

Introduction

At Definity, we strive to meet the needs of our customers, partners, and employees with disabilities, and are actively working to remove and prevent barriers to accessibility.

Definity is committed to ensuring the services we provide are as accessible as possible to people with disabilities and are compliant with applicable Accessibility Legislation including the Accessibility for Ontarians with Disabilities Act (AODA) and The Accessibility for Manitobans Act.

This multi-year accessibility plan outlines the steps Definity has taken, and is taking, to meet those requirements, and to create or improve opportunities for people with disabilities. Our Accessibility Plan applies to Definity and its wholly-owned subsidiaries (collectively “Definity”).

Achievements to Remove and Prevent Barriers

The following represents a summary of the accessibility initiatives Definity has completed up to and including December 31, 2020.

CUSTOMER SERVICE

Definity is committed to ensuring our customer service policies and practices meet or exceed the Customer Service Standard established by Accessible Legislation. We have done this by:

- Providing appropriate and timely training to all necessary persons that is aligned with the requirements of the accessibility standards referred to in the Integrated Accessibility Standards Regulation (IASR), and continuing to provide training Accessibility as it pertains to persons with disabilities. Appropriate records of training are maintained.
- Establishing processes for customers to provide feedback or request an accommodation through all channels including telephone, TTY service, email, and post. Through these processes, we have received customer requests to supply alternative formats and have worked with those customers to provide solutions that meet their needs in a timely fashion.

INFORMATION AND COMMUNICATION

Definity is committed to ensuring we meet or exceed the communication and information requirements of people with disabilities. We have done this by:

- Providing user experience and accessibility reviews and consultation through a dedicated resource – a Senior Digital Marketing specialist on our Content & Digital Marketing team, responsible for ensuring all external digital messaging and customer facing user interfaces are rigorously tested to comply with the WCAG 2.0 A standard or better ongoing, extensive testing using assistive technology devices on all digital properties to confirm compliance
- Identifying gaps in the WCAG Level A requirements and establishing an internal standard for all Definity digital properties that exceeds the compliance requirements to deliver an experience that is accessible to all users. To address these gaps, we have incorporated the following additional WCAG 2.0 Level AA criteria:
 - Colour contrast requirements for web and digital messaging
 - Focus position is identified on all interactive controls
 - Resize text 200% without reflow issues
 - Images of text all have alternative text relayed through screen reader
 - Multiple ways of finding content on digital properties (increased to three ways rather than the AA required two)
 - Descriptive headings and labels
 - Consistent navigation

- Error prevention (legal, financial, data)
- Conducting internal training sessions as required for developers, designers, and content creators on meeting WCAG 2.0 Level A compliance and our internal AA criteria
- Conducting internal and third-party accessibility audits and user testing on external digital properties when new sites are launched
- Acquiring automated accessibility testing and reporting tool for our web properties
- Curating an extensive library of accessibility requirements, samples, and tools for development and content creation teams to reference and review
- All employees completed the AODA training course and is currently included in onboarding plans for new employees
- Document accessibility will be incorporated at the asset design phase. -
- Automated accessibility reporting will be incorporated and integrated within development and design workflows - Digital and design marketing team members from Sonnet and Economical (now known as Definity) participated in training sessions to deepen accessibility knowledge and update processes to ensure greater rigour of execution.
- Document accessibility was incorporated at the asset design phase

TRAINING

Definity is committed to ensuring our standards for accessibility training are in full compliance with applicable regulations. We have done this by:

- Mandatory Accessibility training for all new employees
- Transitioning our eLearning authoring tools for employee and partner audiences to one that allows HTML output, removing a dependency on Flash-based content (net new eLearning content is created using accessible technologies)
- Developing a learning module for customer-facing roles to address specific accommodation requests and customers with diverse needs.
- Implementing a training platform solution that provides a more robust accessible experience for all employees

EMPLOYMENT

Definity is committed to being an inclusive and accessible employer. We have done this by:

- **Workplace emergency response information** — Individual workplace emergency response plans have been developed, documented, and implemented for employees with disabilities.
- **Recruitment** — Open positions are posted on Economical.com and include notice of the availability of accommodation for applicants with disabilities in the recruitment process. In addition, applicants are notified

when they are called for an interview about the availability of recruitment-related accommodations during the selection process.

