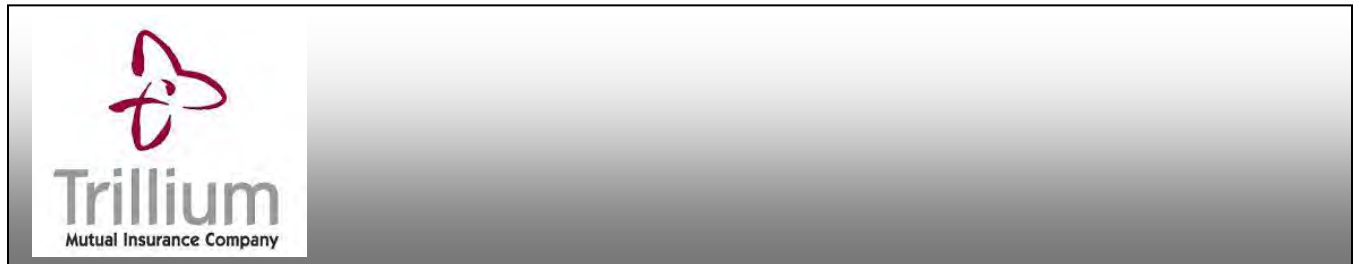


Trillium Mutual Insurance Company's Accessibility
Policies and Multi-Year Plan



TMI Accessibility Policies and Multi-Year Plan

Table of Contents

Introduction	3
Statement of Commitment to Accessibility	4
TMI Multi-Year Accessibility Plan	6
Proposed Built Environment Standard	13
Accessible Service Policy	14
Information and Communication Policy	20
Employment Standard Policy	25
Emergency Response Plan	28

TMI Accessibility Policies and Multi-Year Plan

Introduction

In 2005, the Government of Ontario passed the Accessibility for Ontarians with Disabilities Act (AODA). It is the goal of the Ontario government to make Ontario accessible by 2025.

In compliance with the Integrated Accessibility Standards Regulations (IASR) under the AODA, TMI has established, implemented and documented a Multi-Year Accessibility Plan, outlining TMI's commitment to meeting the following accessibility standards:

- Customer Service;
- Information and Communications;
- Training; and
- Employment.

This document outlines TMI's Accessibility Policies and TMI's Multi-Year Accessibility Plan which includes TMI's actions to date as well as our plan and strategy to improve opportunities for people with disabilities by preventing and removing barriers to accessibility.

TMI Accessibility Policies and Multi-Year Plan

December 2014

Statement of Commitment to Accessibility

Trillium Mutual Insurance Company (TMI) is committed to providing a barrier-free environment for our Members, Business Associates, Employees, Job Applicants, Suppliers, Visitors, and other Stakeholders who enter our premises, access our information, or use our services. As an organization, we respect and uphold the requirements set forth under the Accessibility for Ontarians with Disabilities Act (2005), Customer Service Standard, and the Integrated Accessibility Standards Regulation for Information and Communications, Employment, and eventually, for the Built Environment.

Approximately 1.8 million Ontarians live with a disability, and as the population grows older, this number will also increase. TMI has made a commitment to accessibility for everyone who uses our services not only because it is a legal obligation, but because it benefits our employees and business associates and makes good business sense. TMI has an important responsibility for ensuring a safe, dignified, and welcoming environment for everyone. We are committed to ensuring our organization's compliance with accessibility legislation by incorporating policies, procedures, equipment requirements, training for employees, and best practices. We will review these policies and practices at least annually. We are committed to reviewing and incorporating the following information with our employees now and in the future:

- Legislation regarding the Human Rights Code and the Accessibility for Ontarians with Disabilities Act, 2005;
- Integrated Accessibility Standards for Information and Communications, Employment, and the Built Environment;
- Accessible employment practices such as recruitment, assessment, and selection;
- Developing emergency response plans and individual workplace accommodation plans for employees with disabilities;
- Customer service standards;
- Accessible communication supports and information formats (both digital and non-digital)
- Communicating with people with various forms of disabilities;
- Accessible websites and web content;
- Assistive devices, mobility aids, service animals and support persons;
- Notice of service disruptions (temporary or long-term);
- TMI's relevant policies and procedures regarding accessibility;
- Reporting procedures; and

TMI Accessibility Policies and Multi-Year Plan

- Training procedures.

To accomplish our accessibility goals and objectives, TMI will:

- Establish, review, and update this plan;
- Post this plan on its website, www.trilliummutual.com
- Report as required on its website, www.trilliummutual.com on the progress and implementation of this plan;
- Provide this plan in an accessible format, upon request; and
- Review and update this plan at least once every five years.

TMI realizes that providing accessible and barrier-free environments for everyone is a shared effort. As a community, all businesses and services must work together to make accessibility happen. For more detailed information on our accessibility policies, and training programs, please contact 1-800-265-3020.

Trillium Mutual Insurance Company: AODA Multi-Year Accessibility Plan

Introduction

In accordance with our organizational obligations under the AODA, Integrated Accessibility Standards Regulation (O. Reg. 191/11, s.4 (1) (2)), Trillium Mutual Insurance Company has prepared a multi-year plan which contains the deliverables and activities that have been and will be worked on over the next few years. At Trillium Mutual we are committed to making accessibility throughout the organization a reality and all employees of Trillium Mutual play a role in creating an accessible and inclusive work environment.

This multi-year plan is a fluid document and provides the framework with which we will provide high level deliverables and activities. It has been developed by Human Resources in conjunction with the Leadership Team.

This document is available in an alternative format upon request. Please contact 1-800-265-3020.

