

ACCESSIBILITY: CUSTOMER SERVICE STANDARD POLICY

STATEMENT OF COMMITMENT

Travel Healthcare Insurance Solutions Inc. o/a guard.me International Insurance ("guard.me" or the "Company"), a division of Travel Healthcare Insurance Solutions Inc., is committed to improving the accessibility needs of people with disabilities and providing equal treatment and opportunity to people with disabilities with respect to accessing services, accommodation and employment in a way that respects their dignity and independence.

PURPOSE

The *Integrated Accessibility Standards*, Regulation 191/11 ("IASR") under the *Accessibility for Ontarians with Disabilities Act, 2005* ("AODA") establishes accessibility standards for providing customer service to persons with disabilities. The requirements under these standards are not a replacement or substitution for the requirements of the Ontario *Human Rights Code*.

The purpose of this Policy is to put in practice our responsibilities under the AODA and to ensure that **guard.me** complies with the Government of Ontario's accessibility standards.

APPLICATION

guard.me strives to meet the accessibility needs of its employees and the public it serves. As such, the practices and procedures in this Policy apply to all **guard.me** employees, volunteers and individuals that provide services or interact with people with disabilities on behalf of the Company.

DEFINITIONS

Assistive Devices – Auxiliary aids such as communication aids, cognition aids, personal mobility aids and medical aids (e.g., canes, crutches, wheelchairs or hearing aids).

Communication Supports – Supports facilitating effective communications, including captioning, alternative and augmentative communication supports, plain language and sign language.

Disability – As per the Ontario *Human Rights Code*, 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*.

Persons with Disabilities – Individuals who have a disability as defined under the Ontario *Human Rights Code* (as above).

Service Animals – Animals individually trained to do work or perform tasks for the benefit of a person with a disability.

Support Persons – Any persons, whether a paid professional, volunteer, family member, or friend, who accompany an individual with a disability in order to help with communications, personal care or medical needs, or with access to services.

PROVIDING GOODS AND SERVICES TO PEOPLE WITH DISABILITIES

Reasonable efforts will be made by **guard.me**, including its employees, volunteers and individuals providing services on their behalf, to ensure that:

- Persons with disabilities are provided equal opportunity to obtain, use and benefit from **guard.me**'s services;
- **guard.me**'s services are provided in a manner that respects the dignity and independence of persons with disabilities;
- Services provided to persons with disabilities are integrated with the services provided to others unless an alternative measure is necessary to allow a person with a disability to benefit from the services;
- Communications with a person with a disability are conducted in a respectful manner that takes the person's disability into account;
- Persons with disabilities may use assistive devices, service animals and support persons as is necessary to access **guard.me**'s offices and services unless superseded by other legislation.

1. Assistive Devices

We are committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our services. We will ensure that all staff, volunteers and others dealing with the public are trained and familiar with various assistive devices that may be used by customers with disabilities while accessing our services.



2. Telephone Services

We are committed to providing fully accessible telephone service to our customers.

We will train employees to communicate with customers over the telephone in clear and plain language and to speak clearly and slowly.

All staff, volunteers and others dealing with the public will offer to communicate with customers by web-based customer care requests, e-mail or fax if telephone communication is not suitable to their communication needs or is not available.

3. Billing and Invoicing

We are committed to providing accessible invoices to all of our customers. For this reason, invoices will be provided in the following formats upon request: hard copy, e-mail or fax.

All staff, volunteers and others dealing with the public will answer any questions that customers may have about the content of the invoice in person, by telephone or e-mail.

4. Use of Service Animals and Support Persons

We are committed to welcoming people with disabilities who are accompanied by a service animal on parts of our premises that are open to the public and other third parties. All staff, volunteers and others dealing with the public will be properly trained in how to interact with people with disabilities who are accompanied by a service animal.

We are also committed to welcoming people with disabilities who are accompanied by a support person on parts of our premises that are open to the public and other third parties. Any person with a disability who is accompanied by a support person will be allowed to enter the Company's premises with his or her support person.

5. Notice of Temporary Service Disruption

guard.me will provide customers with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. This notice will include information about the reason for the disruption and its anticipated duration, and a description of alternative facilities or services, if available.

The notice will be placed in conspicuous places, including entrances and service counters of the affected premises, as well as by other means such as on our website that will ensure that the notice reaches those persons potentially affected by the temporary disruption.

