

Harmonic Fund Services Canada Inc.

Accessible Customer Service Policy

1. Policy Summary

- 1.1. Harmonic Fund Services Canada Inc. is committed to providing excellence in the field of customer service, serving all clients including people with disabilities.
- 1.2. As a member of Harmonic Group¹ the Firm² aims to provide a safe and healthy working environment for all its staff, visitors and contractors in accordance with local legislation, good practice and corporate behaviours.
- 1.3. Designated personnel and the Board of Harmonic Fund Services Canada Inc. are primarily responsible for implementing this Policy. All staff, visitors and contractors however have a legal duty to contribute constructively to their own environment and that of others.

2. Scope

- 2.1. The Policy applies to all persons who, on behalf of the Firm deal with members of the public or other third parties. This includes our employees, volunteers, agents and contractors.

3. Risks controlled by the Policy

- 3.1. Risk of business disruption due to government inspections, fines, prosecution, tribunals etc. for failure to meet the provisions prescribed in the Accessibility for Ontarians with Disabilities Act, 2005³.

¹ Harmonic Group currently comprises of the following Entities or Business Units: Harmonic Fund Services (Cayman), Harmonic Fund Services Canada Inc., Harmonic Fund Services (Geneva) & Harmonic Fund Services Ireland Limited.

² Please note the terms “Firm” and “Business Unit” refer to Harmonic Fund Services Canada Inc. These terms may be used interchangeably throughout the document.

³ Recognizing the history of discrimination against persons with disabilities in Ontario, the purpose of this Act is to benefit all Ontarians by, (a) developing, implementing and enforcing accessibility standards in order to achieve accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises on or before January 1, 2025; and (b) providing for the involvement of persons with disabilities, of the Government of Ontario and of representatives of industries and of various sectors of the economy in the development of the accessibility standards 2005, c. 11, s.1.

3.2. Risk of injury or harm to a member of staff, visitor or contractor or any other person using the Firm's building or office space through a failure to take adequate steps to comply with legislation. This could result in criminal prosecution or a civil claim of negligence relating to personal injury or harm.

3.3. Reputational risk.

4. **Definitions**

A. Accessibility Report

A report required to be filed pursuant to section 14 of the Accessibility for Ontarians with Disabilities Act, 2005.

B. Assistive Device

Any device used to assist a person in performing a particular task or tasks or to aid that person in activities of daily living (i.e. Wheelchair, walker, cane, screen reader, listening device, oxygen tank etc.).

C. Disability

A disability includes:

Vision disabilities	Learning disabilities
Hearing disabilities	Health disabilities
Deaf-blind disabilities	Speech or language disabilities
Physical disabilities	

D. Service Animal

An animal is a service animal for a person with a disability;

- If it is readily apparent that the animal is used by the person for reasons relating to his or her disability (i.e. guide dog); or
- If the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

E. Support person

A person who accompanies a person with a disability to assist with communication, mobility, personal care or medical needs or with access to goods or services.

5. Mandatory Requirements

5.1. Assistive Devices

The Firm will ensure that personnel are trained and familiar with various assistive devices maintained on site or those provided which may be used by clients with disabilities while accessing goods or services.

5.2. Communication

The Firm shall communicate with people with disabilities in ways that take into account their disability. Staff are encouraged to speak clearly and slowly, using plain language to a person or persons with a disability.

The Firm shall provide fully accessible telephone services to members of the public upon request.

5.3. Service Animals

The Firm welcomes people with disabilities and their service animals. Service animals are permitted on parts of our premises which are open to the public.







5.4. Support Persons

A person with a disability who is accompanied by a support person will be allowed to have the person accompany them on our premises.

5.5. Notice of temporary disruption

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities the Firm will notify customers promptly. This clearly posted notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available.

Services/Facilities include, but are not limited to:

- Dedicated Accessible Parking  Dedicated Accessible Parking
- Barrier Free Restrooms  Barrier-Free Restrooms
- Stairs/Escalators/Elevators  Stairs/Escalators/Elevators
- Place of Refuge  Place of Refuge
- Barrier Free Emergency Exit  Fire-fighter Elevator / Barrier-Free emergency exit
- Automatic Doors  Automatic Doors

- Alternate Barrier-Free Route Alternate Barrier-Free Route
- Public Space Public Space

The notice will be made public at the following location:

Upon entrance to Reception at:

Harmonic Fund Services Canada Inc.
Brookfield Place,
Bay Wellington Tower
181 Bay Street, Suite 3830
Toronto, ON
M4J 2T3
Canada

The notice will include a copy of the relevant floor plans attached in Appendix B.

