

## ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT (AODA) POLICY

### Purpose

Ives Insurance Brokers Ltd. believes in inclusion and equal opportunity for all and is committed to developing and implementing strategies to comply with the accessibility legislation. As an organization we are looking to strengthen the underlying principles of dignity, independence, integration, and equal opportunity.

### Our Commitment

Ives Insurance Brokers Ltd. is committed to treating everyone with fairness and respect, in an impartial, equitable, sensitive, and ethical manner. Ives Insurance Brokers Ltd. is working towards full compliance with current standards of the Integrated Accessibility Standards Regulation (IASR) Policy, Regulation 191/11, under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA); and Accessible Canada Act as they are introduced. In doing so, we affirm our commitment to providing quality services in a manner that respects the dignity and independence of persons with disabilities.

Ives Insurance Brokers Ltd. is committed to developing, implement, and maintain policies that govern how the organization achieves or will achieve accessibility. To facilitate this commitment, Ives Insurance Brokers Ltd. has established, maintained, and documented a multi-year accessibility plan, that is reviewed and updated at least once every five years to identify progress made in addressing barriers and will be posted on Ives Insurance Brokers Ltd.'s website and Employee Intranet.

Ives Insurance Brokers Ltd. is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination.

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

Ives Insurance Brokers Ltd is committed to excellence in serving and providing goods, services or facilities to all customers including people with disabilities. Our accessible customer service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

### Scope

This policy applies to all staff personnel (employees, volunteers, contractors, and other third parties).

Location of offices that are covered by this policy:

- Essex Ontario 347 Maidstone Ave E. PO Box 369, Essex, ON N8M 2Y4
- Leamington Ontario 197 Talbot St. E, Unit 1 Leamington, ON N8H 3X5
- Lakeshore Ontario 13039 Tecumseh Rd. E. Windsor, ON N8N 3T4
- Waterloo Ontario 550 Parkside Dr. Unit C1 Waterloo, ON N2L5V4
- Tilbury Ontario 40 Queen St. PO Box 1270 Tilbury, ON NOP 2L0
- Lasalle Ontario 5994 Malden Rd. Suite 1 LaSalle, ON N9H 1S4
- Amherstburg Ontario 580B Middle Side Road N Amherstburg, ON N9V 3R3

## Providing Services to Persons with Disabilities

Ives Insurance Brokers Ltd. is committed to excellence in serving any person who may require services, including persons with disabilities, through the following areas:

### General Requirements:

#### Accessibility Policies:

The AODA requires Ives Insurance Brokers Ltd. to maintain one or more policies governing how the organization will achieve the requirements of the IASR. Ives Insurance Brokers Ltd. must also make such documents available to the public, and in accessible formats upon request. This Policy is adopted in compliance with this obligation.

#### Multi-Year Accessibility Plan:

The AODA requires Ives Insurance Brokers Ltd. to establish, implement, maintain, and make public a Multi-Year Accessibility Plan outlining the organization's strategy to identify, remove and prevent barriers and to meet the legislated requirements of the IASR. It must be posted on the company's website and made available in an accessible format or with appropriate communications support as soon as possible upon request. Accompanying this policy is Ives Insurance Brokers Ltd.'s Multi-Year Accessibility Plan (2023-2028).

#### Procurement of Goods and Services:

When procuring goods, services, or facilities, Ives Insurance Brokers Ltd. incorporates accessibility criteria and features into its selection process. In instances where this is not feasible, the organization will provide an explanation, upon request.

In addition, Ives Insurance Brokers Ltd. requires that for any contractors or service providers whose staff may interact with employees, clients, or the public on behalf of the organization, it is necessary that those individuals have received training in the Customer Service Standard prior to commencing their duties at, or on behalf of, the organization. It is the responsibility of the contractor or service provider to provide this training to their employees.

#### Training:

All Company employees who deal with the public or other third parties on their behalf will be required to attend and complete Customer Service Accessibility Training. The training provided will include best practices for interactions with customers with a disability.

