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Accessibility policy

Serving customers with disabilities

Background

The Accessibility for Ontarians with Disabilities Act, 2005 ("AODA") is legislation for the purpose of developing, implementing, and mandating accessibility standards to achieve accessibility with respect to goods, services, facilities, accommodation, employment, buildings, structures, and premises for persons with disabilities.

Under the AODA, Ontario Regulation 191/11: Integrated Accessibility Standards ("the Regulation") came into effect on July 1, 2011. The Regulation establishes accessibility standards specific to customer service for private sector organizations that provide goods and services to members of the public or other third parties and includes:

- Information and Communications Standards
- Employment Standards
- Transportation Standards
- Design of Public Spaces Standards
- Customer Service Standards

Purpose

Sonnet Insurance ("Sonnet") is committed to ensuring the services we provide are as accessible as possible to persons with disabilities, and are compliant with the Regulation set forth by the Government of Ontario. To fulfil this commitment, Sonnet has developed inclusive policies and procedures that mirror the regulatory standards. These policies and procedures will be regularly monitored and reviewed to ensure access and accommodation for all persons with disabilities.

The Accessibility Policy mirrors the regulatory standards both developed by the government and its representatives on the standards development committees.

The purpose of the policy is to:

- identify, remove, and prevent barriers to accessing our services for people with disabilities
- build awareness within the Sonnet community of the rights of persons with disabilities and our responsibility to foster an accessible and inclusive environment



- provide equal access to services and facilities for all customers
- provide equal opportunity in employment
- monitor the continual improvement of access to our properties, facilities, and services
- define the development, publication, and review of the annual Accessibility Plan
- ensure quality in what and how we deliver services to all members of Sonnet community
- ensure compliance with all regulatory standards legislated by the government of Ontario

The objective of this policy is to address the following with respect to service delivery to persons with disabilities:

- the provision of goods and services
- the use of assistive devices
- the use of guide dogs and service animals
- the use of support persons
- receiving customer feedback
- employee training
- notice of availability and format of required documents.

Statement of commitment and accountabilities

Commitment

Sonnet supports and promotes the rights of all persons with disabilities as outlined in the Ontario Human Rights Code, AODA, and the Regulation. Sonnet also affirms the rights of all persons, including those with disabilities, to have access to equal opportunity in employment or business dealings with Sonnet.

Sonnet strives to provide an accessible environment for all persons with disabilities who interact with us and affirms its commitment to promoting the following principles in all of its policies and interactions with persons with disabilities:

Dignity — Respecting the dignity of a person with a disability means treating them as valued customers, deserving of the same high quality and timely service as any other customer. Persons with disabilities are not treated as an afterthought or forced to accept lesser service, quality, or convenience. The delivery of goods and services must take into account how persons with disabilities can effectively access and use them.

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Independence — In some instances, independence means freedom from control or influence of others; freedom to make one's own choices. In other situations, it may mean the freedom to do things in one's own way. Sonnet must allow persons with disabilities to take the time they need, without rushing or taking over a task from a person who prefers to do it themselves.

Integration — The provision of goods or services to persons with disabilities and others must be integrated to allow persons with disabilities to fully benefit from the same services, in the same place, and in the same or similar way as other customers. Integration means that policies, programs, and services, including practices and procedures, are designed to be accessible to everyone.

Equal opportunity — Persons with disabilities must be offered the same chances, options, benefits, and results to obtain, use, and benefit from the goods or services provided by Sonnet. They should not have to make significantly more effort to access or obtain services, or accept lesser quality of services.

