



2024-2027 Accessibility Plan





Table of contents

 General Information	2	 Accessibility Plan	7
 Executive Summary	4	9 Employment	
 Statement of Commitment	5	12 Built environment	
 Consultations	6	13 Information and communication technologies (ICT)	
		14 Communication other than ICT	
		15 Procurement of goods, services and facilities	
		16 Design and delivery of programs and services	
		17 Transportation	
		 Glossary	17

General Information

In 2023, Fairstone’s defining theme was “accountability”.

For us, accountability goes beyond responsibility; it’s a commitment that extends to every individual at every level within our organization. Being accountable at Fairstone means prioritizing the right actions, collaborating with courage and empathy and consistently delivering exceptional experiences for our employees, customers and partners.

As part of this accountability lies one of our core values: diversity. At Fairstone, our commitment to Diversity, Equity, and Inclusion (DEI) is not just integral to our corporate strategies, but it also drives the advancement of an inclusive culture that respects people’s dignity, ideas, beliefs and abilities, while promoting equal opportunity. This commitment ensures that everyone is valued and included in our journey

regardless of their abilities. We do this by improving the accessibility of our products, services and facilities for our customers and employees.

We are committed to improving the accessibility of our products, services and facilities for both our customers and employees. This commitment is reflected in our first Accessible Canada Act Accessibility Plan. This plan outlines how Fairstone Bank of Canada (referred to as “Fairstone,” the “Company,” “we,” “our,” or “us”) are fulfilling our responsibility to identify, prevent, and remove barriers, thereby enhancing opportunities for people with disabilities. Whenever possible, we will strive to extend this commitment to the customers and employees of Fairstone’s affiliates, ensuring the accessibility of their products and services as well.



Feedback process and contact information

We welcome your feedback on our Accessibility Plan, our Feedback Process and any other feedback you want to provide regarding our products and services' accessibility.


Our Vice President of Customer Care and Sales Contact Centre is designated to receive accessibility feedback and will coordinate with internal subject matter experts responsible for each of the seven priority areas to meet new obligations described under the ACA as required.


Fairstone welcomes feedback from members of the public, customers, employees and groups representing the interests of persons with disabilities on:


- The manner in which Fairstone is implementing its Accessibility Plan.
- The barriers to accessibility encountered by Fairstone employees and persons interacting with Fairstone.
- The format in which the accessibility of the plan is requested.

Acknowledgement of receipt will be provided in the same manner as the feedback was received unless it is requested using a different channel or format. Feedback may be provided anonymously, in which case acknowledgement of receipt will not be issued. You can use the toll-free number, email address or mailing address noted above to request an alternate version of our feedback process, accessibility plans or progress reports.

Feedback may be provided to the Vice President of Customer Care and Sales Contact Centre at:

 **Toll-free number:** 1-800-995-2274

 **Website:** FairstoneBank.ca/Contact-Us

 **Email:** accessibility@fairstone.ca

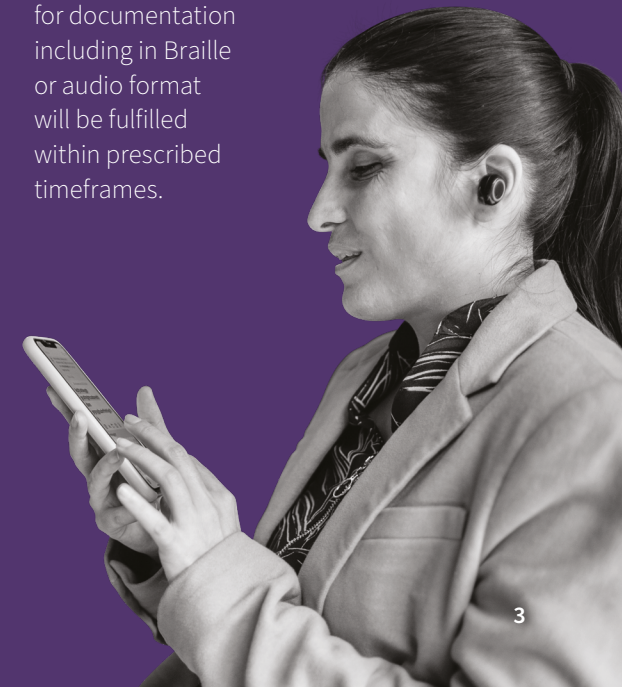
 **Mailing address:**

Fairstone Bank of Canada
 Attn: Vice President of Customer Care and Sales Contact Centre
 33 Yonge Street, Suite 810
 Toronto, Ontario M5E 1G4

→ ALTERNATE FORMATS

Fairstone is committed to ensuring that all individuals have access to information related to its Accessibility Plan and feedback process.

