The purposes of the AODA and the requirements of the customer service standard;
- How to interact and communicate with people of diverse 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 use the Assistive Devices provided by AGF;
- What to do if a person with a Disability is having difficulty in accessing AGF's services; and
- AGF Management's policies, practices and procedures relating to the customer service standard.

The Company will ensure that accurate and up-to-date training records are kept. These records will include the dates of the training and the number of individuals to whom the training was provided.

## Policy and Plan:

### General:

AGF does and will continue to provide training on the requirements of the Integrated Standard and on the Ontario Human Rights Code as it relates to people with disabilities. AGF takes and will continue to take the following steps to ensure that training is provided to all our employees, volunteers and those persons who develop our policies and provide goods, services or facilities by:

- developing and consolidating training materials that address the requirements of the Integrated Standard, including information about achieving accessibility by 2025 and on the disability- related regulations obligations under the *Human Rights Code*;
- reviewing the duties of those individuals that require training, and tailoring the training to be appropriate for such duties;
- scheduling the training such that it is delivered annually to all current employees, consultants, and volunteers;
- delivering the training via a method that is appropriate for the audience and the needs of AGF;
- keeping a record detailing those employees that were trained and when; and
- ensuring that new employees are trained as soon as practicable after being hired and when AGF's accessibility policies change.

### Information and Communication:

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

AGF has ensured and will continue to ensure that our existing processes for receiving and responding to feedback are accessible to people with disabilities upon request by:

- providing multiple methods for feedback, such as in writing or via email, telephone or in person; and considering and implementing those accessible formats or communication supports required elsewhere in the Integrated Standard.

AGF has ensured and will continue to ensure that, upon request, we will provide or arrange for the provision of publicly available information that is in respect of our goods, services, or facilities in an accessible format and at a cost that is not more than that charged to others by:

- consulting with the person making the request to determine the most appropriate accessible format or communication support, given the needs of the person, whether the content is convertible and AGF's capability;
- providing the accessible format or communication support in a timely manner and at no additional cost; and
- notifying the public about the availability of accessible formats and communication supports.

AGF has enacted a process to provide its customers and clients with publicly available emergency procedures, plans or public safety information in an accessible way, as soon as practicable upon request.

AGF has committed to meeting the communication needs of people with disabilities, and has ensured and will continue to ensure that all its new websites and content on those sites conform to WCAG 2.0, Level A by:

- liaising with our Information Technology department to determine whether the website(s) are compliant;
- determining whether the Information Technology department can upgrade the website and content internally, or if third party assistance is required; and

AGF has ensured that all websites and content have conformed with WCAG 2.0, Level AA as of January 1, 2021, by:

- liaising with our Information Technology department to determine whether the website is compliant;
- determining whether the Information Technology department can upgrade the website and content internally, or if third party assistance is required.

## **Employment:**

AGF is committed to fair and accessible employment practices we have and will continue to ensure that our employment practices support our commitment by:

- notifying the public and our staff that we will accommodate people with disabilities during the recruitment process, either through our website, via a recruiter or the applicable job

- posting, as applicable;
- notifying job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be utilized;
- consulting with job applicants who request accommodation to support them through the recruitment, selection and/or assessment process and consider their needs, so that the accommodations provided are effective; and
- notifying the successful applicant of AGF's policies for accommodating our employees with disabilities.

AGF has informed and will continue to inform our employees of the policies used to 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 disability, by:

- consulting with our employees with disabilities to determine those accessible formats or communication supports that may be of assistance, and how such accommodation may be provided; and
- providing the information as soon as practicable after commencement of employment, and updates whenever there is a change to the policies.

AGF has provided individualized workplace emergency response information to our employees with disabilities, if the disability is such that the individualized information is necessary and AGF is aware of the need for accommodation.

AGF developed and put in place a process for the creation of individual accommodation plans for those employees that have been absent from work due to a disability. This process has been implemented by:

- considering how employees with disabilities will participate in the development of their accommodation plan and what the plans may include;
- establishing where the plans will be stored and what steps will be taken to protect the privacy of employee information; and
- determining when and how the individual accommodation plans will be reviewed and updated.

AGF developed and put in place a documented return to work process for those employees that have been absent from work due to a disability and require disability-related accommodation to return to work. This process outlines the steps that AGF will take to facilitate the return to work of the applicable employees and the use of individual documented accommodation plans.

AGF has ensured that it considers the accessibility needs of employees with disabilities (as well as their individual accommodation plans) when implementing its performance management processes, by:

- reviewing an individual's accommodation plan to understand their needs and determine whether it should be adjusted to improve job performance;
- providing performance-management related documents in accessible formats; and

- providing informal and formal coaching and feedback in a manner that takes in account an employee's disability.