TMI Accessibility Policies and Multi-Year Plan

Year	Customer Service Standard	Deliverables	Activities	Status		
				Complete	In Progress	Ongoing
2012	s. 3 Policies, practices, procedures -Establish policies, practices and procedures on providing services to persons with disabilities according to principles set out in regulation. -Create document describing policies, procedures and practices; provide upon request in alternative format	-Establish TMI accessible service policy -Post policy on TMI website	-Policy written, approved and posted on the TMI website	x		
	s. 3 (4) -Must communicate with a person with a disability in a manner that takes into account their disability	- Include in content of accessibility training	-Case by case review and appropriate communication will be provided dependent on the disability -Training developed, provided to current staff and provided to all new staff during their on-boarding	x		x
	s. 4 Use of service animals and support persons -Establish policies, practices and procedures around a person with a disability being accompanied by a service animal -Create a document describing policies, practices and procedures; provide upon request	-Include a commitment statement in the TMI accessible service policy	-Statement included in the TMI accessibility service policy -Continued commitment on communicating this obligation	x		x
	s. 5 Notice of temporary disruptions -Provide public notice of disruption in facilities or services by posting on premises or on website. -Include in notice reason for disruption, anticipated duration, and description of alternatives, if available.	-Inform everyone of this obligation -Include information in the TMI accessible service policy -Include in staff training	-Commitment written into policy -Work with Building and Maintenance Professional in the event of a disruption - Included in the training provided to current staff and ongoing to all new staff during their on-boarding	x		x
	s. 6 Training for Staff	- Include a commitment statement in	-Policy on Accessibility training	x		

This document is available in alternate formats, upon request. Please contact 1-800-265-3020.

TMI Accessibility Policies and Multi-Year Plan

2012	<ul style="list-style-type: none"> -Provide training to <ul style="list-style-type: none"> -employees who deal with the public on behalf of the company -everyone who participates in developing the company's policies, practices and procedures governing providing services to public or others. -Include training on specifics set out in the regulation -Provide training on ongoing basis to reflect any changes to policies, practices and procedures. -Create document describing training policy, summary of content and details of when provided -Keep records of training provided, including dates and numbers trained. 	the TMI accessible service policy <ul style="list-style-type: none"> -Develop Accessibility training -Develop process to provide training on an on-going basis -Develop process to keep records of training ,dates and numbers trained 	incorporated into TMI's Health and Safety Program and accessible service policy <ul style="list-style-type: none"> -Power Point and Learning manual training developed -Integrate the training requirement into the HR hiring practice for all staff 	x		
	s. 7 Feedback process <ul style="list-style-type: none"> -Establish process for receiving and responding to feedback; make information about process publicly available. -Create document describing process; make available on request. 	<ul style="list-style-type: none"> -Establish process -Set up process on TMI website 	<ul style="list-style-type: none"> -Process detailed in TMI's accessible service policy -Feedback form developed and posted on website, as well as in hard copy format at reception -Feedback forms will be directed to the Manager of Human Resources and Administration for follow-up 	x	x	
Year	Information & Communication Standards	Deliverables	Activities	Status		
				Complete	In Progress	Ongoing
2012	s. 13 Emergency and public safety information <ul style="list-style-type: none"> -Make information available to public in an accessible format or with appropriate communication supports, upon request. 	<ul style="list-style-type: none"> -Update and ensure Business Continuity and Resumption Plan, as well as the Facility Rental Guidelines for third party users can be made into an accessible format upon request. 	<ul style="list-style-type: none"> -Update the Business Continuity and Resumption Plan 			x

TMI Accessibility Policies and Multi-Year Plan

Year	General Requirements	Deliverables	Activities	Status		
				Complete	In Progress	Ongoing
2014	s. 4 Accessibility Plans - Create multi-year plan outlining strategic direction to prevent and remove barriers, post plan and make accessible -Prepare annual status report on the progress taken	- Prepare multi-year plan	-Prepare multi-year plan -Consult with the Leadership Team on the plan -Prepare status report for Leadership Team and the Board of Directors of all elements of plan that are completed or are being implemented annually		x x	x
	s. 7 Training -Train all employees developing polices, and all others providing services on behalf of TMI on requirements to the Accessibility Standard(s) as changes occur -Provide ongoing training in respect to any changes. -Keep record of training, dates trained, numbers trained.	-Source and/or develop training to meet requirement.	-Secure training to meet obligation. -Develop a strategy to communicate the training requirements to all employees. -Ensure training available to employees in an accessible format. -Ensure tracking of training. -Human Resources to monitor changes to the standards and arrange timely training	x x		x x

TMI Accessibility Policies and Multi-Year Plan

Year	Information and Communication Standards	Deliverables	Activities	Status		
				Complete	In Progress	Ongoing
2014	s. 11 Accessible feedback processes -Ensure feedback processes are accessible by providing accessible formats or arranging for communication supports, upon request. -Notify public about availability of accessible formats and communication supports.	- Feedback process has been established under the customer service standards, in the TMI accessible service policy.	-Develop a feedback process -Post commitment to provide accessible format upon request on website	x		
	s. 14 New Internet websites and web content -Conform to WCAG 2.0, initially Level A. <i>NOTE: Obligation applies to web content published after Jan. 1, 2012.</i>	-Website content developed after January 1, 2012 must conform to WCAG 2.0 Level A	- Obtain information in writing from Avenue A (Current website provider) that TMI website conforms to the requirement	x		x
Year	Employment Standards	Deliverables	Activities	Status		
				Complete	In Progress	Ongoing
2014	s. 22, 23, 24 Recruitment -Notify applicants about the availability of accommodation. -Notify job applicants selected in hiring process that accommodations are available upon request in relation to material or processes to be used. -Consult with applicant, or arrange to provide the accommodation.	-Prepare communication to notify potential applicants about accommodation process. -Consult with potential applicants when a request is made. -Accommodate applicants during the hiring process, upon request	-Develop an employment standard policy and process		x	
	s. 25, 26, 28 Employee	-Prepare a written process for	-Develop a written process for		x	

This document is available in alternate formats, upon request. Please contact 1-800-265-3020.