Upon request, we will provide this information in alternate formats, including print, large print, Braille, audio format (available in both French and English), or electronic formats compatible with adaptive technologies that assist persons with disabilities. Requests for documentation including in Braille or audio format will be fulfilled within prescribed timeframes.



Executive Summary

The *Accessible Canada Act (ACA)* applies to the federal government and to organizations that are regulated by the federal government, such as banks, airlines and phone companies and requires these organizations to publish an Accessibility Plan outlining strategies to eliminate barriers and enhance accessibility by 2040.

These plans should encompass policies, programs, practices and services aimed at identifying, removing and preventing barriers. Under the Act, Fairstone must comply and publish an Accessibility Plan which details the steps taken to remove and prevent barriers to accessibility.

Throughout this Fairstone’s Accessibility Plan, we present our commitment to improving our accessibility practices and progressively removing barriers by focusing on the following seven areas:

- | | |
|---|--|
| ✓ Employment | ✓ Design and delivery of programs and services |
| ✓ Built environment | ✓ Procurement of goods, services and facilities |
| ✓ Information and communication technologies (ICT) | ✓ Transportation |
| ✓ Communication other than ICT | |

By assessing and addressing these key areas when needed, we aim to create an inclusive environment that benefits everyone. Fairstone is dedicated to continuous improvement in our accessibility practices, ensuring that our commitments align with the principles of dignity, equality, integration and independence for all individuals. Our Accessibility Plan is a testament to our ongoing efforts and our promise to make meaningful progress towards a barrier-free Canada.

Statement of Commitment

Fairstone is dedicated to treating all individuals in a manner that respects their dignity and independence.

We believe in fostering an inclusive environment where everyone has equal opportunities. Our commitment is to meet the needs of people with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility. We adhere to all federal and provincial accessibility laws and regulations to ensure compliance and continual improvement.

With a long-established Canadian history, Fairstone is committed to enhancing the lives of Canadians in the communities where we live and work by offering accessible and responsible financial solutions. This Accessibility Plan is an integral part of Fairstone's ESG strategy and aligns with our goals to promote diversity, equity and inclusion.

OUR COMMITMENT INCLUDES:

- **Empowering our employees:** Ensuring all employees have a positive and inclusive working experience by providing the necessary support and resources.
- **Supporting our customers' growth:** Empowering our customers on their financial journeys by actively engaging with them and offering the financial tools they need to succeed.
- **Building alongside the community we serve:** As a community-based lender, we play an essential role in bringing communities together and making a positive impact, both in daily life and in times of crisis.

By embedding these principles into our operations, Fairstone is dedicated to creating a more accessible and inclusive environment for everyone.



Consultations

Fairstone is dedicated to identifying and addressing accessibility barriers through consultations and surveys, and we recognize the importance of continuously seeking and addressing potential barriers.

To develop this Accessibility Plan and identify actions to alleviate barriers, Fairstone employed a survey method to assess the accessibility of our products and services for customers, employees and partners. An internal accessibility survey was conducted, gathering feedback from 67 of our employees on the accessibility of our services for both customers and staff.

In addition to formal surveys, Fairstone encourages ongoing informal consultations. We invite employees with disabilities to share their experiences and recommendations to enhance their overall experience at the Bank. This commitment to continuous feedback ensures that we remain attentive to the needs of our community and make meaningful improvements to our accessibility practices over time.



Accessibility Plan

Seven priority areas are described under Section 5 of the *Accessible Canada Act*, and the following sections are divided into these areas.

Each section will include a short summary, a high-level overview of current practices to ensure inclusion and remove barriers, as well as actions that Fairstone plans to take to address identified barriers.





Employment

At Fairstone, we view employment as an individual's journey that begins with the job application process and continues throughout their entire employment at the organization. Our commitment to building an inclusive workforce is supported by a comprehensive strategy encompassing various key policies and programs. We support employees with disabilities throughout their tenure with us, reflecting our dedication to fair and accessible employment practices.



OUR DEI STRATEGY IS DEEPLY EMBEDDED IN OUR CORE VALUES AND FOCUSES ON THREE KEY OBJECTIVES:

- Improving awareness of diversity and inclusion in the workplace to better serve our existing and future customers.
- Maintaining a diverse work culture founded on equity, inclusion and respect.
- Creating opportunities for communities with varied perspectives and identities to feel supported and represented.

