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SERVING CUSTOMERS WITH DISABILITIES

Background and Purpose

The purpose of this Accessibility Policy (this “Policy”) is to be proactive about the inclusion of people with disabilities in our service offerings and to align Definity with legislative requirements, such as the Accessibility for Ontarians with Disabilities Act, The Accessibility for Manitobans Act and corresponding regulations (collectively “Accessibility Legislation”). The purpose of Accessibility Legislation is to benefit all Canadians by developing, implementing and mandating accessibility standards to achieve accessibility with respect to goods, services, facilities, accommodation, employment, buildings, structures, and premises for persons with disabilities.

This Policy applies to Definity and its wholly-owned subsidiaries (collectively “Definity”).

Definity is committed to ensuring the services we provide are as accessible as possible to persons with disabilities and are compliant with applicable Accessibility Legislation. To fulfil this commitment, Definity has developed inclusive policies and procedures that mirror the standards established by Accessibility Legislation. These policies and procedures will be regularly monitored and reviewed to ensure access and accommodation for all persons with disabilities.

The purpose of this Policy is to:

- identify, remove, and prevent barriers to accessing our services for people with disabilities
- build awareness within the Definity community of the rights of persons with disabilities and our responsibility to foster an accessible and inclusive environment
- provide equal access to services and facilities for all customers
- provide equal opportunity in employment
- monitor the continual improvement of access to our properties, facilities, and services
- define the development, publication, and review of the annual Accessibility Plan
- ensure quality in what and how we deliver services to all members of Definity community
- ensure compliance with applicable Accessibility Legislation

The objective of this Policy is to address the following with respect to service delivery to persons with disabilities:

- the provision of goods and services
- the use of assistive devices
- the use of guide dogs and service animals
- the use of support persons
- receiving customer feedback
- employee training
- notice of availability and format of required documents

STATEMENT OF COMMITMENT AND ACCOUNTABILITIES

Commitment

Definity supports and promotes the rights of all persons with disabilities. Definity also affirms the rights of all persons, including those with disabilities, to have access to equal opportunity in employment or business dealings with Definity.

Definity strives to provide an accessible environment for all persons with disabilities who interact with us and affirms its commitment to promoting the following principles in all of its policies and interactions with persons with disabilities:

Dignity — Respecting the dignity of a person with a disability means treating them as valued customers, deserving of the same high quality and timely service as any other customer. Persons with disabilities are not treated as an afterthought or forced to accept lesser service, quality, or convenience. The delivery of goods and services must take into account how persons with disabilities can effectively access and use them.

Independence — In some instances, independence means freedom from control or influence of others; freedom to make one's own choices. In other situations, it may mean the freedom to do things in one's own way. Definity must allow persons with disabilities to take the time they need, without rushing or taking over a task from a person who prefers to do it themselves.

Integration — The provision of goods or services to persons with disabilities and others must be integrated to allow persons with disabilities to fully benefit from the same services, in the same place, and in the same or similar way as other customers. Integration means that policies, programs, and services, including practices and procedures, are designed to be accessible to everyone.

Equal opportunity — Persons with disabilities must be offered the same chances, options, benefits, and results to obtain, use, and benefit from the goods or services provided by Definity. They should not have to make significantly more effort to access or obtain services or accept lesser quality of services.

Accountabilities

Definity accountabilities

- Ensure all leaders and employees are aware of this Policy and its application
- Hold all leaders and employees accountable for their responsibilities in related program elements and obligations
- Advocate and support accessibility through assigning internal responsibility, and aligning the required resources and behaviours to targeted initiatives, programs, and policies
- Consider accessibility of people with disabilities as part of the regular development and ongoing review of existing policies and practices
- Amend existing policies as needed to comply with Accessibility Legislation

Leader accountabilities

- Communicate this Policy to all employees
- Inform employees of their obligations and accountabilities to adhere to the requirements of this Policy as an element of their work performance and a condition of employment
- Implement, monitor, and evaluate compliance to this Policy in their business unit
- Ensure employees are responding to requests for accommodation in a timely manner
- Ensure all complaints, or identified risks about accessibility, are dealt with in a timely manner

Human resources accountabilities

- Identify, develop, and deliver required training on this Policy
- Review this Policy and procedures related to accessibility on an annual basis
- Monitor developments of the accessibility standards and communicate these developments to the business

Employee accountabilities

- Support the implementation of accessibility standards in the workplace
- Participate in required training related to the accessibility and Definity policies and procedures
- Promote the principles of dignity, independence, integration, and equal opportunity when providing customer service
- Forward feedback from customers regarding accessibility to their leader

SCOPE OF THE ACCESSIBILITY POLICY

This Policy applies to the provision of goods and services at premises owned or operated by Definity, as well as any interactions with employees, customers, and clients via telephone, email, post, websites or through social media.

