



MULTI-YEAR ACCESSIBILITY PLAN

This plan outlines the measures Imperial Capital has taken and will take to identify, remove and prevent barriers to people with disabilities, in compliance with the AODA regulations.

1. Training

Imperial Capital will provide training on Ontario's accessibility laws, in accordance with the Accessibility Standards for Customer Service regulations under the AODA, and on the Human Rights Code as it relates to people with disabilities. The training will be provided to staff and other persons who provide goods, services or facilities on behalf of the organization, as well as anyone who participates in developing the Policies for Imperial Capital.

We have taken the following steps to ensure staff receive the training needed to meet Ontario's accessible laws:

- New Individuals are trained on Imperial Capital's Accessibility policy, and training about accessibility and the requirements set out under this Policy will be completed within 30 days of their hire date.
- Training about accessibility will be provided to existing staff whenever changes to the Company's accessibility policies are made and, possibly if someone changes their job duties.

2. Kiosks

Imperial Capital does not currently have self service kiosks as part of its business, however should this become a requirement in the future we will consider the needs of people with disabilities when designing, procuring or acquiring kiosks.

3. Information and Communications

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

Imperial Capital has taken the following steps to ensure existing feedback processes are accessible to people with disabilities in Ontario upon request:

- We administer our feedback processes in accessible formats and make communication supports available upon request.

Imperial Capital has taken the following steps to make sure all publicly available information in Ontario is made accessible upon request:

- We provide information and communications in accessible formats and with communication supports to people with disabilities upon request in a timely manner and at a cost equal to the regular cost charged to others, if any.

Imperial Capital has ensured that all websites and web content, including web-based applications, that we control directly or indirectly through a contractual relationship that allows for modification of the product, meet the WCAG 2.0 Level AA standard.

4. Employment

Imperial Capital is committed to fair and accessible employment practices. We take the following steps to notify the public and staff that, when requested, we accommodate people with disabilities during the recruitment and assessment processes and when people are hired:

- We include a statement in our job postings and employment letters, to inform all applicants and employees that persons with disabilities will be accommodated throughout the recruitment and selection process and for the duration of employment with Imperial Capital; and
- New hires are notified of our policies for accommodating employees with disabilities.

Imperial Capital has taken the following steps to develop and put in place a process for developing individual accommodation plans and return-to-work policies for employees and individualized workplace emergency response plans in Ontario that have been absent due to a disability:

- HR has developed a standard template for the development of individual accommodation plans and return-to-work programs, and individualized workplace emergency response plans.

We have taken the following steps to ensure the accessibility needs of employees with disabilities are taken into account in performance management, career development and redeployment processes:

- Employees with disabilities have an individual accommodation plan developed by HR in consultation with the employee and manager. The plans include consideration for performance management, career development and redeployment processes.
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5. Design of Public Spaces

Imperial Capital will focus on removing barriers in our buildings and public spaces.

- Buildings - New construction and renovations will reflect updated accessibility requirements as outlined by building codes.
- Public Spaces – Will be designed with accessibility standards where there is new construction.

QuadReal Property Group, the property manager where Imperial Capital's offices are located, has put procedures in place to address service disruptions to its accessible parts of its public spaces. In the event of a service disruption to the accessible parts of public spaces, we notify the public of the service disruption and alternatives available.

The Imperial Capital Multi-Year Accessibility Plan will be reviewed and updated every 5 years.