TMI Accessibility Policies and Multi-Year Plan

	<p>accommodation</p> <ul style="list-style-type: none"> -Inform employees of policies used to support employees with disabilities, including policies on providing job accommodation. -Develop a written process for developing documented Individual Accommodation Plans. 	<ul style="list-style-type: none"> individualized accommodation plans. -Include this in the employment standard policy 	individualized accommodation plans			
	<p>s. 27 Emergency response information</p> <ul style="list-style-type: none"> -Establish individualized workplace emergency response information to employees who have a disability 	<ul style="list-style-type: none"> -Prepare a written process for employees requiring an Individualized Emergency Response Plan 	<ul style="list-style-type: none"> -Develop a written process for employees who require an Individualized Emergency Response Plan 		x	
	<p>s. 29 Employees returning to work</p> <ul style="list-style-type: none"> -Establish a documented Return to Work process -Process to facilitate Return to Work and document the Individualized Accommodation Plan 	<ul style="list-style-type: none"> -Prepare a documented Return to Work Process -Incorporate the Individual Accommodation Plan in the Return to Work Process - Include this in the employment standard policy 	<ul style="list-style-type: none"> -Establish a Return to Work Process -Incorporate the Individual Accommodation Plan in to the Return to Work Process 	x	x	
	<p>s. 30, 31 Performance management, career development and redeployment</p> <ul style="list-style-type: none"> -Take into account disability and accommodation plan when using performance management, when redeploying employees. 	<ul style="list-style-type: none"> -Prepare a document outlining process to ensure the Individualized Accommodation Plan is involved during the performance management process and redeployment. - Include this in the employment standard policy 	<ul style="list-style-type: none"> -Develop a written process to address the Individualized Accommodation Plan during performance, career development and redeployment. 		x	

TMI Accessibility Policies and Multi-Year Plan

Year	Information and Communication Standards	Deliverables	Activities	Status		
				Complete	In Progress	Ongoing
2020 - 2021	s. 14 ALL internet websites and web content (2021) -Must comply with WCAG 2.0 Level AA (Excludes live captioning, audio description).	-All website and web content to conform to Level AA.	-Enlist assistance from Website provider- Avenue A		x	

References:

Accessibility for Ontarians with Disabilities Act, Developing accessibility policies and multi-year accessibility plan
 George Brown College: AODA Multi-Year Accessibility Plan
 Accessibility for Ontarians with Disabilities Act, 2005, Ontarians Regulation 191/11
 FMRP Accessibility Policies and Multi-Year Plan

Proposed Built Environment Standard

The 45- day public comment period on the government's proposal for the Accessibility Standards for the Built Environment closed on October 1, 2012. The goal of the proposed standard is to remove barriers in public spaces and building. The Built Environment Standard relevant to interior spaces is still being developed by the Ministry of Community and Social Services. It is expected that enhancements to accessibility in buildings will happen at a later date through Ontario's Building Code, which governs new construction and renovations in buildings. The Design of Public Spaces Standard was only recently added to the IASR as a draft and includes requirements for accessible parking, outdoor public eating areas, as well as service counters and waiting areas in locations where services are provided. This standard applies only to new construction and the redevelopment of existing elements in public spaces and is still under review by the government.

In the meantime, TMI will address accessibility issues that may fall within the Built Environment Standard on an as needed basis. It is anticipated that the Built Environment Standard will set firm time lines for the completion of accessibility indicatives and TMI will ensure that any applicable requirements set out in the standard are followed.

ACCESSIBILITY POLICY AND PROCEDURES

Accessible Service Policy

APPROVALS

Manager of Human Resources & Administration	President & CEO
--	----------------------------

1.0 INTENT

All people regardless of disability have equal right of access to all services provided by Trillium Mutual Insurance Company. TMI will ensure that persons with disabilities achieve accessibility to the provision of services, consistent with the principles of independence, dignity, integration and equal opportunity as set out in the Accessibility Standards for Customer Service.

2.0 PURPOSE

In accordance with the Accessibility Standards for Customer Service, Ontario Regulation 429/07, this policy addresses the following:

- The Provision of Services to Persons with Disabilities;
- The Use of Assistive Devices
- The Use of Service Animals and / or Support Persons
- Notice of Service Disruptions
- Customer Feedback
- Training
- Notice of Availability and Format of Required Documents

3.0 SCOPE

This policy applies to employees of TMI who deal with the public or other third parties who act on behalf of Trillium, including the provision of services that occur off the premises of Trillium.

4.0 GENERAL PRINCIPLES

4.1 The Provision of Services to Persons with Disabilities

TMI 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 by:

TMI Accessibility Policies and Multi-Year Plan

- Ensuring that all individuals receive the same value and quality;
- Allowing individuals with disabilities to do things in their own ways, at their own pace when accessing services as long as this does not present a safety risk;
- Using alternative methods when possible to ensure that individuals with disabilities have access to the same services, in the same place and in a similar manner;
- Taking into account individual needs when providing services; and
- Communicating in a manner that takes into account the individual's disability.

4.2 **The Use of Assistive Devices**

If a person with a disability requires assistive devices to access the services of TMI they will be allowed to use such devices.

4.2.1 Assistive Devices Provided by TMI

- TMI has available onsite a wheelchair (located in the main entrance coat room)
- Accessible door openers

4.3 **Use of Service Animals and Support Persons**

4.3.1 If a person with a disability is accompanied by a guide dog or other service animal, TMI will ensure that the person is permitted to enter the premises with the animal and keep the animal with him or her unless that animal is otherwise excluded by law from the premises. If the service animal or guide dog is excluded by law from the premises, TMI will provide other measures to enable the person with the disability to obtain, use or benefit from the services.

4.3.2 If a person with a disability is accompanied by a support person, they shall be permitted to enter the premises together and not be prevented from having access to each other while in the premises. TMI may require a person with a disability be accompanied by a support person while on our premises only if a support person is necessary to protect the health or safety of the person with a disability or others on the premises.

4.3.3 In situations where confidential information might be discussed, consent will be obtained from the individual, prior to any conversation where confidential information might be discussed.

4.4 **Notice of Service Disruption**

4.4.1 Trillium Mutual Insurance Company will provide individuals with notice in the event of a planned or unexpected disruption in the facilities or services

TMI Accessibility Policies and Multi-Year Plan

usually used by people with disabilities. These facilities and services include (but are not limited to);

- Accessible Parking Spots
- Accessible Door Openers
- Accessible Washrooms
- Wheelchair

4.4.2 This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available. Notice of the disruption will be given by:

- Posting of the information at the reception desk
- Verbally notifying individuals if they are booking an appointment and contacting individuals with booked appointments
- By any other method that may be reasonable under the circumstances

4.5 **Feedback Process**

4.5.1 The public can provide feedback on the accessibility of the provision of services by TMI through the **Human Resources Department**. **Feedback may be given in the following formats:**

- Verbally; in person or over the phone
- Electronically via email
- In writing via the accessibility form found on our website or at the reception desk

4.5.2 Feedback in person, by telephone, via written mail or through email should be directed to:

Trillium Mutual Insurance Company

495 Mitchell Road South

Listowel ON N4W 0C8

Tel: 1-800-265-3020

Fax: 519-291-1800

Email: hr@trilliummutual.com

Website: www.trilliummutual.com

4.5.3 Individuals who provide formal feedback will receive acknowledgment of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

Training

4.6 4.6.1 Training will be provided to:

TMI Accessibility Policies and Multi-Year Plan

- a) All employees who deal with the public or other third parties who act on behalf of Trillium; and,
- b) Those who are involved in the development and approval of customer service policies, practices and procedures.

