



ACCESSIBILITY STANDARD POLICY

At Imperial Capital, we are committed to respecting and promoting the dignity and independence of people with disabilities. We support accessibility and inclusiveness of persons with disabilities as set out in the *Canadian Charter of Rights and Freedoms*, the *Ontario Human Rights Code* and the *Accessibility for Ontarians with Disabilities Act (AODA)*.

This Accessibility Standard Policy outlines the steps we will take in order to bridge accessibility and accommodate the needs and requirements of individuals with disabilities.

All policies and procedures at Imperial Capital have been developed to promote respect of all individuals, and dignity and independence for people with disabilities. If any person finds that an Imperial Capital policy or procedure impedes these principles, such policy or procedure will be reviewed.

Accessible Information and Communication

Imperial Capital is committed to providing accessible information and communications. If an individual requests information to be provided in an alternative format to accommodate their disability, Imperial Capital will address the request to the best of its abilities.

Customer Service Policy

Imperial Capital is committed to excellence in serving all, including people with disabilities. We will communicate respectfully and ensure that we take into account the individual's specific needs, requirements and circumstances when communicating with people with disabilities. To that end, we have implemented the following plan to ensure accessibility:

Assistive Devices

A personal assistive device, as acquired by the user of said device, is any device that is used, designed, made or adapted to assist persons with disabilities in performing various, everyday tasks such as moving, communicating, reading, writing or lifting.

Below are some assistive devices guidelines:

- Persons with disabilities are entitled to use personal assistive devices while accessing Imperial Capital, excepting in situations where the use of the device contravenes policies and/or legislation governing the delivery of particular services or poses any element of risk or hazard.
- Persons with disabilities are entitled to the protection of their privacy and are not required to disclose to Imperial Capital information about their disability and/or the need for a personal assistive device, unless such information is required by Imperial Capital or other appropriate persons for the purposes of creating and implementing an individualized accommodation plan.
- Employees and other individuals engaged on behalf of Imperial Capital are required to cooperate with the use of a personal assistive device.

Service Animals and Support Persons

Service animals and support persons accompanying our clients and / or employees with disabilities will be welcomed by Imperial Capital. Service animals shall be permitted on the parts of our premises that are open to the public. Imperial Capital will do all that it can to assist any support person who accompanies an individual with a disability in accessing our premises.

A service animal is defined as "any guide dog, signal dog, or other animal individually trained to do work or perform tasks for the benefit of an individual with a disability, including, but not limited to, guiding individuals with impaired vision, alerting individuals with impaired hearing to intruders or sounds, providing minimal protection or rescue work, pulling a wheelchair, or fetching dropped items."

On rare occasions, Imperial Capital may determine, in the case of a person(s) with disability, that a support person or a service animal cannot enter an area of the premises consistent with certain legal requirements, including safety legislation. In these instances, Imperial Capital will suggest appropriate alternatives and provide assistance to those persons to enable them to access Imperial Capital.

When a support person is required (e.g., sign language communicators, interpreters, assistants, etc.) he/she will be permitted to accompany the person with the disability to Imperial Capital meetings or events. The support person may be required to sign in, providing his/her name, address, identification and name of the accompanied person with disability.

Notice of Temporary Disruption

In the event of a planned or unexpected disruption to facilities for Imperial Capital related individuals with disabilities, Imperial Capital will attempt to notify them promptly. Appropriate notification of the disruption will be made visually and/or by notice on Imperial Capital's website as necessary. Such notification will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities, if available.

Visual notices will be placed at the Imperial Capital entrance and at affected areas.

Training for Staff

Imperial Capital will provide appropriate training to all members of staff on policies, practices and procedures that affect the way access is provided to persons with disabilities. They will also be trained on an on-going basis when changes are made to these policies, practices and procedures.

Training will include:

- An overview of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the various legislation it contains that impacts our business
- Imperial Capital 's Accessibility Standard Policy
- How to interact and communicate with people with various types of disabilities, including:
 - How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person; and
 - What to do if a person with a disability is having difficulty in accessing Imperial Capital.

Staff will also be trained when changes are made to this policy or our Accessible Customer Service plan.

