

Accessibility Policy, Procedures, and Plan

Burgundy is committed to providing our goods and services in a way that respects the dignity and independence of people with disabilities. Burgundy is an equal opportunity employer who prioritizes the wellbeing and inclusion of all individuals involved in its operations, including people with disabilities. Burgundy believes in integration and will meet the needs of people with disabilities in a timely manner by removing and preventing barriers to accessibility and by meeting our accessibility requirements under Ontario law. Burgundy will comply with both the Ontario Human Rights Code and the Accessibility for Ontarians with Disabilities Act (AODA).

One of Burgundy's core values is to always act in the best interest of our clients; as a result, we have continually prioritized prompt and effective responses to client requests and have been committed to accommodating clients since our inception as a firm. For instance, Burgundy has always provided client statements in preferred formats and trained client-facing staff on effective communication techniques. Furthermore, one of Burgundy's greatest assets is its people; consequently, we make it a priority to ensure that our employees and candidates are accommodated for and supported at the firm.

Burgundy will make every reasonable effort such that:

- a) persons with disabilities are provided equal opportunity to obtain, use and benefit from Burgundy's services and facilities;
- b) services and facilities are provided in a manner that respects the dignity and independence of persons with disabilities;
- c) communications with a person with a disability are conducted in a manner that takes the person's disability into account, when applicable; and
- d) persons with disabilities may use assistive devices, service animals and support persons as is necessary to access Burgundy's services and facilities where permitted by law.

Procedures:

A. Communication and Client Service

- (1) Burgundy will communicate with people with disabilities in ways that take into account their disability, when applicable.
- (2) Burgundy takes all practical measures necessary to ensure that accessible document formats are available for Client and employee use upon request.
- (3) Burgundy trains all staff on how to interact and communicate with people with various types of disabilities.
- (4) Burgundy ensures that all accessible facilities have clear signs that include internationally recognized symbols and indicators for persons with disabilities.
- (5) Burgundy strives to ensure that its website complies with applicable Web Content Accessibility Guidelines.

B. Telephone Services

- (1) Burgundy trains staff to communicate with Clients over the telephone in plain language and to speak clearly and, where applicable, in a manner that takes into account an individual's access needs.
- (2) On a best effort basis, Burgundy will offer to communicate with Clients by the accessible method of their choice if telephone communication is not suitable to their communication needs or is not available.

C. Accessible Invoices

- (1) Burgundy is committed to providing accessible invoices to all of our Clients. For this reason, Burgundy will undertake reasonable efforts to provide invoices in the accessible format of our Clients' choice subject to any systems limitations.
- (2) Burgundy will answer any questions Clients may have about the content of the invoice in person, by telephone, or by email.

D. Use of Service Animals and Support Persons

- (1) Burgundy is committed to welcoming people with disabilities who are accompanied by a service animal on the parts of our premises that are open to the public. In the event that a law excludes a service animal, the reason why the animal is excluded should be explained to the individual and other reasonable arrangements to provide goods and services should be explored with the assistance of the person with the disability.
- (2) Burgundy is committed to welcoming people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter Burgundy's premises with his or her support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on Burgundy's premises.
- (3) If Burgundy is concerned about a health and or safety issue regarding the use of a service animal or the lack of a support person, Burgundy's concerns will be communicated to the person with a disability and an alternate solution will be determined.

E. Notice of Temporary Disruption

- (1) Burgundy will provide Clients and employees with notice in the event of a planned or unexpected disruption in its 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 placed at our reception desk.
- (2) If a disruption in service is planned and expected, Burgundy will provide notice as far in advance of the disruption as possible as individuals may require considerable

time to make alternative arrangements. If a disruption is unexpected, Burgundy will provide notice as soon as possible after the disruption has been identified.

F. Training For Staff

- (1) Burgundy will provide training to all employees on accessible client service and how to interact with people with different disabilities. This training will comprise a part of Burgundy's annual Code of Conduct training in order to ensure that the information is disseminated to employees on at least an annual basis.
- (2) Training will include the following:
 - a. The purpose of AODA and the requirements of the customer service standard;
 - b. Information regarding the customer service, information and communication, and employment standard;
 - c. How to interact and communicate with people with various types of disabilities;
 - d. How to provide or arrange for the provision of accessible formats and communication supports for persons with disabilities;
 - e. How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person;
 - f. How to use any accessible formats or devices available on Burgundy's premises or otherwise that may help with the provision of goods or services to people with disabilities; and
 - g. What to do if a person with a disability is having difficulty in accessing Burgundy's services or facilities.
- (3) Staff will also be trained on an ongoing basis when changes are made to this policy.
- (4) A record of when and how the training was completed will be maintained.

G. Documentation And Filing Requirements

- (1) When providing a document to a person with a disability, Burgundy will work with the individual to determine options in order to provide the document or the information contained in the document in a format that takes into consideration a person's disability, when applicable.
- (2) Publicly - on its website and via its reception desk - Burgundy makes clear that all Client and employee documents will be made available upon request and in an accessible format. Any other special requirements of our Clients and employees will be addressed on a circumstantial basis to the best extent of Burgundy's capacity.
- (3) Burgundy is committed to filing its Accessibility Compliance Report in a timely manner.