4.6.2 As reflected in Ontario Regulation 429/07, regardless of the format, training will cover the following:

- A review of the purpose of the Accessibility for Ontarians with Disabilities Act, 2005.
- A review of the requirements of the Accessibility Standards for Customer Service, Ontario Regulations 429/07.
- Instructions on how to interact and communicate with people with various types of disabilities.
- Instructions on how to interact with people with disabilities who:
 - Use assistive devices;
 - Require the assistance of a guide dog, service dog, or other service animal; or
 - Require the use of a support person
- Instructions on how to use equipment or devices that are available at our premises or that we provide that may help with disabilities.
- Instructions on what to do if a person with a disability is having difficulty accessing our services.
- TMI's policies, procedures, and practices pertaining to providing accessible service to individuals with disabilities.

4.6.3 TMI will provide training to all new employees as a part of the onboarding process.

4.6.4 Revised training for all employees will be provided in the event of changes to legislation, procedures and /or practices and as soon as practical.

4.6.5 TMI will keep a record of training that includes the dates training was provided and the number of employees who attended the training.

4.7 **Notice of Availability and Format of Documents**

4.7.1 TMI shall notify customers that the documents related to the Accessibility Standard for Customer Service are available upon request, within a reasonable amount of time and in a format that takes into account the customer's disability.

TMI Accessibility Policies and Multi-Year Plan

5.0 DEFINITIONS

- 5.1 **Assistive Devices:** is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of individuals with disabilities. Personal assistive devices are typically devices that individuals bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and / or reaching.
- 5.2 **Disability:** In the Act, “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.
- 5.3 **Barrier:** Is anything that keeps someone with a disability from fully participating in all aspects of society because of their disability.
- 5.4 **Support Person:** a person who helps someone with a disability perform daily tasks.
- 5.5 **Guide Dog:** is a highly-trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the Blind Persons’ Rights act, to provide mobility, safety and increased independence for people who are blind.
- 5.6 **Service Animal:** 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 his or her 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.

TMI Accessibility Policies and Multi-Year Plan

6.0 REFERENCES / ASSOCIATED DOCUMENTS

- 6.1 Ontario. Ministry of Citizenship, 2002. "Ontarians with Disabilities Act, 2001" Bill 125. Toronto, Queen's Printer.
www.gov.on.ca/citizenship/accessibility/english/act2001.htm
Ontario. Ministry of Citizenship, 2002. "A Guide to Annual Accessibility Planning under the Ontarians with Disabilities Act, 2001". Toronto, Queen's Printer.
www.gov.on.ca/citizenship/accessibility/english/accessibleplanningguide.htm
- 6.2 Accessibility for Ontarian's with Disabilities Act (AODA) 2005
- 6.3 Headwaters Health Care Centre Annual Accessibility Policy and Plan
- 6.4 Farm Mutual Reinsurance Plan Customer Service Policy: Providing Goods and Services to People with Disabilities
- 6.5 Accommodating Employees Policy
- 6.6 HR Downloads

TMI Accessibility Policies and Multi-Year Plan

INFORMATION AND COMMUNICATION POLICY

APPROVALS

Manager of Human Resources and Administration	President and CEO
--	--------------------------

1.0 INTENT

- 1.1 This policy is intended to meet the requirements of the *Integrated Accessibility Standards Regulation (IASR)*, *Ontario Regulation 191/11* for the Information and Communications Standard set forth under the *Accessibility for Ontarians with Disabilities Act, 2005*. This policy applies to the provision of information and communication services and materials for people with disabilities. All information and communications materials and services provided by Trillium Mutual Insurance Company will follow the principles of dignity, independence, integration and equal opportunity.

2.0 SCOPE

- 2.1 This policy applies to all employees of TMI who deal with the public or other third parties on behalf of Trillium, including when the provision of services occurs off-site.

3.0 GENERAL PRINCIPLES

In the age of rapid information, Trillium is aware of the importance of accessibility to digital and non-digital communications and that they cannot be underestimated. Trillium is committed to eliminating barriers by providing accessible types of communications and information to individuals with disabilities, as part of Trillium's regular processes, and upon request. Trillium will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner and at no additional cost to the individual and will take into account the person's accessibility needs when customizing individual requests.

This policy is in accordance with the Integrated Accessibility Standards, Ontario Regulation 191/11, this policy addresses the following:

- General requirements,
- Accessible formats and communication supports,
- Accessible websites and web content,

TMI Accessibility Policies and Multi-Year Plan

- Exceptions,
- Feedback Process, and
- Notice of Availability of Accessible Formats and Communication Supports.

4.0 GUIDELINES

4.1 Establishment of Accessibility Policies and Plans

- Trillium is committed to developing, implementing and maintaining policies governing how we will achieve accessibility and eliminate barriers to individuals with disabilities.
- A statement of Trillium’s commitment to meeting the accessibility needs of persons with disabilities in a timely manner will be included in our policies, posted on our website and made available in an accessible format upon request.
- Trillium’s Multi-Year Accessibility Plan has been established, implemented and will be maintained to outline our strategy to prevent and remove barriers and meet our requirements under the IASR Regulation. Trillium’s Multi-Year Accessibility Plan will be posted on our website and provided in an accessible format upon request.
- Trillium’s Multi-Year Accessibility Plan will be reviewed once every five years and if deemed necessary, will be reviewed in consultation with a third party professional.
- Annual status reports will be prepared to report on the progress of steps taken to implement Trillium’s Multi-Year Accessibility Plan and the status will be posted on our website. If requested, the report shall be created in an accessible format.