We are committed to training all staff and volunteers in accessible customer service, other Ontario's accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities. In addition to the above, we will train:

- all persons who participate in developing the organization's policies; and
- all other persons who provide goods, services or facilities on behalf of the organization

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

## Training includes:

- purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Customer Service Standards
- our policies related to the Customer Service Standards
- how to interact and communicate with people with various types of disabilities
- how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- how to use the equipment or devices available on-site or otherwise that may help with providing goods, services or facilities to people with disabilities.
- the purpose of the AODA and related Ives Insurance Brokers Ltd. policies
- how the Ontario Human Rights Code works with AODA.
- any accessibility requirements that apply to their job duties and your organization
- the Company's accessible customer service plan.
- what to do if a person with a particular type of disability is having difficulty in accessing Ives Insurance Brokers Ltd. goods and services.

## Assisted Devices include but are not limited to

- Wheelchairs
- hearing aids
- white canes
- speech amplification devices

We train every person as soon as practicable after being hired and provide training in respect of any changes to the policies.

We maintain records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided.

## **Information and Communication Requirements:**

### **Accessible Formats and Communication Supports:**

The AODA requires that all information and communications that Ives Insurance Brokers Ltd. produces, directly or indirectly through contractual relationships, must be made available in accessible formats upon request.

When an accessible format or communication support is requested, Ives Insurance Brokers Ltd. will consult with the person making the request to determine which format or support is required and provide or make arrangements to provide the material in a reasonable amount of time and at no additional cost to the requestor.

If, in consultation with Human Resources, the information or communication is determined to be unconvertible, Ives Insurance Brokers Ltd. must provide the person requesting the information or communication with:

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

### Notice of Availability of Documents:

This Policy will be maintained by Human Resources and available on the company's website and Company Intranet. The Policy will be provided to individuals, upon request, in the appropriate format or with communication support. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and, at no additional cost.

Ives Insurance Brokers will notify the public that documents related to accessible customer service, are available upon request by posting a notice on the Ives Insurance Website.

### Accessible Websites and Web Content:

Ives Insurance Brokers Ltd.'s internet website and web content, conforms to World Wide Web Consortium (W3C) Web Content Accessibility Guidelines (WCAG) 2.0 at Level AA, in accordance with the timelines set out in the IASR and in the Accessible Information, Communications, and Technology Guidelines.

Our Marketing department, in consultation with Human Resources, is responsible for establishing and maintaining procedures, standards and guidelines to ensure all internet websites and web content is accessible.

### Emergency Procedures, Plans or Public Safety Information:

Ives Insurance Brokers Ltd.'s emergency procedures, plans and public safety information is available to our employees and public and it will be made available in an accessible format or with appropriate communication supports as soon as possible upon request.

If necessary or upon request, Ives Insurance Brokers Ltd creates individualized workplace emergency response plans for employees with disabilities. The emergency response plan considers the unique challenges created by the individual's disability and the physical nature of the workplace and is created in consultation with the employee. If an employee with a disability requires assistance from a support person during an emergency, the company designates a fellow mutually agreed upon employee to act as such. Where necessary, this employee will have the required first aid training and certification necessary to provide emergency support.

Customized emergency response plans are reviewed when:

- The employee moves to a different physical location in the organization;
- The employee's overall accommodation needs or plans are reviewed; and
- The company reviews general emergency response policies

### Feedback:

Ives Insurance Brokers Ltd. endeavors to meet customer expectations when serving persons with disabilities. Comments on our services are welcomed and appreciated from members of the public and employees.

Feedback regarding the way that Ives Insurance Brokers Ltd. provides services to persons with disabilities can be made in the following ways:

- in person at any Ives Insurance location
- by telephone at 519-776-7371

- in writing to Ives Insurance Brokers Ltd 347 Maidstone Ave PO Box 369 Essex Ontario N8M 2Y4
- by email to [service@ivesinsurance.com](mailto:service@ivesinsurance.com)

If clients and employees with disabilities would prefer to give their feedback, and receive a response to it, using an alternative method than the one offered; they may request it. All reviewed feedback will be addressed according to established service management procedures.

