



## **ACCESSIBLE CUSTOMER SERVICE POLICY**

PER: Accessibility for Ontarians with Disabilities Act, 2005 (AODA)

### **Providing Goods and Services to People with Disabilities**

#### **Our Commitment**

Aviva Canada Inc. and its subsidiaries (“Aviva Canada”) are committed to meeting the needs of all our customers, including those individuals with disabilities.

Our goal is to try to identify, address and mitigate barriers faced by persons with disabilities and provide them with our goods or services in a way that respects their dignity and independence.

#### **Our Promise**

Aviva Canada will make every reasonable effort to develop and implement policies, practices and procedures that are consistent with the principles of dignity, independence, integration and equal opportunity, ensuring that all of our customers receive the same quality of service. We will carry out our functions and responsibilities in the following areas:

##### **Communication**

We will communicate with customers in a way that will take into account their disability. We will make every reasonable effort to have the person with a disability understand both the content and intent of our communications.

##### **Telephone services**

We will provide fully accessible telephone service to our customers and train our staff on how to communicate in the most effective manner. We will offer relay services and email to our customers as an alternative form of communication.

##### **Assistive devices**

Persons with disabilities may use their own assistive devices as required when assessing goods or services provided by Aviva Canada. We will ensure that our employees are trained and familiar with the various assistive devices that may be used by our customers with disabilities while accessing our goods or services.

## **Support Persons**

If a customer with a disability is accompanied by a support person to our premises, both persons will be allowed to enter the premises together so the customer is not prevented from having access to the support person. It may be necessary for support persons to provide documentation for customer privacy purposes.

## **Service Animals**

Customers with a disability, who require a service animal, will be allowed access to Aviva Canada premises that are open to the public, unless otherwise excluded by law.

If a service animal is excluded by law (*Food Safety and Quality Act 2001, Ontario; The Health Protection and Promotion Act Ontario; Dog Owners' Liability Act, Ontario*), Aviva Canada will offer alternative methods to enable the person with a disability to access goods or services, when possible.

## **Notice of Temporary Disruption**

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, Aviva Canada will notify customers promptly. The clearly posted notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or service, if they are available. The notice will be placed on our Internet site, [www.avivacanada.com](http://www.avivacanada.com) and at the appropriate public entrances and service counters on our premises.

## **Billing and Policy Documents**

We are committed to providing accessible invoices and policy documents to our customers. For this reason, invoices and policy documents will be provided in a format, such as large print or Braille, where required. We will answer any questions customers may have about the content of the invoice and policy documentation in person, by telephone, relay service or email.

## **Training for staff**

Aviva Canada will provide AODA customer service training to employees in Ontario and to the other employees across Canada who may deal with the Ontario public, and those involved in the development and approval of customer service policies, practices and procedures.

Training shall include:

- An overview of the purposes of the AODA and the requirements of the Accessibility Standards for Customer Service.
- How to interact and communicate with persons with various types of disabilities
- How to interact with persons with disabilities who use an assistive device or require the assistance of a service animal or a support person
- How to use assistive devices or equipment that may be available on our premises
- What to do if a person with a disability is having difficulty accessing our services

## **Feedback process**

Our ultimate goal is to meet and surpass customer expectations while serving customers with disabilities. Comments on our services regarding how well those expectations are being met are welcome and appreciated.

Feedback regarding the way Aviva Canada provides goods or services to people with disabilities can be made by contacting the Office of the Ombudsman at:

2206 Eglinton Avenue East  
Scarborough, ON M1L 4S8  
Email: [ombudsman@avivacanada.com](mailto:ombudsman@avivacanada.com)  
Telephone: 416-615-3634  
Toll free: 1-877-689-3634  
Fax: 416-615-4239

Alternatively, customers may complete the online feedback form found on the [avivacanada.com](http://avivacanada.com) website via the “Accessibility” link located at the bottom of the page.

Complaints will be addressed according to complaint categories already established in our company's [complaint management procedures](#).

Customers who provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints.

## **Modifications to this or other policies**

We are committed to developing customer service policies that respect and promote the dignity and independence of people with disabilities. Therefore, no changes will be made to this policy before considering the impact on people with disabilities. Any policy of Aviva Canada that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

## **Questions about this policy**

This policy exists to help us strive to provide excellent service to customers with disabilities. If anyone has a question about the policy, or if the purpose of the policy is not understood, an explanation will be provided by the Ombudsman of Aviva Canada.

## APPENDIX A – DEFINITIONS

### DISABILITY:

- 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 service animal or on a wheelchair or other remedial appliance or device;
- A condition of mental impairment or a developmental disability;
- A learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- 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, Ontario*

**ASSISTIVE DEVICE:** Any equipment that is used to maintain or improve the functional abilities of people with disabilities and may include, but is not limited to, a wheelchair, scooter, walker or a personal oxygen tank, hearing devices, etc.

### SERVICE ANIMAL:

- a) A dog trained as a guide for a blind person and having qualifications prescribed by the regulations (*Blind Persons' Rights Act 1990, Ontario*)
- b) As per regulation (*Health Protection and Promotion Act, Ontario Regulation 562*) a dog other than a guide dog for the blind is a service dog if:
  - It is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability;
  - Or the person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog
- c) As per legislation (*Ontario Regulation 429/07*), an animal is a service animal for a person with a disability if:
  - It is readily apparent that the animal is used by the person for reasons relating to a disability; or
  - If the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

**SUPPORT PERSON:** As per legislation (*Ontario Regulation 429/07*), a support person means another person who accompanies a person with a disability in order to help with communication, mobility, personal care, medical needs or access to goods and services.