6. Feedback System



Feedback regarding the way **guard.me** provides services to people with disabilities can be made in person, by phone, by mail, by fax and online. Any feedback about our service to customers with disabilities, or an inquiry as to how to leave feedback can be directed to Kelly Mohsenzadeh either in person, in writing, by telephone or by e-mail using the contact information below.

Upon receipt of any complaints, **guard.me** will investigate the matter with the appropriate personnel and provide a response within thirty (30) days.

7. Training

guard.me will provide training on the Customer Service Standard requirements under the AODA to all employees, volunteers and others who deal with the public or other third parties on their behalf, and all those who are involved in the development and approvals of customer service policies, practices and procedures.

Applicable staff will be trained on policies, practices and procedures that affect the way services are provided to people with disabilities. As changes are made to these policies, practices and procedures, **guard.me** will provide on-going training.

MODIFICATIONS TO THIS POLICY

Any **guard.me** policies that do not respect and promote the dignity and independence of people with disabilities will be modified or removed. The Company's policies are maintained and updated regularly to reflect legislative changes and changes in practices.

As we are committed to developing accessibility policies that respect and promote the dignity and independence of people with disabilities, no changes will be made to this policy before considering the impact on people with disabilities.

FURTHER INFORMATION

If anyone has a question about the AODA Customer Service Standard Policy or wishes to request a copy of this Policy, please contact:

Kelly Mohsenzadeh, HR Director
1-877-873-8447 or 905-752-6210
hr@guard.me



guard.me International Insurance
MULTI-YEAR ACCESSIBILITY PLAN

Travel Healthcare Insurance Solutions Inc. o/a guard.me International Insurance ("guard.me" or the "Company"), a division of Travel Healthcare Insurance Solutions Inc., is 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 accessibility requirements under the *Accessibility for Ontarians with Disabilities Act, 2005* ("AODA"). The *Integrated Accessibility Standards, Regulation 191/11* ("IASR") under the AODA establishes standards to address barriers that persons with disabilities face in the areas of information and communications, employment and the design of public spaces.

This 2017-2022 Multi-Year Accessibility Plan outlines the strategy of **guard.me** to prevent and remove barriers to address the current and future requirements of the AODA, and to fulfil the Company's commitment as outlined in the **guard.me** Accessibility Policies.

In accordance with the requirements set out in the IASR, **guard.me** will:

- Establish, review and update this Plan in consultation with persons with disabilities;
- Post the Plan on the Company website;
- Provide the Plan in an accessible format, upon request; and
- Review and update the Plan at least once every five (5) years.

DEFINITIONS

Assistive Devices – Auxiliary aids such as communication aids, cognition aids, personal mobility aids and medical aids (e.g., canes, crutches, wheelchairs or hearing aids).

Communication Supports – Supports that facilitate effective communications, including, captioning, alternative and augmentative communication supports, plain language and sign language.

Disability – As per the Ontario *Human Rights Code*, 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 coordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or 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*.

Employees – Every person who deals with members of the public or other third parties on behalf of **guard.me**, whether the person does so as an employee, agent, volunteer or otherwise.

Persons with Disabilities – Individuals who have a disability as defined under the Ontario *Human Rights Code* (as above).

Service Animals – Animals individually trained to do work or perform tasks for the benefit of a person with a disability.

Support Persons – Any persons, whether a paid professional, volunteer, family member or friend, who accompanies an individual with a disability in order to help with communications, personal care or medical needs or with access to services.

CUSTOMER SERVICE STANDARDS

Commitment:

Since 2012, **guard.me** has been in compliance with the Customer Service Standards outlined in the IASR with respect to providing service to persons with disabilities.

guard.me is committed to excellence in serving all customers, including persons with disabilities, and will provide goods, services and facilities in a way that is accessible and respects the dignity and independence of persons with disabilities.

Action Taken effective January 1, 2012:

- All persons who, on behalf of the Company, deal with the public or other third parties, and all those who are involved in the development and approvals of customer service policies, practices and procedures, as well as others providing services to customers, are trained on an on-going basis to communicate with persons with disabilities. Training has included the following:
 - Review of the purpose of the AODA and the requirements of 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;
 - How to use the alternative means to help provide goods or services to people with disabilities;
 - What to do if a person with a disability is having difficulty in accessing the Company's goods and services; and
 - The Company's policies, practices and procedures relating to the Customer Service Standard.