4.2 Procuring Services or Facilities

- Trillium will incorporate accessibility criteria and features when procuring services or facilities. The only exception will be in cases where it is impracticable to do so.

4.3 Accessible Website and Web Content

- Trillium will make its web content conform to the Web Content Accessibility Guidelines (WCGA) 2.0 at Level AA as required by the IASR by 2021. Web content includes any information which resides on an internet or intranet web site.

TMI Accessibility Policies and Multi-Year Plan

4.4 Feedback Process

- Trillium values feedback to monitor and improve its services and experiences as we strive to meet the needs of all individuals who access our services and facilities, including persons with disabilities.
- Feedback can be provided by submitting an Accessibility Feedback Form found on our website or by contacting us by any of the methods listed below:
Trillium Mutual Insurance Company
495 Mitchell Road South
Listowel, ON N4W 0C8
Phone: 1-800-265-3020
Fax: (519) 291-1800
Email: hr@trilliummutual.com

4.5 Notice of Availability of Accessible Formats and Communication Supports

- If requested, Trillium will provide documents in a format that takes into account a person's disability when customizing individual requests.
- Trillium will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner and at no additional cost to the individual
- Trillium will notify of availability of documents in different formats by posting the information in a conspicuous place such as the Trillium website

4.6 Exceptions

- The Information and Communications Standard does not apply to products and product labels; unconvertible information or communications; or information that the organization does not control directly or indirectly through a contractual relationship.
- If the organization determines that information or communications are unconvertible, Trillium will provide the person requesting information or communication with the following:
 - An explanation as to why the information or communications are unconvertible; and
 - A summary of the unconvertible information or communications.
- Information is regarded as unconvertible if it is not technically feasible to convert the information or communications; or if the technology to convert the information is not readily available.

TMI Accessibility Policies and Multi-Year Plan

4.7 Training

- Training will be provided to all employees of Trillium; full time, part time, temporary and contract; as everyone works with the public or other third parties on behalf of Trillium.
- Our Accessibility training will cover the Integrated Accessibility Standards, Ontario Regulation 191/11 including the Information and Communication Standard
- Trillium will provide training to all new employees as part of their on-boarding
- Revised training will be provided in the event of changes to legislation, procedures and /or practices.
- Training provided will take into account a person's disability and will be available in an alternate format upon request
- Trillium will keep record of training that includes the training materials, the employee's name and the dates training was provided

5.0 DEFINITIONS

- 5.1 Accessible Formats:** includes but not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.
- 5.2 Communication Supports:** includes but not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.
- 5.3 Conversion Ready:** an electronic or digital format that facilitates conversion into an acceptable format.
- 5.4 Extranet Website:** a controlled extension of the intranet, or internal network of a organization to outside users over the Internet.
- 5.5 Internet Website:** a collection of related Web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier (URI) and are accessible to the public.
- 5.6 Intranet Website:** is an organization's internal website that is used to privately and securely share any part of the organization's information or operational systems within the organization and includes extranet websites.
- 5.7 Information:** includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and conveys meaning.
- 5.8 Support Person:** in relation to a person with a disability, another person who accompanies the person with a disability in order to help with communication, mobility, personal care or medical needs or with access to goods, services or

TMI Accessibility Policies and Multi-Year Plan

facilities.

- 5.9 Web Content Accessibility Guidelines:** refers to the World Wide Web Consortium Recommendation, dated December 2008, entitled “Web Content Accessibility Guidelines (WCAG) 2.0.”

6.0 REFERENCES / ASSOCIATED DOCUMENTS

- 6.1 Accessibility for Ontarian’s with Disabilities Act (AODA) 2005
6.2 Integrated Accessibility Standards, Ontario Regulation 191/11
6.3 Farm Mutual Reinsurance Plan Information and Communications Policy

TMI Accessibility Policies and Multi-Year Plan

EMPLOYMENT STANDARD POLICY

APPROVALS

Manager of Human Resources and Administration	President and CEO
--	--------------------------

1.0 INTENT

This policy is intended to meet the requirements of the *Integrated Accessibility Standards, Ontario Regulation 191/11* for the Employment Standard set forth under the *Accessibility for Ontarians with Disabilities Act, 2005*. This policy applies to the provision of accessible employment services for people with disabilities.

All employment services provided by Trillium Mutual Insurance Company shall follow the principles of dignity, independence, integration and equal opportunity.

2.0 SCOPE

2.1 This policy shall apply to every person who deals with members of the public on behalf of TMI.

3.0 GENERAL PRINCIPLES

In accordance with the *Integrated Accessibility Standards, Ontario Regulation 191/11*, this policy addresses the following:

- General Requirements
- Employment Standards Overview
- Recruitment, Assessment and Selection
- Accessible Formats and Communication Supports for Employees
- Documented Individual Accommodation Plans
- Plans and Processes
- Return to Work and Redeployment

3.1 General Requirements

General requirements that apply across all of the three standards, *Information and Communications, Employment and Transportation* are outlined as follows.

TMI Accessibility Policies and Multi-Year Plan

Establishment of Accessibility Policies and Plans

TMI will develop, implement and maintain policies governing how it will achieve accessibility through these requirements. TMI is responsible for including a statement of its commitment to meeting the accessibility needs of persons with disabilities in a timely manner in its policies. This should be achieved through documentation in TMI's policies and making these documents publicly available, in an accessible format upon request.

TMI will establish, implement, maintain and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR regulation. TMI will post its accessibility plans on our website, if any, and provide the plan in an accessible format upon request. TMI will review and update its accessibility plan once every five years and will establish, review and update its accessibility plans in consultation with persons with disabilities or an advisory committee. Annual status reports will be prepared to report on the progress of steps taken to implement TMI's accessibility plan and post this status on its website. If requested, the report shall be created in an accessible format.

Training Requirements

TMI will provide training for its employees and volunteers regarding the IASR and the Ontario *Human Rights Code*. Training will be provided for individuals who are responsible for developing TMI's policies, and all other persons who provide services on behalf of TMI.

