

MCAN Accessibility Policy

1. Scope

This Policy applies to all Employees of MCAN and its subsidiaries as well as Volunteers, Contract Workers and Consultants doing work on behalf of MCAN and shall be administered in accordance with the Accessibility for Ontarians with Disabilities Act (AODA), 2005.

2. Objectives

MCAN Financial Group (the “Company”) is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration 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 and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA).

3. Definitions

Accessibility: The degree to which persons with disabilities can access a device, service or environment without barriers. Accessibility is also a process – it is the proactive identification, removal and prevention of barriers to persons with disabilities.

Accessibility Formats: Formats that are an alternative to standard print and are accessible to people with disabilities. Accessible formats may include large print, Braille, and audio electronic formats such as DVDs or CDs.

Accessibility Standards: Regulations or rules created under the AODA that provide minimum levels for improving accessibility to meet the goals of the AODA across the province.

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Communication Supports: Supports that individuals with disabilities may need to access information. Some examples include plain language formats, sign language, word, or picture boards as well as reading out loud, captioning, or using written notes to communicate.

Disability:

- 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 coordination, 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;
- c) A learning disability or dysfunction in one or more of the processes involved in understanding symbols of spoken language;
- d) A mental disorder; and
- e) An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act.

Guide Dog: a dog trained as a guide for a blind person and having the qualifications prescribed by the regulations to the Blind Persons Rights Act.

Support Person: In relation to a person with a disability, another person who accompanies him or her in order to assist them with communication, mobility, personal care, or medical needs or with access to goods and services.

Service Animal: Any animal used by a person with a disability where it is readily apparent that the animal is used by the person for reasons relating to his or her disability. A Service Animal includes a Guide Dog.

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4. Policy Requirements

4.1 Accessible Emergency Information

The Company is committed to providing customers and clients with publicly available emergency information in an accessible way upon request. We will also provide employees with disabilities with individualized emergency response information when necessary.

4.2 Training

The Company will provide training to employees, volunteers, and other staff members on Ontario's accessibility laws and on the Human Rights Code as it relates to people with disabilities. Training will be provided in a way that best suits the duties of employees, volunteers, and other staff members. Employees will be trained when changes are made to the Accessibility Policy. New employees will be trained as part of the onboarding process, as soon as practicable. The Company will keep a record of the training it provides.

Training will include:

- The purpose and application of this policy;
- A review of the purposes and requirements of the Accessibility for Ontarians with Disabilities Act;
- A review of the purposes and requirements of the Accessibility Standards for Customer Service Regulation;
- How to interact and communicate with persons with various types of disabilities;
- What to do if a person with a disability is having difficulty accessing MCAN's services and/or facilities;
- Instruction on MCAN's policies, procedures and practices pertaining to the provision of services to persons with disabilities;

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- How to use equipment or devices available on MCAN's premises, or that is otherwise provided by MCAN, to assist with the provision of MCAN's services to persons with disabilities; and
- How to interact with persons with disabilities who use assistive devices or who require the assistance of a support person or service animal.

4.3 Information and Communication

The Company is committed to meeting the communication needs of people with disabilities. We will consult with people with disabilities to determine their information and communication needs.

4.3.1 Feedback

The Company will continue to ensure that its 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.

Feedback may be provided in person, by telephone, in writing, or in electronic format or by visiting MCAN's website (www.mcanfinancial.com). All feedback should be directed to MCAN's Vice President, Operations.

Feedback in person or by mail should be directed to;
MCAN Financial Group
Attention: Vice President, Operations
200 King Street West Suite 600 , Toronto, ON M5H 3T4

Feedback via email can be sent to: termdeposits@mcanfinancial.com

Feedback may also be provided by calling: (855) 213-MCAN (6226)

Complaints will be handled in accordance with MCAN's current complaint management procedures.

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4.3.2 Accessible Formats and Communication Supports

Upon request, the Company will provide, or will arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability. The Company will consult with the person making the request in determining the appropriateness of an accessible format or communication support.

4.3.3 Accessible Website and Web Content

MCAN will ensure that any new web content posted to existing web pages and any significant refresh, after January 1, 2014 will comply with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 at Level A requirements, except where this is impracticable. MCAN will ensure that its website, including web content, will conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 at Level AA by January 1, 2021, except where this is impracticable.

4.4 Customer Service

The Company strives to provide its services in a manner that respects the dignity and independence of people with disabilities. MCAN is committed to giving people with disabilities the same opportunity as others to access and benefit from its services.

4.4.1 Communication

When communicating with a person with a disability, MCAN will do so in a manner that takes into account the person's disability. MCAN will train its employees, agents and any other person who deals with members of the public on its behalf, on how to interact and communicate with people with various types of disabilities.

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4.4.2 Notice of Temporary Disruptions in Services of Facilities

MCAN is aware that the operation of its services and facilities is important to our customers. On occasion, disruptions in MCAN's services and facilities may occur due to reasons that may or may not be within our control or knowledge.

