



# P102B – Accessible Client Service Policy

Owner:	Chief Compliance Officer
Custodian:	Chief Compliance Officer
Implemented:	December 2011
Reviewed:	December 18, 2017
Revised:	December 18, 2017

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**Policy Effective Date:** December 18, 2017

## Policy Statement

The Accessible Client Service Policy and Plan (the “Policy”) describes the commitment of IFDS Canada and IFDS LP (collectively “IFDS”) relating to the provision of goods and services to clients, client representatives and other third parties with disabilities. A Multi-Year Accessibility Plan is in place and is available upon request. From time to time, IFDS may implement additional policies, practices and/or procedures in this regard, including those contained in client service training materials. All such additional policies, practices and procedures will be consistent with this Policy.

## Scope

This Policy applies to IFDS Canada and IFDS LP and its content is posted to the IFDS Canada website.

## Policy Details

IFDS is committed to achieving excellence in client service and understands that client relationships are the key to IFDS’ business.

As part of the overall policy to provide excellent client service, IFDS is committed to providing goods and services to clients and client representatives with disabilities in an accessible manner, and in a way that respects the dignity and independence of those individuals. Individuals with disabilities should have an equal opportunity to access, use and benefit from IFDS’ goods and services.

## Application

The Policy has been adopted in compliance with the Integrated Accessibility Standards Regulation made under the Accessibility for Ontarians with Disabilities Act, 2005. IFDS is committed to meeting its obligations with this and all other similar laws that are applicable to its operations.

All other IFDS’ policies and procedures will be interpreted in a manner that is consistent with this Policy and that promotes the dignity, independence, integration and equality of opportunity for individuals with disabilities.

### 1. Accessible Communications

IFDS will communicate with individuals with disabilities in a manner that takes into account their disability. IFDS communicates with clients and client representatives and our employees in a variety of ways, including face to face interactions, letters, telephone calls and electronic/systems communications.

In determining the appropriate method and form of communication, an individual's accessibility needs resulting from disability will be taken into account

In order to meet its obligations under the Policy and applicable laws, IFDS will consider communications and interactions required throughout the entire client relationship, including through the following stages: marketing; sales; transacting; servicing; and closing.

Clients, client representatives and other third parties are encouraged to identify accessibility needs in communicating and interacting with IFDS.

## 2. Service Animals

IFDS welcomes all individuals with disabilities who are accompanied by a service animal to those portions of our premises that are open to the public or such other areas as may be necessary in the circumstances. At no time will a person with a disability who is accompanied by a service animal be prevented from having access to his/her service animal while on our premises.

## 3. Support Persons

An individual with a disability who is accompanied by a support person will be allowed to have that support person accompany them to those portions of IFDS' premises that are open to the public or such other areas as may be necessary in the circumstances. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his/her support person while on our premises. There will be no fees associated with support persons accompanying individuals with disabilities.

IFDS may, in certain circumstances, require an individual with a disability to be accompanied by a support person for the health or safety of the individual with a disability or others on the premises. Prior to making such a decision, IFDS will consult with the individual with the disability to understand his/her needs, review and consider health or safety reasons based on available evidence, and determine whether there are other available alternatives to protect the health or safety of the individual or others on the premises.

To the extent possible, individuals will be advised in advance of any requirement for a support person to sign confidentiality agreements or other similar documents.

## 4. Assistive Devices

Clients, client representatives and other individuals with disabilities may use their own assistive devices to access IFDS' goods and services and premises. To the extent required, IFDS will provide its staff with training to become familiar with various assistive devices that may be used by individuals when accessing IFDS' services and premises.

## 5. Notice of Temporary Disruptions

In the event of a planned or unexpected disruption to services or facilities to be used by individuals with disabilities to access goods or services (for example, elevators located at our premises), IFDS will notify individuals of the disruption promptly. The notice will advise individuals the reason for the disruption, its anticipated duration and will provide a description of alternative facilities or services, if available.

The notice will be posted and/or communicated to individuals with disabilities in a manner that is reasonable in the circumstances.

## 6. Training of Staff

IFDS will provide all of its employees who deal with the public or others who deal with the public on its behalf, and those who are involved in the development and approval of client service policies, practices and procedures, with annual training. New employees will complete the training within a reasonable time after commencement of employment. Records of all training (identity of trainee, nature of training and date trained) will be maintained.

In general terms, such training will include the following components:

- an overview of applicable laws related to the provision of goods and services to individuals with disabilities;
- an overview of the Policy, the IFDS' Multi-Year Accessibility Plan and any other practices, policies or procedures developed by IFDS Canada with respect to the provision of goods and services to individuals with disabilities;
- information regarding how to interact and communicate with individuals with various types of disabilities, including interaction with individuals who use assistive devices, support persons or service animals;
- how to use any assistive devices, including TTY, that IFDS may have available to assist individuals with disabilities to access our goods and services; and
- what to do if an individual with a disability is having difficulty accessing IFDS Canada's goods and services.

Training will also be provided as soon as practicable following material changes to the Policy or other related policies, practices or procedures.

IFDS' third party service providers will likewise be required to provide appropriate training to their staff involved with IFDS' clients.

## 7. Feedback Process

Clients, client representatives and other third parties who wish to provide feedback on the way IFDS provides goods and services to individuals with disabilities can do so by contacting IFDS, using the contact information set out below. Individuals are also encouraged to speak to their regular IFDS' contacts regarding any questions or concerns. So that the feedback process is accessible to individuals with disabilities, on request, accessible formats, and/or communication supports will be provided or arranged.

Feedback regarding the way IFDS provided services to people with disabilities can be provided by Fax, email, in writing or verbally.

IFDS Entities	By Mail:	By Email, Fax & Telephone
IFDS Canada IFDS Limited Partnership	International Financial Data Services (Canada) Ltd. Attention: Chief Compliance Officer 30 Adelaide Street East - Suite 1 Toronto, Ontario M5C 3G6	Email: <a href="mailto:dgregoris@ifdsgroup.com">dgregoris@ifdsgroup.com</a>  FAX: 416-240-1021  Phone: 416-506-8012

Any feedback, including complaints requiring a response will be handled by IFDS in accordance with the regular feedback management process. Individuals can generally expect a response or preliminary response to their feedback (if required) within 15 days of receipt of the feedback by IFDS.

## Policy Administration

This Policy is maintained by the Compliance departments of each IFDS entity and will be reviewed and updated, where necessary, and approved on an annual basis. Any changes to, or exceptions from this Policy require the approval of the respective IFDS' Board or equivalent. No changes will be made to this policy before considering the impact on people with disabilities.

A copy of the Policy will be provided to individuals requesting it, in an accessible format if required. The Policy is also available on the IFDS Canada website.

Modification Date	Resultant Version	Change Description	Reviewer
December 2011	1.0	Implementation	Compliance Department
November 26, 2014	1.1	Reviewed content only	Compliance Department
March 2011	1.2	Review and revision	Compliance Department
December 15, 2017	2.0	Legal Review	Legal Counsel
December 18, 2017	2.1	Number provision, style update	Compliance Department