5.6. Training

The Firm will provide accessible customer training to employees, volunteers and others who deal with the public or other third parties on our behalf. Training will also be provided to people involved in the development of policies, plans, practices and procedures related to the provision of our goods and services.

Individuals⁴ in the following positions will undergo and disseminate training to staff on an annual basis:

- Health & Safety Officer
- Facilities Co-Ordinator

Training will include:

- An overview of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard.
- The Firm's plan related to the customer service standard.
- 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 the equipment or devices available on-site or otherwise that may help with providing goods or services to people with disabilities. These include:

⁴ The Health & Safety Officer and Facilities Co-Ordinator (otherwise referred to as Designated personnel) will maintain a log containing dates of training provided, staff in attendance, form of training provided (i.e. External course, in-house workshop, e-learning training module, other) and contents of training materials.

- What to do if a person with a disability is having difficulty in accessing the firm's goods and services.

Staff will also be trained when changes are made to our accessible customer service plan.

New staff will receive training as part of the Firm's induction process.

5.7. Feedback process:

Customers who wish to provide feedback on the way the Firm provides goods and services to people with disabilities can provide feedback in the following way:

By completing the AODA Customer Feedback Form readily available upon request at Reception. Please refer to Appendix A for a copy of the Firm's AODA Customer Feedback Form.

All feedback, including complaints, will be reviewed by either:

- The Health & Safety Officer, or;
- The Facilities Co-Ordinator

Customers can expect to hear back within **10 business days** from the Firm with regard to complaints lodged/items addressed.

5.8. Notice of availability

The Firm will notify the public that all documents related to accessible customer service, are available upon request by posting a notice in the following location:

Upon entrance to Reception at:

Harmonic Fund Services Canada Inc.
Brookfield Place,
Bay Wellington Tower
181 Bay Street, Suite 3830
Toronto, ON
M4J 2T3
Canada

5.9. Modifications to this or other policies

Any policy, practice or procedure of the Firm that does not respect and promote the principles of dignity, independence, integration and equal opportunity for people with disabilities will be modified or removed.

6. **Reporting**

6.1. Designated personnel are responsible for filing the Firm's compliance reports (i.e. Accessibility Report) with the Ontario Ministry of Economic Development, Trade and Employment.

Please refer to the following link for information pertaining to filing dates and requirements;

http://www.mcass.gov.on.ca/en/mcass/programs/accessibility/customerService/report_online.aspx

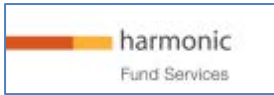
7. Remedial Action

7.1. Personnel are required to report any violations of this policy using the following e-mail address; AODInfo@harmonic.ky When in doubt, staff are also encouraged to use this address to request advice on how best to meet the Firm's accessible customer service standards.

Strict compliance with the provisions of this policy is considered essential.

Harmonic Fund Services Canada Inc. reserves the right to amend or modify this policy document on a periodic basis.

APPENDIX A



Harmonic Fund Services Canada Inc.

AODA Customer Feedback Form

Thank you for visiting Harmonic Fund Services Canada Inc. We value all our customers, visitors, agents etc. and strive to meet everyone’s needs. Your comments are important to us as we want to ensure that your experience with Harmonic Fund Services Canada Inc. is a pleasant one.

Please complete and return this form to the Facilities Manager at our place of business:

Brookfield Place,
Bay Wellington Tower
181 Bay Street, Suite 3830
Toronto, ON
M4J 2T3
Canada

Thank you in advance for your feedback.

Please tell us the date and time of your visit (mm/dd/yyyy): _____

What services were you looking for?

Did we respond to your customer service needs today? Yes No

Was our customer service provided to you in an accessible manner?

Yes Somewhat No

Did you have any problems accessing the Building or goods and services within our Office?

Yes Somewhat No

What could Harmonic Fund Services Canada Inc. do to make it easier for you to access our goods and services?

Additional comments:

Would you like to be contacted?