- All staff, volunteers and others dealing with the public are trained and are familiar with various assistive devices that may be used by customers with disabilities while accessing our services.
- **guard.me** provides accessible telephone service to customers and communication if telephone communication is not suitable to their needs.
- The Company ensures accommodation to customers serviced by a guide dog or other service animal in public areas.
- Where a person with a disability is accompanied by a support person, the support person is accommodated.
- Customers are notified in the event of a planned or unexpected disruption of service or inaccessibility of facilities used by persons with disabilities by placing standard notices of temporary disruption at all public entrances and service counters on **guard.me** premises.
- Feedback is encouraged by persons with disabilities through multiple accessible ways, including in-person, by phone, by mail and online.
- **guard.me** communicates its Accessible Customer Service Standard policy on the Company website and provides the policy upon request.

Status: Complete

EMERGENCY PROCEDURE, PLANS OR PUBLIC SAFETY INFORMATION

Commitment:

guard.me is committed to providing and maintaining premises that respect the dignity and independence of persons with disabilities.

Action Taken effective January 1, 2012:

- Any emergency procedures, plans and public safety information that are prepared by **guard.me** and made available to the public, will be available in accessible formats or with communication supports upon request.
- Requests can be made for such procedures, if applicable, and requests will be documented by the Company.

Status: Complete

WORKPLACE EMERGENCY RESPONSE INFORMATION

Commitment:

guard.me is committed to providing individualized workplace emergency response information to an employee with a disability requiring accommodation.

Action Taken effective January 1, 2012:

- Individualized workplace emergency response information procedures have been developed for employees with disabilities as required.
- Workplace Emergency Response Information forms have been prepared for employees who have disclosed a disability and who are being accommodated according to their disabilities.
- **guard.me** provides assistance to specific disabled employees, with consent, to help them evacuate the workplace during an emergency.
- Workplace Emergency Response Information forms have only been communicated to the employees' managers and other affected persons on an as-needed basis.
- **guard.me** reviews and assesses general workplace emergency response procedures and individualized emergency plans on an on-going basis.
- The Company will ensure that the individual workplace response information is updated as necessary.

Status: Complete

TRAINING

Commitment:

guard.me is committed to training employees, volunteers, all persons who deal with the public or other third parties on their behalf and other persons involved in developing policies on Ontario's accessibility laws and on accessibility aspects of the Ontario *Human Rights Code* that apply to persons with disabilities.

Planned Action effective January 1, 2015:

- Appropriate training on the requirements of the IASR and the Ontario *Human Rights Code* as it pertains to persons with disabilities will be provided to employees, volunteers, third-party contractors who provide goods, services and facilities on **guard.me**'s behalf and persons participating in the development and approval of **guard.me**'s policies.
- Training will be completed as soon as practicable to new and current employees, and records of dates and the number of participating individuals will be kept.
- Training will be provided on an ongoing basis where there are any changes to legislation or practices.

Status: Complete & Ongoing

INFORMATION AND COMMUNICATION STANDARDS

Commitment:

guard.me is committed to making information and communications accessible to persons with disabilities. The Company 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 in accessible formats that meet the needs of persons with disabilities.

1. Feedback, Accessible Formats and Communication Supports

Planned Action effective January 1, 2015:

- Upon request, accessible formats and communication supports will be provided or arranged in a timely manner that accounts for the person's needs due to disability and at a cost no more than the regular cost charged to other persons.
- **guard.me** will consult with the person making a request to determine the suitability of the accessible format or communication supports.
- The public will be notified through the Company website about the availability of accessible formats and communication supports.
- **guard.me** will ensure current and new processes for receiving and responding to feedback are accessible to persons with disabilities.

Status: Complete & Ongoing

2. Accessible Websites and Web Content

Action Plan effective January 1, 2014:

- If **guard.me** develops new internet websites, the Company will ensure that the websites and web content conform with the World Wide Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA.

Action Plan effective January 1, 2021:

- Internet websites and web content will conform with the World Wide Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA.

Status: Complete & Ongoing

EMPLOYMENT STANDARDS

Commitment:

guard.me is committed to fair and accessible employment practices in all stages of the employment cycle that will respect the dignity and independence of current and prospective employees with disabilities.