Accountabilities

Sonnet accountabilities

- Ensure all leaders and employees are aware of the Accessibility Policy and its application
- Hold all leaders and employees accountable for their responsibilities in related program elements and obligations
- Advocate and support accessibility through assigning internal responsibility, and aligning the required resources and behaviours to targeted initiatives, programs, and policies
- Consider accessibility of people with disabilities as part of the regular development and ongoing review of existing policies and practices
- Amend existing policies as needed to comply with the law in any jurisdiction Sonnet operates

Leader accountabilities

- Communicate the Accessibility Policy to all employees
- Inform employees of their obligations and accountabilities to adhere to the requirements of the policy as an element of their work performance and a condition of employment
- Implement, monitor, and evaluate compliance to the Accessibility Policy in their business unit

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- Ensure employees are responding to requests for accommodation in a timely manner
- Ensure all complaints, or identified risks about accessibility, are dealt with in a timely manner

Human resources accountabilities

- Identify, develop, and deliver required training on policy
- Review the policy and procedures related to accessibility on an annual basis
- Monitor developments of the accessibility standards and communicate these developments to the business

Employee accountabilities

- Support the implementation of accessibility standards in the workplace
- Participate in required training related to the accessibility and Sonnet policies and procedures
- Promote the principles of dignity, independence, integration, and equal opportunity when providing customer service
- Forward feedback from customers regarding accessibility to their leader

Scope of the accessibility policy

The Accessibility Policy applies to the provision of goods and services at premises owned or operated by Sonnet, as well as any interactions with employees, customers, and clients via telephone, email, post, websites or through social media.

This policy applies to employees, as well as volunteers, agents, and contractors who deal with the public or third parties that interact with the public on behalf of Sonnet.

Definitions

Disability — The definition of disability used in this policy is the same as that used by the AODA and the Ontario Human Rights Code, defined in five points:

- 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

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- a condition of mental impairment or a developmental disability
- a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language
- a mental disorder
- an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997

Assistive device — Any device used to assist persons with disabilities in carrying out activities or in accessing the services of our organization. This could include technical devices such as communication devices or personal assistive devices such as a walker.

Support person — An individual hired or chosen by a person with a disability to provide service or assistance with communication, mobility, personal care, medical needs, or access to goods or services.

Guide dog — A highly-trained working dog that has been trained at one of the special facilities to provide mobility, safety, and increased independence for people with visual impairments.

Service animal — The Regulation defines a service animal as “an animal for a person with disability.” For the purposes of this policy, a service animal is any animal used by a person with a disability for reasons relating to the disability, where the person provides:

- A letter from a physician confirming that they require the animal for reasons relating to their disability, or
- A valid identification card signed by the Attorney General of Canada, or a certificate of training from a recognized guide dog or service animal training school.

Customers — Include direct customers and customers of third party providers that represent Sonnet.

Barriers — As defined by the AODA, barriers are anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability. There are several types of barriers:

- Physical barrier
- Architectural barrier
- Information or communications barrier
- Attitudinal barrier
- Policy, practice, or procedural barrier



Accessibility standards

Information and communication

Upon request, Sonnet will communicate with people with disabilities in ways that take into account each individual's needs, in a timely manner at no additional cost to the person. Accessible websites and web content.

Sonnet internet websites and web content will conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out in the Regulation.

Public safety

In preparing emergency procedures, plans, and public safety information documents, Sonnet will ensure that all documents made available to the public will be made available in an accessible format or with appropriate communication supports, upon request.

Employment

The purpose of the employment standard is to integrate accessibility into a regular workplace process, and to ensure that Sonnet provides accessibility across all stages of the employment lifecycle. The employment standard applies only with respect to paid employees. This includes, but is not limited to, full-time and part-time employees and contract employees. The employment standard does not apply to volunteers or other unpaid staff.

Workplace emergency response information

Should any employee at Sonnet with a disability, whether permanent or temporary, require a personalized workplace emergency response plan, Sonnet will create such document as soon as the information is provided from the employee. Sonnet will work with the employee, their leader, and the Occupational Health and Safety committee for that location to ensure a plan is in place in the event of an emergency.

This information shall be reviewed if the employee moves to a different location in the organization, if the employee's overall accommodation needs or plans change, and when Sonnet reviews its general emergency response policies.



Recruitment

Sonnet will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

Recruitment, assessment, and selection process

Sonnet will notify job applicants when they are selected to participate further in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.

