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Accessibility Policy and Multi-Year Accessibility Plan

In compliance with Ontario Regulation 191/11 under the *Accessibility for Ontarians with Disabilities Act, 2005* ("AODA")

Introduction

The Integrated Accessibility Standards Regulations ("IASR") under the AODA require that effective January 1, 2014, Sonnet Insurance Company (Sonnet) establish, implement, maintain and document its accessibility policies and multi-year accessibility plan (the "Accessibility Plan"), which outlines our strategy for preventing and removing barriers for persons with disabilities and to meet our requirements under the IASR.

The Accessibility Plan will be posted on our website and will be available in an accessible format upon request. The Accessibility Plan will be reviewed and updated, if applicable, at least once every five years.

Application

The Accessibility Plan applies to all of our employees and clients, and, where indicated, to any independent contractors working for us.

Our commitment

In fulfilling our mission, we strive to treat all individuals in a manner that allows them to maintain their dignity and independence. We promote integration and equal opportunity and is committed to meeting the needs of people with disabilities in a timely manner. We will seek to achieve this by preventing and removing barriers to accessibility and by meeting accessibility requirements under the AODA. This Accessibility Plan sets out our policy on how we will achieve accessibility generally, as well as in employment, information and communications and the design of public spaces (built environment).

Under the IASR, the following accessibility strategies set out the requirements that are applicable to us:

1) Workplace emergency response information;

2) Training;

3) Information and communication;

4) Employment; and

5) Design of public spaces standards

Accessibility standards for customer service

We are committed to compliance with the Accessibility Standards for Customer Service Regulation (O.Reg.429/07) under the AODA, which involves the providing of products and services in a way that respects the dignity and independence of people with disabilities.

Integrated Accessibility Standards Regulations (IASR)

The following sets out how we are committed to complying with the IASR.

1) **Workplace emergency response information**

Where we are aware that an employee has a disability and that there is a need for accommodation, individualized workplace emergency response information will be provided to the employee as soon as practicable if such information is necessary given the nature of the employee's disability.

Action taken:

We have implemented the following measures:

- individualized workplace emergency response information procedures have been developed for employees with disabilities, as required;
- where required, we provide assistance to specific disabled employees, with the disabled employees' prior consent, to help them evacuate the workplace in case of an emergency or disaster. These plans for providing assistance have been set out in individualized emergency plans for the employees;
- individualized emergency plans have been communicated to the employees' respective managers and safety personnel on an 'as needed' basis;
- on an ongoing and regular basis, and as per the applicable terms of the IASR, we review and assess general workplace emergency response procedures and individualized emergency plans to ensure accessibility issues are addressed.

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2) Training

We are committed to providing training on the requirements of the accessibility standards referred to in the IASR and on the *Human Rights Code*, as it pertains to persons with disabilities.

Planned action:

In accordance with the IASR, we will:

- determine and ensure that appropriate training on the requirements of the IASR and on the *Human Rights Code* as it pertains to persons with disabilities, is provided to all employees, independent contractor representatives, volunteers, third-party service providers who provide services related to products, services and facilities on our behalf, and persons participating in the development and approval of our policies;
- ensure that the training is provided to persons referenced above as soon as practicable;
- keep and maintain a record of the training provided, including the dates that the training was provided and the number of individuals to whom it was provided; and
- ensure that training is provided on any changes to our policies on an ongoing basis.

Required legislative compliance: January 1, 2015

3) Information and communication

We are committed to making company information and communications accessible to persons with disabilities. We will incorporate new accessibility requirements under the information and communication standards to ensure that its information and communications systems and platforms are accessible and are provided, upon request, in accessible formats that meet the needs of persons with disabilities.

a. Feedback, accessible formats and communication supports

Planned action:

In accordance with the IASR, we will:

- ensure that existing and new processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request and in a timely manner;
- more broadly, as a general principle where accessible formats and communication supports for persons with disabilities are requested:
    - provide or arrange for the provision of such accessible formats and communication supports;
    - consult with the person making the request to determine the suitability of the accessible format or communication support;
    - provide or arrange for the provision of accessible formats and communication supports in a timely manner that takes into account the person's accessibility needs due to disability, and at a cost no more than the regular cost charged to other persons; and
- notify the public about the availability of accessible formats and communication supports.

Required legislative compliance:

January 1, 2015 – feedback

January 1, 2016 – accessible formats and communication supports.

b. Accessible websites and web content

Planned action:

In accordance with the IASR, we will work toward making its websites and web content conform with the World Wide Consortium Web Content Accessibility Guidelines (WCAG 2.0) Level AA.

Required legislative compliance:

January 1, 2014: WCAG 2.0 Level A – new Internet websites and web content
January 1, 2021: WCG 2.0 Level AA – all Internet websites and web content, except for exclusions set out in the IASR.

4) **Employment**

a. Recruitment

We are committed to fair and accessible employment recruiting practices that attract and retain employees with disabilities. This includes providing accessibility across all stages of the employment cycle.

