

ACCESSIBILITY POLICY – INTEGRATED STANDARDS

Purpose

This Policy outlines how Empire Life complies with the Accessibility Standards established by the Integrated Accessibility Standards Regulation under the Accessibility for Ontarians with Disabilities Act, 2005.

Scope

This Policy applies to The Empire Life Insurance Company and its subsidiaries (“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 (ex: BrowseAloud)
- 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 development 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’s accessibility plan (the “Plan”) is set out in Appendix A.

Empire Life will:

- (i) implement each Accessibility Standard on or before the date set out in the Plan
- (ii) post the Plan on its corporate website and provide an accessible format on request
- (iii) review and update the Plan at least once every five years

Accessibility Training

Empire Life will provide accessibility training to:

- (i) all of its employees
- (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 cover:

- (i) the Accessibility Standards set out below
- (ii) the rights of persons with disabilities under the Ontario Human Rights Code

Empire Life will:

- (i) provide accessibility training appropriate to a person’s duties performed on behalf of Empire Life
- (ii) update the accessibility training to reflect any changes to this Policy
- (iii) keep a record of the accessibility training provided

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
- (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
- (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) 2.0 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.

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
- (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
- (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 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
- (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
- (ii) provide suitable accessible formats and communication supports based on the employee's accessibility needs due to disability for information needed to perform his or her 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
- (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
- (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
- (iii) considering redeployment of the employee

APPENDIX A ACCESSIBILITY PLAN (2014 – 2021)

This Plan outlines Empire Life's phased-in strategy to prevent and remove barriers to accessibility by meeting its requirements under the Integrated Accessibility Standards Regulation under the Accessibility for Ontarians with Disabilities Act, 2005.

This Plan identifies a number of specific requirements described in Empire Life's Accessibility Policy that are aimed at achieving accessibility for job applicants, employees and customers with disabilities. Implementation of each of these requirements will commence not later than the date indicated below.

January 1, 2014

Empire Life will share the Accessibility Policy and this Plan with employees and the public through internal and external websites and provide both in accessible formats if requested.

Any new external website and its content and any existing websites that undergo a significant refresh will incorporate WCAG 2.0 Level A accessibility guidelines.

January 1, 2015

Train employees and other persons who provide products and services on behalf of Empire Life on the Accessibility Policy and the portions of the Human Rights Code that relate to persons with disabilities.

Provide, upon request, accessible formats and communication supports for processes for receiving and responding to feedback. Notify the public about the availability of these formats and supports.

January 1, 2016

Notify the public about the availability of accessible formats and communication supports.

Upon request, provide information in an accessible format and with communication supports in consultation with the person making the request and based on the person's accessibility needs.

Implement accessibility requirements relating to employment as set out in section 2 of the Accessibility Policy

January 1, 2019

Review this Plan and update as necessary.

January 1, 2021

All external websites and their content will incorporate WCAG 2.0 Level AA accessibility guidelines.