



ACCESSIBILITY

The Worldsource Group of Companies (“Worldsource”) is committed to excellence in serving all Associates, clients, advisors and visitors to our offices and will provide accommodation where required to meet the needs of people with disabilities and in accordance with the Accessibility for Ontarians with Disabilities Act, 2005 (“AODA”). For more information, please see the following:

- The Worldsource Group of Companies Accessibility Policy – Page 2-8
- The Worldsource Group of Companies Multi-Year Accessibility Plan – Page 9-12

Please note that accessible formats of these document are available free upon request from Worldsource’s Human Resources department.

Feedback Process:

Feedback regarding the way Worldsource provides goods and services to people with disabilities can be made in person, via telephone, e-mail or in writing to:

Human Resources
Worldsource Wealth Management
625 Cochrane Drive, Suite 700
Markham, ON L3R 9R9
Phone: 905-940-5500 | 1-800-287-4869
Email: hr@worldsourcewealth.com



THE WORLDSOURCE GROUP OF COMPANIES

ACCESSIBILITY POLICY

PURPOSE

The Accessibility for Ontarians with Disabilities Act ("AODA"), which was built on the 2001 Ontarians with Disabilities Act, became law in 2005 with the aim to create a fully accessible province by 2025. The AODA outlines the rules that all businesses and organizations must follow to identify, remove and prevent barriers to accessibility in Ontario for people with disabilities. Over 22% of Canadians have a disability and that figure is expected to rise over the coming years as the population ages. By 2036, 47% of Canada's population is expected to be over 65 years of age¹.

Under the AODA, the Integrated Accessibility Standards Regulation ("IASR") was first enacted in 2011 and, as amended, now contains the following five (5) standards: the Information and Communications Standards, the Employment Standards, the Transportation Standards, the Design of Public Spaces Standards, and the Customer Service Standards (collectively, the "Standards").

These Standards outline where and how organizations need to remove barriers for people with disabilities in relation to Information and Communications, Employment, Transportation, the Design of Public Space and Customer Service. The requirements in the Standards are not a replacement or a substitution for the requirements established under the Ontario Human Rights Code; nor do the Standards limit any obligations owed to persons with disabilities under any other legislation.

Throughout this Accessibility Policy (the "Policy"), all persons, whether employed on a full-time or part-time basis by the Company (as defined below), are referred to as "Associates". The Associates, coming from all departments and levels within the organization, play an integral part in contributing to the Company's overall objectives.

The Worldsource Group of Companies may be referred to as either "Worldsource" or "the Company". For the purpose of this Policy, the reference to Worldsource or the Company will include all affiliated companies that provide goods, services or facilities to the public or other third parties and that have at least one employee in Ontario.

¹ Statistics Canada, *A demographic, employment and income profile of Canadians with disabilities aged 15 years and over, 2017*, Canadian Survey on Disability Reports, 2017

THE POLICY

The Company is committed to excellence in serving all of its Associates, clients, advisors and investors, as well as visitors to our offices, members of the public and other third parties, and will provide accommodation where required in accordance with the AODA. Worldsource is committed to meeting the needs of people with disabilities and will do so in a way that respects their dignity and independence.

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. The Company will ensure that all persons with a disability receive the same access to opportunities and our good, services and facilities; taking into account their individual needs and communicating in a manner that accommodates the person's disability.

THE PRINCIPLES

The Company will make reasonable efforts to ensure that this Policy and any related practices or procedures are consistent with the following core principles:

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

INTEGRATED ACCESSIBILITY STANDARDS REGULATION

Multi-Year Accessibility Plan

In order to achieve Worldsource's accessibility goals, and in accordance with the provisions of the IASR and the AODA, the Company has implemented and will maintain and document, a Multi-Year Accessibility Plan. This Multi-Year Accessibility Plan outlines our commitment to accessibility, provides a strategy to prevent and remove barriers, and outlines a plan to meet the requirements under the IASR. This Plan is available to all Associates and the public on Worldsource's website, and will be provided in an accessible format or with communication support, upon request. The Company will review and update the Multi-Year Accessibility Plan every five (5) years.

Reporting

In accordance with the requirements of the AODA, the Company will report accessibility achievements every three (3) years by filing the required accessibility compliance report with the Ministry of Seniors and Accessibility, the Accessibility for Ontarians with Disabilities Division.