This Policy applies to employees, as well as volunteers, agents, and contractors who deal with the public or third parties that interact with the public on behalf of Definity.

DEFINITIONS

For the purposes of this Policy, the terms 'assistive device', 'barriers', 'customers', 'disability', 'guide dog', 'support person' and 'service animal' shall have the meanings given to them in applicable Accessibility Legislation. In jurisdictions where there is no applicable Accessibility Legislation, or where such term is not defined, these terms shall have the following meanings:

Assistive device — Any device used to assist persons with disabilities in carrying out activities or in accessing the services of our organization. This could include technical devices such as communication devices or personal assistive devices such as a walker.

Barriers — Barriers are anything that hinder a person with a disability from fully and effectively participating in all aspects of society on an equal basis because of his or her disability. There are several types of barriers such as:

- physical barrier
- architectural barrier
- information or communications barrier
- attitudinal barrier
- technological barrier
- policy, practice, or procedural barrier

Customers — Include direct customers and customers of third party providers that represent Definity (i.e., brokers).

Disability — Disability means:

- 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 co-ordination, 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;
- a condition of mental impairment or a developmental disability;
- a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- a mental disorder; or
- an injury or disability for which benefits were claimed or received under the insurance plan established under applicable workers' compensation legislation.

Guide dog — A highly-trained working dog that has been trained at one of the special facilities to provide mobility, safety, and increased independence for people with visual impairments.

Support person — An individual hired or chosen by a person with a disability to provide service or assistance with communication, mobility, personal care, medical needs, or access to goods or services.

Service animal — Any animal used by a person with a disability for reasons relating to the disability, where the person provides:

- a letter from a physician confirming that they require the animal for reasons relating to their disability, or
- a valid identification card signed by the Attorney General of Canada, or a certificate of training from a recognized guide dog or service animal training school.

ACCESSIBILITY STANDARDS

Information and Communication

Upon request, Definity will communicate with people with disabilities in ways that take into account each individual's needs, in a timely manner at no additional cost to the person.

Accessible websites and web content

Definity internet websites and web content will conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out in Accessibility Legislation where applicable.

Public safety

In preparing emergency procedures, plans, and public safety information documents, Definity will ensure that all documents made available to the public will be made available in an accessible format or with appropriate communication supports, upon request.

Employment

The purpose of the employment standard is to integrate accessibility into a regular workplace process, and to ensure that Definity provides accessibility across all stages of the employment lifecycle. The employment standard applies only with respect to paid employees. This includes, but is not limited to, full-time and part-time employees and contract employees. The employment standard does not apply to volunteers or other unpaid staff.

Workplace emergency response information

Should any employee at Definity with a disability, whether permanent or temporary, require a personalized workplace emergency response plan, Definity will create such document as soon as the information is provided from the employee. Definity will work with the employee, their leader, and the Occupational Health and Safety committee for that location to ensure a plan is in place in the event of an emergency.

This information shall be reviewed if the employee moves to a different location in the organization, if the employee's overall accommodation needs or plans change, and when Definity reviews its general emergency response policies.

Recruitment

Definity will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

Recruitment, assessment, and selection process

Definity will notify job applicants when they are selected to participate further in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.

If a selected applicant requests accommodation, Definity will consult with the applicant, and provide or arrange for the provision of suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

Notice to successful applicants

When making offers of employment, Definity will notify the successful applicant of its policies for accommodating employees with disabilities.

Informing employees of supports

Definity will inform its employees of the policies used to support employees with disabilities, including but not limited to policies on the provision of job accommodation that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as possible after commencing employment.

Accessible formats and communication supports for employees

Upon the request of an employee with a disability, Definity 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 the employee's role, and information that is generally available to other employees.

Documented individual accommodation plans

Definity will maintain a written process for the development of documented individual accommodation plans for employees with disabilities.

If requested, information regarding accessible formats and the communications supports provided will also be included in individual accommodation plans.

In addition, the plans will include the individual's workplace emergency response information (where required), and will identify any other accommodation that is to be provided.

For further information on our process for creating documented accommodation plans for employees with disabilities, please see our Accommodation Policy.

Return-to-work process

Definity is committed to supporting employees who have been absent from work due to illness, injury, or disability, and require accommodation in order to return-to-work. Definity will work with the returning employee and other stakeholders to create a return-to-work plan to ensure a successful reintegration of the employee into the workplace. If required, Definity will create an individual accommodation plan as per our Accommodation Policy.

