Accessibility Standards Policy, Procedures & Practices

INTRODUCTION AND STATEMENT OF ORGANIZATIONAL COMMITMENT

Mackenzie Financial Corporation (the “Company”) is committed to providing access to the Company’s financial products and services to individuals with disabilities in Ontario in a timely manner, consistent with the requirements of the Accessibility for Ontarians with Disabilities Act, 2005 and related standards and regulations (collectively, the “AODA”).

This Policy is intended to specifically address the requirements of the AODA and describes how the Company will comply with those requirements and what customers may expect from the Company. The AODA does not replace or limit any requirements that have been established under Human Rights Code or other legislation that is applicable to the Company and the Company is committed to meeting those requirements as well.

This Policy will be implemented in accordance with the time frames for compliance established by the AODA.

The Policy applies to every person who deals with members of the public or who deals with other third parties in Ontario on behalf of the Company.

This Policy is meant to benefit persons with a wide range of disabilities, as defined below. Whether a person’s disability is apparent or not, everyone should be treated with courtesy and have his or her need for accommodation respected whenever interacting with the Company.

In this Policy, an individual with a disability includes a person with any degree of physical disability, infirmity, disfigurement, mental disorder, learning disability or condition of mental impairment or a developmental disability. For the complete definition of disability, and other definitions, see section 7 of the Policy.

GENERAL

The Company will make reasonable efforts to ensure that individuals with disabilities have the same opportunity to access the products and services which the Company provides, in the same place and in a similar way as other members of the public.

The Company will make reasonable efforts to be consistent with the following principles when establishing policies, practices and procedures:

- Financial products and services will be provided in a manner that respects the dignity and independence of individuals with disabilities;
- The provision of financial products and services to persons with disabilities will be in a manner that is integrated with the way in which such financial products and services are provided to other members of the public unless an alternative measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to access, use or benefit from the financial products and services of the Company;
- The Company will seek to give individuals with disabilities an opportunity equal to that of others to obtain, use or benefit from, the Company’s financial products and services.

TRAINING

The Company will provide appropriate training to employees working in a Canadian location on the Policy, the requirements of the AODA and, where appropriate, the Human Rights Code (Ontario) as it pertains to persons with disabilities. The Company will also ensure that other persons who require training pursuant to the AODA are provided with the appropriate training.
CUSTOMER SERVICE

Assistive Devices

The Company will seek to allow for an individual to be able to use his or her own assistive devices to access the Company’s premises or its financial products and services, except where this may reasonably pose a security risk or a risk to the health or safety of the individual or others. An assistive device is any device that is designed, made or adapted to assist an individual with a disability in carrying out activities.

In situations where the use of an assistive device could reasonably pose a security risk or a risk to the health or safety of the individual or others, the Company may make other reasonable measures available to assist the individual with a disability in accessing premises, or being able to obtain, use or benefit from, the Company’s financial products or services. It is the responsibility of the individual with a disability to ensure that his or her assistive device is operated in a safe and controlled manner at all times.

Support Persons

An individual with a disability who is accompanied by a support person will be permitted to enter the Company’s premises that are open to the public with his or her support person.

An individual with a disability, who is accompanied by a support person, will not be prevented from having access to his or her support person while on the Company’s premises unless the security, health or safety of the person with a disability or of others on the premises would be negatively impacted.

The Company may require a person with a disability to be accompanied by a support person when on the Company’s premises, but only if a support person is necessary to protect the security, health or safety of the person with a disability or the security, health or safety of others on the premises. The Company will consult with the person with a disability prior to making a decision and consider all information available. If it is determined that a support person is required, the fee (if applicable) for the support person will be waived by the Company.

Given the nature of information that may be discussed in the presence of a support person accompanying or assisting an individual with a disability, the Company may require that the individual with a disability give his or her consent to the Company to discuss confidential information in the presence of the support person.

If an individual with a disability has concerns about discussing confidential information in the presence of the support person, he or she may ask the support person to leave during the discussion of the confidential information.