Feedback Process

Individuals who wish to provide feedback on how Imperial Capital provides information, communication or access to people with disabilities can:

- Contact a manager or supervisory individual on-site directly at the time of their visit;
- Phone or email Imperial Capital with their feedback at (416) 362-3658 or HR@imperialcap.com; and
- Direct Imperial Capital to provide the individual with the most effective and reasonable method of communication to accommodate their individual needs and requirements in order to address their question, concern, feedback or complaint.

Personal privacy will be respected and all feedback will be reviewed for possible action that can be taken to improve Imperial Capital's policies, practices and procedures.

Feedback/ responses will endeavor to be in a format that is accessible to the complainant. The feedback process proposes to evaluate the manner in which persons with disabilities are accommodated, including the actions to be taken by Imperial Capital when a complaint is received.

Accessible Employment

Within the guidelines of the Ontario Human Rights Code and up to the point of undue hardship, Imperial Capital is committed to:

- Achieving a culture and work environment that is supportive of employees with disabilities;
- Ensuring that each person with a disability will be considered individually, on a case-by-case basis, in order to determine accommodation requirements;
- Ensuring compliance with all applicable legislation and Imperial Capital's policy; and
- Establishing an efficient accommodation process that is consistent with principles of confidentiality, dignity, respect and shared responsibility.

Shared responsibility and accountability include open communication and partnership between the individual requiring accommodation, supervisors, applicable employee groups and Imperial Capital.

Imperial Capital has the following plan in place to promote accessible employment:

Recruitment

During recruitment processes, if it is feasible to accommodate applicants with disabilities for the specific position, Imperial Capital will:

- Notify their employees and the public about the availability of accommodation for applicants with disabilities;
- Notify 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 used;

- If an applicant requests an accommodation, consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability while promoting the individual's dignity and independence; and
- When making an offer of employment, notify the successful applicant of our policies for accommodating employees with disabilities.

During Employment

During the course of employment, Imperial Capital will:

- Inform employees of the policies in place to support employees with disabilities, including, but not limited to, policies to provide equitable job accommodations that take into account an employee's accessibility needs due to disability;
- Update employees whenever there is a change to existing policies;
- Upon request and as is reasonably possible, consult with a disabled employee to provide or arrange for accessible formats and communication supports for information that is needed in order to perform the employee's job, and information that is generally available to employees in the workplace;
- Make individual accommodation plans that, if requested, include any information regarding accessible formats and communication supports available; include individualized workplace emergency response information; and, identify any other accommodation that is to be provided;
- Designate and train a person(s) to provide assistance to employees with disabilities during a workplace emergency, if the employee requires the assistance and provides consent; and
- Review the individualized accommodation plans in place when an employee moves to a different location in the organization, when reviewing an employee's overall accommodation needs, and whenever these policies are updated.

Return to Work

Imperial Capital has put the following plan in place with respect to return-to-work processes for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work:

- Ensure the return-to-work process outlines the steps Imperial Capital will take to facilitate the return to work of employees who were absent because their disability required it; and
- Incorporate steps to document individual and equitable accommodation plans as part of the process.

Performance Management and Professional Development

As part of Imperial Capital's performance management and professional development processes, Imperial Capital is committed to taking into account the accessibility needs of employees with disabilities, as well as individual accommodation plans in place, in assessing and improving employee performance, productivity and effectiveness, and in developing and promoting employees. Imperial Capital will consistently operate with the goal of facilitating ongoing employee success for all members of our team, to the extent that it does not cause undue hardship to the operational success of the business.

Accessible Emergency Response for On-site Workers with Disabilities

In compliance with AODA legislation, Imperial Capital has implemented the following procedures to support employees with disabilities who may require assistance during emergency situations:

- Designating person(s) in the workplace to provide assistance to workers with disabilities during emergency situations (if the worker with the disability requires assistance and if he/she consents);
- Providing workplace emergency response information to person(s) designated to provide assistance to workers with disabilities during an emergency; and
- Reviewing the individualized workplace emergency response information when a worker with a disability moves to a different location in the organization, when reviewing the worker's overall accommodation needs or plans, and whenever the Company reviews its general emergency response policies.