

Accessible Customer Service Policy

The Accessibility Standards for Customer Service Policy applies to CI Financial Corp. and all of its affiliates, and their respective employees, advisors and contractors, in their interactions with clients, the public and other third parties.

Executive Summary

The Accessibility Standards Act is in place to ensure equal access for persons with disabilities in Ontario. This is a new Act and imposes requirements on CI and its affiliates (the “Company”) and the Company’s employees, advisors and contractors, **effective January 1, 2012**. In particular, the Act sets specific legal standards regarding interaction and communication with customers and/or members of the public who have a disability, whether the disability is visual, audible, verbal, physical, mental, intellectual, or otherwise.

All of the Company’s employees, advisors and contractors must take individual needs into account when providing services to clients and/or interacting with the public. All such personnel must ensure that all persons receive the same value and quality of service regardless of any disabilities. This may involve making accommodations for a person who uses an assistive device, service animal or support person, and in some cases it may mean services are provided from an alternate more accessible location.

Clients and the public must be provided with appropriate and accurate information about this Policy and, upon request, must be provided with a copy. All enquiries and feedback from clients and the public should be directed to the Company’s Human Resources department.

Violations to this policy may lead to substantial fines and/or reputational harm against the Company, and/or discipline against non-compliant personnel. The Company will provide mandatory training to personnel regarding these new legal requirements.

Intent

This policy is intended to meet the requirements of *Accessibility Standards for Customer Service, Ontario Regulation 429/07* (the “Regulations”) under the *Accessibility for Ontarians with Disabilities Act, 2005* (the “Act”), and applies to the provision of goods and services to the public or other third parties, not to the goods themselves.

All goods and services provided by CI Financial Corp. and its affiliates (the “Company”) shall follow the principles of dignity, independence, integration and equal opportunity.

Scope

- a) This policy applies to the provision of goods and services to our customers and clients, members of the public and other third parties.

- b) This policy applies to employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of the Company (including head office staff, Assante branch personnel, and all others who deal with clients/public on behalf of the Company) when the provision of goods and services occurs off the premises of the Company, such as services provided at Assante branches, offsite meetings and presentations, etc.
- c) The section of this policy that addresses the use of guide dogs, service animals and service dogs only applies to the provision of goods and services that takes place at premises owned or operated by the Company.
- d) This policy shall also apply to all persons who participate in the development of the Company's policies, practices and procedures governing the provision of goods and services to members of the public or third parties.

Definitions

Assistive Device – is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that customers bring with them such as a hearing aid, wheelchair, walker or a personal oxygen tank that might assist the individual in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

Customer -- for the purpose of this policy, a customer includes clients of CI and its affiliates and members of the public with whom an employee or agent acting on behalf of the Company interacts for the purpose of providing a good or service to the public.

Disability – is defined by the Act as follows:

- 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;
- 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*.

Guide Dog – is a highly-trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons' Rights Act*, to provide mobility, safety and increased independence for people who are blind.

Service Animal – as reflected in the Regulations, an animal is a service animal for a person with a disability if:

- it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

Service Dog – as reflected in *Health Protection and Promotion Act, Ontario Regulation 562*, a dog other than a guide dog for the blind is a service dog if:

- it is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability; or the person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.

Support Person – as reflected in the Regulations, a support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to goods and services.

General Principles

In accordance with the Regulations, this policy addresses the following:

- A. The Provision of Goods and Services to Persons with Disabilities
- B. The Use of Assistive Devices
- C. The Use of Guide Dogs, Service Animals and Service Dogs
- D. The Use of Support Persons
- E. Notice of Service Disruptions
- F. Customer Feedback
- G. Training
- H. Notice of Availability and Format of Required Documents

A. **The Provision of Goods and Services to Persons with Disabilities**

The Company will make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- ensuring that all customers receive the same value and quality;
- allowing customers with disabilities to do things in their own ways, at their own pace when accessing goods and services as long as this does not present a safety risk;
- using alternative methods when possible to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner;
- taking into account individual needs when providing goods and services; and
- communicating in a manner that takes into account the customer's disability.

B. **Assistive Devices**

Customer's own assistive device(s):

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by the Company.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services. For example, open flames and oxygen tanks cannot be near one another. Therefore, the accommodation of a customer with an oxygen tank may involve ensuring the customer is in a location that would be considered safe for both the customer and business. Or, where elevators are not present and where an individual requires assistive devices for the purposes of mobility, service will be provided in a location that meets the needs of the customer.

C. Guide Dogs, Service Animals and Service Dogs

A customer with a disability that is accompanied by a guide dog, service animal or service dog will be allowed access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to guide dogs, service animals and/or service dogs.