H. Accessibility Standard For Employment at Burgundy

- (1) When Burgundy undergoes the job selection process, it will make applicants aware that, upon request, they have access to accessible materials and that their accessibility needs will be taken into account.
- (2) When Burgundy makes an offer of employment, it will notify the successful applicant of its policy of accommodating employees with disabilities. The following commitment statement will be included in offer letters: “Burgundy Asset Management Ltd. is an equal opportunity employer. Accommodations on the basis of disability, and other accommodations as required by the Ontario Human Rights Code, are available on request at all stages of the selection process and during employment.”
- (3) Where an employee with a disability so requests, Burgundy will consult with the employee to provide or arrange for accessible formats and communication supports in relation to information that is generally available to employees in the workplace and that the employee needs to perform his or her job.
- (4) Burgundy will ensure that individualized workplace emergency response information will be collected from employees who have a disability, provided that Burgundy has been made aware of the need for accommodation.
- (5) If an employee who provides individualized workplace emergency response information requires assistance, Burgundy will, with the consent of the employee, provide such information to the person designated to provide assistance to the employee.
- (6) The Employee Emergency Information Worksheet is maintained on Burgundy’s staff management platform for employee use as and when necessary.
- (7) Burgundy is in the process of implementing a firmwide diversity, equity, and inclusion initiative to ensure that our firm fosters an environment of respect and support. Burgundy has long embraced the idea that diversity of thought makes us better and stronger as a firm, and policies like our Code of Conduct and employee policies emphasize Burgundy’s commitment to the ideals of DEI. As part of our DEI initiative, Burgundy implements a variety of initiatives relating to accessibility, including posting related information on our internal staff management and intranet platforms and offering a variety of supports, training, development initiatives, and volunteering opportunities to employees.

I. Events

- (1) Burgundy will take practical measures to ensure that its event spaces are accessible.
- (2) Burgundy will implement an Accessible Event Considerations Checklist when planning events and assessing event spaces in order to ensure that appropriate accommodations are made for individuals with accessibility needs.
- (3) When requested, Burgundy will provide all event-related documents and materials in available accessible formats. Burgundy includes the following language on all event invitations: “Please advise Burgundy if you require any special accommodations or have any requests.”

J. Feedback process

- (1) Burgundy welcomes feedback on how to improve its services and facilities for individuals with accessibility needs, and will respond to such feedback in a timely manner.
- (2) Feedback can be submitted via telephone (416- 869-3222), via email (info@burgundyasset.com), via mail (Burgundy Asset Management Ltd.; Bay Wellington Tower, Brookfield Place; 181 Bay Street, Suite 4510; PO Box 778, Toronto ON M5J 2T3) or verbally to our receptionists located at our reception desk or any other Burgundy employee. Burgundy will respond to such feedback in a timely manner.

K. Individual Accommodation Plans, Return to Work Processes, and Other Accommodations

- (1) Burgundy will provide individual accommodation plans to employees and in accessible formats upon request. The accommodation plan can include emergency workplace information upon request as well. The accommodation plan will include at minimum the following information:
 - a. Information about the manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
 - b. . The means by which the employee is assessed on an individual basis.
 - c. The manner in which Burgundy can request an evaluation by an outside medical or other expert to assist the Burgundy in determining if accommodation can be achieved and, if so, how accommodation can be achieved.
 - d. The steps taken to protect the privacy of the employee's personal information.
 - e. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
 - f. If an individual accommodation plan is denied, the reasons for the denial will be provided to the employee.
 - g. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.
- (2) Burgundy shall implement individualized return to work processes for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work. In the documentation for these processes, Burgundy will outline the steps that will be taken to facilitate the return to work of employees who were absent because their disability required them to be away from work and use documented individual accommodation plans.
- (3) Burgundy will take into account an employee's accessibility needs during the firm's performance management and career development/advancement processes.

Burgundy Multi-Year Accessibility Plan

What has Burgundy done to remove and prevent barriers to accessibility at the firm?

- Implemented and maintained written policies governing how Burgundy will meet its obligations.
- Provided any documents - including accessibility policies and procedures, client documents, event information, and any other information - in an accessible format upon request.
- Trained all employees on accessibility standards, AODA, and the Human Rights Code.
- Ensured that feedback can be provided to Burgundy in an accessible manner, and that the public is made aware of Burgundy's feedback protocols.
- Notified the public about the availability of accessible formats and communication supports via both our website and our reception desk.
- Notified employees and the public (via our website, our reception desk, and in our hiring and interviewing materials) that accommodations are available for all employees and candidates for all stages of the hiring, interview, recruitment, onboarding, and training processes.
- Upon request, offered the option to provide information pertaining to their role to employees in accessible formats.
- Developed an emergency worksheet for employees to ensure that employees with accessibility needs can acquire necessary supports in the event of an emergency.
- Developed protocols for the development and implementation of individual accommodation plans and return-to-work plans for employees with access needs, and made these plans available to employees upon request.
- Developed, implemented, and maintained policies to ensure the equitable provision of services to individuals with disabilities, including but not limited to information on the use of assistive devices and how to accommodate individuals who use them; our welcoming of support persons and guide/service animals where permissible by law; our provision of temporary disruption notices; and the details of our employee training, including an adapted employee training guide.

What will Burgundy do moving forward to remove and prevent barriers in 2024 and beyond?

- Maintain the aforementioned practices and procedures in order to limit barriers for individuals with disabilities.
- Continue updating Burgundy's website and web content to conform with WCAG standards.
- Continue to monitor applicable laws and regulations pertaining to accessibility and human rights.
- Continue to update policies, procedures, and the multi-year accessibility plan in accordance with applicable laws and guidelines.
- Continue to implement policies and procedures with the intent of accommodating all individuals who interact with Burgundy, including clients, candidates, and employees.
- Continue to file the Accessibility Report in a timely fashion.