Planned Action:

In accordance with the IASR, we will do the following:

(i) Recruitment general

We will notify employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process. This will include:

- Review and, as necessary, modification of existing recruitment policies, procedures and processes;
- specifying that accommodation is available for applicants with disabilities, on our website and on job postings; and

(ii) Recruitment, assessment and selection

We will notify job applicants, when they are individually selected to participate in an assessment or selection process and inform them that accommodations are available upon request in relation to the materials or processes to be used in the assessment/selection process. This will include:

- review and, as necessary, modification of existing recruitment policies, procedures and processes;
- inclusion of availability of accommodation notice as part of the script in the scheduling of an interview and/or assessment; and
- if a selected applicant requests an accommodation, a consultation with the applicant and arrangement for provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to the disability.

(iii) Notice to successful applicants

When making offers of employment, we will notify the successful applicant of its policies for accommodating employees with disabilities. This will include:

- review and, as necessary, modification of existing recruitment policies, procedures and processes; and

- inclusion of notification of our policies on accommodating employees with disabilities in offer of employment letters.

Required legislative compliance:

January 1, 2016

b. Informing employees of supports and general provision of accessible formats and communications supports

In accordance with the IASR, we will inform all employees of policies that support employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability.

This will include:

- informing current employees and new hires of our policies supporting employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's needs due to disability;
- providing information as soon as practicable after the new employee begins employment, specifically in the orientation process;
- keeping employees up to date on changes to existing policies on job accommodations with respect to disabilities;
- where an employee with a disability so requests it, we will provide or arrange for provision of suitable accessible formats and communications supports for:
    - information that is needed in order to perform the employee's job;
    - information that is generally available to employees in the workplace; and
- in meeting the obligations to provide the information that is set out above, we will consult with the requesting employee in determining the suitability of an accessible format or communication support.

Required legislative compliance:

January 1, 2016

c. Documented Individual accommodation plans/return to work process

We will incorporate new accessibility requirements under the IASR to ensure that barriers in accommodation and return to work processes are eliminated and corporate policies surrounding accommodation and return to work are followed, where applicable.

Planned action:

Our existing policies include steps that we will take to accommodate employees with disabilities and to facilitate employees' return to work after absence due to disability.

We will review and assess the existing policies to ensure that they include a process for the development of documented individual accommodation plans for employees with disabilities, if such plans are required.

In accordance with the provisions of the IASR, we will ensure that the process for the development of documented individual accommodation plans includes the following elements:

- information regarding the manner in which the employee requesting accommodation can participate in the development of the plan;
- information regarding the means by which the employee is assessed on an individual basis;
- information regarding the manner in which we can request an evaluation by an outside medical or other expert, at our expense, to assist us in determining if and how accommodation can be achieved;
- steps to protect the privacy of the employee's personal information;
- information regarding the frequency with which individual accommodation plans will be reviewed and updated and the manner in which this will be done;
- the reasons for a denial if an individual accommodation plan is denied;
- information regarding the means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs;
- the following will be included if individual accommodation plans are established:
    - any individualized workplace emergency response information that is required;

- any information regarding accessible formats and communication supports that have been provided for or arranged, in order to provide the employee with:
    - information that is needed in order to perform the employee's job;
    - information that is generally available to employees in the workplace; and

- identify any other accommodation that is to be provided to the employee.

We will ensure that the return to work process as set out in its existing policies outlines:

- the steps we will take to facilitate the employee's return to work after a disability-related absence;
- the development of a written individualized return to work plan for such employees; and
- the use of individual accommodation plans, as discussed above, in the return to work process.

Required legislative compliance:

January 1, 2016

d. Performance management, career development and redeployment

WE will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans:

- when using its performance management process in respect of employees with disabilities;
- when providing career development and advancement to employees with disabilities; and
- when redeploying employees with disabilities.

Planned action:

In accordance with the IASR, we will:

- review, assess and, as necessary, modify existing policies, procedures and practices to ensure compliance with the IAS

Take the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account when:

- assessing performance;
- managing career development and advancement; and
- redeployment is required.

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- assessing performance;
- managing career development and advancement; and
- redeployment is required.

- review, assess and, as necessary, include in performance management workshops, accessibility criteria;
- take into account the accessibility needs of employees with disabilities when providing career development and advancement to its employees with disabilities, including notification of the ability to provide accommodations on internal job postings; and
- take into account the accessibility needs of employees with disabilities when redeploying employees, including review and, as necessary, modification of employee transfer checklist.

Required legislative compliance: January 1, 2016

Information and feedback

For more information on this Accessibility Plan or for accessible formats of the Accessibility Plan, please contact:

Human resources toll-free Number: 1-844-766-6388

For TTY users (Bell Relay Service, who can then connect with us): 1-800-268-9242 (Ontario) or 1-800-361-6476 (Quebec)

Email: accessibility@sonnet.ca

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Sonnet Insurance Company is part of the Economical family and is compliant with all AODA requirements either through development of its own policies and procedures, or through Economical's AODA policies and procedures.