Customer Service Standard

The Company is committed to providing an accommodating environment to all individuals, whatever their ability, and ensuring all goods and services are received in an accessible and timely manner. The Company will communicate with a person with a disability in a manner that takes into account his/her disability, whether the disability is visual, audible, verbal, physical, mental, intellectual, or otherwise. This may involve making accommodations for a person who uses an assistive device, service animal or support person, and the Company will make the following accommodative provisions:

- ◆ **Assistive Devices:** Persons with disabilities will be allowed to use their own personal assistive devices to access our goods, services and facilities, as may be applicable, and will also have access to assistive devices that may be available on our premises, including: accessible washrooms, alternate document formats, screen readers and telecommunication devices for the deaf.
- ◆ **Use of Service Animals or Support Persons:** Persons with disabilities may, at all times, be accompanied by their required support person and/or a service animal on the parts of our premises that are open to the public and other third parties.

The Company has established a separate Accessibility Standards for Customer Service Policy to meet the specific requirements of the Customer Service Standards outlined in the IASR, a copy of which is available upon request.

Notice of Temporary Disruption

We will notify our Associates, clients, advisors, investors, and visitors if there is a planned or unexpected disruption in the facilities or the provision of our goods and services usually used by persons with disabilities. This notice will be posted at the entrance of the applicable premises and on the Worldsource website. The notice will include the following information:

- ◆ the facility or service that is unavailable;
- ◆ the reason for the disruption;
- ◆ the anticipated duration of the disruption; and
- ◆ alternative facilities or services, if available.

Information and Communication

The Company will ensure that the provision of documents and information in respect of our goods, services or facilities is available in accessible formats or with appropriate communications support, upon request, at no additional cost and in a timely manner. A request for an accessible format of information, or for communications support, in relation to the provision of our goods, services or facilities, may be made through our feedback process, as outlined in the Feedback Process section below.

The Company will consult with the person making the request in order to determine the suitability of an accessible format or communication support. Upon so doing, the IASR gives the Company the flexibility to decide on the most appropriate accessible format or communication support, given the needs of the person with a disability and the Company's capability to deliver.

As outlined in the IASR, if the Company determines that we are unable to convert the information or communications into an accessible format, the Company will provide a report to the person explaining why we are unable to do so and provide a summary of the content.

Web Content

As outlined in the IASR, all new web content posted after 2012 on the Company's public websites will conform to the required Web Content Accessibility Guidelines ("WCAG") 2.0 Level AA protocols, with the exception of live captions and pre-recordings. This applies to websites and website content, including web-based applications that the Company controls directly or through a contractual relationship that allows for modification of the product, unless it is not practicable to conform due to the unavailability of commercial software or tools or both.

Training and Record Keeping

The Company will ensure that training is provided to all new Associates and volunteers, and to any agent or contractor who is being retained to provide goods, services or facilities to the public or other third parties on the Company's behalf, and to all those who are involved in the development of the Company's relevant policies, practices and procedures.

The training will be provided as soon as possible after hiring or engagement and on commencement of new or additional duties that require training. Training will include the following:

- ◆ a review of the purpose of the AODA and IASR and the requirements therein, along with a review of the Human Rights Code as it pertains to persons with disabilities;
- ◆ a review of this Policy;
- ◆ how to interact and communicate with persons with various types of disabilities;
- ◆ how to interact with persons with a disability who use an assistive device or require the assistance of a service animal or support person;
- ◆ the Company's policies, procedures and practices pertaining to providing accessible customer service to persons with disabilities, that takes into account the person's accessibility needs due to disability;
- ◆ the types of accessible information that can be provided;
- ◆ how to assist a person with a disability that is experiencing difficulty accessing the Company's workplace premises' and/or our services and/or information about our products; and
- ◆ the Feedback Process.

Associates or other persons who work directly with our clients, advisors, investors or the general public in relation to the provision of our goods, services or facilities will receive further training as deemed appropriate. Revised training will be provided in the event of changes to legislation, procedures and/or practices.

The Company will keep accurate and up to date training records. These records shall include the dates that the training was provided, and the individuals to whom the training was provided.