Service Animals

An individual with a disability who is accompanied by a service animal will generally be permitted to enter premises owned by the Company with the service animal and keep the animal with him or her. In the rare occurrence that a service animal’s access may be excluded by law, the Company will make reasonable efforts to arrange alternative ways for the individual to obtain, use or benefit from the Company’s financial products and services.

The individual with a disability is responsible for the care and control of the service animal at all times.

Notice of Service Disruption

The Company will, when reasonable, provide notice in the event of a disruption in the facilities or services owned or controlled by the Company that are usually used by individuals with disabilities.

A copy of the AODA Notice of Service Disruption can be found on www.mackenzieinvestments.com
Self-service Kiosks

If the Company purchases self-service kiosks that allow public users to access the Company’s financial products or services, regard will be given to the accessibility features of such self-service kiosks and preference will be given to self-service kiosks that are accessible.

Feedback and Concerns

Feedback regarding the way the Company provides access to its financial products and services to individuals with disabilities should be made in writing, if reasonable. Feedback may be made by e-mail, letter, telephone, in person, or in another way that better meets the communication needs of the person providing the feedback. The Company will ensure that every process for receiving and responding to feedback is accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports upon request.

A copy of the AODA Feedback Procedure can be found on www.mackenzieinvestments.com

INFORMATION & COMMUNICATION

When communicating with an individual with a disability, the Company will do so in a manner that takes into account the individual’s disability. Upon request, the Company will endeavour to provide, or arrange to provide, communications in accessible formats and communication supports to a person with a disability in order to facilitate access to the Company’s financial products and services. The Company will do this in a timely manner that takes into account the person’s accessibility needs due to his or her disability and at a cost that is no more than the regular cost charged to other persons.

On request and where applicable, the Company will provide emergency procedures, plans and public safety information that is available to the public in an accessible format or with appropriate communication supports as soon as practicable.

The Company will, except where impracticable, ensure that its internet websites that are accessible to members of the public conform with the applicable requirements of the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 by the dates specified in the AODA.

Accessibility Plan

The Company will establish, maintain and document a multi-year accessibility plan to outline its strategy to prevent and remove barriers and meet its requirements under certain AODA standards. The accessibility plan will be reviewed and updated as required, but not less frequently than every five years, and will be posted online. Upon request, the Company will provide a copy of the accessibility plan in an accessible format.

EMPLOYMENT

The Company will notify employees and the public that accommodation is available for persons with disabilities during the recruitment process. Job applicants who are individually selected for an interview will be notified that accommodations are available upon request. Successful applicants will be notified about the Company’s policies for accommodating employees with disabilities as part of their offer of employment. If a selected participant requests accommodation, the Company shall consult with the applicant and provide, or arrange for the provision of, a suitable accommodation in a manner that takes into account the applicant’s accessibility needs due to disability.

The Company will inform employees of the policies used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee’s accessibility needs due to disability. The Company will provide this information to new employees as soon as reasonable after they begin their employment and provide updated information to all employees whenever there is a change to the existing policies on the provision of job accommodations that take into account an employee’s accessibility needs due to disability.
The Company will work with the employee, upon request, to provide or arrange for the provision of accessible formats and communication supports for:

a) Information that is needed in order to perform the employee’s job; and
b) Information that is generally available to employees in the workplace.

The Company will work with the employee making the request in determining the suitability of an accessible format or communication support.

The Company shall provide individualized workplace emergency response information to the Company’s employees who have a disability, if the disability is such that the individualized information is necessary, and if the Company’s employee makes the Company aware of the need for accommodation due to the employee’s disability. The Company shall provide this information as soon as practicable after becoming aware of the need for a accommodation.

Where an employee of the Company requires assistance, the Company shall, with the consent of the employee, provide the workplace emergency response information to the person designated by the Company to provide assistance to the employee.