TO FOSTER AN INCLUSIVE ENVIRONMENT FOR ALL EMPLOYEES, WE HAVE ESTABLISHED A RANGE OF ENTERPRISE-WIDE POLICIES AND PRACTICES. THESE INCLUDE:

- Code of Conduct
- Diversity and Employment Equity policy
- Anti-Bias Training Program
- Policy Against Hiring Discrimination
- Comprehensive Disability Coverage
- Religious Diversity policy

To enhance accessibility and efficiency, we updated the contact information for HR resources provided by our People and Culture teams in 2024. This update ensures better accessibility to all HR and employment-related information for our employees. Additionally, we conduct monthly integration sessions for all new employees to familiarize them with our policies, procedures and practices.



At Fairstone, our approach ensures that every employee, regardless of their background or abilities, is valued and supported throughout their journey with us.



! BARRIERS IDENTIFIED

As observed at Fairstone, the following barriers to accessibility could include:

Application and Interview Process

- Many of our job applications are submitted online, and it has been noted that our digital platforms may not be fully accessible to individuals with disabilities. This includes issues with screen reader compatibility and the absence of alternative formats for application forms.

Current Employment Experience

- Lack of understanding of mental health needs, with insufficient changes to the work environment or management styles to support employees with neurological differences.
- Absence of clear processes for obtaining ergonomic adjustments like standing desks, ergonomics mouses or headsets.

Advancement Opportunities

- Instances of bias and misunderstanding in discussions about hiring and development, particularly affecting autistic individuals and those with ADD/ADHD.

Trainings

- Standard training programs may not be effective for employees with ADHD or ADD.





★ **OPPORTUNITY TO IMPROVE ACCESSIBILITY**

To improve accessibility, Fairstone will focus on the following opportunities:

Enhance Training Programs

- Redesign and deliver accessibility training module, with a specific focus on incorporating feedback from our consultation survey.
- Introduce a Diversity, Equity, and Inclusion (DEI) module specifically addressing disability inclusion, ensuring all employees understand the challenges faced by individuals with disabilities and how to support them effectively.

Review and Update Policies

- Conduct a review of the current Accommodation Policy to ensure it meets the needs of employees with disabilities. Update the policy to include clearer guidelines on requesting and implementing accommodations.
- Establish a streamlined process for ergonomic assessments. This should include clear steps for employees to request assessments and follow-up procedures to ensure adjustments are effective.

Foster a Culture of Accessibility

- Launch a Learning Experience Campaign aimed at increasing awareness and understanding of Diversity, Equity and Inclusion issues across the organization.
- Build a foundation of inclusion and accessibility by incorporating inclusive language in our communications and reducing knowledge gaps through continuous education and dialogue.
- Ensure representation of people with disabilities in internal and external graphics and communications, showcasing diversity and inclusion in marketing and promotional materials.
- Awareness Campaigns
 - Promote existing programs and upcoming initiatives aimed at supporting employees with disabilities.
 - Enhance mental health awareness and promotion programs by detailing what has been achieved so far and what new initiatives are on the horizon.
- Information Sessions (Branch and Customer Service team)
- Organize information sessions on the hiring process to educate managers and HR personnel on best practices for interviewing and be more inclusive.



Built Environment

The built environment includes all physical spaces that customers and employees have access to, including work-from-home spaces.

! BARRIERS IDENTIFIED

As observed at Fairstone, the following barriers to accessibility include:

Workspace and Environment

- Absence of clear processes for obtaining ergonomic adjustments like standing desks, adjustable monitors, ergonomics mouses, etc.
- Main office doors at various locations are not accessible for wheelchair users, nor are some washrooms

Customer and Employee Accessibility

- Some affiliate branches and corporate offices do not all have accessible entrances or wheelchair ramps, including automatic doors and wheelchair-friendly space
- Washrooms are not always wheelchair accessible

★ OPPORTUNITY TO IMPROVE ACCESSIBILITY

All our properties are leased, and we collaborate closely with property owners and managers to enhance accessibility across all our locations. As part of our commitment to inclusivity, we prioritize accessibility in both renovations and new site selections. Accessibility requirements are a component of our Construction Guidelines. To improve accessibility, Fairstone will focus on the following opportunity:

Review and Update Policies

- Conduct a review of Fairstone’s Construction Guidelines to ensure feedback from our consultation survey are addressed, ensuring our locations are welcoming and accommodating to everyone.



Information and Communication Technologies (ICT)

In this report, Information and Communication Technologies (ICT) encompasses all the technological tools and systems that employees use in their daily work activities, as well as the customer-facing technologies that facilitate interactions and services.

This includes everything from internal communication platforms and business systems to online services and applications accessed by our customers.

