

# Accessibility

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## Eligibility

This policy applies to employees, customers, members of the public, volunteers, or other parties (collectively the "Individuals"), who interact with, or on behalf of, Zurich Canadian Holdings Limited and World Travel Protection Canada Inc. (collectively the "Company").

## Overview

The Company is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the Accessibility for Ontarians with Disabilities Act and Ontario's accessibility laws.

The Company is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non discrimination.

The Company understands that obligations under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and its accessibility standards do not substitute or limit its obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law.

The Company is committed to excellence in serving and providing goods, services or facilities to all customers including people with disabilities.

Our accessible customer service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

The Company will engage in a good faith interactive process with individuals who request reasonable accommodation; requests are assessed on a case-by-case basis.

[Accessibility Multi-year Plan - Zurich](#)  
[Accessibility Multi-year Plan – World Travel Protection Canada Inc.](#)

## Training

The Company is committed to training all employees and volunteers in accessible customer service, other Ontario's accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities.

In addition, the Company will train:

- a) all persons who participate in developing the organization's policies; and

b) all other persons who provide goods, services or facilities on behalf of the organization.

Training of our employees and volunteers on accessibility relates to their specific roles.

Training includes:

- purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Customer Service Standards
- our policies related to the Customer Service Standards
- 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
- how to use the equipment or devices available on-site or otherwise that may help with providing goods, services or facilities to people with disabilities
- what to do if a person with a disability is having difficulty in accessing our organization's goods, services or facilities.

The Company trains every person as soon as practicable after being hired and provides training in respect of any changes to the policies.

The Company maintains records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided.

## Definitions

**Assistive Device** means any device that helps someone do something they might not otherwise be able to do well, or at all. This term is frequently used for devices that help people overcome a Disability such as a mobility, vision, dexterity, or hearing loss.

**Barrier** means anything that prevents a person with a disability from fully participating in all aspects of society because of their disability, including barriers that are: physical, architectural, attitudinal, technological, informational or communications barrier, or a policy or a practice.

### Disability means:

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

**Guide dog** means a guide dog as defined in section 1 of the Blind Persons' Rights Act.

**Service animal** means an animal used by a person with a disability for reasons relating to the disability where:

- a) it is readily apparent the animal is used by the person for reasons relating to their disability; or
- b) the person provides a letter from a physician or nurse confirming the person requires the animal for reasons relating to the disability.

**Support person** means, in relation to a person with a disability, another person who accompanies them in order to help with communication, mobility, personal care or medical needs or with access to goods or services.

## **Our Commitment**

The Company demonstrates commitment in the following ways:

### Information & Communication

We communicate with people with disabilities in ways that take into account their disability. This may include the following:

- Employees are trained how to interact and communicate with Individuals with disabilities using clear and plain language while speaking clearly
- Interactions and communications with Individuals with disabilities takes into account their needs
- Website meet the requirements of WCAG 2.0 Level AA
- If telephone communication is not suitable or available, alternatives including email, TTY and relay services may be offered
- Sign language interpretation, captioning or other disability-related communication services may be offered for meetings and public events, in advance or upon request depending on the audience

The Company will work with the person with disabilities to determine what method of communication works for them.

The Company have a process for receiving and responding to feedback and the process is accessible to persons with disabilities upon request.

The Company communicates with people with disabilities in ways that take into account their disability. When asked, the Company will provide information about the organization and its services, including public safety information, in accessible formats or with communication supports:

- i. in a timely manner, taking into account the person's accessibility needs due to disability; and
- ii. at a cost that is no more than the regular cost charged to other persons.

The Company will consult with the person making the request in determining the suitability of an accessible format or communication support. If the Company determines that information or communications are unconvertible, the Company shall provide the requestor with:

- i. an explanation as to why the information or communications are unconvertible; and
- ii. a summary of the unconvertible information or communications.

The Company does not typically provide services directly to the public however, does notify customers about the availability of accessible formats and communication supports on request.

The Company will also meet internationally-recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario's accessibility laws.

### Assistive Devices

People with disabilities may use their personal assistive devices when accessing our goods, services or facilities.

In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with a disability can access our goods, services or facilities.

The Company ensures that our employees are trained and familiar with various assistive devices we have on site or that we provide that may be used by customers with disabilities while accessing our goods, services or facilities.

### Accessible Documentation

Documents created by the Company are available in other alternate formats upon request

### Use of Service Animals and Support Persons

The Company welcomes people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public and third parties.

When the Company cannot easily identify that an animal is a service animal, our employees may ask for documentation (template, letter or form) from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.