Employment Standards

The Company has implemented accessible employment practices, as they pertain to recruitment and selection, new hire orientation, performance management and career development. The company responds to all requests for accommodation, including consultation with the employee's accessibility needs due to a disability and determination of the provision or arrangement of suitable accommodation. The Company will provide for an employee with a disability, upon request, 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.

Recruitment

All recruitment practices and procedures will comply with applicable accessibility standards for internal and external candidates who may have a disability. This includes identifying and removing any barriers that may exist for persons with disabilities to apply for positions and, if qualified, to participate in the interview process. All candidates will be advised of Worldsource's commitment to accessibility in employment and to ensuring equal access to employment opportunities for all candidates, including persons with disabilities. Worldsource will endeavour to provide reasonable accommodation to persons with disabilities in the recruitment process upon request.

If a selected candidate requests an accommodation, the Company shall consult with the candidate and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the candidate's accessibility needs due to disability.

The purpose of these principles are to ensure consistent and equitable standards for the recruitment, assessment and selection of prospective Associates, including persons with disabilities, to create a diverse and qualified talent pool to support current and future business needs.

Employee Support and Individual Accommodation Plans

The Company is committed to the prevention and removal of barriers to people with disabilities, to the accommodation of persons with disabilities and to establish processes by which persons with disabilities may request accommodation.

The Company will make every effort to accommodate the needs of a person with a disability provided that person is able to perform the essential functions of their job or the duties of other available work. The Company has a written process for the development of documented individual accommodation plans for employees with disabilities, which is available to employees upon request.

Associates who wish to raise a potential accommodation concern shall do so by submitting a request for accommodation, in writing, to their immediate manager and Human Resources. The request shall:

- ◆ describe the condition or circumstance causing the accommodation concern; and
- ◆ describe in detail, the accommodation sought to address the need.

Return to Work Plan

If an Associate is absent from work due to disability and requires accommodation in order to return to work, the Company will work with the Associate to develop an individual accommodation plan for that individual, in consultation with disability benefits providers, where suitable and necessary. After identifying the most appropriate return to work accommodation, safety considerations and any transitional measures, the details will be provided in a written return to work plan.

The return to work plan will be monitored and reviewed regularly to ensure that it remains effective. If the accommodation is no longer appropriate, the Company will reassess the circumstances and update the plan.

Accessible Formats and Communication Supports for Employees

Where an Associate requests it, the Company will consult with the Associate to arrange for the provision of accessible information and communication supports for information that is needed to perform the Associate's job, and information that is generally available to Associates in the workplace.

Performance Management & Career Development

Accessibility needs of Associates and individual accommodation plans will be taken into account when managing an Associate's performance, career advancement or opportunities for redeployment.

Emergency Response Procedures

In the event that the Company makes emergency procedures, plans and public safety information available to the public, it will be provided, upon request, in an accessible format or with appropriate communication supports.

If the Company is made aware of the need for accommodation due to an Associate's disability, the Associate will be provided with an individualized workplace emergency response plan. If the Associate who receives the individualized workplace emergency response information requires assistance, the Company will provide the workplace emergency response plan to the person designated to provide assistance, upon consent from the Associate.

The Company shall provide the information required under this section as soon as practicable after becoming aware of the need for accommodation due to the individual's disability.

The Company will review the individualized workplace emergency response plans if/when the Associate moves to a different location in the organization, and/or when the Company reviews its general emergency response policies.

FEEDBACK PROCESS

We welcome feedback on this Policy and its implementation, as well as feedback in relation to the Company's provision of accessible customer service. Customer feedback will help us identify barriers and respond to concerns.

Feedback, and requests for information about the Feedback Process, can be made in person, via telephone, e-mail or in writing to:

Human Resources
Worldsource Wealth Management
625 Cochrane Drive, Suite 700
Markham, ON L3R 9R9
Phone: 905-940-5500 | 1-800-287-4869
Email: hr@worldsourcewealth.com

We will respond within seven (7) business days either in writing, in person, by e-mail or telephone acknowledging receipt of feedback and will set out the action to be taken in response to any concerns.

Accessible formats and communications supports with respect to the Feedback Process will be provided upon request. A description of the Feedback Process is available upon request.

DEFINITIONS

“Accessible formats” shall mean formats that are an alternative to standard print and are accessible to people with disabilities. Accessible formats include, but are not limited to, large print, Braille, audio electronic formats such as DVDs, CDs, or accessible PDF documents readable by assistive technology.