! BARRIERS IDENTIFIED

As observed at Fairstone, the following barriers to accessibility include:

Challenges in Serving Deaf or Visually Impaired Customers

- We face difficulties in serving deaf or visually impaired customers due to inadequate communication accommodations.
- Understanding what tools are available to assist customers with disabilities.

Customer Access to Fairstone Technology

- Fairstone customers sometime face challenges in using Fairstone technology, including accessing online services or applications. The means of communication are not always adapted to meet our customers' diverse needs

★ OPPORTUNITY TO IMPROVE ACCESSIBILITY

To improve accessibility, Fairstone will focus on the following opportunities:

Work to Enhance Communication around the Accessibility Process

- Fairstone is committed to enhancing communication accessibility by better promoting and extending our existing services. Currently, we offer services for credit card and retail financing operations, but we recognize the opportunity to improve their visibility and expand their availability to our affiliate direct lending business line. Specifically, we have established a TTY (Text Telephone) number, implemented an IP Relay system, and integrated a Video Relay Call system using the Canada Video Relay Service (Canada VRS). By more effectively communicating these services, we aim to ensure that all our customers and employees can access the tools they need for effective communication.



Communications other than ICT

Under the *Accessible Canada Act*, this section addresses all forms of communication within and outside Fairstone. It emphasizes in providing barrier-free services for individuals with speech, visual, or hearing impairments, ensuring that information exchange in any format is accessible.

We are committed to building an inclusive culture where accessibility is integral to our operations. If employees need support in serving clients with disabilities through non-digital communication, we are committed to improve the various internal resources are available to assist them.

! BARRIERS IDENTIFIED

As observed at Fairstone, the following barriers to accessibility include:

- Documents and/or policies may not be written in clear, simple plain language and may include undefined acronyms, jargon, idioms or expression
- Lack of clear processes for responding to requests for materials in accessible formats (e.g. large print, braille)

★ OPPORTUNITY TO IMPROVE ACCESSIBILITY

To improve accessibility, Fairstone will focus on the following opportunities:

Enhancements to Language and Services

- Fairstone is committed to simplifying language in documents and policies, providing materials in accessible formats where feasible, and enhancing our accessibility program over time. We will offer training for employees on writing in plain language, regularly review and update documents, and create and promote a glossary of commonly used terms.
- We will develop clear processes for when customers request accessible materials. By consulting with people with disabilities, we will continuously improve our customer accessibility program to ensure inclusivity. We are actively looking into these areas and will adjust our processes as needed over time.



Procurement of Goods, Services and Facilities

At Fairstone, our commitment to inclusivity extends to every aspect of our operations, including the procurement of goods, services and facilities. This section outlines our approach to ensuring that all acquisitions—whether they involve products, services, or facilities—are designed with accessibility in mind.

We strive to make every item and service usable by individuals with disabilities without requiring additional modifications. By incorporating accessibility criteria into our procurement specifications, such as ensuring new furniture accommodates all users, we aim to foster an environment that supports equal access and participation for everyone.

! BARRIERS IDENTIFIED

As observed at Fairstone, the following barriers to accessibility include:

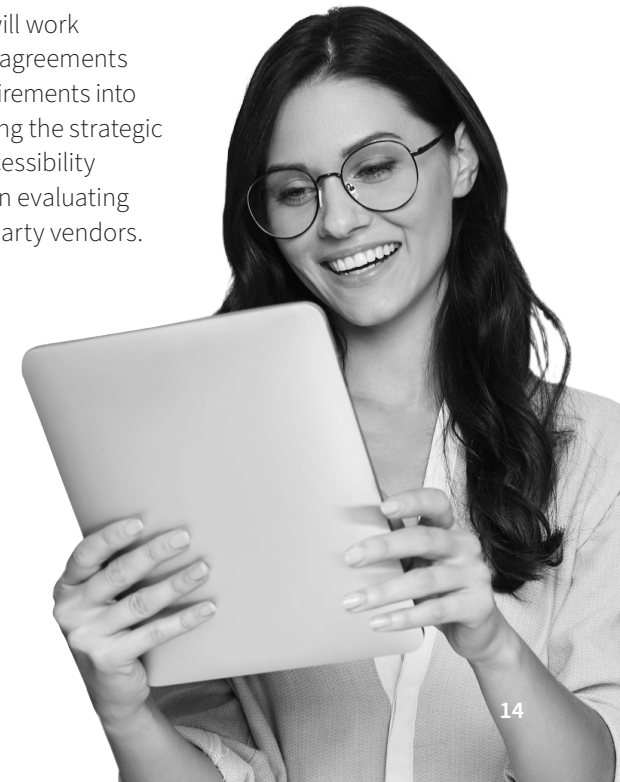
- Third party contracts / agreements may lack specific clauses on accessibility, which would outline clear expectations for our accessibility standards.

