

Accessibility

Purpose

Zurich Canadian Holdings Limited, World Travel Protection Canada Inc., and Adjuvantz (individually and collectively the “Company”) is committed to providing a diverse, inclusive and barrier-free environment, resulting in an accessible organization for employees, customers, and other parties who interact with or on behalf of the Company. The Company strives to achieve a workplace free of discrimination on the basis of physical or mental disability, or medical condition.

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Applies to

This policy applies to Zurich Canadian Holdings Ltd., World Travel Protection Canada Inc. (“Company”) and their affiliates and subsidiaries operating in Canada:

- Employees
- Customers
- Members of the public
- Volunteers
- Other parties who interact with, or on behalf of, the Company

Accessibility for Ontarians with Disabilities Act, 2005 (AODA)

The *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”) was created to make Ontario accessible for persons with disabilities. The aim of this law is to create a province where all individuals can fully participate in both personal and professional barrier-free activities. Ontario’s businesses, organizations, and communities are working together to become more accessible and inclusive to people with Disabilities. The AODA regulates

accessibility within the province of Ontario however, the Company will apply the policy and applicable practices within all of its operational jurisdictions.

Accessibility

The Company supports the full inclusion of persons with Disabilities as set out in:

- The United Nations' *Convention on the Rights of Persons with Disabilities*;
- The Canadian *Charter of Rights and Freedoms*;
- Canadian Human Rights laws; and
- The *Accessibility for Ontarians with Disabilities Act (AODA) 2005*.

The Company will provide reasonable accommodation to individuals who have a known Disability where accommodation is needed to: (1) enable an individual to be considered for a job; (2) enable an individual to perform the essential functions of his or her job; (3) enable an individual to enjoy equal benefits and privileges of employment; or (4) enable an individual barrier-free access to Company products and services. The Company will engage in a good faith interactive process with individuals who request reasonable accommodation.

This policy identifies the Company's plan to meet the requirements of the AODA, provides a framework to discuss disability related concerns, and provides for an interactive process to discuss accommodation. This policy applies to all employment practices such as recruitment, termination, hiring, training, job assignments, promotions, pay, benefits, layoff, leave and any other employment related activity, as well as to the provision of customer service, and access to products, services and premises.

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 his or her disability, including barriers that are: physical, architectural, attitudinal, technological, informational or communications based, , , , 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 coordination, 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 his or her 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 him or her in order to help with communication, mobility, personal care or medical needs or with access to goods or services.

Key Requirements

The Company is committed to excellence in serving all customers, including those with Disabilities, and will carry out our functions and responsibilities in

an accessible manner. Each request for accommodation is assessed on a case-by-case basis. In addition the Company follows these steps:

Communication:

The Company will train staff on how to:

- interact and communicate with people with various types of Disabilities; and
- communicate with customers over the telephone in clear and plain language and to speak clearly and slowly.

If communication over the telephone is not suitable or available, the Company will offer to communicate with customers in other ways including email, TTY and relay services.

The Company will arrange and pay for sign language interpretation, captioning or other disability-related communication services for its meetings and public events, in advance or upon request depending on the audience.

Requests for such services should be made as early as possible due to the amount of work required to make these arrangements.

Assistive Device(s):

The Company ensures its employees are trained and familiar with various Assistive Devices that may be used by customers while accessing our products, services and premises.

The Company will only use facilities for meetings and public events that are accessible for people with Disabilities who use mobility aids and devices or have other facility-related needs.

Customers are encouraged to contact the Company (or employee or manager involved) as early as possible if any special arrangements are required.

Accessible Documentation:

All of the Company's public documents, including correspondence and publications, are available in electronic format. Company publications are released in electronic format and made available on our websites. The

Company is committed to complying with the WCAG 2.0 Web Content Accessibility Guidelines as required by the integrated Accessibility Standards.

Some documents created by the Company are available, upon request, in other alternate formats to accommodate Disability-related needs. The Company will provide information on the availability of documents in other formats upon request.

Scent Sensitive Environment:

Due to health concerns related to exposure to scented products, such as perfumes and colognes, employees and visitors are asked to be considerate in their use of such products when on Company premises. Employees and visitors should be aware they may be asked to not use such products should this be required to accommodate individuals with environmental sensitivities.

Use of Service Animals and Support Persons:

The Company welcomes people with Disabilities who are accompanied by a service animal or a support person. We will ensure employees are properly trained on how to interact with people with Disabilities who are accompanied by a service animal or a support person.

Notice of Temporary Disruption:

The Company will inform individuals if there is a planned or unexpected disruption in the facilities or services usually used by persons with Disabilities. This notice will include information about the reason for the disruption, how long it may last, and what other facilities or services are available.

This information will be placed on our automated phone system and at the entrance to our offices. If individuals are expected we will do our best to let them know about any disruption including waiting outside the offices for those visitors to help them as needed.

Training:

The Company provides training to employees who regularly interact with parties within the province of Ontario and elsewhere in Canada so they understand their responsibilities, entitlements, how to interact and communicate with individuals with Disabilities, and how to respond to requests for accessibility and accommodation.

The Company will maintain and update a training package for employees.

Feedback Process:

The Company strives to continuously improve accessibility to our products, services and premises. If you have accessibility-related feedback, or if you would like more information about the Company's Accessibility Program, please take a moment to contact us:

Phone: 416-586-6773
Fax: 416 586 6771
Email: ombudsman.zurich.canada@zurich.com
Mail/In-person: Ombudsman
100 King Street West, Suite 5500
P.O Box 290
Toronto, Ontario
M5X 1C9

The Ombudsman will review the feedback, investigate the situation, attempt to resolve it, and provide a response within fifteen (15) business days of receiving the information.

Policy Modifications:

The Company is committed to developing customer service policies, procedures and practices that respect and promote the dignity and independence of people with Disabilities. Therefore, no changes will be made to Company policies before considering the impact on individuals with Disabilities.

Policy Violations

Policy violations may result in corrective action, up to and including termination of employment.

Policy violations must immediately be reported to:

- your manager, or
- a Human Resources Representative, or



- the independent North America Ethics & Compliance Line at 1-800-448-1426, which provides an option for reporting information anonymously.

Contact

For more information about this policy, contact:

The HR Service Center
1400 American Lane, Tower 2, Floor 2
Schaumburg, IL 60196

Phone: (888) 599-3636
Fax: (866) 677-7591

E-mail: hr.service.center@zurichna.com