



November 2022

The following sets forth The Northern Trust Company, Canada, The Northern Trust Company, Canada Branch & NT Global Advisors, Inc.'s (collectively "NTC Canada") policy for complying with the requirements of the Accessibility for Ontarians with Disabilities Act, 2005 ("AODA"). This policy is designed to provide assurance that NTC Canada's products and services remain accessible to all clients, visitors and employees in a way that respects their disabilities, whether apparent or not.

I. General Terms

Providing Goods and Services

NTC Canada is committed to making its services fully available to Ontarians with disabilities and providing the same level of *Signature Service* – a Northern Trust standard – to all clients, in a manner which respects the dignity and independence of persons with disabilities.

Communication

Communication between NTC Canada and its clients is essential to successful relationships. NTC Canada is committed to working with persons with disabilities in order to provide alternatives that facilitate open and complete communication. We will consider individual needs when initiating the appropriate form of communication.

In accordance with the Integrated Accessibility Standards Regulation ("IASR") regarding Information and Communications, Northern Trust's digital services team places a strong emphasis on ensuring accessibility to all Northern Trust clients, with a dedicated team working across digital channels ensure compliance with World Wide Web Consortium Web Content Accessibility Guidelines ("WCAG") 2.1 AA for new features, as well as review and update existing and legacy features in compliance with WCAG regulations.

Assistive Devices/Technology

NTC Canada recognizes that some persons with disabilities require the use of assistive technology or other devices/equipment. NTC Canada partners are committed to accommodating the use of such equipment in its facilities and over its communication channels.

Persons who are deaf or hard of hearing and use telephone relay services, for example, will be fully accommodated. Verification of the identity of callers who use such services will follow the same protocol as verification for non-disabled persons.

Walkers, wheelchairs, larynx box machines and any other assistive devices used by persons with disabilities will be accommodated under this policy and the users of such devices will be welcomed.

Service Animals

Service animals, for example, guide dogs, will be permitted in NTC Canada offices when they accompany individuals with disabilities.

Support Persons

NTC Canada welcomes support persons who accompany a person with a disability, whether the support person is a family member, a friend or a volunteer.

Any customers with disabilities may be accompanied by a support person as long as the integrity of the relationship with the client/potential client with a disability is not compromised.

Notice of Temporary Disruption

In the event of a temporary disruption of service, using the available channels – telephone, internet, office building signage, other – NTC Canada will post notices to provide details of the service disruption, including the reason for and anticipated length of the disruption, alternative methods of receiving service and NTC Canada contact information.

II. Training for Partners

NTC Canada will ensure that all persons to whom this policy applies receive training as required by the AODA. In addition, training will be provided on a continuous basis to all newly hired partners of NTC Canada as part of our onboarding process.

A record of training received by NTC Canada partners will be kept by the NTC Canada Compliance department. Training will include:

- The purpose of the AODA and the requirements of the NTC Canada customer service policy.
- 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 equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods or services to a person with a disability.
- What to do if a person with a particular type of disability is having difficulty accessing the provider's goods or services.

III. Accessibility of the Customer Service Policy

An electronic version of this policy is available on northerntrust.com/Canada. Hard copies are available in the NTC Canada office located at 145 King Street West, Suite 1910, Toronto, Ontario Canada. Questions about this policy can be directed to the Senior Vice President, Chief Risk and Compliance Officer at cdr3@ntrs.com or by calling 416-775-2223.

IV. Feedback

NTC Canada welcomes feedback from clients, their representatives and other third parties, which may be received by telephone, email, mail, video, in person or any other method that meets the communication

requirements of the person providing feedback.

All feedback received will be considered and any feedback requiring a response will be handled in accordance with our Complaints Handling Policy. You should expect to receive a preliminary reply from the appropriate NTC Canada partner within 15 days of providing the feedback.

V. Modifications to this or other policies

NTC Canada is committed to developing customer service policies that respect and promote the dignity and independence of people with disabilities. All NTC Canada policies and procedures will be developed or updated in such a manner as to respect and promote the dignity and independence of persons with disabilities.