



# ACCESSIBILITY POLICY

## Purpose

The Empire Life Insurance Company and Empire Life Investments Inc. have implemented this policy in order to comply with:

- the Integrated Standards Regulation issued pursuant to the *Accessibility for Ontarians with Disabilities Act*; and
- the Customer Service Standard Regulation, the Accessible Employment Standard Regulation and the Accessible Information and Communication Standard Regulation issued pursuant to *The Accessibility For Manitobans Act*.

## Scope

This Policy applies to The Empire Life Insurance Company and Empire Life Investments Inc. (“Empire Life”).

## Our Commitment

Empire Life is committed to respecting the dignity and independence of people with disabilities by preventing and removing barriers to accessibility.

## Definitions

“**accessible formats**” are alternatives to standard print such as large print, recorded audio, and Braille.

“**barriers**” are anything that prevent a person with a disability from fully taking part in society because of that disability. Barriers include:

- physical barriers e.g. a step at the entrance to a building;
- architectural barriers e.g. no elevators in a building of more than one floor;
- information or communications barriers e.g. a publication that is not available in large print
- attitudinal barriers e.g. assuming a person with a disability cannot perform a certain task
- technological barriers e.g. a website that does not support screen-reading software
- policies or practices e.g. a recruitment process that does not offer accommodations

“**communication supports**” are used to facilitate effective communication with people with disabilities and may include:

- Screen Reader software
- Verbal explanation of a written document
- Video captioning, transcripts
- Use of plain language or sign language

**“disability”** means:

- Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and may include diabetes mellitus, epilepsy, a brain injury, paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a service animal, or on a wheelchair or other remedial appliance or device;
- Mental impairment or a developmental disability;
- A learning disability or a dysfunction;
- A mental disorder; or
- An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

**“information”** includes data, facts and knowledge in any format, including text, audio, digital, and images.

## Policy

### Accessibility Plan

Empire Life will establish, implement, maintain and document a multi-year accessibility plan, which outlines its strategy to prevent and remove barriers and meet its obligations under this policy; post the accessibility plan on its website and provide the plan in an accessible format upon request.

Empire Life’s accessibility plan (the “Plan”) is set out in Appendix A.

Empire Life will:

- (i) post the Plan on its corporate website and provide an accessible format on request;
- (ii) review and update the Plan at least once every five years; and
- (iii) provide the plan in an accessible format upon request.

### Accessibility Training

Empire Life will provide accessibility training to:

- (i) all of its employees; and
- (ii) all other people who provide products and services on behalf of Empire Life who are not required to be trained by another organization;

The accessibility training will address:

- (i) how to make employment opportunities accessible to people with disabilities;
- (ii) how to interact and communicate with applicants or employees who face barriers, use assistive devices, or are assisted by a support person or service animal;
- (iii) how to apply the accessible customer service standards;
- (iv) an overview of the accessibility legislation, the applicable Human Rights Codes, and the applicable accessibility standards;
- (v) Empire Life’s accessible policies and procedures, including updates or changes; and
- (vi) how to accommodate employees with a disability to staff with the following responsibilities:
  - (1) recruiting, selecting or training employees;
  - (2) supervising, managing or coordinating the work of employees;

- (3) promoting, redeploying or terminating employees; and
- (4) developing and implementing employment policies and practices.

A record of the accessibility training provided, including who was trained and the date of the training, will be retained.

## Accessibility Standards

### 1. Information and Communication Standards

This section outlines how Empire Life will make information accessible for people with disabilities.

#### 1.1 Feedback Processes

Empire Life will:

- (i) provide accessible formats and communication supports for its processes for receiving and responding to feedback on request; and
- (ii) notify the public about the availability of these formats and supports

#### 1.2 Requests for Accessible Formats and Communication Supports

Empire Life will notify the public about the availability of accessible formats and communication supports.

When requested, Empire Life will:

- (i) consult with the person making the request to determine their accessibility needs;
- (ii) provide information in an accessible format and with communication supports, taking into account the person's accessibility needs due to disability; and
- (iii) provide accessible formats and communication supports in a timely manner and at a cost that is no more than the regular cost charged to other persons

#### 1.3 Website Accessibility

Empire Life will make its external websites and their web content accessible to people with disabilities by conforming to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) according to the following schedule:

- (i) By January 1, 2014, any new websites and their content and any existing websites that undergo a significant refresh will conform to WCAG 2.0 Level A.
- (ii) By January 1, 2021, all existing and new websites and their web content will conform to WCAG 2.0 Level AA.
- (iii) By May 1, 2025, all existing and new websites and their web content will conform to WCAG 2.1 Level AA.

#### 1.4 Exceptions to Information and Communication Standards

The requirements set out in sections 1.1, 1.2 and 1.3 above do not apply to:

- (i) products;
- (ii) information that Empire Life does not control directly or indirectly through a contract; or
- (iii) information or communications that cannot be converted because it is not feasible to convert them or the technology to convert them is not readily available

If it is determined that information or communications cannot be converted, Empire Life will provide the person requesting the information or communication with:

- (i) an explanation of why the information or communication cannot be converted; and

- (ii) a summary of the information or communication.

