

ACCESSIBILITY PLAN

FOR PEOPLE WITH DISABILITIES

The Raymond James **Accessibility Plan** is a multi-year road map that describes how we have and will continue to become a more accessible organization for people with disabilities.

The Plan was developed and will be reviewed and updated at least every 5 years in a consultative process with key internal stakeholders. With the establishment of the firm's National Inclusion Council in 2020, the Plan reviews will be informed by the Council's feedback on the needs of people with disabilities.

The Plan is posted on the Raymond James Ltd. corporate website. Publishing date: May 2021.

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COMMITMENT

Raymond James is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in inclusion 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.

The firm is committed to applying accessibility standards throughout our offices and websites across Canada in support of inclusion, diversity and dignity in all our dealings.

Raymond James is committed to providing clients with disabilities the opportunity to access our products and services in a professional environment that promotes barrier-free access. In order to ensure we provide equal access for all clients, Raymond James has established an Access for Clients with Disabilities policy.

Our human resources practices explicitly consider and respond to accessibility needs for candidates and for employees in the workplace, including recruitment, accommodation, performance management, career development and return-to-work practices. The following summarizes accessibility requirements, and the firm's related policies.

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INTRODUCTION

ABOUT ACCESSIBILITY

Accessibility refers to the systems and processes which enable people with disabilities to access client service and employment opportunities. The purpose of accessibility is to address systemic discrimination that excludes or limits access to opportunities.

LEGISLATION

The *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) became law on June 13, 2005. Under this legislation, the government of Ontario has developed mandatory accessibility standards that identify, remove, and prevent barriers for people with disabilities. There are a series of compliance deadlines for accessibility standards. The standards are intended to achieve accessibility for people with disabilities in the areas of customer service, information and communication, employment, the built environment, and transportation.

While the AODA legislation is specific to Ontario, the practices are applicable nationally.

Employees are integral to identifying barriers to accessibility and helping to guide solutions to prevent or remove them. Client and employee feedback is welcomed and appreciated.

WHAT IS A DISABILITY

“Disability” covers a broad range and degree of conditions, visible or not. A disability may have been present from birth, caused by an accident or developed over time. There are physical, mental and learning disabilities, hearing or vision disabilities, drug and alcohol dependencies, environmental sensitivities and many other conditions.

ACCESSIBILITY TEAM

Raymond James Ltd. has an accessibility initiative team, composed of representatives from various departments across the company, including human resources, compliance, communications, web services, facilities and client service leadership. The team is responsible for coordinating efforts to ensure that the firm is compliant with its obligations, and works to inspire inclusive services. Responsibilities include:

1. Developing accessibility standards, policy and practices;
2. Supporting and promoting accessibility initiatives, tools and guides;
3. Responding to feedback on accessibility related issues; and
4. Complying with regulatory filing requirements.

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CLIENT SERVICE

Under the AODA legislation, the **Customer Service Standard** mandates that service providers must find ways to remove barriers that prevent customers with disabilities from accessing the services they need. All people deserve to be able to access goods, services, and facilities in ways that respect their independence and their dignity.

CLIENT FIRST

We're dedicated to the interests of our clients, offering them the professional guidance they need to help meet their financial goals and safeguard their future and the future of their families. Client needs drive everything we do.

Our clients reflect the diversity of all Canadians, at all life stages. We often service individuals (and their families and their representatives) with complex conditions and disabilities. In each situation, we navigate individual preferences, and sometimes legal matters such as Power of Attorney (POA) or trust and estate needs, with care.

Foundational [principles](#) of our service approach for all clients are:

- Our clients' needs always come first
- We will provide the highest level of service and integrity
- Assisting our clients in attaining their financial objectives is our business
- We will communicate with our clients clearly and frequently

CLIENT ACCESSIBILITY POLICY

The Raymond James **Client Accessibility Policy** – our accessibility Customer Service Standard – was first introduced in 2012. The policy provides guidance, resources and recommendations on accessibility, with the key aim to focus initially on how the client would prefer to engage and be served. Our approach presumes each person is unique with individual preferences, thus our goal is to be open and as flexible as possible to approaches customized to the individual.

With the launch of the client policy, **Accessible Customer Service** training for all employees in Ontario and managers across the country was instituted. New employees in Ontario were required to complete the training within 90 days of hire, and all records of training are maintained throughout the duration of employment.