3.2 Employment Standards Overview

The Employment Standards regulation will expand Ontario's labour pool by ensuring people with disabilities are welcome and supported within all workplaces. Employment standards will assist organizations with employment recruitment, providing accessible information, plans for emergencies, individual accommodation, return to work, performance management, and career development and redeployment.

3.3 Recruitment, Assessment and Selection

TMI must notify employees and the public about the availability of accommodation for job applicants who have disabilities. Applicants must be informed that these accommodations are available, upon request, for the

TMI Accessibility Policies and Multi-Year Plan

interview process and other candidate selection methods. TMI must notify the successful applicant of their policies and supports for accommodating people with disabilities.

3.4 Accessible Formats and Communication Supports for Employees

If an employee with a disability requests it, TMI must provide or arrange for the provision of accessible formats and communication supports for the following:

1. Information needed in order to perform their job; and
2. Information that is generally available to all employees in the workplace.

TMI should consult with the employee making the request to determine the best way to provide the accessible format or communication support.

3.5 Documented Individual Accommodation Plans

TMI must also develop and have in place written processes for documenting individual accommodation plans for employees with disabilities. The process for the development of these accommodation plans should include specific elements, including:

- The ways in which the employee can participate in the development of the plan;
- The means by which the employee is assessed on an individual basis;
- The ways an employee can request an evaluation by an outside medical expert, or other experts (at the employer's expense) to determine if accommodation can be achieved, or how it can be achieved;
- The steps taken to protect the privacy of the employee's personal information;
- The frequency with which the individual accommodation plan should be reviewed or updated determined, and how it should be done;
- The means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs.

Follow the attached hyperlink to access a copy of TMI's Individual Accommodation Plan document [Employment Standard Policy.docx](#).

TMI Accessibility Policies and Multi-Year Plan

3.6 Plans and Processes

Any department within TMI that utilizes performance management tools, or provides career development and advancement to their employees, must respect the accessibility needs of their employees with disabilities when developing these processes. Every department within TMI must provide a tailored workplace emergency response plan or information for employees with disabilities, if their disability makes it necessary. See appendix B for TMI's Individual Accommodation Emergency Response Plan.

3.7 Return to Work and Redeployment

TMI must develop and have return to work processes in place for employees who are absent from work due to a disability—and require disability-related accommodations in order to return to work. TMI will need to document these processes. The return to work process must include an outline of the steps TMI will take to facilitate the employee's return to work and use documented individual accommodation plans (as described in section 28 of the regulation). If TMI uses redeployment processes, they must take into account the accessibility needs of its employees with disabilities. Redeployment may mean the reassignment of employees to other departments within the organization as an alternative to a "layoff", when a particular job or department has been eliminated. *These standards do not apply to volunteers or other non-paid individuals.*

4.0 DEFINITIONS

4.1 Accessible Formats – include but not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.

4.2 Communication Supports – include but not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

4.3 Performance Management – activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success.

4.4 Redeployment – the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.

5.0 REFERENCES / ASSOCIATED DOCUMENTS

5.1 Accessibility for Ontarians with Disabilities Act, 2005

TMI Accessibility Policies and Multi-Year Plan

- 5.2 Accessibility Plan 2014-2021
- 5.3 Accessibility Guide for Staff
- 5.4 Accommodation / Return to Work Policy
- 5.5 Mount Sinai Hospital- Emergency Response Planning for Employees with Disabilities
- 5.6 HR Downloads

TMI Accessibility Policies and Multi-Year Plan

Emergency Response Plan

APPROVALS

Manager of Human Resources and Administration	President and CEO
--	--------------------------

1.0 INTENT

- 1.1 Trillium Mutual Insurance Company is committed to supporting the welfare of its Employees and visitors to the premises. The purpose of the TMI's Emergency Response Plan as detailed in the Business Continuity and Resumption Plan is to ensure human safety, minimize damage to property, and assure rapid and responsive communication to all parties involved. This plan has been created to address, in a coordinated and systematic manner, all types of emergencies affecting TMI.
- 1.2 This plan will establish processes and procedures for appropriate responses to major emergencies, and assign roles and responsibilities for the implementation and execution of the plan in the event of an emergency or catastrophe. The guidelines shown in this plan are intended to keep employees of TMI prepared should TMI premises and / or facilities become unsafe due to calamity or a pandemic is declared.

2.0 SCOPE

- 2.1 This plan applies to all employees and visitors of TMI.

3.0 GUIDELINES

- 3.1 In general, TMI employees must report an emergency event immediately to their Leader or member of the Emergency Response Team.
- 3.2 Once the emergency has been ascertained, the Emergency Response Team will be the first to respond to the incident. They will assess the severity of the emergency and communicate immediately with assigned groups as appropriate. The Emergency Response Team is composed of at least one person per department to coordinate and instruct staff. These teams will coordinate emergency and/or evacuation efforts within their areas of responsibility.
- 3.3 Not all emergencies will require the same level of response. Appropriate responses will be dictated by the severity of the event and its effect on the health and safety of employees, visitors, and property. Only the Emergency

TMI Accessibility Policies and Multi-Year Plan

Response Team Leader or the appointed designate has the authority to declare a state of emergency for TMI and can activate this Plan.

- 3.4 For the purposes of this Plan, TMI defines “emergency” as an instance, or combination of instances, of unsafe conditions that pose a threat to people or property, and include: instances of fire and/or smoke; natural disaster/severe weather; chemical, biological or radiological incidents, hostile caller / visitor, medical emergency; and structural failures.

**Responsibilities in an emergency are delegated amongst various Emergency Response Team Members, as indicated in the Trillium Business Continuity and Resumption Plan.*

3.5 Potential Emergencies

Fire and/or Smoke

The primary purpose of the Fire Procedure is to provide a course of action for all personnel to follow in the event of a fire or smoke emergency.

Upon discovery of fire or smoke:

- Leave the affected area immediately.
- Close all doors behind you.
- Activate the fire alarm.
- Provide assistance for any employee or visitor requiring help to leave the building.
- Leave the building via the nearest exit.
- Meet at the “smoking hut”

Upon hearing the fire alarm:

- Begin to evacuate immediately, providing help to others as required.
- Close all doors behind you.
- Leave the building via the nearest exit.
- Proceed to the staff parking lot and to the “smoking hut”.
- Stay calm and await further instructions.