Performance management, career development, advancement, and redeployment

Definity is committed to providing all employees equal opportunity for advancement. Definity will take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans (where they are in place), when undertaking performance management, and providing career development and advancement to employees with disabilities. When conducting any redeployment initiatives, Definity will also take into account the accessibility needs and individual accommodation plans (where they are in place).

Design of Public Spaces

Definity is committed to ensuring its buildings are accessible. Definity reviews the requirements associated with Accessibility Legislation on a regular basis.

Customer Service

Assistive devices

In such cases where a person with a disability requires the use of their own personal assistive devices in order to access the goods and services provided by Definity, they are welcome to do so. Assistive devices include, but are not limited to hearing aids, wheelchairs, electronic organizers, magnifying devices, and electronic voice synthesizers.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to facilitate access to goods and services.

Guide dogs and service animals

Persons with disabilities who rely on the use of guide dogs or service animals are welcome to bring such animals with them to Definity in order to access the goods and services provided. The only exception to this practice is where such animals are prohibited by law.

If a guide dog or service animal is excluded by law, Definity will make all reasonable efforts to offer alternative methods to enable the person with a disability to access goods and services.

Recognizing a guide dog and/or service animal

If it is not readily apparent that the animal is being used by the customer for reasons relating to a disability, Definity may request verification from the customer which should include

- a letter from a physician, therapist, or nurse confirming that the person requires the animal for reasons related to the disability
- a valid identification card signed by the Attorney General of Canada, or
- a certificate of training from a recognized guide dog or service animal training school.

Support persons

If the use of a support person is required in order to access the goods and services provided by Definity, persons with disabilities are welcome to have the support person present when interacting with Definity. If necessary, Definity will request written authorization to validate that the support person can act on the customer's behalf.

Definity recognizes that at times, a support person may be necessary for the health and safety of the person with the disability or for the health and safety of others on the premises.

All customer confidentiality requirements and practices will also apply to support person.

Communication

Definity will ensure all members of the organization strive to communicate with a person with a disability in a manner that takes into account their disability. All employees will be trained on how to interact and communicate with customers with disabilities. We will offer alternative communication and document formats that will meet the needs of customers with disabilities as promptly as feasible.

Training

Training will be provided to all employees and volunteers of Definity. Training will be provided as soon as practicable upon the individual being assigned the applicable duties, and on an ongoing basis as changes occur to Definity policies, procedures, and practices relating to the provision of services to persons with disabilities.

Definity will maintain a training policy and a record of training that includes a summary of the content of the training, the dates training was provided, the number of employees, and names of employees trained.

The training will be conducted in an online format and will include information on the purposes of Accessibility Legislation, how to communicate and interact with people with disabilities, how to interact with a service animal or support person, how to utilize assistive devices that are available on our premises, how to interact with persons with disabilities who use an assistive device or require assistance of a service animal or support person, what to do if a person with a disability has difficulty accessing Definity services or facilities, and our policies, procedures, and practices pertaining to accessibility.

Contractors and agents providing services to the public on behalf of Definity will also be required to ensure their staff has received appropriate training.

Disruption of service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Definity. In the event of temporary disruption to facilities or services that customers with disabilities rely on, reasonable efforts will be made to provide advance notice. In some circumstances, such as an unplanned temporary disruption, advance notice may not be possible.

Notification will be given by posting the information in a conspicuous place that is owned and operated by Definity and on our website, or will be given by another reasonable method. In the event that a notification needs to be posted, the following information will be included, unless it is not readily available or known:

- the goods or services that are disrupted or unavailable
- the reasons for the disruption
- the anticipated duration
- description of alternative service or options

Feedback process

Customers will have an opportunity to provide feedback on how Definity provides goods or services to people with disabilities. This feedback will be received by the Definity human resources department, and feedback will be forwarded to the relevant business unit. Definity will respond to any feedback, take immediate action on any complaints and document its resulting actions. Feedback forms, along with alternate methods of providing feedback, such as verbally (in person or by telephone), or written (paper or electronic), will be made available upon request.

Availability and format of documents (alternative formats)

All documents required by Accessibility Legislation, as well as related policies, including the Accessibility Policy, notices of temporary disruptions, training policy, written feedback process and documentation of actions resulting from feedback, are available upon request. When providing these documents to a person with a disability, Definity will endeavour to provide the document, or the information contained in the document, in a format that takes the person's disability into account.

REVIEW AND ADMINISTRATION

All areas of Definity are accountable for ensuring that the principles of this policy are upheld. However, it is the responsibility of human resources to ensure that this policy is reviewed every three years, or as required, to ensure adherence to developing law (i.e., regulatory standards for accessibility).

Should you have any questions or concerns about this policy or the related procedures, please contact Definity:

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