



THE EMPIRE LIFE INSURANCE COMPANY

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

CUSTOMER SERVICE STANDARDS POLICY

November 30, 2011

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ACCESSIBLE CUSTOMER SERVICE STANDARDS POLICY

1. PURPOSE OF THIS POLICY

1.1 The Empire Life Insurance Company (the “Company”) is required to implement customer service standards in order to comply with the *Accessibility for Ontarians with Disabilities Act, 2005*, Customer Service Standard regulations issued by the Ontario Ministry of Community and Social Services effective January 1, 2012.

1.2 This Policy:

- (a) Sets out the responsibilities required by the Company with respect to the Customer Service Standard regulations as follows:
 - i. Establishing policies, practices and procedures governing the provision of goods and services to persons living with disabilities;
 - ii. Allowing persons living with disabilities who use service animals or support persons to enter areas that are open to the public or that are open to other third parties where the Company is providing goods or services;
 - iii. Notifying the public regarding temporary planned or unexpected disruptions to facilities or services that persons living with disabilities use to access the Company’s goods or services;
 - iv. Providing training to all people who interact with the public on the Company’s behalf, as well as to those who are involved in developing the organization’s policies and procedures;
 - v. Establishing a process by which people can give feedback on how the Company provides goods or services to persons living with disabilities and describe how the Company will respond to the feedback; and
 - vi. Maintaining documents containing the general policies, feedback processes and training materials developed pursuant to the above requirements, as well as to provide such documents to any person upon request.

2. SCOPE

2.1 This policy applies to all employees, volunteers and others who deal with the public or other third parties on the Company’s behalf.

3. POLICY

3.1 Our commitment

- (a) Empire Life strives at all times to provide its goods and services in a way that respects the dignity and independence of all people.
- (b) We are also committed to giving people living with disabilities the same opportunity to access our goods and services and allowing them to benefit from the same services, in the same place and in a similar way as other customers.

3.2 Providing goods and service to people living with disabilities

- (a) Empire Life is committed to excellence in serving all customers. This commitment is demonstrated in the following areas:

(i) Assistive devices

We are committed to serving people living with disabilities who use assistive devices to obtain, use or benefit from our goods and services.

We ensure staff is trained and familiar with various assistive devices that may be used by customers living with disabilities while accessing our goods or services.

(ii) Communication

We will communicate with people living with disabilities in ways that take into account their disability.

We train staff who communicate with the public on how to interact and communicate with people living with various types of disabilities.

(iii) Telephone services

We are committed to providing telephone services to our customers using Bell Canada's Relay Service should it be required.

We train staff to communicate with people over the telephone in clear and plain language.

(iv) Written documentation

We are committed to providing accessible Customer Service policies and procedural documentation to our customers, employees or other persons living with disabilities if requested.

Customer service standard policies and procedures will be provided in alternative format mutually agreeable between Empire Life and the person living with disabilities.

We will answer any questions customers may have about the content of these policies and procedures in person, by telephone or email.

3.3 Use of service animals and support persons

- (a) We are committed to welcoming people living with disabilities who are accompanied by a service animal on the parts of our premises open to the public and other third parties.

We will ensure our employees, and others who may deal with the public, are properly trained on how to interact with people living with disabilities who are accompanied by a service animal.

- (b) We are committed to welcoming people living with disabilities who are accompanied by a support person. Any person living with a disability who is accompanied by a support person will be allowed to enter parts of our premises which are open to the public with his or her support person.

At no time will a person living with a disability who is accompanied by a support person be prevented from having access to his or her support person while on those parts of the premises which are open to the public.

3.4 Notice of temporary disruption

- (a) Empire Life will provide the public with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people living with disabilities.
- (b) This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available. The notice will be placed at all Empire Life reception areas and depending on the nature of the disruption will also be provided on outgoing telephone messages and on the Company website.

3.5 Training

- (a) Customer service training will be provided as part of Empire Life's corporate orientation program for new staff whose role involves interaction with the public. This training will be completed within the first month of the date of hire.
- (b) Empire Life will provide customer service training to all existing employees who interact with the public as well as those involved in the development and approvals of customer service policies, practices and procedures before January 1, 2012.
- (c) Accessibility customer service training will be provided as required to any existing employee transferring to a new role where they will be required to interact with the public.

3.6 Feedback

- (a) Empire Life's goal is to meet customer service expectations while serving customers with disabilities. Comments on our services and how well expectations are being met are welcome and appreciated.
- (b) Feedback regarding the way Empire Life provides goods and services to people living with disabilities may be made by e-mail, letter, phone, in person; or via the feedback form available online, or in hard copy by request or, in another format that better meets the person's communication needs.
- (c) Our feedback process specifies all comments will be shared with our Company Ombudsman so it can be recorded, reviewed and responded to in a timely fashion.

A copy of this Policy would be made available in an alternate format upon request.