## 2. Employment Standards

This section outlines how Empire Life will make accessibility part of the recruitment process and support employees with disabilities. These standards only apply to employees or potential employees and do not apply to any non-paid individuals.

### 2.1 Recruitment

When advertising job positions, Empire Life will notify its employees and the public about the availability of accommodation for job applicants with disabilities.

When inviting individually selected job applicants to participate in the interview process, Empire Life will:

- (i) inform the applicant that accessibility accommodations are available upon request; and
- (ii) consult with an applicant who requests accommodation and provide suitable accommodation based on the applicant's accessibility needs

When offering a job to a successful applicant Empire Life will inform them of Empire Life's policies on accommodating employees with disabilities

### 2.2 Accessible Formats and Communication Supports for Employees

Empire Life will:

- (i) inform employees of its accessible employment policies;
- (ii) provide these policies to new employees when they begin their employment; and
- (iii) provide updated information to all employees whenever these policies change

Upon request from an employee with a disability, Empire Life will:

- (i) consult with the employee in order to determine their accessibility needs; and
- (ii) provide suitable accessible formats and communication supports based on the employee's accessibility needs due to disability for information needed to perform their job and that is generally available to Empire Life employees in the workplace.

### 2.3 Workplace Emergency Response Information

Empire Life will provide individualized workplace emergency response information to employees who have a disability:

- (i) if the disability makes Emergency Response Information necessary;
- (ii) if Empire Life is aware of the need for accommodation; and
- (iii) as soon as is practicable.

With the employee's consent, Empire Life will also provide the emergency response information to any person designated to assist the employee.

Empire Life will review the emergency response information when:

- (i) the employee moves to a different location within Empire Life;
- (ii) the employee's overall accommodation needs or plans are reviewed; and
- (iii) Empire Life reviews its general emergency response policies

## 2.4 Individual Accommodation Plan

Empire Life will have a written process for assessing the request for, and developing, an individual accommodation plan for any employee with a disability who requests accommodation.

Among other elements, the process will outline how:

- (i) the employee's disability needs will be assessed;
- (ii) the employee's personal information will be protected;
- (iii) the employee can participate in developing the accommodation plan;
- (iv) the employee can request that a representative from the workplace participate in developing the plan;
- (v) the reasons for denying a plan are communicated to the employee;
- (vi) the accommodation plan can be made accessible; and
- (vii) the accommodation plan is reviewed and updated

## 2.5 Return to Work Process

Empire Life will have a written return-to-work process for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work.

The return-to-work process will include developing an accommodation plan.

## 2.6 Performance Management, Career Development and Redeployment

Empire Life will take into account the accessibility needs of its employees with disabilities when:

- (i) providing career development;
- (ii) engaging in performance management discussions; and
- (iii) considering redeployment of the employee

## 3. Customer Service Standards

This section sets out the responsibilities addressed by Empire Life with respect to the Customer Service Standard regulations.

### 3.1 Providing Goods and Services to People Living with Disabilities

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 are 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.

### 3.2 Use of Service Animals and Support Persons

- (i) Empire Life is committed to welcoming people living with disabilities who are accompanied by a service animal on the parts of its 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.

- (ii) 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 their 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 their support person while on those parts of the premises which are open to the public.

### 3.3 Notice of Temporary Disruption

- (i) 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.
- (ii) 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 our website.

### 3.4 Training

- (i) 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.
- (ii) Empire Life provides customer service training to all employees who interact with the public as well as those involved in the development and approvals of customer service policies, practices and procedures.
- (iii) 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.

### 3.5 Feedback

- (i) 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.

- (ii) 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.
- (iii) 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.

## APPENDIX A

### MULTI-YEAR ACCESSIBILITY PLAN (2022 – 2027)

This Plan outlines Empire Life's phased-in plan to prevent and remove barriers to accessibility,

#### Statement of Commitment

Empire Life is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration and inclusivity, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing accessibility barriers and by meeting our accessibility requirements under accessibility laws.

This Plan identifies initiatives that are aimed at achieving accessibility for customers, employees, and job applicants with disabilities. Implementation of these initiatives will commence not later than the date indicated below.

#### 2022-2027 Multi-Year Accessibility Plan Initiatives

The multi-year initiatives in this plan represent strategies to help address barriers to accessibility.

1. Review and update our recruitment processes and systems to remove barriers and bias in the hiring process, and help increase accessibility to employment opportunities for people with disabilities.
2. Enhance our mental health products and services, including for Empire Life employees with disabilities.
3. Develop and implement strategies to support Empire Life customer service employees in providing accessible customer service.
4. Review, update and provide training on accessibility standards as needed.
5. All external websites and their content will incorporate WCAG 2.1 Level AA accessibility requirements on or before May 1, 2025.