No, I do not need to be contacted

Yes, my preferred method of contact is:

Mail, Phone, Email

**COMPLETE THIS SECTION ONLY IF YOU ARE REQUESTING A REPLY
-CONTACT INFORMATION-**

First Name: _____ **Last Name:** _____

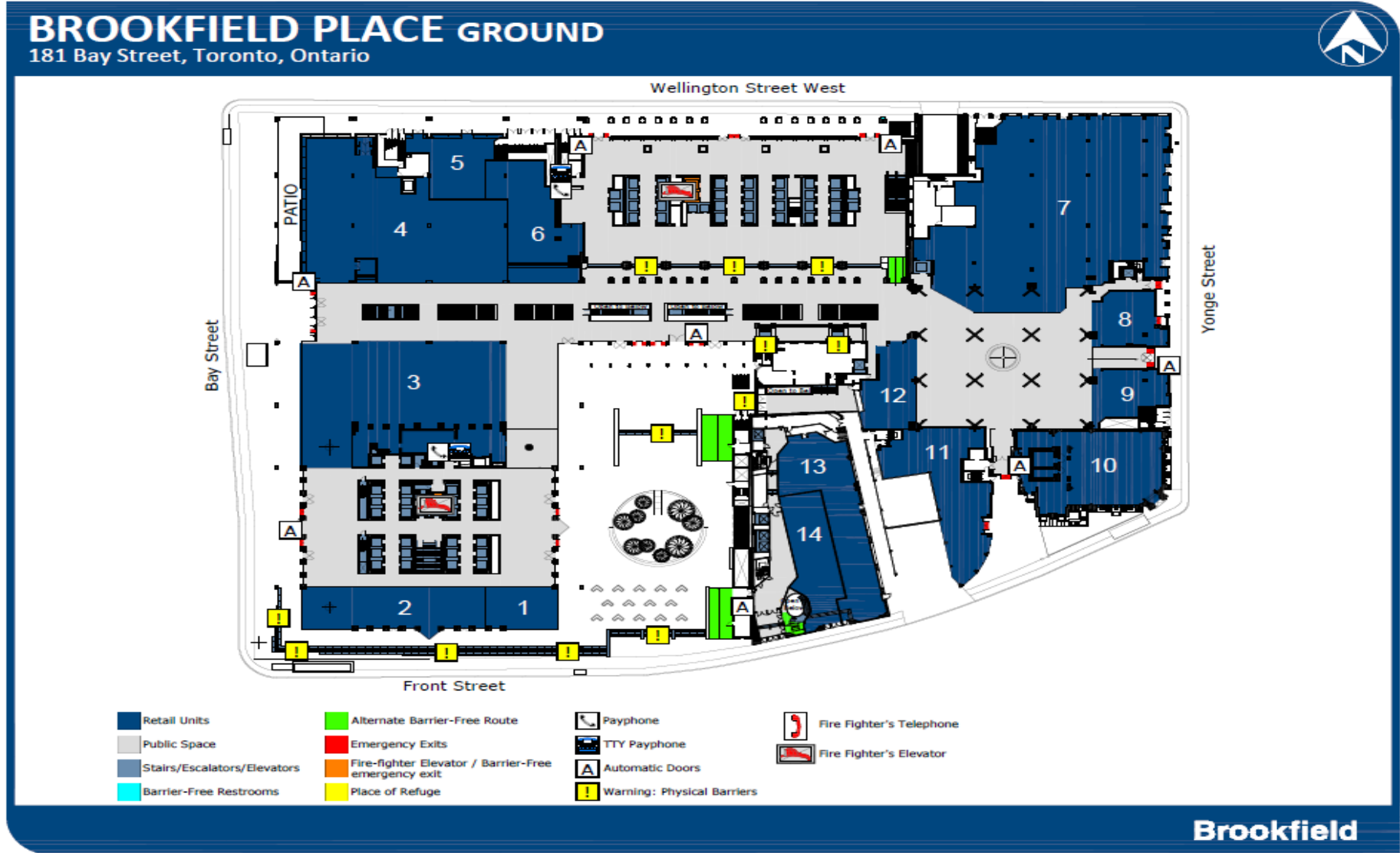
Address: _____

Phone: _____

E-mail: _____

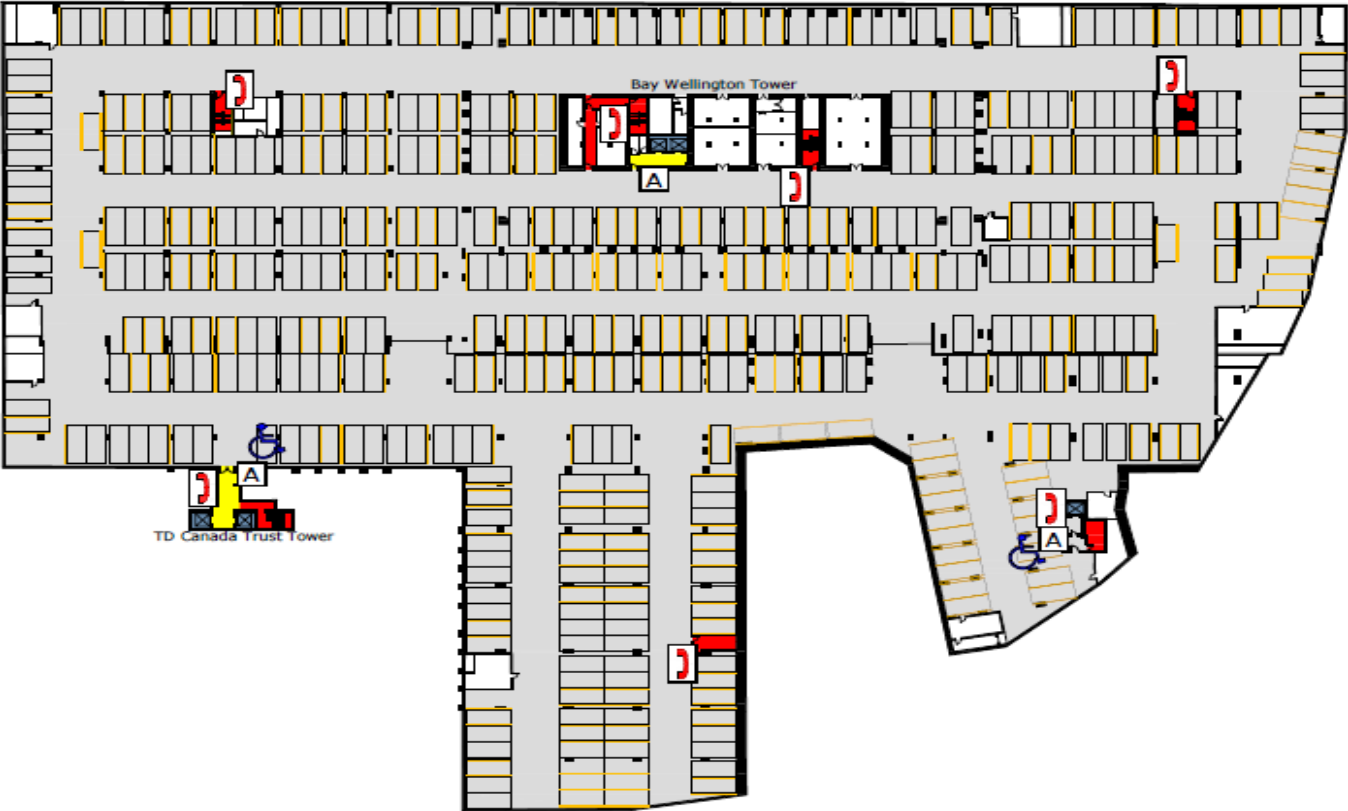
Harmonic Fund Services Canada Inc. is collecting the personal information you provide on this form so we can respond to your feedback. If you have any questions about the collection, use and disclosure of your personal information by the Firm, please contact us via the following e-mail address: privacy@harmonic.ky

APPENDIX B – FLOOR PLANS



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BROOKFIELD PLACE P3 LEVEL
 181 Bay Street, Toronto, Ontario




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|-----------------------------|---|----------------------------|------------------------------|
| Retail Units | Alternate Barrier-Free Route | Payphone | Fire Fighter's Telephone |
| Public Space | Emergency Exits (Stairs) | Automatic Doors | Fire Fighter's Elevator |
| Stairs/Escalators/Elevators | Fire-fighter Elevator / Barrier-Free emergency exit | Warning: Physical Barriers | Dedicated Accessible Parking |
| Barrier-Free Restrooms | Place of Refuge | | |


BROOKFIELD PLACE PARKING LEVELS


181 Bay Street, Toronto, Ontario

In Case of Emergency

 In the event of an emergency please remain calm and proceed to the nearest EXIT indicated in solid **RED** on the plan.

For those unable to exit via the stairs

 Notify Emergency Personnel of your location using one of the many Fire Fighter's telephones located on the floor.

 Proceed to the nearest Area of Refuge or safe area near an elevator lobby or EXIT stair.

Await assistance by emergency personnel.