

# Accessibility Policy & Practice

Version 7 – October 2023

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## Table of Contents

Summary & Commitment .....	3
Training .....	4
Employment.....	5
Devices and Alternative Formats.....	6
Design of Public Spaces.....	7
Accessibility and Multi-Year Plan .....	8
Client & Employee Feedback .....	10

## Summary & Commitment

The Accessibility for Ontarians with Disabilities Act is a law that was passed by the province of Ontario which allows the government to develop and enforce specific standards for accessibility. The standards are intended to achieve accessibility for people with disabilities in the areas of customer service, transportation, the built environment, information and communication, and employment. The Customer Service Regulation establishes accessibility standards for the provision of goods and services and applies to private sector organizations as of January 1, 2012.

**Richardson Wealth and RF Capital Group** are committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting requirements under the Accessibility for Ontarians with Disabilities Act.

**Richardson Wealth and RF Capital Group** are also committed to applying the same standard throughout its offices and websites across Canada.

**Richardson Wealth and RF Capital Group** have developed a Multi-Year Plan that describes how it intends over time to become a more accessible organization and sets forth the principles of how it provides service and otherwise interacts with people with disabilities. This plan will be posted on the company website, reviewed and updated periodically by the Committee.

## Training

**Richardson Wealth and RF Capital Group** provide mandatory training to their employees and Managers in Ontario upon hire on the accessibility laws and the Human Rights Code to increase awareness and encourage respect for the core principles of independence, dignity, integration and equality of opportunity for people with disabilities.

Training is provided in a way that best suits the duties of the employees.

The training focuses on the following topics:

- The purpose and requirements of the Accessibility Act
- How to interact and communicate with people with various types of disabilities
- The purpose of assistive devices and how to interact with people who use them
- The purpose of service animals and how to interact with people who use them
- The purpose of support persons and how to interact with people who are accompanied by a support person
- What to do if a person with a disability is having difficulty accessing Richardson Wealth and RF Capital Group.

Training content shall be updated as the result of any AODA or policy changes, and shall be provided to employees.

Employees are required to read the Richardson Wealth and RF Capital Group policies, practices and procedures in addition to any other internal documents on accessibility.

**Richardson Wealth and RF Capital Group** keep a record of all training provided under the Act, including the dates on which the training was provided and the individuals who received the training.

## Employment

**Richardson Wealth and RF Capital Group** are committed to fair and accessible employment practices and will continue take steps to notify applicants and employees that accommodations are available upon request to people with disabilities. These practices are available during recruitment, selection and assessment process and for the duration of their employment.

**Richardson Wealth and RF Capital Group** have a process in place for individual accommodation plans and return-to-work policies for employees that have been absent due to a disability and will work with the employee to meet their needs upon their return.

Steps will be taken to ensure accessibility needs of employees with disabilities are taken into account during performance management, career development and redeployment processes.

Upon request, employees with disabilities will have an individual accommodation plan developed by Human Resources in consultation with the employee.

## Devices and Alternative Formats

Richardson Wealth and RF Capital Group will provide any document in an accessible format or with communication support, on request. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and, at no additional cost.

Individuals to whom Richardson Wealth and RF Capital Group provide services may need to do so with the use of assistive devices such as communication aids, cognition aids, personal mobility aids and medical aids.

These assistive devices may include:

- Manual and motorized wheelchairs
- Canes, crutches and walkers
- White canes
- Hearing aids
- Magnifiers
- Oxygen tanks
- Electronic communication devices

Availability of assistive devices:

**Richardson Wealth and RF Capital Group** strive to enable people with disabilities to benefit from the same quality of service as other customers. Physically-accessible areas of Richardson Wealth and RF Capital Group premises include the following assistive devices, as appropriate:

- Automatic door openers
- Elevator or ramp
- Accessible washrooms
- Websites
- TTY telephony

## Design of Public Spaces

**Richardson Wealth and RF Capital Group** will put plans and procedures in place for ensuring the accessibility of public spaces in the organization. Steps will be taken to regularly inspect and repair any features that facilitate accessibility, such as ramps, elevators, automatic doors, signage, etc. The procedures will also cover emergency situations, such as power outages, fire alarms, evacuations, lockdowns, alternative access routes and assisting people with disabilities in these scenarios.

In the event of a disruption or breakdown of any accessible element, Richardson Wealth and RF Capital Group will notify the public promptly of the status of the accessible elements, reason for the disruption, the expected duration of any disruptions and provide alternative solutions or accommodations as needed. It will make every effort to restore the accessible element as quickly as possible, and to minimize the inconvenience to the customers and visitors.

**Richardson Wealth and RF Capital Group** along with each location building management will meet the standards for the design of public spaces when building or making major modifications to public spaces. It will put procedures in place to prevent disruptions to its accessible parts of its public spaces. In the event of disruption, Richardson Wealth and RF Capital Group will notify the public of this disruption.

These procedures will be in conjunction with building management practices as they comply with the Act.