The Company shall review the individualized workplace emergency response information developed for an employee of the Company when the employee moves to a different location at the Company, when the employee’s overall accommodations needs or plans are reviewed and, when the Company reviews its general emergency response policies.

A written process for the development and maintenance of documented individual accommodation plans is available for employees with disabilities. If requested, these plans will include information regarding accessible formats and communication supports.

The Company has in place a documented return to work process for employees returning to work due to disability and requiring disability-related accommodations. This return to work process outlines the steps that the Company shall take to facilitate the return to work.

The Company will take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans when providing career development, performance management and when considering redeployment.

**BUILT ENVIRONMENT**

Where the Company owns real property that includes public spaces and undertakes to build new structures or make major changes to existing structural features, the Company is committed to meeting the design and accessibility requirements of the AODA within the time frames specified.

**REVIEW**

This Policy will be reviewed and revised from time to time. When new or revised standards are developed under the AODA, this Policy will be reviewed and updated as may be necessary to ensure consistency with such standards.

**DEFINITIONS**

For the purpose of this Policy, the following terms have the meanings indicated: “disability” means:

(a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,

(b) a condition of mental impairment or a developmental disability,
a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,

(d) a mental disorder, or

(e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997 (Ontario).

“Service animal” means, for a person with a disability, an animal if:

(a) it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
(b) the person provides a letter from a physician, nurse, psychologist, psychotherapist, audiologist, chiropractor or optometrist confirming that the person requires the animal for reasons relating to the disability.

“Support person” means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care or medical needs or with access to goods or services.

ACCESSIBILITY IN CUSTOMER SERVICE TRAINING PROCEDURES (THE “PROCEDURES”)

Introduction

Mackenzie Financial Corporation (the “Company”) is committed to providing access to the Company’s products and services to individuals with disabilities.

The Procedures are intended to address, at a minimum, the requirements of the Accessibility for Ontarians with Disabilities Act 2005 and related standards and regulations. The Procedures describe how the Company will provide its employees with training in order that they may enhance the accessibility of its products and services to persons with disabilities.

General

The Company will provide appropriate training to employees working in a Canadian location on the Policy, the requirements of the AODA and, where appropriate, the Human Rights Code (Ontario) as it pertains to persons with disabilities.

Content of Training

Training of Employees will include:

- The purpose of the Accessibility for Ontarians with Disabilities Act 2005 and the requirements under the regulations made thereunder;
- How to interact and communicate with people with various types of disabilities
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person;
- How to use assistive devices that may be available on the premises of the Company or are otherwise provided by the Company that may help with the provision of products or services to a person with a disability; and
- What to do if a person with a disability is having difficulty accessing the Company’s products and services.

Timing for Training

Each Employee will receive training as soon as reasonably possible after assuming a role that requires training.
Training Updates

Training will be provided in connection with changes to the policies, practices and procedures governing the provision of the Company’s products and services to persons with disabilities, or in any event, every two years. For feedback or inquiries please contact:

| Telephone: 1-800-3870614 | Or write to: Client Services  
Mackenzie Financial Corporation  
180 Queen Street West  
Toronto, Ontario,  
M5V 3K1 |
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<td>E-mail: <a href="mailto:service@mackenziefinancial.com">service@mackenziefinancial.com</a></td>
<td>Fax: 1-866-766-6623</td>
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FEEDBACK AND CUSTOMER CONCERNS PROCEDURES (THE “PROCEDURES”)

Introduction

Mackenzie Financial Corporation (the “Company”) is committed to providing access to the Company’s products and services to individuals with disabilities.

The Procedures are intended to address, at a minimum, the requirements of the Accessibility for Ontarians with Disabilities Act 2005 and related standards and regulations. It describes how a person may provide feedback and notice of concerns to the Company with respect to the accessibility of its products and services for persons with disabilities.

General

The Company shall make reasonable efforts to ensure that individuals with disabilities have the same opportunity to access the Company’s products and services in the same place and in similar ways as others.