If a selected applicant requests accommodation, Sonnet will consult with the applicant, and provide or arrange for the provision of suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

Notice to successful applicants

When making offers of employment, Sonnet will notify the successful applicant of its policies for accommodating employees with disabilities.

Informing employees of supports

Sonnet will inform its employees of the policies used to support employees with disabilities, including but not limited to policies on the provision of job accommodation that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as possible after commencing employment.

Accessible formats and communication supports for employees

Upon the request of an employee with a disability, Sonnet will consult with the employee to provide, or arrange for the provision of accessible formats and communication supports for information that is needed to perform the employee's role, and information that is generally available to other employees.

Documented individual accommodation plans

Sonnet will maintain a written process for the development of documented individual accommodation plans for employees with disabilities.

If requested, information regarding accessible formats and the communications supports provided will also be included in individual accommodation plans.



In addition, the plans will include the individual's workplace emergency response information (where required), and will identify any other accommodation that is to be provided.

For further information on our process for creating documented accommodation plans for employees with disabilities, please see our [Accommodation Policy](#).

Return-to-work process

Sonnet is committed to supporting employees who have been absent from work due to illness, injury, or disability, and require accommodation in order to return-to-work. Sonnet will work with the returning employee and other stakeholders to create a return-to-work plan to ensure a successful reintegration of the employee into the workplace. If required, Sonnet will create an individual accommodation plan as per our [Accommodation Policy](#).

Performance management, career development, advancement, and redeployment

Sonnet is committed to providing all employees equal opportunity for advancement. Sonnet will take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans (where they are in place), when undertaking performance management, and providing career development and advancement to employees with disabilities. When conducting any redeployment initiatives, Sonnet will also take into account the accessibility needs and individual accommodation plans (where they are in place).

Design of public spaces

Sonnet is committed to ensuring its buildings are accessible. Sonnet reviews the requirements associated with the Regulations on a regular basis.

Customer service

Assistive devices

In such cases where a person with a disability requires the use of their own personal assistive devices in order to access the goods and services provided by Sonnet, they are welcome to do so. Assistive devices include, but are not limited to hearing aids, wheelchairs, electronic organizers, magnifying devices, and electronic voice synthesizers.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to facilitate access to goods and services.



Guide dogs and service animals

Persons with disabilities who rely on the use of guide dogs or service animals are welcome to bring such animals with them to Sonnet in order to access the goods and services provided. The only exception to this practice is where such animals are prohibited by law.

Dog Owners' Liability Act, Ontario

If there is a conflict between a provision of this act or of a regulation under this or any other act relating to banned breeds (such as pit bulls) and a provision of a bylaw passed by a municipality relating to these breeds, the provision that is more restrictive in relation to controls or bans on these breeds prevails.

If a guide dog or service animal is excluded by law, Sonnet will make all reasonable efforts to offer alternative methods to enable the person with a disability to access goods and services.

Recognizing a guide dog and/or service animal

If it is not readily apparent that the animal is being used by the customer for reasons relating to a disability, Sonnet may request verification from the customer which should include:

- A letter from a physician, therapist, or nurse confirming that the person requires the animal for reasons related to the disability,
- A valid identification card signed by the attorney general of Canada, or
- A certificate of training from a recognized guide dog or service animal training school.

Support persons

If the use of a support person is required in order to access the goods and services provided by Sonnet, persons with disabilities are welcome to have the support person present when interacting with Sonnet. If necessary, Sonnet will request written authorization to validate that the support person can act on the customer's behalf.

Sonnet recognizes that at times, a support person may be necessary for the health and safety of the person with the disability or for the health and safety of others on the premises.

All customer confidentiality requirements and practices will also apply to support person.



Communication

Sonnet will ensure all members of the organization strive to communicate with a person with a disability in a manner that takes into account their disability. All employees will be trained on how to interact and communicate with customers with disabilities. We will offer alternative communication and document formats that will meet the needs of customers with disabilities as promptly as feasible.