“Communications” refers to the interaction between two or more people or entities when information is provided, sent or received.

“Communication supports” shall mean methods to assist communication for people with disabilities who may need to access information. Some examples include plain language formats, sign language, as well as reading out loud, captioning or using written notes to communicate.

“Information” refers to knowledge, data and facts that convey meaning and that exist in any format such as text, audio, digital or images.

“Individualized workplace emergency response information” refers to the information prepared by employers, in consultation with their employees who have disabilities, to help them prepare for emergencies such as fire, severe weather and power outages.

“People with Disabilities” shall mean those individuals who have a disability. “Disability” as defined under the Ontario Human Rights Code is:

- (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 in 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 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.

“Web Content Accessibility Guidelines (WCAG)” is an international standard for making websites and web content accessible to people with a wide range of disabilities.



THE WORLDSOURCE GROUP OF COMPANIES

MULTI-YEAR ACCESSIBILITY PLAN

INTRODUCTION

Worldsource is committed to meeting the objectives and requirements outlined in the *Accessibility for Ontarians with Disabilities Act, 2005* (the “AODA”) and the applicable regulations, and to making our workplace meet the needs of persons with disabilities through the implementation of the requirements of the Act and its applicable regulations.

STATEMENT OF COMMITTEMENT

Worldsource is committed to creating and maintaining an equitable and integrated environment whereby every employee and job applicant receives equal opportunity with respect to employment and receives accommodation where required, in accordance with the provisions of the AODA and the *Integrated Accessibility Standards Regulation (191/11)* (the “IASR”).

Worldsource is committed to providing access to our facilities and delivering excellent customer service to clients and visitors to the firm in a manner that respects the dignity and independence of people with disabilities.

INTEGRATED ACCESSIBILITY STANDARDS REGULATION (“IASR”) – ONTARIO REGULATION 191/11

In accordance with the IASR, the Accessibility Policy was developed to address how Worldsource will achieve accessibility and meet with the requirements of the IASR. The Multi-Year Accessibility Plan was developed in accordance with the regulation and it outlines our strategy to address the current and future accessibility goals.

The Accessibility Policy and Multi-Year Accessibility Plan are available to employees on our Public Folders under Corporate Policy and will be available to the public on the firm’s website at www.worldsourcewealth.com, and can be provided in an accessible format upon request. In accordance with the requirements of the AODA and IASR, Worldsource will report accessibility achievements every 3 years, and will review and update the Multi-Year Accessibility Plan every 5 years.

The regulations applicable to our business, in accordance with the AODA and IASR, are as follows:

- customer service standard;
- workplace emergency response information;
- information and communications;
- training; and,
- employment practices.

CUSTOMER SERVICE STANDARD – ONTARIO REGULATION 429/07

COMMITMENT

Worldsource's Customer Service Standard states Worldsource's commitment to providing access to our facilities and delivering excellent service at all times in a way that respects the dignity and independence of all of our clients and visitors.

ACTIONS TAKEN

The following measures have been implemented by Worldsource:

- Development and distribution of the Accessibility Policy and the AODA Training document which outlines the Customer Service Standard policy. Both of these documents will be available on the firm's public folders and the website;
- Frontline employees who interact directly with clients and visitors are trained and familiar with various assistive devices;
- Clients and visitors who are accompanied by a registered service animal or support person are accommodated and permitted to access areas of our premises open to the public. If clients and visitors are accompanied by a support person, the support person will be accommodated;
- Assistive devices can be provided to clients and visitors who are hearing and visually impaired upon request;
- Notice is provided to clients and visitors with self-disclosed disabilities in the event of a planned or unexpected disruption to services or office facilities. Where possible, we post a notification on Worldsource's website regarding the disruption. The notice includes the reason for the disruption, how long the disruption is expected to last, and a description of any alternative facilities or services available (where applicable);
- Training is provided to all employees on the purpose and requirements of the AODA legislation;
- Worldsource has and will continue to develop feedback processes to respond to inquiries and suggestions by phone, email, mail or in person;
- Worldsource submitted compliance reports to the Province indicating we had addressed the requirements of the Regulation. We continue to ensure compliance with the Customer Service Standard; and
- Training is provided to all employees during the new hire orientation process and on an ongoing basis when changes are made to relevant policies and procedures. Training records are maintained and include the dates of the training and the people trained.