The Company welcomes feedback on the way it provides access to its products and services to individuals with disabilities. Comments and concerns should be in writing, if reasonable. However, they may be made in person or by e-mail, letter, telephone or other method that accommodates a person’s communication needs.

How to Provide Feedback and Concerns

If an individual has feedback or concerns about the way the Company provides access to its products and services by persons with disabilities, direct them to Client Services:

| Telephone: 1-800-3870614 | Or write to: Client Services  
Mackenzie Financial Corporation  
180 Queen Street West  
Toronto, Ontario,  
M5V 3K1 |
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The Company will forward all feedback, including concerns, to the appropriate business unit for a response which will be communicated in the same manner as received, if reasonable, within 30 days of receipt. The Company will ensure that every process for receiving and responding to feedback is accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports upon request.
NOTICE OF SERVICE DISRUPTION PROCEDURES (THE “PROCEDURES”) 

Introduction

Mackenzie Financial Corporation (the “Company”) is committed to providing access to the Company’s products and services to individuals with disabilities.

The Procedures is intended to address, at a minimum, the requirements of the Accessibility for Ontarians with Disabilities Act 2005 and related standards and regulations. It describes how the Company will provide notice in the event of a planned service disruption. The Procedures applies to facilities and services owned or controlled by the Company in Ontario.

General

People with disabilities rely on certain facilities and services to access premises owned and managed by the Company or to access the Company’s products and services.

The Company will provide advance notice of a planned disruption of access to or use of the Company’s facilities or the Company’s services typically used by persons with disabilities.

Service Disruption Steps

The Company will provide advance notice of planned disruptions of access or use of its facilities or services at least 24 hours prior to any such disruption.

The Company will strive to provide notice as soon as possible of any unexpected disruption of access or use of facilities or services.

The notice provided by the Company will include:

- a description of the nature of the disruption;
- information about the reason for the disruption;
- how long the disruption is expected to last; and
- a description of alternate facilities or services which may be accessed in the interim.

For feedback or inquiries please contact Client Services:

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PRACTICES TO ENHANCE ACCESSIBILITY FOR PEOPLE WITH DISABILITIES (THE “PRACTICES”) 

Introduction

Mackenzie Financial Corporation (the “Company”) is committed to providing access to the Company’s products and services to individuals with disabilities.

The Procedures is intended to address, at a minimum, the requirements of the Accessibility for Ontarians with Disabilities Act 2005 and related standards and regulations. The Practices describe how the Company will enable people with disabilities to access the Company’s products and services.
General

The Company shall ensure that employees who deal with members of the public or others, strive to provide people with disabilities with reasonable access to the Company's products and services, taking into account an individual's specific disability. The Company shall undertake a process of ongoing enhancement of the manner in which its products or services can be accessed by individuals with disabilities.

Practices for Assuring Accessibility to Products & Services

In order to assure reasonable access to the Company’s products and services by individuals with disabilities the Company shall:

- Make client account statements available in Braille upon request.
- Make account statements accessible online at all times.
- Send account information including statements or cheques, which are required in a timely fashion, to a client’s location via courier upon request.
- Ensure that all of the Company’s locations, including washroom facilities, are wheelchair accessible.
- Ensure that the elevators located at all of the Company’s locations have floor numbers indicated in Braille and audio floor and directional announcements both English and French.
- Ensure that all of the Company’s customer service representatives staffing the Access Line shall be capable of accepting complaints and feedback from individuals with disabilities in relation to accessing the Company’s products and services and shall make best efforts to identify the manner in which the needs of such individuals can be best met.
- Ensure that all of the Company’s policies, practices and procedures are consistent with the principles of dignity, independence and equal opportunity and to the extent reasonable take into account specific disabilities to the greatest extent possible.
- Ensure that if an individual with a disability is accompanied by a support person, such person will be permitted to enter the Company’s premises and accompany such individual at all times.
- Ensure that if an individual with a disability is accompanied by a service animal, such animal will be permitted to enter the Company’s premises and accompany such individual at all times.