Leadership / JHSC Members / ERT Members

- When the fire alarm is activated or you become aware of a fire emergency, contact the Fire Department by dialing 9-911.
- If the fire alarm is not sounding, activate the fire alarm.
- Direct all staff and visitors to leave the building through the nearest exit.
- Ensure that fire escape routes are clear and unobstructed.
- Inspect all areas to ensure that all staff and visitors have evacuated and doors are closed.

TMI Accessibility Policies and Multi-Year Plan

- Make a note of any persons who will not be able to evacuate and ensure they are at an identifiable location so that fire fighters can find them and assist them with evacuation if necessary.

Once outside,

- Take inventory of staff and visitors by team.
- Report to the Building and Maintenance Professional (or designate) on the status of the evacuation.

Along with Building and Maintenance Professional,

- Liaise with the Fire Department to provide any assistance they require.

Once the emergency is over:

- Take the necessary steps to return the building emergency systems to service as quickly as possible.
- If the building is completely safe, advise employees that they may re-enter the building.
- If the building cannot be re-entered, ensure that all employees have transportation to their homes.

Medical Emergencies

Employees or visitors may require emergency medical aid for a variety of reasons. Staff with pre-existing medical conditions such as respiratory or heart conditions, diabetes, severe allergies etc. should be identified and their co-workers should be instructed in actions to take if those employees have a problem.

3.6 Potential Threats

Bomb Threat

In the unlikely event of a bomb threat, it is impossible to discern valid threats from hoaxes. Therefore, all threats will be treated as real in order to protect lives and property, and the premises shall be evacuated immediately.

Suspicious Packages

Bombs and other potentially harmful agents have been known to be delivered to intended targets through the mail system. These weapons may be delivered in the form of a package, envelope, or concealed in such things as a hollowed-out book. Identifying these packages and dealing with them appropriately before they reach their intended destination is crucial to the safety of the building and its occupants. A member of the Emergency Response Team must be notified.

TMI Accessibility Policies and Multi-Year Plan

Hostile Visitor or Caller

From time to time there will be telephone calls from customers that are unhappy with the progress or outcome of their claim, policy underwriting, collection or other company process, or a member of the public that has a perceived issue with the company. In most cases the normal procedures in dealing with unhappy customers will diffuse the situation. However, if the situation cannot be diffused and the caller utters threats against specific staff members, non-specific staff members or management, or company property, precautions should be initiated.

A disgruntled policyholder or someone having a perceived problem with the company may actually show up, unannounced, to advance their issue or find a resolution. The visitor might not even be a policyholder but might have a grudge towards the insurance industry in general. Yet another possibility is a visitor that has a personal issue with an employee, unrelated to company business.

The primary focus in dealing with a hostile visitor is to maintain the safety and security of all staff members. This can best be accomplished if the visitor can be calmed to the point of leaving peacefully after having an opportunity to discuss their issue.

In a worst case scenario, the objective will be to keep the visitor as calm as possible until help arrives.

In most cases the first contact with the visitor will be with the employee manning the reception desk. The receptionist can activate the reception panic alarm which will call into action TMI's Staff Safety Response Team. Detailed instruction for this procedure can be found in the Business Continuity and Resumption Plan.

3.7 Chemical, Biological, or Radiological

The purpose of the Chemical, Biological, or Radiological Procedure is to inform employees and visitors of the steps that should be taken in the event that a contaminant, virus, or other harmful agent poses an immediate threat.

Natural Gas or Carbon Monoxide

The Emergency Response Team Leader or Designate will be the leader in this type of situation

- If it is believed that a natural gas leak has occurred, immediately take steps to shut off the main gas valve and secondary valves as necessary or in the case of suspected carbon monoxide exposure, shut down the Heating, Ventilation and Air Condition system.

TMI Accessibility Policies and Multi-Year Plan

- Inform other ERT members.
- Evacuate the building, following fire evacuation procedures.
- Instruct all staff and visitors not to smoke or use any electronic devices, including cellular phones.
- Call 9-911 from a telephone located well away from the source of the leak.
- Call the gas company from a telephone located well away from the source of the leak.

Biological

In pandemic situations, follow the Pandemic Contingency Plan found in the Business Continuity and Resumption Plan.

Steps will include advance preparation, planning as the pandemic approaches, the pandemic declaration phase, the coordinated response and follow-up post pandemic emergency

3.8 **Natural Disaster**

Major Electrical Power Failure

A major electrical power failure should not have a strong direct impact on Trillium. During the first two to three minutes of a power failure most computer data and transactions will be protected by individual UPS units at local work stations and the server room. Following that short interval the company's back-up generator will activate. The generator is expected to provide sufficient power for all company and building needs indefinitely.

Severe Storm

The primary purpose of the Severe Storm Procedure is to inform employees and visitors of any serious weather conditions that warrant their attention. A "weather watch" means that conditions are favorable for severe weather to develop. A "weather warning" means that severe weather has been sighted in the vicinity.

If a severe storm occurs while employees or others are in the building;

- Stay calm, and do not go outdoors.
- Stay as far away from exterior walls as possible.
- Keep at least 15 feet away from windows to avoid flying glass.
- Keep away from any skylights or overhead fixtures.
- Take shelter in the ***Designated Safe Spot(s)**- the staff washrooms and / or the staff coat room and if needed the wellness room*
- If unable to reach a designated safe spot, take shelter under tables, desks or other objects that will provide protection from flying glass and debris

TMI Accessibility Policies and Multi-Year Plan

- Stay under cover until the severe weather condition has subsided.

When the storm has subsided:

- Identify persons with injuries, call emergency services, as appropriate, and notify ERT member.
- If instructed to evacuate the building, watch for falling debris or exposed wiring upon leaving the building.
- Follow fire evacuation procedures and proceed to a safe area away from the danger of falling glass, bricks, wiring or other hazardous objects.
- Await further instructions from the ERT and do not re-enter the building until advised.