WORKPLACE EMERGENCY RESPONSE INFORMATION

COMMITMENT

Worldsource is committed to providing individualized workplace emergency response information to employees and visitors who have a disability where the nature of the disability is such that accommodation is required.

ACTIONS TAKEN

The following measures have been in place since 2012:

- Completion of a building evacuation form by all employees who are not physically capable of descending the building stairwell in the event of an evacuation. Instructions and procedures have been communicated to individuals who have a disability, as required; and

- Where required and with the disabled individual's prior consent, the individualized workplace emergency response plans are provided to emergency response providers, and to designated employees responsible in emergency situations for the evacuation of the workplace.

INFORMATION AND COMMUNICATION STANDARDS

COMMITTMENT

Worldsource is committed to making company information and feedback processes accessible to people with disabilities.

ACTIONS TAKEN

Feedback, Accessible Formats and Communication Supports

- Feedback processes are accessible by providing or arranging for the provision of, upon request, accessible formats and communication supports. The provision of accessible formats and communication supports to persons with disabilities will be done in a timely manner, taking into account the individual's accessibility needs, and at no extra cost above what is charged to other persons.
- Worldsource will be publishing information regarding the availability of accessible formats and communication supports on the firm's new website.

Accessible Websites and Web Content

- All content on the firm's new website will conform to Web Content Accessibility Guidelines ("WCAG") 2.0, Level A.
- All content on the firm's new website will conform to WCAG 2.0, Level AA.
- Ability to comply with AODA will be incorporated into the selection criteria for vendors for technology, website and software development initiatives.

EMERGENCY PROCEDURE, PLANS OR PUBLIC SAFETY INFORMATION

In the event that Worldsource makes emergency procedures, plans and public safety information available to the public, it will be provided, upon request, in an accessible format or with appropriate communication supports.

TRAINING COMMITMENT

Worldsource is committed to providing training to all firm members and temporary employees who provide services on the firm's behalf with respect to the requirements of the IASR and the Ontario Human Rights Code (the "Code"), as it relates to people with disabilities.

PLANNED ACTION

In accordance with the IASR, Worldsource has:

- Reviewed and determined the appropriate training requirements in the Code and the IASR and establish a format for delivery of training to all employees and temporary employees who provide services on the firm's behalf;
- Ensured that training is provided to all employees and temporary employees who provide services on the firm's behalf as soon as practicable and on any changes to the prescribed policies on an ongoing basis; and

- Maintain a detailed record of the training provided.

EMPLOYMENT PRACTICES

COMMITMENT

Worldsource is committed to providing accessible formats and communication supports with respect to employment practices.

ACTIONS TAKEN

- If an employee is absent from work due to disability and requires accommodation in order to return to work, Human Resources develops an individual accommodation plan for that individual, in consultation with the insurance company (if applicable) and the employee's manager. If necessary we will utilize the expertise of an outside consultant.
- Specify that accommodation is available for applicants with disabilities during the recruitment and selection process.
- Provide information in candidate communications that accommodations are available upon request in relation to the materials or processes to be used.
- Inform applicants about the firm's approach to accessibility and the process to request accommodation due to a disability at the time of the job offer.
- If an employee or new hire with a disability makes a request for accommodation, we will consult with the individual and determine the provision or arrangement of suitable accommodation in a manner that takes into account the applicant's accessibility needs due to a disability.
- Inform current employees and new hires of policies supporting employees with disabilities.
- Review and update, if necessary, our established process for the development of individual accommodation plans for employees with disabilities. When requested by an employee with a disability, consult with the employee to provide or arrange for provision of suitable accessible formats and communication supports needed to perform the employee's job.
- When providing performance management information to an employee with a disability, the firm will take into account the accessibility needs of the employee and as applicable, individual accommodation plans.
- When providing career development information to an employee with a disability, the firm will take into account the accessibility needs of the employee, and as applicable, individual accommodation plans.

For more information on this multi-year accessibility plan, please contact:

Human Resources
Worldsource Wealth Management
625 Cochrane Drive, Suite 700
Markham, ON L3R 9R9
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