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PURPOSE

To describe the way in which MD Financial Management Inc. and its subsidiaries¹, collectively known as MD Financial Management, provide goods and services, to persons with disabilities, in a way that respects a person’s dignity, independence, integration and equality of opportunity.

MD Financial Management Inc (MDFMI) promotes an atmosphere of mutual trust and respect with all of our stakeholders. We do this because we believe it leads to a higher level of personal and corporate performance that ultimately delivers better outcomes for our clients. Our values are consistent with the principles outlined in the Accessibility for Ontarians with Disabilities Act (otherwise known as AODA) to effectively provide services to people with disabilities. In keeping with our values, MDFMI aims at all times to provide (goods and) services in a way that respects the dignity and independence of people with disabilities.

We honour a person’s dignity by ensuring we provide the same level of service, quality or convenience; regardless of their level or ability.

We honour a person’s wish for independence by respecting a client’s choices and integrate our services to ensure persons with disabilities fully benefit from the same services, in the same place and in the same or similar way as other clients.

We make efforts to ensure persons with disabilities have the same chances, options, benefits and results as others. We offer a variety of means to access our services to help ensure persons with disabilities do not have to make significantly more effort to access or obtain a service.

SCOPE

As noted in our Code of Conduct, we promote an atmosphere of mutual trust and respect; this Policy is a reflection of how we do that while meeting the requirements of the Customer Service Standard². This Policy is a subset of the Code of Conduct and applies to all employees dealing directly with our clients, including former and prospective clients, for the purposes of providing goods or services.

I. DEFINITIONS

- a) Assistive Devices: include a broad range of products such as wheelchairs, walkers, white canes, oxygen tanks, portable chalk boards and electronic communication devices that people may bring to our premises.
- b) Disability: includes physical, mental or developmental disabilities which may or may not be visible or permanent³.
- c) Feedback: clients' comments regarding the manner in which we provide goods or services to persons with disabilities.

II. ROLES AND RESPONSIBILITIES

- a) The Executive Vice President Member Experience, or his or her delegate, is responsible for ensuring all clients are treated in a manner that meets the expectations of the Policy. This responsibility includes:
 - 1. Providing training to all applicable employees;
 - 2. Ensuring offices are located in accessible structures, or that alternate locations are provided to clients for meetings;
 - 3. Reviewing all feedback provided by clients about the way we provide goods and services; and,
 - 4. Providing notice of temporary disruptions of services.
- b) The Vice President Compliance, Legal and Registrations, or his or her delegate, is responsible for creating, maintaining and reporting on this Policy.
- c) The Executive Vice President Member Solutions, or his or her delegate, is responsible for ensuring communication pieces produced meet the expectations of this Policy.

III. COMMUNICATIONS

MD Financial Management offers products and services through four channels of communication; these are: voice, mail, face-to-face and electronic. When communicating with a person with a disability, we will communicate in a manner that takes into account the person's disability. We will offer to communicate with clients by the method best suited to their communication needs.

a) Advertising

- 1. When creating or updating communications to clients whose purpose is to offer goods or services, Member Solutions documents how they meet the requirements of this Policy.
- 2. The format in which they are produced may dictate how flexible the communications can be. In cases where the communication cannot be offered in an alternate format, Member Solutions documents how the client can obtain the information through an alternate channel.

b) Telephone Services

Where service by telephone is not accessible for our clients, we offer alternate channels such as a TTY line, a web-facing or face-to-face meeting.

c) Assistive Devices

We will allow (as technology permits) individuals with disabilities the use of their assistive devices to obtain, use or benefit from our services. Where an individual with a disability is unable to access our services through the use of their own personal assistive device, we will assess service delivery and potential service options to meet the needs of the individual client.

d) Billing and Statements

- 1. Where possible documentation required for the purposes of maintaining a client's account will be provided in an alternate format upon request.
- 2. Explanations necessary are provided by use of the four channels of communication upon request.

IV. USE OF SERVICE ANIMALS AND SUPPORT PERSONS

- a) Persons with disabilities who are accompanied by a service animal will be permitted to enter parts of our premises that are common areas and to keep the animal with them, unless the animal is otherwise excluded by law or for any other reason (health of the occupants) from the premises. If the animal is legally excluded from some parts of the premises, alternative measures to enable the person to obtain, use or benefit from its services will be made available.
- b) A person with a disability who is accompanied by a support person will be allowed to enter MDFMI's premises together with the support person and will not be prevented from having access to the support person while on our premises.

V. FEEDBACK

- a) Feedback regarding the way the MDFMI provides goods and services to people with disabilities can be made through any medium in which MD Financial Management is engaged.
- b) All feedback addressing issues or concerns is treated as a complaint and is dealt with through the standard complaint procedures.
- c) Information about how to give feedback is maintained on all websites.

VI. NOTICE OF TEMPORARY DISRUPTION

- a) MDFMI will provide clients with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available. The notice will be posted on the premises, where appropriate in the circumstances.
- b) Where the website is not working notification is posted to the website as soon as possible.
- c) Where the phone lines are not working the calls are re-routed or a message is engaged to inform the caller of the disruption.

VII. TRAINING

- a) All members of staff who provide services and all those involved in the development and approvals of customer service policies, practices and procedures will be provided training about the provision of services to persons with disabilities. Training will be updated as needed
- b) Training includes informing employees of their responsibility to meet the expectations of this policy will include :
 - ◆ Purpose and requirements of Act
 - ◆ Tips for serving clients with disabilities
 - ◆ Definitions of Assistive devices, Support persons and Service animals
 - ◆ Feedback mechanism
 - ◆ Link to resources and more detailed courses

VIII. ENFORCEMENT

A breach of this Policy is considered a breach of the Code of Conduct.

IX. EXCEPTIONS

Exceptions to this Policy may only be granted by the Executive Vice President of Member Experience or his or her delegate.

X. RECORD RETENTION

Unless otherwise stated, records are kept for 7 years from the date of publication.

XI. IMPACTING REGULATIONS

Canadian Human Rights Act (R.S.C., 1985, c. H-6)

Accessibility for Ontarians with Disabilities Act, 2005

Accessibility Standards for Customer Service, Ontario Regulation 429/07

¹ As of the date of publication, these are: MD Management Limited, MD Private Trust Company, MD Life Insurance Company, and MD Insurance Agency Limited

² Accessibility Standards for Customer Service, Ontario Regulation 429/07

³ 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 on 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, or,

d) A mental disorder.

e) The definition includes disabilities of different severity, visible as well as non-visible disabilities, and disabilities the effects of which may come and go.