

## Gluskin Sheff's Multi-Year Accessibility Plan

Gluskin Sheff believes in equal opportunity and is committed to providing an accessible environment that allows all people to maintain their independence and dignity. As an organization, we respect and uphold the requirements set forth under the Accessibility for Ontarians with Disabilities Act (2005) and its associated Regulations and strive to meet the needs of individuals with disabilities in a timely and effective manner.

Gluskin Sheff has developed the following multi-year action plan to improve opportunities for people with disabilities in accordance with the requirements communicated under the Integrated Accessibility Standards Ontario Regulation 191/11 (IASR).

Part I: GENERAL					
Requirements	Date for Compliance	Action	Status		
Implement and maintain written policies governing how the organization achieves or will achieve accessibility through meeting its requirements in the IASR.  Include a statement of organizational commitment to meet the accessibility needs of persons with disabilities in a timely manner in their policies.	January 2014	Written policies which include an Accessible Employment Standards Policy and a Customer Service Standards policy, as well as Gluskin Sheff's statement of commitment are included in the Human Resources Manual for Employees and Human Resources Manual for Contractors.	Completed		
Prepare a written document describing its policies and make the documents publicly available, and shall provide them in an accessible format upon request.	January 2014	A written document describing Gluskin Sheff's policies developed to meet its requirements under the Integrated Accessibility Standards is available and will be provided in an accessible format upon request.	Completed		
Establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under this Regulation. Post the plan on website. Review and update the accessibility plan at least once every five years.	January 2014	Multi-year accessibility plan is established and will be reviewed as required.	Completed  Next update: January 2019		
Provide and keep records on employee training on the requirements of all accessibility standards and on the Human Rights code as it pertains to persons with disabilities.	January 2015	Employees will complete on-line training. Training is required as part of the on-boarding process for new hires. Training and records are maintained by a 3 <sup>rd</sup> party provider.	In progress and on-going		



Part II: INFORMATION AND COMMUNICATION STANDARDS						
Requirements	Date for	Action	Status			
	Compliance					
Ensure that Gluskin Sheff's feedback process is accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request. Must notify the public about the availability of accessible formats and communication supports.	January 2015	Website includes a statement that accessible formats or communication supports are available upon request.	Completed			
Upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities. Must consult with the person making the request in determining the suitability of an accessible format or communication support.	January 2016	Accessible formats and communication supports will be made available upon request.	As required			
Gluskin Sheff's website and web content to conform with WCAG 2.0 Level AA.	January 2021	The Information Technology Department will work towards completing this requirement by the due date.	Will be completed by 2021			



Part III: EMPLOYMENT STANDARDS				
Requirements	Date for Compliance	Action	Status	
Gluskin Sheff shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes, including in the assessment and selection process.	January 2016	Applicants are notified when called for an interview about the availability of accommodation if required.  Automated response to resume submissions on-line include notification of availability of accommodation. Notification re accommodation is provided on website.	Completed	
Successful applicants are to be notified of Gluskin Sheff's policies for accommodating employees with disabilities.	January 2016	All new hires are directed to the Human Resources Manual which is posted on the Company's internal website and are required to sign an acknowledgement that they have read the policies.	Completed	
Employees to be notified of the Company's policies or any changes to existing policies used to support its employees with disabilities, including policies on the provision of job accommodations that take into	January 2016	All employees have access to the Human Resources Manual which is posted on the internal website.	Completed	
account an employee's accessibility needs due to disability.		When changes are made to any policies, the Human Resources Manual is updated and employees are notified by e-mail.	Completed	
Upon request, consult with and provide employees with information in order to perform their job, or with information that is generally available to employees, in an accessible format or with communication support.	January 2016	Employees will be provided with information upon request in an accessible format or with communication supports to enable them to fulfill the job requirements.	As required	
Provide individual emergency response information to employees with a disability, if it is required, and provide that information, with the employee's consent, to an individual designated to provide assistance.	January 2012	Gluskin Sheff 's Emergency Response Policy includes a process for creating Individual Emergency Response information for those who require it.	As required	
Develop a written process for the development of individual accommodation plans for employees with disabilities.	January 2016	A documented process has been developed that includes the elements required under the regulation.	Completed	
Develop a return to work process for employees who were absent due to a disability and require accommodation in order to return to work.	January 2016	Return to work process is included as part of the sick leave policy.	Completed	
The performance management process and career development and advancement opportunities will take nto account the accessibility needs of employees with disabilities, as well as individual accommodation plans.	January 2016	Performance management and promotion policies have been updated to include consideration of individual accommodation plans and the needs of employees with disabilities.	Completed	
Situations involving redeployment will take into account the accessibility needs of employees with disabilities.	January 2016	In the event of redeployment, accessibility needs of an employee will be taken into consideration.	As required	



Part IV.2: CUSTOMER SERVICE STANDARDS					
Requirements	Date for Compliance	Action	Status		
Gluskin Sheff shall develop implement and maintain policies governing its provision of goods, services or facilities to persons with disabilities.	January 2012	Customer Service Standards policies have been created and included in the Human Resources Manual.	Completed		
The policies must deal with the use of assistive devices.	January 2012	Use of assistive devices is permitted when accessing Gluskin Sheff's services and premises.	Completed		
Allow persons with a disability to enter the premises with a support person, guide dog or service animal.	January 2012	Individuals requiring assistance are permitted entry to Gluskin Sheff's premises accompanied by a support person, guide dog or service animal.	Completed		
Gluskin Sheff shall provide notification of any temporary disruptions to its services, set out steps that will be taken.	January 2012	There is a process in place to notify clients of a temporary disruption in service.	Completed		
All employees and contractors will receive training that includes a review of the Act and requirements under the Customer Service Standards.	July 2016	Employees and contractors have received training. AODA training is required by all new employees and contractors.	Completed and on-going		
Provide on-going training in respect of any changes to Customer Service Standards Policies.	July 2016	Employees and contractors will be retrained if there are any material changes to the policies.	As required		
Maintain records of training, including dates and number of individuals trained.	January 2012	Training records, including numbers and dates, are maintained by a 3 <sup>rd</sup> party provider.	Completed		
Establish a process for receiving and responding to feedback about the manner in which Gluskin Sheff provides services to persons with disabilities, and the actions it will take.	January 2012	The feedback process is included in the Customer Service Standards Policy.	Completed		
Gluskin Sheff shall prepare one or more documents describing these policies and on request shall give a copy to any person in an accessible format or with communication support.	January 2012	Documents describing the Customer Service Standards policies are available. These will be provided in an accessible format upon request.	Completed		
Gluskin Sheff shall notify persons to whom it provides goods, services or facilities that the documents relating to policies in this section are available upon request. This can be done by posting the information at a conspicuous place on the premises, posting it on the website or by other methods deemed reasonable in the circumstances.	July 2016	Clients are informed through communication included in the Investor Guide and Annual Notices.	Completed		