

Stifel Nicolaus Canada Inc. (“Stifel”) is committed to excellence in serving all clients, including persons with disabilities.

### **PURPOSE:**

The purpose of this policy is to outline the practices and procedures approved by Stifel in order to meet employer obligations under the *Accessibility for Ontarians with Disabilities Act, 2005* and its regulation, the Integrated Accessibility Standards (collectively, the “AODA”).

### **DEFINITIONS:**

Terms in this policy shall have the defined meaning set out in the AODA.

**‘Accessibility’** means the design of products, devices, services, or environments that enable people with disabilities with the similar ease of access as would be designed for people with no disabilities.

**‘Accessibility Standards’** means laws and regulations that individuals, government, businesses, nonprofits and public sector organizations in Canada must follow in order to become more accessible, this includes but not limited to, setting policies, practices, timelines or other requirements for the identification and removal of barriers with respect to goods, services, facilities, accommodation, employment, buildings, structures, premises or such other things as may be prescribed, and for the prevention of the erection of such barriers in order to improve accessibility for people with disabilities. Without limiting the foregoing, this means requirements under the AODA.

**‘Disability’** means a physical or mental condition that limits a person’s movements, senses, or activities, or other meaning under applicable legislation.

### **KEY PRINCIPLES:**

(a) treat employees, job applicants, clients and other members of the public requiring access to Stifel Toronto premises, products, services and information equitably, fairly and in a way that allows them to maintain their dignity and independence; and

(b) provide an accessible work environment, products and services and information that meet the needs of people with Disabilities. Stifel strives to meet the needs of people with disabilities and to treat all people in a way that allows them to maintain their dignity and independence and believes its workforce should reflect the diversity of the communities in which it operates.

### **TRAINING:**

Stifel will provide training to all Ontario employees, persons who participate in developing Stifel’s policies, and all other persons who provide goods, services or facilities on behalf of Stifel, on this Policy, the Accessibility Standards, and the Ontario *Human Rights Code*, as appropriate in the circumstance.

Employees will be trained as soon as practical following their date of hire, no more than six (6) months after their start date, as well as on an ongoing basis as changes occur to applicable policies, procedures and practices. Stifel HR will keep records of all training sessions.

All documents required by Accessibility Standards for Customer Service are available upon request, subject to privacy protection laws. When providing such documents to a person with a disability, Stifel will provide

the document, or the information contained in the document, in an accessible format that takes into consideration the person's disability.

### **ROLES AND KEY RESPONSIBILITIES:**

Stifel employees have the responsibility to:

- a) disclose any accommodation needs (physical and/or mental), including if assistance of any kind is required in the event of an emergency; and
- b) familiarize themselves with, and abide by this Policy, Stifel Canada Code of Business Conduct and Ethics Policy and Workplace Conduct Policy to ensure that they work in a manner that maintains a safe workplace.

Stifel managers have the responsibility to:

- a) play an active role in the accommodation process, including, but not limited to, speaking with an employee or potential employee on whether accommodation is required; and working with HR to develop an accommodation plan for someone who is in need of accommodation; and
- b) communicate the accommodation plan to other Stifel employees who may be impacted by the plan, on an 'as needed' basis without disclosing confidential information on the Stifel employee, except as necessary or as required by law.

Stifel HR have the responsibility to:

- a) advise and train employees on the requirements of this Policy;
- b) develop and update employees' accommodation plans as appropriate, together with the manager or in partnership with an external organization that assesses the employee's accessibility needs and advises on the best approach to ensure needs are met;
- c) ensure that job applicants with disabilities are advised of the availability of accommodations and that any accommodation requests are appropriately addressed.

### **RECRUITMENT AND HIRING:**

In our recruitment processes, Stifel will advise our employees and the public about the availability of accommodation for applicants with disabilities. Stifel will notify job applicants, when they are individually selected that accommodations are available upon request in relation to the materials or processes to be used and will work with the applicant to address any requests for accommodation up to the point of undue hardship.

### **INFORMING EMPLOYEES OF SUPPORTS:**

We will notify our employees of Stifel's policies (and any updates to those policies) for supporting employees with disabilities, including our policies regarding the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new hires as soon as practicable after they commence employment.