AGF has considered and will continue to consider the accessibility needs of its employees with disabilities (as well as their individual accommodation plans) when providing career development, advancement, or redeployment. This may occur through the consideration of what accommodations employees with disabilities may need to succeed elsewhere within our organization, to take on new responsibilities in a current role, or when redeployment has become necessary.

## The Employment Standard

AGF provides equal support to employees with Disabilities as it does to customers with Disabilities. In fact, our support for employees starts when they are candidates seeking employment. During the recruitment process AGF ensures that applicants are aware that those who need accommodation during the recruitment process will be provided with it upon request. We will consult with the individual requesting accommodation to ensure we provide or arrange suitable accommodation in a manner that considers the applicant's accessibility needs due to Disability.

AGF is committed to consulting with any employee who requires accommodation because of a Disability. Accommodation required may include:

- Provision of information in accessible formats, required to perform their job, or available to all employees
- Communication supports
- Individualized workplace emergency response information
- Individualized accommodation plans
- Changes in our performance management and/or career development to accommodate individual accessibility needs arising from a Disability

AGF maintains a documented Return to Work procedure for employees who have been absent from work due to a Disability and who require Disability-related accommodation to return to work. The Return-to-Work document outlines processes, procedures, roles and responsibilities amongst other information required to support an employee returning to work.

This Policy, along with other documentation on AGF's commitment to support individuals with Disabilities, is made available to employees on their first day of employment.

## The Design of Public Spaces Standard

As and if AGF develops or redevelops any of its public spaces, as defined in the Design of Public Spaces Standard. AGF will ensure compliance with the then current requirements and will work with both building owners and contractors to ensure the requirements are complied with.

AGF will work with contractors and building owners to ensure that new construction or renovations affecting AGF's workers or customers factors in the AODA requirements and that we take every available opportunity to support everyone's right to independence and dignity.

## Modifications to this or Other Policies

We are committed to developing customer service policies that respect and promote the dignity and independence of people with Disabilities. Therefore, no changes will be made to this policy before considering the impact on people with Disabilities. Any policy of AGF that does not respect and promote the dignity and independence of people with Disabilities will be modified, as necessary.

## Feedback Process

### Customers

The goal for AGF is to meet and surpass customer expectations. Comments on our services regarding how well those expectations are being met are welcome and appreciated. Feedback regarding the way AGF provides services to people with Disabilities can be made as follows:

#### **AGF Investments and AGF subsidiaries:**

- In Person: AGF Senior Complaints Officer and/or Compliance Officer CIBC SQUARE, Tower One, 81 Bay Street, Suite 3900 Toronto, Ontario, M5J 0G1, or
- By mail: AGF Senior Complaints Officer and/or Compliance Officer, CIBC SQUARE, Tower One, 81 Bay Street, Suite 3900 Toronto, Ontario, M5J 0G1, or  
By Telephone: call AGF Investment's Client Services at 1-800-268-8583 All feedback, regardless of how received, will be directed to:

**AGF Investments and AGF subsidiaries:** Senior Complaints Officer and/or Compliance Officer

### Employees

Employees are encouraged to report any concern or compliant in how AGF is accommodating employees with Disabilities to their leader, another member of their business unit leadership team, or to the SVP HR. If the incident appears to have involved your leader, then you should report such incident to one of the alternative contacts listed above.

## Responding to Feedback

Acknowledgement of receipt of feedback can be expected to be received within 48 business hours of being received.

Complaints will be addressed according to processes already established in AGF's complaintmanagement procedures.

AGF will ensure that processes for providing, receiving, and responding to feedback is accessible to persons with Disabilities by ensuring that accessible formats are available as well as communicationsupports upon request.

## **Documentation**

AGF will prepare one or more documents that will describe the policies, practices and procedures regarding accessible customer service, with particular reference to: (i) the use of personal Assistive Devices, as well as those provided by AGF; (ii) entry of Service Animals and Support Persons; (iii) the steps that will be taken in connection with a temporary disruption to facilities or services used by peoplewith Disabilities; (iv) provision of accessible customer service training; and (v) receiving and responding to feedback regarding the provision of goods and services to people with Disabilities.

AGF will make this documentation available to members of the public upon request, and in a format that considers a person's Disability, if applicable. Notification of the availability of this documentation will be posted on the Company website, AGF.com, and on our Company Intranet.

## **Going Forward:**

AGF considers and will continue to consider accessibility in all aspects of its business and operations and will continue to endeavor to identify and remove accessibility barriers.

## **For More Information:**

For more information on this accessibility policy and plan or for accessible formats of this document, which are available free upon request, at:

E-mail [complaints@agf.com](mailto:complaints@agf.com) or call AGF Investment's Client Services at 1-800-268-8583