A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

A regulated health professional is defined as a member of one of the following colleges:

- College of Audiologists and Speech-Language Pathologists of Ontario
- College of Chiropractors of Ontario
- College of Nurses of Ontario
- College of Occupational Therapists of Ontario
- College of Optometrists of Ontario
- College of Physicians and Surgeons of Ontario
- College of Physiotherapists of Ontario
- College of Psychologists of Ontario
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

If service animals are prohibited by another law, the Company will do the following to ensure people with disabilities can access our goods, services or facilities:

- explain why the animal is excluded
- discuss with the customer another way of providing goods, services or facilities

### Support Persons

A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises. The Company does not charge fees for accessing goods, service or facilities.

In certain cases, this organization might require a person with a disability to be accompanied by a support person for the health or safety reasons of:

- the person with a disability
- others on the premises

Before making a decision, this organization name will:

- consult with the person with a disability to understand their needs
- consider health or safety reasons based on available evidence
- determine if there is no other reasonable way to protect the health or safety of the person or others on the premises

### Notice of Temporary Disruption

The Company does not typically provide services directly to the public. In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, the Company will notify customers promptly and directly. This clearly posted notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available. The property management company who manages facilities will post a notice at entrances and electronically on the website.

### Notice of Availability of Documents

The Company notifies the public that documents related to accessible customer service, are available upon request by posting a notice on its website Accessibility page ([EN](#) | [FR](#)).

The Company will provide these documents in an accessible format or with communication support, on request. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and, at no additional cost.

#### Self-service Kiosks

The Company does not typically provide services directly to the public and, therefore, does not have self-service kiosks.

#### Employment

The Company notifies employees, job applicants and the public that accommodations can be made during recruitment and hiring.

Job applicants are notified when they apply for a job posting and when they are individually selected to participate in an assessment or selection process that accommodations are available upon request. The Company consults with the applicants and provides or arranges for suitable accommodation.

The Company notifies successful applicants of policies for accommodating employees with disabilities when making offers of employment and during their onboarding journey.

The Company notifies employees that supports are available for those with disabilities as soon as practicable after they begin their employment. Updated information is provided to employees whenever there is a change to existing policies on the provision of job accommodation that take into account an employee's accessibility needs due to a disability.

The Company will consult with employees when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to disability. We will consult with the person making the request in determining the suitability of an accessible format or communication supports specifically for:

- i. information that is needed in order to perform the employee's job; and
- ii. information that is generally available to employees in the workplace

Where needed, the Company will also provide customized emergency information to help an employee with a disability during an emergency. With the employee's consent, workplace emergency information will be provided to a designated person who is providing assistance to that employee during an emergency. Employees may notify the company of their need for an individualized response plan and consent by submitting a completed [Employee Assistance Notification Form](#).

The Company will provide the information as soon as practicable after we become aware of the need for accommodation due to the employee's disability.

The Company will review the individualized workplace emergency response information:

- i. when the employee moves to a different location in the organization;
- ii. when the employee's overall accommodations needs or plans are reviewed; and
- iii. when the employer reviews its general emergency response policies.

The Company has a written process to develop individual accommodation plans for employees. The Company a written 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 Company performance management, career development and redeployment processes take into account the accessibility needs of all employees.

#### Design of Public Spaces

The Company does not design public spaces.

#### Transportation

The Company does not provide transportation services.

#### Policy Modifications

Company policies, procedures and practices are developed and updated to respect and promote the dignity and independence of Individuals with Disabilities.

Any policies of this organization that do not respect and promote the principles of dignity, independence, integration and equal opportunity for people with disabilities will be modified or removed.

This document is publicly available. Accessible formats are available upon request.

### **Feedback Process**

We welcome your feedback. Customer feedback will help us identify barriers and respond to concerns. Please use the following contact information to let us know how we're doing or to request information about our Accessibility Program:

#### [Employee Accessibility Feedback Form](#)

Phone: 416-586-6773

Toll Free: 1-800-387-5454 x6773

Email: <mailto:ombudsman.zurich.canada@zurich.com>

Mail/In-person: 100 King Street West, Suite 5500 P.O Box 290, Toronto, Ontario M5X 1C9

Our Ombudsman will review get back to you within fifteen (15) business days. The Company ensures our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request.

### **Policy Violation**

A violation of this policy may result in corrective action, up to and including termination of employment. You must report a policy violation immediately to:

- your manager, or
- a Human Resources Representative, or
- The Zurich Ethics Line at 1-800-448-1426 or [online](#), which provides you options for reporting information anonymously.

### **Contact**

Employees should contact the HR Service Center with questions or if needing assistance:

Online Request: [HR Service Request](#)