ERT Members

- When severe weather conditions are expected, monitor media for weather watches, advisories or warnings.
- As storm approaches and potential for significant impact becomes clear, communicate with or convene team members to decide upon immediate strategy for employee safety.
- Depending upon the nature of the weather event and potential severity:
 - Close building and send employees home, if safety can be assured,
 - Direct employees to safest areas within building, or
 - Provide employees with choice of going home or waiting out the storm.
- If severe weather conditions occur while the building is occupied, instruct employees and visitors to seek shelter according to the nature and severity of the event.
- If the building is damaged by a severe weather condition while occupied:
 - Identify persons with injuries and call emergency services as appropriate,
 - Check exits to ensure they are safe and available for use in the event the building is evacuated,
 - If the building appears to be unsafe or there is danger to the occupants from the building condition, direct the evacuation of the building through safe exits,
 - Do not authorize re-entry to the building until it is determined (by expert advice, if appropriate) that the building is safe to occupy.

TMI Accessibility Policies and Multi-Year Plan

Earthquake

All Staff

- Stay calm, and do not go outdoors.
- Stay as far away from exterior walls as possible.
- Keep at least 15 feet away from windows to avoid flying glass.
- Keep away from skylights or overhead fixtures.
- Take shelter under tables, desks or other objects that will provide protection from flying glass or debris.
- Seek shelter in a narrow hall or corridor, or in an interior office or meeting room (away from exterior wall).
- Stay under cover until shaking stops.
- Be prepared for aftershocks.
- When instructed to evacuate the building, watch for falling debris or electrical wires while leaving the building.
- If fire occurs (frequently follows earthquake damage), activate fire alarm and follow fire procedures.
- Proceed to safe area, away from the danger of falling glass, bricks, electrical wires or other hazardous objects.

ERT Members

- Warn employees to expect fire alarms to activate during an earthquake.
- Instruct employees to remain in building and seek shelter within the building.
- Once the shaking has stopped, consult as a group to determine whether or not to evacuate the building.
- If the decision is to evacuate, check exits to determine their safety and advise employees to evacuate, avoiding any fallen power lines or other hazards.
- Call emergency services, as appropriate, and provide first aid, as necessary. Do not attempt to move seriously injured people unless they are in immediate danger of further injury.
- Put out any small fires quickly if this can be done without endangering anyone.
- Expect aftershocks.
- As a group, determine if and when it is safe to re-enter the building (after obtaining advice from experts when appropriate).

Roof Collapse

The purpose of this procedure is to inform employees or visitors of precautions to be taken in the event of a structural failure.

- In the event of a power outage, TMI's backup power generator should engage supplying the building with sufficient power and lighting. If the

TMI Accessibility Policies and Multi-Year Plan

power outage is prolonged, the Emergency Response Team will meet and consult to consider dismissing employees for the day.

- In the case of water, heat, or other utility disruptions, all attempts will be made to determine the cause of the disruption and the probable length of shutdown. Where required, the local utility provider shall be contacted to assess and resolve the situation. If the shutdown is prolonged, the Emergency Response Team will consult to consider dismissing employees for the day.
- Any type of damage to the building such as roof collapse will prompt the immediate evacuation of the building lead by the Emergency Response Team.

3.9 Employee/Visitor Evacuation Procedure

In the event that TMI declares that an evacuation of the premises is necessary in response to an emergency situation, employees/visitors are required to follow the steps below:

1. Stop working immediately.
2. Proceed to closest exit (unless advised of alternate exit)
3. Proceed to designated meeting area (unless otherwise instructed).

3.10 Alternative Formats

TMI is dedicated to ensuring the Health and Safety of all of our employees, volunteers, visitors, customers and guests. As such, we will provide our Emergency Response Plan in a format that takes into consideration individual needs.

It is critical that all of our employees and visitors know and understand our Emergency Response Plan, if the information provided to you is unclear or is in a format that prevents you from fully knowing and understanding our process, please contact the following person as soon as possible:

Trillium Mutual Insurance Company

495 Mitchell Road South

Listowel ON N4W 0C8

Tel: 1-800-265-3020

Fax: 519-291-1800

Email: hr@trilliummutual.com

Website: www.trilliummutual.com

TMI Accessibility Policies and Multi-Year Plan

TMI will work with the individual, as soon as practicable, to identify solutions and options that take into consideration their needs. Alternative options include, but are not limited to:

- Enlarged text;
- Braille format;
- Communication support either in person or over the phone;
- Documents provided via email.

4.0 DEFINITIONS

- 4.1 **Fire and/or smoke:** Any conflagration (fire) of combustible materials at TMI causing danger of burns from fire or suffocation/choking from smoke inhalation. This can also include fires nearby TMI where there is a clear danger of the fire spreading to TMI or causing the air to become un-breathable due to smoke.
- 4.2 **Medical Emergency:** Employee or visitor who may require emergency medical aid for a variety of different reasons.
- 4.3 **Hostile Caller / Visitor:** Can be a known and / or unknown person who calls or enters the TMI premise and is unhappy about something or someone.
- 4.4 **Chemical, biological, or radiological incidents:** This may include a release of toxic chemicals or other dangerous agents within the vicinity of TMI, including natural gas leaks; the release of harmful bacteria, viruses, or other biological dangers; release of or exposure to radioactive materials.
- 4.5 **Natural disaster:** This is a broad term meaning any emergency caused by inclement weather conditions or tectonic activity. Natural disasters include tornados, floods, earthquakes, mudslides, hurricanes, lightning strikes, blizzards, ice storms, severe thunderstorms, and so on. In some cases, natural disaster may also include excessive periods of intensely cold weather, or excessive periods of intensely hot and/or humid weather.
- 4.6 **Roof Collapse:** This term encompasses any damage to TMI property or premises that causes unsafe conditions due to structural failure. Failures or pending failures include (but are not limited to) bomb threats, collapsed walls, ceilings, or foundations, burst water mains, electrical power outages, and so on.

5.0 REFERENCES / ASSOCIATED DOCUMENTS

- 5.1 Trillium's Business Continuity and Resumption Plan
- 5.2 HR Downloads

TMI Accessibility Policies and Multi-Year Plan

Accessibility Contact Information

For more information on this accessibility plan and for accessible formats of this document free upon request, please contact:

Phone: 1-800-265-3020

Email: hr@trilliummutual.com