ENHANCEMENTS TO CLIENT ACCESSIBILITY PRACTICES

In 2016, Raymond James reviewed the Client Accessibility Policy and determined no changes were needed at that time as it met the provisions of the Customer Service Standard. Concurrently, Accessible Customer Service training became required learning for all associates upon joining the firm anywhere in Canada. All new employees are required to complete the training within 90 days of hire.

By 2021, the Client Accessibility Policy resources and some content had become outdated. In May 2021, the policy was reviewed and updated to reflect a unified firm-wide commitment and to integrate accessibility formats and reference tools.

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INFORMATION AND COMMUNICATION STANDARDS

According to legislation, organizations must be ready to provide **information and communications** in accessible formats and with communication supports to individuals with disabilities (in a timely manner and at a cost equal to the regular cost charged to others) upon request.

FEEDBACK

CLIENT FEEDBACK

Raymond James aims to meet expectations of 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 the feedback as an opportunity to improve.

We understand that some people with disabilities may use different methods to communicate their feedback. Clients who wish to provide feedback on the way we support people with disabilities can do so in a variety of formats including:

Toll Free Number	1-888-299-0209
Mail	Raymond James Ltd. Attn: Compliance Department - Designated Complaints Officer Suite 2100 - 925 West Georgia Street Vancouver BC V6C 3L2
Email	clientconcerns@raymondjames.ca
Fax	Our fax number is: (604) 654-7238 Attn: Compliance Department - Designated Complaints Officer

CANDIDATE AND EMPLOYEE FEEDBACK

Raymond James Ltd. is committed to accessibility for all applicants and employees. We recognize the value of a diverse workforce and appreciate the unique skills and special contributions of each person. We are committed to accessibility for candidates through all stages of the recruitment process and welcome employee to seek support throughout their career with RJL.

Applicants who need accommodation are welcome to contact Human Resources via email at resumes@raymondjames.ca.

Employees who need accommodation are encouraged to discuss their needs with their manager or contact Human Resources for assistance.

FORMATS, SUPPORT AND EMERGENCY PROCEDURES

The Client Service and Employment practices provide for a range of supports including practices that apply in the event of emergency.

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WEBSITES AND WEB CONTENT

Accessibility became a feature on our primary website – raymondjames.ca – in 2012. The site welcomes feedback, outlines the availability of accessibility standards at the firm, and provides for public notification procedures in the event of business disruption.

In 2021, all of our websites have been enhanced:

- Promotion of Accessibility on the landing page of raymondjames.ca.
- Compliance with World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0.
- Publication of the Accessibility Plan.
- Additional information on browser settings and accessibility tools.

Raymond James web pages include the following accessibility features:

- Keyboard shortcut options for navigation without a mouse
- Navigation by headings
- Ability to change text size
- Ability to change contrast ratio
- Quick access to main navigation (links to skip to main page content is scheduled for 2022)

Raymond James supports screen readers for visually impaired users of our sites.

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EMPLOYMENT

According to legislation, organizations must ensure their **human resources practices** explicitly consider and respond to accessibility issues in the workplace, including recruitment, accommodation, performance management, career development and return-to-work processes.

INITIATING ACCESSIBILITY POLICY

The Raymond James **Workplace Accommodation** and **Return to Work** policies were introduced in 2012, along with our **Diversity** policy. The tenants of the diversity policy were published on the RaymondJames.ca [Raymond James Career site](#), as follows:

Raymond James Ltd. recognizes the value of a diverse workforce and appreciates the unique skills and special contribution of each employee. The firm believes teamwork, innovation and a great client experience are founded upon a truly diverse team of employees each contributing to their highest potential. By welcoming diversity among employees and all those with whom we conduct business, we will ensure a work environment free of harassment that is accommodative to those with special needs.

ENHANCEMENTS TO ACCESSIBILITY PRACTICES

In 2016, Raymond James published our first Accessibility Plan. The Plan included the background of accessibility, clarification on the role of managers and individual accommodation plans, and a summary of actions taken to be compliant with legislation. In addition, a detailed procedure for creating an individual accommodation plan was added to our Workplace Accommodation policy. At that time, accessibility communication was included in key employment practices as follows:

- job postings,
- candidate notifications upon applying to a job posting,
- new hire orientation training on accessibility and availability of accommodation,
- performance management intranet site and forms,
- training intranet site.