### **WORKPLACE EMERGENCY RESPONSE INFORMATION:**

Stifel will provide individualized workplace emergency response information to employees with disabilities where the disability is such that individualized information is necessary and Stifel is aware of the need for accommodation. Where an employee who receives individualized workplace emergency response information requires assistance, Stifel will designate a person to provide assistance and, with the employee's consent, Stifel will provide the workplace emergency response information to such person.

## **INDIVIDUAL ACCOMMODATION PLAN:**

Stifel employees requesting accommodations (physical and/or mental) have the responsibility to:

- a) disclose the nature of the limitation or need and what, if any, assistance is required in the event of an emergency;
- b) disclose any concerns that could potentially impair their ability to function at work;
- c) engage with their manager or JHSC, and/or HR so that a customized accommodation plan can be put in place to ensure health and safety in the workplace;
- d) actively monitor their accommodation plan and report if at any time there is any change; and
- e) actively participate and collaborate in the search for accommodation solutions, which may include providing additional documentation relating to their accommodation

## **RETURN TO WORK PROCESS:**

Stifel will develop and maintain a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work. The return to work process will, as part of the process, outline the steps that Stifel will take to facilitate the return to work and will include documented individual accommodation plans. We note that this return to work process will not replace or override any other return to work process created by or under any other statute (for example, the *Workplace Safety Insurance Act, 1997*).

## **PERFORMANCE MANAGEMENT, CAREER DEVELOPMENT AND ADVANCEMENT & REDEPLOYMENT:**

Stifel will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.

## **CUSTOMER SERVICE:**

### Assistive Devices

Stifel will ensure that its employees are fully trained and familiar with various assistive devices that may be used by clients with disabilities while accessing Stifel's services.

A person with a disability may enter any part of Stifel's premises that is open to the public with an assistive device unless such assistive device is not allowed by law, or cannot otherwise be accommodated. If the assistive device is not allowed or cannot be accommodated, the person will be advised and alternate options will be explored.

### Communication

Stifel employees shall communicate with persons with disabilities in ways that take into account their disability when necessary.

### Service Animals

Stifel welcomes persons with disabilities and their service animals. Service animals are allowed on those parts of Stifel's premises that are open to the public and not otherwise excluded by law from the premises. It should be noted that it is the responsibility of the person with a disability to ensure that his or her service animal is kept in control at all times.

### Support Persons

A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on Stifel's premises.

Depending on the nature of the service being provided, for the benefit of the person with the disability, Stifel may require the support person to sign a Confidentiality Agreement, agreeing not

to disclose any information or documents obtained in his or her role as a support person to any third parties without the written consent of Stifel.

#### Notice of Temporary Disruption

In the event of a planned or unexpected disruption to services or facilities for clients with disabilities at Stifel's location, clients will be notified by the posting of a notice at the Stifel premises, which will include information about the reason for the disruption, its anticipated length of time and a description of alternative facilities or services, if available.

#### **AODA COMPLIANCE REPORT:**

Every three years, the HR team assesses compliance with the Accessibility Standards and submits a compliance report to the Ontario government in a timely manner.

#### **FEEDBACK:**

Feedback about the delivery of services to persons with disabilities may be given in confidence by telephone, in person, in writing, in electronic format or through other methods.

Stifel will continue to ensure that our processes for receiving and responding to feedback are accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communications supports, upon request.

#### **Mail or deliver to:**

Stifel Nicolaus Canada Inc.  
Attn: Human Resources  
3800 – 161 Bay Street  
Toronto, ON  
M5J 2S1

#### **Call to:**

416-367-8600

#### **E-mail to:**

[SNCHR@stifel.com](mailto:SNCHR@stifel.com)

#### **EMERGENCY PROCEDURE, PLANS, OR PUBLIC SAFETY INFORMATION:**

Stifel does not currently have emergency response procedures, plans and public safety information that it makes available to the public in Ontario. In the event that we do make such information available in the future, Stifel will, upon request, provide or arrange for accessible formats and communication supports for persons with disabilities in a timely manner that takes into account each person's accessibility needs due to disability and (if applicable) at a cost that is no more than the regular cost charged to other persons. Stifel will consult with the person making the request when determining the suitability of an accessible format or communication support.