MCAN will make reasonable efforts to provide notice to the public of any disruption in its services and/or facilities, including: information about the reason for the disruption, its anticipated duration and a description of alternative services and/or facilities, if any that may be available. MCAN will make reasonable efforts to provide prior notice of any planned disruptions in its services and/or facilities, if possible, recognizing that in some circumstances, including an unplanned temporary disruption, advance notice will not be possible. In such cases, MCAN will provide notice as soon as reasonably possible. When temporary disruptions occur to MCAN's services and/or facilities, MCAN will provide notice by posting the information in visible places, or on the company's website, or by any other method that may be reasonable under the circumstances as soon as reasonably possible.

4.4.3 Assisted Devices and Measures that Assist with Accessibility

A person with a disability may provide their own assistive device for the purpose of obtaining, using and benefiting from MCAN's services and facilities. Exceptions may occur in situations where MCAN has determined that the assistive device may pose a risk to the health and safety of a person with a disability or the health and safety of others on its premises. In these situations, and others, MCAN may offer a person with disability other reasonable measures to assist him or her in obtaining, using and benefiting from MCAN's services and facilities, where MCAN has such other measures available.

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It is the responsibility of the person with the disability to ensure that his or her assistive device is operated in a safe and controlled manner at all times.

4.4.4 Support Persons

A person with a disability may enter premises owned and/or operated by MCAN with a support person and have access to the support person while on the premises. MCAN may require a person with disability to be accompanied by a support person while on MCAN premises in situations where it is necessary to protect the health or safety of the person with a disability or the health and safety of others on the premises. A person with a disability who is accompanied by a support person will have access to his or her support person while on MCAN premises.

In situations where the support person will be exposed to confidential information, MCAN may require that the support person sign a confidentiality agreement.

4.4.5 Service Animals

A person with a disability may enter premises owned and/or operated by MCAN accompanied by a service animal and keep the animal with them if the public has access to such premises and the animal is not otherwise excluded by law. If a service animal is excluded by law, MCAN will ensure that alternate means are available to enable the person with a disability to obtain, use or benefit from MCAN's services and facilities. If it is not readily apparent that an animal is a service animal, MCAN may ask the person with a disability for a letter from a physician or nurse confirming that the person requires the animal for reasons relating to his or her disability. MCAN may also, or instead, ask for a valid identification card or certificate of training from a recognized guide dog or service animal training school. It is the responsibility of the person with disability to ensure that his or her service animal is kept in control at all times.

If an employee or any other person on MCAN premises has a severe allergy to animals, which could result in health and safety concerns, MCAN will make reasonable efforts in the circumstances to meet the needs of all individuals.

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4.4.6 Availability of Documents for Customer Service Standard

All documents required by the Accessibility Standards for Customer Service Regulation, including this policy, are available upon request by any customer. When providing a document to a person with a disability, MCAN will provide the document, or the information contained in the document, in a format that properly takes the person's disability into account.

All documents required by the Accessibility Standards for Customer Service Regulation, including this policy, will be posted on MCAN's website (www.mcanfinancial.com).

4.5 Employment Standard

MCAN is committed to fair and accessible employment practices. This includes providing accessibility across all stages of the employment cycle.

4.5.1 Recruitment

The Company will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment and assessment process. The Company will notify job applicants when they are individually selected to participate further in an assessment or selection process and that accommodations are available upon request in relation to the materials or processes to be used. If a selected applicant requests an accommodation, the Company will 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. When making offers of employment, the Company will notify the successful applicant of its policies for accommodating employees with disabilities.

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4.5.2 Informing Employees of Supports

MCAN will inform all employees of existing policies and any updated policies used to support employees with disabilities. This includes policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practicable after commencing employment.

4.5.3 Accessible Formats and Communication Supports for Employees

Upon the request of an employee with a disability, the Company will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his or her job, and information that is generally available to other employees. In determining the appropriateness of an accessible format or communication support, the Company will consult with the employee making the request.

4.5.4 Workplace Emergency Response Information

Where the Company is aware that an employee has a disability and that there is a need for accommodation, individualized workplace emergency response information will be provided to the employee as soon as practicable if such information is necessary given the nature of the employee's disability. Where the employee requires assistance, the Company will, with the consent of the employee, provide the workplace emergency response information to any person designated by the Company to provide assistance to the employee. The Company will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodations needs or plans are reviewed, and when the Company reviews its general emergency response policies.

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4.5.5 Individual Accommodation Plans

The Company will develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities and to facilitate an employee's return to work after absenteeism due to disability in accordance with the requirements of the Integrated Accessibility Standards Regulation (IASR), 2011.

4.5.6 Performance Management, Career Development, Advancement and Redeployment

The Company will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting its performance management process, providing career development and advancement opportunities to employees, or when redeploying employees with disabilities.

5.0 General Administration

5.1 Frequency of Review

Policy will be reviewed on an annual basis.

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