- **Informing employees of support available** — Definity advises potential employees of supports available during the offer process and is outlined in our employment offer letter. Updated information on accommodations policies is provided to employees when changes occur.
- **Individual accommodation plans** — On request, we will consult with an employee with a disability to create an individual accommodation plan to determine which accessible formats or communication supports they require to perform the duties of their job. The plan will cover:
 - Providing individual accommodation plans in a format that meets the needs of the employee
 - Individualized workplace emergency response information, if required
 - Regular review and updates to the individual accommodation plan, where required
 - Return to work process to ensure successful re-integration to their role
 - Privacy considerations
- **Performance management, career development, advancement, and redeployment** — When undertaking performance management, and providing career development and advancement opportunities to employees with disabilities, we will take into account the accessibility needs as well as individual accommodation plans (where they are in place). We also regularly review and update our internal people practices and procedures.

PROCUREMENT

Definity is committed to ensuring our procurement processes prevent barriers to accessibility. We have done this by:

- Procurement and selection of third party digital tools meet accessibility compliance requirements
- Definity is committed to ensuring our procurement processes include accessibility checkpoints for all digital and physical products and services where applicable.
- Procurement for digital solutions will incorporate accessibility requirements as an integrated step in the sourcing and selection processes.

OTHER

- There are plans in place to address the needs of our customers, partners, and employees with disabilities during times of service disruption
- Established Emergency evacuation and individual evacuation plans.
- Launched an Accessibility Working Group that meets quarterly, represented by various departments, to ensure the Accessibility Plan is implemented and updated and key risks
- Established a Diversity and Inclusion Advisory Committee and three employee resource groups.
- Updated our Accessibility Policy language to incorporate all jurisdictions across Canada with accessible legislation are represented under this plan and the policy.

FUTURE Strategies and Actions

The following represents a summary of the accessibility initiatives Definity is committed to pursuing in 2021 and beyond.

CUSTOMER SERVICE

Definity is committed to providing ongoing accessible customer service, providing goods and services to people with disabilities with the same high quality and timeliness as others.

- Continue to source new resources and tools to support accessibility audits

INFORMATION AND COMMUNICATIONS

Definity is committed to making our information and communications accessible to people with disabilities.

- Definity is committed to delivering digital properties which meet or exceed WCAG 2.0 Level A requirements. Additionally, any significant, net new changes to our web properties will be designed and developed to meet WCAG 2.0 Level AA compliance.
- Establish a Digital Accessibility Centre of Excellence to promote consistency in execution of accessibility compliance across Definity's Communication and Marketing functions, and continue to address any gaps in training, knowledge, or technology as they arise.

TRAINING

Definity is committed to providing training in the requirements of Accessibility and Human Rights Laws as it applies to people with disabilities.

- All employees will continue to be required to complete Accessibility training
- Continue to offer a customer service representative specific training module available to employees related to interacting with users with diverse needs
- Finalize internal accessibility review process for developing accessible learning assets
- New eLearning content will be created using accessible technologies

EMPLOYMENT

Definity is committed to fair and accessible employment practices.

PROCUREMENT

Definity is committed to ensuring our procurement processes include accessibility checkpoints for all digital and physical products and services where applicable.

- Procurement for digital solutions will incorporate accessibility requirements as an integrated step in the sourcing and selection processes.

DESIGN OF PUBLIC SPACES

Definity continues to meet accessibility laws when building or making major changes to public spaces.

- Work is nearing completion to reconstruct the employee entrance of the Definity head office. The construction incorporates changes to outdoor eating areas and outdoor paths of travel. Construction is planned for completion in 2021 and will meet the technical requirements for public space accessibility.
- If approved, the plan to renovate the server area of the Westmount cafeteria; including lowering counters, more accessible self-service areas, etc. would be included in this project. Please note this project may be deferred to a future year depending on pandemic circumstances.

FOR MORE INFORMATION

For more information on this accessibility plan, please contact us at:

- Toll-free: 1-800-265-9996
- TTY (Ontario): 1-800-268-9242
- TTY (Quebec): 1-800-361-6476
- Email: accessibility@economical.com

You can also submit your comments through our online [Customer Service Feedback form](#) or contact us through our website or our social media channels:

- Website: economical.com
- LinkedIn: [linkedin.com/company/14505/](https://www.linkedin.com/company/14505/)
- Twitter: twitter.com/economicalCA

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