Candidate communications state:

“We are committed to accessibility for candidates through all stages of the recruitment process. Should you require accommodation, please contact Human Resources via email at resumes@raymondjames.ca.”

Employee communication states:

“Raymond James Ltd. is committed to accessibility for all employees. Should you require accommodation to participate in performance management or career development practices, please speak with your manager or contact Human Resources for assistance.”

In 2019, Human Resources integrated accessibility further into training programs using transcripts and captioning including video tutorials. In the same year, Human Resources also initiated a **Scent Free Workplace** policy in response to employee feedback.

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ROLE OF MANAGERS

Managers welcome and support accessibility needs in the following ways:

- Facilitate accessibility needs during **recruitment**, from the application stage through to the final offer. For example, a pre-employment test provided in larger font.
- Customize workplace **emergency** response information in accordance with the accommodation needs of employees. For example, an employee with reduced mobility or who may need to be assigned a buddy would be reflected in an **accommodation plan**.
- **Accommodate** accessibility needs. For example, RJL computer monitors are able to display text in a larger format, or a person in a wheelchair may need an automated door. To determine the appropriate accessible format or support, the manager asks the employee for information, who typically would complete an Accommodation Request Form.
- When conducting **performance** management, providing **career** development and other career **placements**, take into account the accessibility needs and individual accommodation plans. For example, a standing workstation, modified duties or alternate work arrangements may need to be considered in assessing job expectations and outcomes.

In all cases of accessibility and / or accommodation, consult with Human Resources to ensure AODA, health and safety, human rights and other requirements are met.

ACCOMMODATION PLANS FOR EMPLOYEES

Depending upon the degree of modification required, an individual accommodation plan may be created for an employee with disabilities. An accommodation plan would detail workplace specifications, emergency procedures, and required accessible formats or communication supports.

A point in time accommodation, such as the one-time installation of equipment or a permanent change in job duties, will not necessitate requiring an individual accommodation plan.

An example of an accommodation plan might be when an employee has a medical condition (e.g. epilepsy) and requires an ongoing emergency or first aid response protocol.



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PLANNED ENHANCEMENTS

Our current accessibility focus is concentrated on two areas: website compliance, as outlined in the section Information and Communication Standards; and the consistent use of transcripts and captions for live and digital events, such as webinars, town halls and other internal communications.

Going forward, we are committed to continuous improvement through consultation and monitoring, such as:

- In partnership with our National **Inclusion Council**, support educational initiatives to improve understanding of barriers for people with disabilities, ensuring we have a workplace that is welcoming and safe, and accessibility agile.
- One such initiative launched in March 2021 is a **Self Identification initiative**. The goal is to understand our diversity representation across the firm, including the percent of people living with a disability. From this process, we will look to compare to the Canadian census data for 2021.

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ACCESSIBILITY COMPLIANCE CHECKLIST

	INTEGRATED ACCESSIBILITY STANDARDS	COMPLIANCE
PART I	GENERAL	
3.	Establishment of accessibility policies	December 2012
4.	Accessibility plans	January 2016
5.	Procuring or acquiring goods, services or facilities	Not applicable
6.	Self-service kiosks	Not applicable
7.	Training	December 2012
PART II	INFORMATION AND COMMUNICATIONS STANDARDS	
11.	Feedback	December 2012
12.	Accessible formats and communication supports	December 2012
13.	Emergency procedure, plans or public safety information	December 2012
14.	Accessible websites and web content	June 2021
PART III	EMPLOYMENT STANDARDS	
22.	Recruitment, general	January 2016
23.	Recruitment, assessment or selection process	January 2016
24.	Notice to successful applicants	January 2016
25.	Informing employees of supports	December 2012
26.	Accessible formats and communication supports for employees	December 2012
27.	Workplace emergency response information	December 2012
28.	Documented individual accommodation plans	January 2016
29.	Return to work process	December 2012
30.	Performance management	January 2016
31.	Career development and advancement	January 2016
32.	Redeployment	January 2016
PART IV	TRANSPORTATION STANDARDS	Not applicable
PART IV.1	DESIGN OF PUBLIC SPACES STANDARDS	Not applicable
PART IV.2	CUSTOMER SERVICE STANDARDS	
80.46	Establishment of policies	December 2012
80.47	Use of service animals and support persons	December 2012
80.48	Notice of temporary disruptions	December 2012
80.49	Training for staff, etc.	December 2012
80.50	Feedback process required	December 2012
80.51	Format of documents	December 2012