

Accessibility Standards Policy

This **Accessibility Standards Policy** ("the Policy") is intended to meet the requirements of the *Integrated Accessibility Standards Regulation* ("the Regulation").

This Policy establishes accessibility standards applicable to persons with disabilities in the following areas of the Company's operations: information and communications, employment and human resources, and facilities open to members of the public.

The Company is governed by this Policy, the Company's **Accessible Customer Service Policy** and such other policies that the Company may adopt to make its products, services and operations accessible to persons with disabilities.

This Policy applies to all employees, volunteers, agents or contractors who deal with members of the public or other third parties in Ontario on behalf of the Company.

The standards set out in the Regulation, as reflected in this Policy, are not a replacement or a substitution for the requirements established under the Ontario *Human Rights Code*; nor do the standards limit the obligations owed to persons with disabilities in Ontario under any other legislation.

This Policy will be implemented in accordance with the time frames established by the Regulation. Throughout the Policy, SecuriGlobe will be referred to as "the Company," "we," "our" or "us."

For the meaning of terms used in this Policy and not otherwise defined, please refer to the "Definitions" section.

Our Commitment

The Company is committed to treating all people in a way that allows them to maintain their dignity and independence. We are committed to meeting the needs of persons with disabilities in a timely manner in accordance with the provisions of this Policy and the Regulation.

The Company demonstrates its commitment to serving persons with disabilities in the following ways:

A. Accessibility Policies, Self-Service Kiosks and Training

1. Accessibility Policy

We will establish and maintain policies that explain how the Company will meet its obligations to persons with disabilities under the Regulation.

2. Self-Service Kiosks

If we use self-service kiosks to provide insurance or other financial products or services to customers, we will consider the accessibility of the kiosks to persons with disabilities.

"Kiosk" means an interactive electronic device that allows members of the public to access the Company's products and services.

3. *Training*

As soon as is practicable, we will provide training on this Policy, the Regulation and the Ontario *Human Rights Code* (as it pertains to persons with disabilities) to:

- All of the Company's employees and volunteers
- All persons who participate in the development of the Company's policies and
- All other persons who provide products or services on behalf of the Company.

The training will be appropriate to the duties of the employees, volunteers and other persons. The training will be conducted on an ongoing basis to reflect any changes to this Policy and to such other policies that the Company may from time to time adopt in order to make its products, services and operations accessible to persons with disabilities.

B. Information and Communications Standards

1. *Feedback*

Our process for receiving and responding to customer feedback will be accessible to persons with disabilities. We will arrange to provide accessible formats and communication supports, upon request, to enable persons with disabilities to provide feedback on the Company's products and services, including the manner in which these products and services are delivered.

"Accessible formats" may include large print, electronic and other formats usable by persons with disabilities.

"Communication supports" may include devices to assist persons with disabilities who are hearing impaired, communication using plain language and other supports that facilitate communications between the Company and its customers.

2. *Accessible Formats and Communication Supports*

To assist persons with disabilities in their communications with the Company, we will, upon request:

- Arrange to provide accessible formats and communication supports for persons with disabilities
- Consult with the person making the request to determine the suitability of a particular format or communication support and
- Inform members of the public of the availability of accessible formats and communication supports.

We will provide accessible formats and communication supports:

- In a timely manner that takes into account accessibility needs due to a person's disability and
- At a cost that is no more than the regular cost charged to the Company's other customers.

C. Employment Standards

1. Recruitment – General

We will inform our employees and members of the public of the availability of accommodation for applicants with disabilities who are participating in the Company's recruitment process.

2. Recruitment, Assessment or Selection Process

We will notify applicants for employment who are individually selected to participate in an assessment or selection process that they may, upon request, have access to accommodations with respect to the materials or processes to be used. We will consult with selected applicants who request an accommodation and will arrange to provide a suitable accommodation in a manner that takes their accessibility needs due to disability into account.

3. Notice to Successful Applicants

When making offers of employment, we will inform all successful applicants of this Policy and such other policies that the Company may, from time to time, adopt in order to accommodate employees with disabilities.

4. Informing Employees of Supports

We will inform our employees about this Policy and such other policies that the Company may, from time to time, adopt in order to support employees with disabilities. This information will include policies on the provision of job accommodations that take into account the accessibility needs of employees due to disability. This information will be provided to new employees as soon as is practicable following the commencement of employment. Training will be provided on an ongoing basis to reflect changes made to the Company's policies.

5. Accessible Formats and Communication Supports for Employees

Upon the request of an employee with a disability, we will consult with the employee to arrange for the provision of accessible formats and communication supports for:

- (a) Information needed to perform the job duties and
- (b) Information generally available to other employees.

In determining the suitability of an accessible format or communication support, we will consult with the employee making the request.

6. Workplace Emergency Response Information

We will provide individualized workplace emergency response information to employees who have a disability if the disability is such that the individualized information is necessary and we are aware of the need for accommodation due to the disability.

If an employee requires assistance, we will, with the employee's consent, provide the workplace emergency response information to the person designated by the Company to provide assistance to the employee.

We will provide individualized workplace emergency response information as soon as is practicable, once we become aware of the need for accommodation due to the employee's disability.

We will review the individualized workplace emergency response information when:

- (a) The employee moves to a different location within the Company
- (b) The employee's overall accommodations needs or plans are reviewed and
- (c) The Company reviews its general emergency response policies.

7. Performance Management, Career Development and Advancement, and Redeployment

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

"Performance management" means a process for assessing and improving employee performance, productivity and effectiveness.

"Career development and advancement" includes the assignment of an employee from one position to another within an organization involving an increase in pay or greater responsibility or elevation to a higher level within the organization (or a combination of the above).

"Redeployment" means the reassignment of an employee to another department or position within the organization when a particular department or position no longer exists.

D. Design of Public Spaces

When constructing new spaces on our premises for use by the public, or when redeveloping existing ones, we will meet the design and accessibility requirements set out in the Regulation. Examples of public spaces include outdoor walkways, parking facilities, service counters and waiting areas.

Definitions

For the purposes of this Policy, the following terms have the meanings indicated.

"Disability" means:

(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 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

(b) A condition of mental impairment or a developmental disability

(c) A learning disability or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language

(d) A mental disorder or

(e) An injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997 (Ontario)*.

Contact Us

To find out more about our **Accessibility Standards Policy**, please feel free to contact us:

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