



ACCESSIBILITY POLICY

Our Commitment

Aviva Canada Inc. and its subsidiaries (“Aviva Canada”) are supportive of the Accessibility for Ontarians with Disabilities Act (“AODA”), and its goal of achieving accessibility with respect to goods, services, facilities, and employment.

We are committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting the accessibility requirements under AODA.

Our Promise

Aviva Canada will make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity. We will carry out our functions and responsibilities in the following areas:

Communication

We will communicate in a way that will take into account the needs of people with disabilities. We will make every reasonable effort to have the person with a disability understand both the content and intent of its 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’ll offer relay services and email to our customers as an alternative form of communication.

Internet

To provide an accessible internet experience for our customers, we ensured that our internet sites met the WCAG 2.0 A accessibility standard as of January 1, 2014, and will ensure it meets the WCAG 2.0 AA standard by January 1, 2021.

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 a person with disabilities.

Support Persons

If a customer with a disability is accompanied by a support person, Aviva Canada will ensure that both persons are allowed to enter the premises together and that 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.

Guide Dogs, Service Dogs and Service Animals

Customers with a disability that require a guide dog, service dog and service animal, (“service animals”) 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, ON, The Health Protection and Promotion Act, 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 and at the appropriate public entrances and service counters on our premises.

Accessible Emergency Information

We will provide our customers with publicly available emergency information in an accessible format upon request. We will also provide employees with disabilities individualized emergency response information when necessary.

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 alternatively 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.

Kiosks

We will ensure that the needs of people with disabilities are considered by our employees when designing, implementing or acquiring any self service kiosks.

Training for staff

Aviva Canada will provide training to employees on Ontario's accessibility laws and on the Human Rights Code as it relates to people with disabilities as required under the Ontario Integrated Accessibility Standards Regulation. Training will be provided in a way that best suits the duties of the employees.

Accessible customer service training will be provided to:

- employees and volunteers
- those involved in developing our policies
- those who provide goods, services or facilities to customers on our behalf to customers.

Employees will complete accessible customer service training as part of the orientation program within two weeks of starting their employment.

Training will include:

- purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard
- Aviva Canada policies related to the customer service standard
- how to interact and communicate with people with various types of disabilities
- how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- what to do if a person with a disability is having difficulty in accessing goods, services or facilities

Where there has been a material change made to legislation or to our accessibility policies, employees will receive further training.

Multi-Year Accessibility Plan

Aviva Canada will establish a multi-year accessibility plan to outline the policies and actions that it will put into place. This plan will be updated regularly and at least once every 5 years.

We will provide our Multi-Year Accessibility plan in an accessible format upon request.

Feedback process

Our ultimate goal is to meet and surpass expectations while serving persons 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:

Aviva Canada Inc.
10 Aviva Way, Suite 100
Markham, Ontario L6G 0G1
ombuds.ca@aviva.com
Toll free: 1-877-689-3634
Fax: 416-615-4239

Or by completing the online feedback form found on the 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](#).

Anyone that provides formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints.

We will make sure our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, upon request.

Modifications to this or other policies

We are committed to developing 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 achieve service excellence to persons with disabilities. If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation should be provided by, or referred to, 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 guide dog or other 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

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.

GUIDE DOG: A dog trained as a guide for a blind person and having qualifications prescribed by the regulations (*Blind Persons' Rights Act 1990*)

SERVICE DOG: 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

SERVICE ANIMAL: As per legislation (*Ontario Regulation 191/11*), an animal is a service animal for a person with a disability if:

- the animal is readily identified as one that is being used by the person for reasons relating to the person's disability as a result of visual indicators such as the vest or harness worn by the animal; or
- If the person provides documentation from a regulated health professional confirming that the person requires the animal for reasons relating to the disability.

SUPPORT PERSON: As per legislation (*Ontario Regulation 191/11*), 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.