1. Recruitment, Assessment and Selection

Action Plan effective January 1, 2016:

- The Company will undertake a review and, as necessary, modify existing recruitment policies, procedures and processes to ensure fair and accessible recruitment processes.
- **guard.me** will notify its employees, as well as the public about the availability of accommodation for job applicants with disabilities during the recruitment process. Notification will be provided in an accessible manner, if necessary.
- The availability of accommodation during the recruitment process will be indicated on job postings.
- Job applicants who are individually selected to participate in an assessment or selection process will be notified of available accommodation upon request. The availability of accommodation will be communicated through a script in scheduling interviews and/or assessments. Notification will be provided in an accessible manner, if necessary.
- If a selected applicant requests accommodation, the Company will consult with the applicant and arrange for suitable accommodation in a manner that takes into account the accessibility needs.
- All successful applicants will be notified through their offer letter of the workplace policies for accommodation for employees with disabilities, and notification will be provided in an accessible manner, if necessary.

Status: Complete & Ongoing

2. Informing Employees of Supports

Action Plan effective January 1, 2016:

- **guard.me** will inform all current and new employees of workplace policies that support employees with disabilities, including accommodation policies that take into account needs due to disability.
- New employees will be informed of workplace policies that support employees with disabilities as soon as practicable via e-mail.
- **guard.me** will inform employees of any changes to existing workplace policies.
- Upon request, **guard.me** will provide or arrange for suitable accessible formats and communication supports for information needed to perform the employee's job and general employee information. In order to provide suitable accessible formats or communication supports, the Company will consult the requesting employee.

Status: Complete & Ongoing

3. Documented Individual Accommodation Plans and Return to Work Processes

Action Plan effective January 1, 2016:

- **guard.me's** existing policies include steps that the Company will take to accommodate an employee with a disability and to facilitate an employee's return to work after absenteeism due to disability.
- **guard.me** will develop written individual accommodation plans for employees with disabilities, if necessary.

- The process for developing each individual accommodation plan for an employee with a disability requiring accommodation will be in accordance with the IASR.
- Current policies on accommodation will be reviewed and modified to integrate the process for developing written individual accommodation plans for employees with a disability, if necessary.
- If applicable, individual accommodation plans will include information regarding accessible formats and communication supports, individualized workplace emergency response information and any other accommodation.
- **guard.me** will ensure that individual accommodation plans are updated as necessary.
- The Company will develop a written Return to Work process for employees absent due to disability and requiring accommodation.
- The written Return to Work process will outline the steps **guard.me** will take to facilitate the return to work after a disability-related absence, and to develop and use written individual accommodation plans.
- Current policies on returning to work will be reviewed and modified to integrate the written Return to Work process.

Status: Complete & Ongoing

4. Performance Management, Career Development and Redeployment

Planned Action effective January 1, 2016:

- **guard.me** will review, assess and modify, if necessary, existing policies, procedures and practices on performance management, career development and redeployment to ensure compliance with the IASR.
- The Company will consider the accessibility needs of employees with disabilities, and as applicable, their individualized accommodation plans, when assessing performance management, career development and advancement, and redeployment.
- Performance management, career development, redeployment and advancement meetings will be taken into account for accessibility needs.

Status: In Progress

ACCESSIBILITY STANDARDS FOR THE BUILT ENVIRONMENT

Commitment:

guard.me is committed to removing barriers in public spaces and buildings that will uphold the dignity and independence of persons with disabilities.

Action Plan effective January 1, 2017:

- **guard.me** will ensure that any of the following public spaces that are newly constructed or redeveloped will meet the accessibility requirements under the IASR:
 - ❖ Accessible parking



- ❖ Service-related elements (e.g. service counters, fixed queuing lines and waiting areas)

Status: Complete & Ongoing

FURTHER INFORMATION

If anyone has a question about the Multi-Year Accessibility Plan, please contact:

Kelly Mohsenzadeh

HR Director

1-877-873-8447 or 905-752-6210 hr@guard.me

80 Allstate Parkway, Markham, Ontario L3R 6H3

A copy of the Multi-Year Accessibility Plan is available upon request by using the contact information above. In addition, a copy of this policy is available on the Company's website.