★ OPPORTUNITY TO IMPROVE ACCESSIBILITY

To improve accessibility, Fairstone will focus on the following opportunities:

Enhancements to Contractual Agreements

- In the coming years, Fairstone will work towards enhancing contractual agreements by integrating accessibility requirements into relevant agreements and updating the strategic sourcing standard to ensure accessibility capabilities are considered when evaluating goods and services from third-party vendors.





Design and Delivery of Programs and Services

In this section, we delve into how Fairstone interacts with customers, employees, business partners, and stakeholders through the design and delivery of our programs and services.

Our focus is on creating and implementing initiatives that are not only effective and efficient but also inclusive and responsive to the needs of all participants. By engaging thoughtfully and proactively, we aim to enhance the overall experience for everyone involved, ensuring that our programs and services contribute positively to our broader goals and relationships.

! BARRIERS IDENTIFIED

As observed at Fairstone, the following barriers to accessibility include:

Employee-Related Services

- Complexity in navigating benefits programs, particularly challenging for employees with disorders.
- Need for more comprehensive mental health support beyond psychologist sessions.

Customer-Related Services

- Lack of accessible washroom facilities and proper entry points at branches.
- Difficulties in configuring workstations and spaces to accommodate customers with disabilities.

★ OPPORTUNITY TO IMPROVE ACCESSIBILITY

- Several initiatives have been put in place over the last year as Fairstone promotes personalized assistance through dedicated benefits counsellors. Mental health support has been enhanced to include various services like counselling, therapy groups, and mindfulness workshops, along with a centralized mental health resources hub on our intranet.
- For customer-related services, Fairstone aims to improve physical accessibility at all our locations; therefore, when making leasehold improvements or selecting new locations, we will ask that automated doors, ramps, and accessible washroom facilities be included as noted in our Built Environment commitment.



Transportation

Fairstone has identified that its current operations do not significantly involve transportation services. Consequently, no specific barriers related to transportation have been identified under this priority area.

However, Fairstone remains committed to a comprehensive approach to accessibility. Should our involvement in transportation increase in the future, we will proactively conduct a thorough accessibility review to identify and address any potential barriers. This commitment ensures that we are prepared to extend our accessibility efforts to all facets of our operations, guaranteeing an inclusive experience for all employees and customers.

WANT TO KNOW MORE?

Discover how Fairstone is working towards a more secure, equitable, and sustainable future for all in [Fairstone's ESG Report](#).



Glossary



ACA

Accessible Canada Act

ACCESSIBILITY

Refers to how services, technology, locations, devices, environments, and products are designed to accommodate people with disabilities. It means giving people of all abilities equal opportunities to take part in life activities. The term implies conscious planning, design, and/or effort to ensure that something is barrier-free to people with disabilities. Accessibility also benefits the general population by making everything more usable and practical for all people.

BARRIER

According to the ACA, anything physical, architectural, technological or attitudinal based on information or communications that is the result of a policy or a practice that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation.

DISABILITY

According to the ACA, any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment – or a functional limitation – whether permanent, temporary or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person’s full and equal participation in society.

DISCRIMINATION

Mistreating someone by either imposing a burden on them or denying them a privilege, benefit or opportunity enjoyed by others because of their race, citizenship, family status, disability, sex, or other personal characteristics.

DIVERSITY

Diversity is about the individual. It is about the variety of unique dimensions, qualities, and characteristics we all possess, and the mix that occurs in any group of people. Race, ethnicity, age, gender, sexual orientation, religious beliefs, economic status, physical abilities, life experiences, and other perspectives can make up individual diversity. Diversity is a fact, and inclusion is a choice.

EQUAL OPPORTUNITY

Aims to ensure that all people have equal access, free of barriers, equal participation, and equal benefit from whatever an organization offers. Note that equal opportunity extends beyond employment.

EQUITY

Where everyone is treated according to their diverse needs in a way that enables all people to participate, perform, and engage to the same extent.

ESG

Environmental, Social and Governance is a framework designed to be embedded in an organization’s strategy that considers the needs and ways in which to generate value for all organizational stakeholders.

INCLUSION

Inclusion is creating a culture that embraces, respects, accepts, and values diversity. It is a mindful and equitable effort to meet individual needs so everyone feels valued, respected, and able to contribute to their fullest potential. Where diversity occurs naturally, creating the mix in the organization, inclusion is the choice that helps the mix work well together.