Training

Training will be provided to all employees and volunteers who interact with the public on behalf of Sonnet. Training will be provided as soon as practicable upon the individual being assigned the applicable duties, and on an ongoing basis as changes occur to Sonnet policies, procedures, and practices relating to the provision of services to persons with disabilities.

Sonnet will keep a record of training that includes the dates training was provided, the number of employees, and names of employees trained.

The training will be conducted in an online format and will include information on the purposes of the Regulation, how to communicate and interact with people with disabilities, how to interact with a service animal or support person, how to utilize assistive devices that are available on our premises, how to interact with persons with disabilities who use an assistive device or require assistance of a service animal or support person, what to do if a person with a disability has difficulty accessing Sonnet services or facilities, and our policies, procedures, and practices pertaining to accessibility.

Contractors and agents providing services to the public on behalf of Sonnet will also be required to ensure their staff has received appropriate training.

Disruption of service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Sonnet. In the event of temporary disruption to facilities or services that customers with disabilities rely on, reasonable efforts will be made to provide advance notice. In some circumstances, such as an unplanned temporary disruption, advance notice may not be possible.



Notification will be given by posting the information in a conspicuous place that is owned and operated by Sonnet, the website, or any other reasonable method. In the event that a notification needs to be posted, the following information will be included, unless it is not readily available or known:

- The goods or services that are disrupted or unavailable
- The reasons for the disruption
- The anticipated duration
- Description of alternative service or options

Feedback process

Customers will have an opportunity to provide feedback on how Sonnet provides goods or services to people with disabilities. This feedback will be received by the Sonnet human resources department, and feedback will be forwarded to the relevant business unit. Sonnet will respond to any feedback and take immediate action on any complaints. Feedback forms, along with alternate methods of providing feedback, such as verbally (in person or by telephone), or written (paper or electronic), will be made available upon request.

Availability and format of documents (alternative formats)

All documents required by the Regulation, as well as related policies, including the Accessibility Policy, notices of temporary disruptions, training policy, and written feedback process, are available upon request. When providing these documents to a person with a disability, Sonnet will endeavour to provide the document, or the information contained in the document, in a format that takes the person's disability into account.

Review and administration

All areas of Sonnet are accountable for ensuring that the principles of this policy are upheld. However, it is the responsibility of human resources to ensure that this policy is reviewed every three years, or as required, to ensure adherence to developing law (i.e., regulatory standards for accessibility). Should you have any questions or concerns about this policy or the related procedures, please contact Sonnet:

- Toll-free: 1-844-766-6384
- TTY (Ontario): 1-800-268-9242
- TTY (Quebec): 1-800-361-6476
- Email: accessibility@sonnet.ca



Accommodation policy

For customers

Accommodation of disabilities

At Sonnet, we believe everyone deserves an equal opportunity to access information and provide feedback. From accommodation training for employees to creating accessible solutions for our digital properties, we are committed to creating the right experience for our customers.

To make an accommodation request or to provide feedback on our accessibility solutions, customers can contact us at:

Sonnet Insurance
590 King Street West,
Toronto, ON M5V 1M3

- Toll-free: 1-844-766-6384
- TTY (Ontario): 1-800-268-9242
- TTY (Quebec): 1-800-361-6476
- Email: accessibility@sonnet.ca

Customers can also submit comments through our website or our social media channels:

- Website: [Sonnet.ca](https://www.sonnet.ca)
- LinkedIn: [linkedin.com/company/sonnet-insurance](https://www.linkedin.com/company/sonnet-insurance)
- Twitter: twitter.com/sonnetinsurance

For employees

Accommodation for employees with a disabilities

An employee may require accommodation in the form of a modified work schedule or modified duties for a temporary or specified period, or permanently. Accommodation may be required as a result of an injury, pregnancy, chronic illness, or condition that does not prevent the employee from coming to work, but restricts their ability to perform their full job duties or work a full-time schedule.