Public spaces include:

- Outdoor paths of travel such as sidewalks, ramps, stairs, rest areas
- Parking lot or garage
- Reception areas
  - Washrooms

## Accessibility and Multi-Year Plan

**Richardson Wealth and RF Capital Group** have established an internal accessibility committee which is composed of members from various departments of the company and is responsible for coordinating efforts to ensure that it is compliant with its obligations under the AODA. This committee also works to inspire leadership through the services provided including:

- Helping with accessibility related issues both with internal employees and external clients, vendors, etc.
- Supporting and promoting accessibility tools and guides
- Supporting or coordinating other initiatives
- Developing accessibility standards and practices

<b>Integrated Accessibility Standard Regulation – General Requirements</b>			
<b>Requirement</b>	<b>Compliance Date</b>	<b>Actions</b>	<b>Status</b>
<p><b>Accessible Customer Service</b></p> <ul style="list-style-type: none"> <li>• Welcome service animals and support persons</li> <li>• Put an accessibility policy in place for employees, vendors, clients so they can know what to expect</li> </ul> <p><b>Provide accessible emergency and public information when asked</b></p> <ul style="list-style-type: none"> <li>• Evacuation plans or brochures</li> </ul> <p><b>Provide employees with disabilities emergency information</b></p> <ul style="list-style-type: none"> <li>• Provide employees with disabilities accessible and customized emergency information</li> </ul>	January 1, 2012	<ul style="list-style-type: none"> <li>•</li> </ul>	Completed
<p><b>Accessibility Policy</b></p> <ul style="list-style-type: none"> <li>• Develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting the application legislative requirements</li> <li>• Make policy publicly accessible</li> </ul>	January 1, 2014	<ul style="list-style-type: none"> <li>• Create policy</li> <li>• Publish on website</li> <li>• Provide contact information in accessible formats</li> </ul>	Completed
<p><b>Accessibility Plan</b></p> <ul style="list-style-type: none"> <li>• Create multi-year plan</li> <li>• Post multi-year plan on the internal and external websites</li> <li>• Maintain plan</li> <li>• Review plan every 5 years</li> <li>• Provide plan in accessible formats upon request</li> </ul>	January 2014	<ul style="list-style-type: none"> <li>• Develop, implement and maintain plan</li> <li>• Publish on Richardson Wealth and RF Capital Group internal and external websites</li> <li>• Report on status of plan annually</li> <li>• Review plan every 5 years</li> </ul>	Completed



<ul style="list-style-type: none"> <li>• Prepare an annual status report on the progress against the plan and post on website</li> </ul>			
<p><b>Training</b></p> <ul style="list-style-type: none"> <li>• How to interact with colleagues and clients with disabilities</li> <li>• Requirements of the customer service standard and AODA Act</li> <li>• Organization’s policy</li> <li>• How to use equipment and devices available</li> <li>• New hire</li> <li>• Changes to the accessible customer service policies</li> <li>• Tracking of completed training</li> <li>• Human Rights Code</li> <li>• Areas of standards that are relevant to work responsibilities</li> <li>• Public areas</li> </ul>	January 1, 2015	<ul style="list-style-type: none"> <li>• Develop training program for employees on:                             <ul style="list-style-type: none"> <li>• General AODA requirements</li> <li>• Information and communication standards in relation to their role and responsibilities</li> <li>• Maintain record of training provided with dates and number of individuals trained</li> </ul> </li> </ul>	Completed
<p><b>Accessibility Compliance Reporting</b></p>	December 31, 2014	<ul style="list-style-type: none"> <li>• File compliance report</li> </ul>	Completed
<p><b>Websites</b></p> <p>New websites, web content and web-based applications must conform to WWW Consortium Web Content Accessibility Guidelines per the following:</p> <ul style="list-style-type: none"> <li>• By January 1, 2014, all new websites and web content on those sites must conform with WCAG 2.0 Level A, except where not practicable</li> <li>• By January 1, 2021, all websites, web content and web-based applications must be WCAG 2.0 Level AA, except where not practicable</li> </ul>	<p>January 1, 2014</p> <p>January 1, 2021 *extended to Jun 30 - 21</p>	<ul style="list-style-type: none"> <li>• Make websites accessible</li> <li>• Apply criteria and requirements to all websites and web content</li> </ul>	<p>Completed</p> <p>Completed</p>
<p><b>Public Spaces</b></p> <ul style="list-style-type: none"> <li>• Parking</li> <li>• Service counters</li> <li>• Waiting areas</li> <li>• Accessible washrooms</li> </ul>	January 1, 2017	<ul style="list-style-type: none"> <li>• Assess needs of each location</li> <li>• Work with building management to ensure all areas are accessible for individuals with disabilities</li> <li>• Redevelop areas wherever necessary</li> </ul>	Ongoing
<p><b>Accessibility Compliance Reporting</b></p>	December 31, 2017	<ul style="list-style-type: none"> <li>• File accessibility compliance report</li> </ul>	Completed
<p><b>Accessibility Compliance Reporting</b></p>	December 31, 2020	<ul style="list-style-type: none"> <li>• File accessibility compliance report</li> </ul>	Completed
<p><b>Accessibility Compliance Reporting</b></p>	December 31, 2023	<ul style="list-style-type: none"> <li>• File accessibility compliance report</li> </ul>	Completed

## Client & Employee Feedback

**Richardson Wealth and RF Capital Group** aim to meet service delivery expectations for all of its clients and employees, including those with disabilities. Our organization welcomes feedback on how client and employee expectations are being met and uses it as an opportunity to improve.

**Richardson Wealth and RF Capital Group** recognize that people with disabilities may use different methods to communicate their feedback. Clients who wish to provide feedback on the way it services people with disabilities can do so in a variety of formats including:

**By mail**            Accessibility Officer  
Richardson Wealth Limited  
145 King Street West  
Suite 500  
Toronto, ON M5H 1J8

**By email**         [Accessibility@RichardsonWealth.com](mailto:Accessibility@RichardsonWealth.com)

Clients providing feedback should include the following information:

- Time and date of event
- Feedback concerning event
- Service being accessed
- Personnel involved
- Additional comments
- Contact information (should the person wish to be contacted)

Feedback will be reviewed and appropriate action, if any, will be developed and implemented.