Recognizing a Guide Dog, Service Dog and/or Service Animal:

If it is not readily apparent that the animal is being used by the customer for reasons relating to his or her disability, the Company may request verification from the customer. Verification may include:

- a letter from a physician or nurse confirming that the person requires the animal for reasons related to the disability;
- a valid identification card signed by the Attorney General of Canada; or
- a certificate of training from a recognized guide dog or service animal training school.

Care and Control of the Animal:

The customer that is accompanied by a guide dog, service dog and/or service animal is responsible for maintaining care and control of the animal at all times.

Allergies:

If a health and safety concern presents itself for example in the form of a severe allergy to the animal, the Company will make all reasonable efforts to meet the needs of all individuals.

D. Support Persons

If a customer with a disability is accompanied by a support person, the Company will ensure that both persons are allowed to enter the premises together and that the customer is not prevented from having access to the support person.

There may be times where seating and availability prevent the customer and support person from sitting beside each other. In these situations the Company will make every reasonable attempt to resolve the issue.

In situations where confidential information might be discussed, consent will be obtained from the customer, prior to any conversation where confidential information might be discussed with or in the presence of the support person.

E. Notice of Disruptions in Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of the Company. In the event of any temporary disruptions to facilities or services that customer's with disabilities rely on to access or use the Company's goods or services, reasonable efforts will be made to provide advance notice. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

Notifications will Include:

In the event that a notification needs to be posted the following information will be included unless it is not readily available or known:

- nature of the disruption;
- reason for the disruption;
- anticipated duration of the disruption; and
- a description of alternative services or options.

Notification Options:

When disruptions occur the Company will take reasonable steps to provide notice by:

- posting notices in conspicuous places including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption and/or on the Company's website;
- contacting customers with appointments as appropriate;
- verbally notifying customers when they are making an appointment; or
- by any other method that may be reasonable under the circumstances.

F. Feedback Process

The Company shall provide customers with the opportunity to provide feedback on the service provided to customers with disabilities. Information about the feedback process will be readily available to all customers and notice of the process will be made available on the Company's corporate website, or by calling our Customer Service Centre. Feedback forms along with alternate methods of providing feedback such as verbally (in person or by telephone) or written (hand written, delivered, website or email), will be available upon request.

Submitting Feedback:

Customers can submit feedback to:

Customer Service Centre - (416) 364-5181 or 1-800-563-5181 – speak to a financial services representative.

Customers who wish to provide feedback by completing an onsite customer feedback form or verbally can do so at any reception area.

The Company will take reasonable steps to ensure that customers who provide formal feedback receive acknowledgement of their feedback, along with information regarding any resulting actions based on concerns or complaints that were submitted.

G. **Training**

Training will be provided to:

- a) all employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of the Company; for example: salespersons, advisors, vendors, event operators, call center personnel and third party marketing agents; and,
- b) those persons who are involved in the development and approval of customer service policies, practices and procedures.

Training Provisions:

As reflected in the Regulations, training will cover the following:

- A review of the purpose of the Act.
- A review of the requirements of the Regulations.
- Instructions on how to interact and communicate with people with various types of disabilities.
- Instructions on how to interact with people with disabilities who:
 - use assistive devices;
 - require the assistance of a guide dog, service dog or other service animal; or
 - require the use of a support person.
- Instructions on what to do if a person with a disability is having difficulty accessing the Company's services.
- The Company's policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

Training Schedule:

Training will be provided to appropriate new employees, volunteers, agents and/or contractors during orientation. Employees who work in Customer Service will receive further training as part of their overall Customer Service Training Program. Additional training will be provided as deemed appropriate.

Revised training will be provided in the event of changes to legislation, procedures and/or practices.

Record of Training:

The Company will keep a record of training that includes the dates training was provided and the names of employees who attended the training.

H. **Notice of Availability and Format of Documents**

The Company shall notify customers that the documents related to the *Accessibility Standard for Customer Service* are available upon request and in a format that takes into account the customer's disability. Notification will be given by posting the information on the Company's website and/or through any other reasonable method.

Administration

If you have any questions or concerns about this policy or its related procedures please contact:

Lorraine Blair
Senior Vice President, Human Resources
15 York Street,
Toronto, ON M5J 0A3
416-681-6548

This policy and its related procedures will be reviewed as required in the event of legislative changes.

Referenced Documents:

- *Accessibility for Ontarians with Disabilities Act, 2005*
- *Accessibility Standards for Customer Service, Ontario Regulation 429/07*
- *Blind Person's Rights Act, 1990*
- *Dog Owners' Liability Act, Ontario*
- *Food Safety and Quality Act 2001, Ontario Regulation 31/05*
- *Health Protection and Promotion Act, Ontario Regulation 562*
- *Ontario Human Rights Code, 1990*