To substantiate a request for accommodation, employees must provide appropriate medical and functional documentation that meets the definition of disability as contained in the the Accessibility for Ontarians with Disabilities Act, 2005 ("AODA") and the Ontario Human Rights Code.

If an employee is able to perform modified duties or work a modified schedule, the employee is expected to be available for work if needed. If warranted, and where possible, Sonnet will provide workplace adjustments to accommodate the employee during this period. If an employee requires long-term, ongoing, or indefinite work accommodation based on a medically-certified disability, Sonnet will make all reasonable efforts to accommodate the employee with a suitable job arrangement.

Requesting accommodation

To request accommodation, an employee must provide written request (or in an alternate format when necessary) to their leader and the Sonnet Human Resources department. Depending on the nature of the employee's accommodation needs, the employee may be asked to provide supporting documentation completed by the attending physician or treatment providers explaining why the accommodation is required, identifying the nature of the accommodation needs, and any applicable restrictions and limitations associated with the request. The attending physician or treatment providers will also be asked to set out the expected length of time required for the accommodation and address any other questions Sonnet may have about the employee's accommodation needs.

While Sonnet will not require details about the employee's specific diagnosis, Sonnet may require information about how the employee's functional abilities are impacted by the disability and the employee's prognosis for recovery. This documentation shall be provided in the format requested by Sonnet, on a case-by-case basis.

Response to accommodation requests

When an employee's request is received, their leader will review the accommodation request with the Human Resources department, and request any supporting documentation required in order to verify the employee's eligibility for accommodation and what accommodation can be provided without undue hardship.

The employee may request or be asked to attend a meeting to provide Sonnet an opportunity to better understand the employee's accommodation needs, explore what options are available for meeting those needs, and explore possible reasonable alternatives to accommodation. Where deemed appropriate and necessary by Sonnet, and at Sonnet's expense, an external expert may be involved in adjudication of the accommodation request based on the medical documentation.



If the employee qualifies for accommodation, their leader and a human resources representative will work with the employee to create an individual accommodation plan. The employee may request a specific representative from Sonnet participate in the development of his or her individual accommodation plan, subject to the company's approval.

Where there are several options to provide accommodation without undue hardship, Sonnet reserves the right to accommodate in the manner that is most convenient for the company. In all cases, while the process is co-operative and the employee is an active participant in the process, the final decision(s) regarding accommodation will be made by Sonnet.

All decisions with respect to accommodation will be communicated to the employee in writing. Where applicable, Sonnet will communicate individual accommodation plans in a format that is accessible to the employee, taking into account the employee's specific needs due to disabilities.

Accommodation process

Sonnet understands that an employee's privacy is of utmost importance and will strive to maintain confidentiality with regard to the employee's information. Disclosure will only be made where necessary to implement the accommodation, or where required by law.

Individual accommodation plans will generally be implemented for fixed periods of time, depending on the circumstances of the accommodation request, and will be reviewed at regular intervals. Depending on the nature of an employee's accommodation needs, the employee may be asked to update the supporting documentation provided from time to time to ensure Sonnet is aware of any changes to his or her accommodation needs. Where appropriate, the individual accommodation plan will include individualized workplace emergency response information.

The employee will be expected to co-operate in the process by taking reasonable steps to minimize the duration of any required accommodations. An accommodation that may be suitable on a temporary basis may not be suitable on a permanent basis without causing Sonnet undue hardship. Each accommodation request, plan, or continuation of same, will be assessed based on the specific circumstances of the situation.

While an employee may be entitled to a certain type of accommodation, absences from work will not always be adequate accommodation based on the circumstances. In such cases, even if an employee is entitled to a different type of accommodation, unauthorized absences from work may result in corrective action, up to and including termination of employment.



Employees with questions or concerns about this policy or the related procedures are encouraged to contact the Sonnet Human Resources department:

- Toll-free: 1-844-766-6384
- TTY (Ontario): 1-800-268-9242
- TTY (Quebec): 1-800-361-6476
- Email: accessibility@sonnet.ca