All feedback, including complaints, will be handled in the following manner:

- Feedback will be directed to the Director of Human Resources and customers can expect to hear back in 24-48 hours.

### **Customer Service Requirements:**

#### **Assistive Devices:**

Ives Insurance Brokers Ltd. is committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our goods and services. We ensure that our employee is trained and familiar with various assistive devices that may be used by people with disabilities while accessing our goods, services, or opportunities.

Most assistive devices such as mobility aid and mobility assistive devices are “personal assistive devices,” such as a wheelchair or walker, white cane, hearing aid, oxygen tank or communication board. They belong to the person using them and are part of their personal space.

People with disabilities may use their personal assistive devices when accessing our goods, services or facilities. In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures such as alternative access points, assistive technology or flexible scheduling will be used to ensure the person with a disability can access our goods, services or facilities.

#### **Billing:**

We are committed to providing accessible invoices to all of our clients. Invoices will be provided in an alternative accessible format upon request. We will answer any questions clients may have about the content of the invoice in person, by telephone or email.

#### **Service Animals:**

People with disabilities may use their service animal in all parts of our premises that are open to the public, unless the animal is excluded by law, such as in food preparation areas. In this case, we will ensure that appropriate alternative arrangements are made to ensure that the person can access the Service. Regulatory changes to Ontario Regulation 191/11. As a result, if an Ives Insurance Brokers Ltd. manager or human resources professional cannot easily identify that the animal is a service animal, the manager or human resources professional can ask the person using the service animal to provide documentation.

The documentation must be from a regulated health professional to confirm that the service animal is required for reasons relating to the person's disability.

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

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

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

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

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

### Support Persons:

Ives Insurance Brokers Ltd. is committed to welcoming persons with disabilities who are accompanied by a support person in parts of our premises that are open to the public. People with disabilities can access their disability-related support person while using our services. In situations where confidential matters will be discussed, the support person may be asked to sign a confidentiality agreement, or the role of the support person may need to be agreed to in advance of the meeting.

In certain cases, Ives Insurance Brokers Ltd. might require a person with a disability to be accompanied by a support person for health or safety reasons of the person with the disability or others on the premises.

As a result of regulatory changes to Ontario Regulation 191/11 which took effect on July 1, 2016, before making a decision, Ives Insurance Brokers Ltd. will do the following:

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

In such a situation, Ives Insurance Brokers Ltd. will waive the admission fee or fare for the support person, if one exists. We notify customers of this by posting a notice on the Ives Insurance Brokers Website under Contact Us.

### Notice of Service Disruption:

If there is a problem with facilities or services that people with disabilities rely on, Ives Insurance Brokers Ltd. will provide notice to the public. The way that Ives Insurance Brokers Ltd. will provide the notice will be determined by the nature of the problem. Ives Insurance Brokers Ltd. will always try to make alternative arrangements to provide service where possible. A Notice of Temporary Disruption form is one of the available

methods for Ives Insurance Brokers Ltd. to print and display at the affected premises where appropriate.

Facilities include:

- Essex Ontario 347 Maidstone Ave E. PO Box 369, Essex, ON N8M 2Y4
- Leamington Ontario 197 Talbot St. E, Unit 1 Leamington, ON N8H 3X5
- Lakeshore Ontario 13039 Tecumseh Rd. E. Windsor, ON N8N 3T4
- Waterloo Ontario 550 Parkside Dr. Unit C1 Waterloo, ON N2L5V4
- Tilbury Ontario 40 Queen St. PO Box 1270 Tilbury, ON N0P 2L0
- Lasalle Ontario 5994 Malden Rd. Suite 1 LaSalle, ON N9H 1S4
- Amherstburg Ontario 580B Middle Side Road N Amherstburg, ON N9V 3R3

Another mode of notification will be via the website [www.ivesinsurance.com](http://www.ivesinsurance.com)

### Telephone Services:

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

### Employment Standards Requirements:

#### Accessible Formats and Communication Supports for Employees:

In accordance with the Ontario Human Rights Code, upon an employee's request, Ives Insurance Brokers Ltd. will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:

- information that is needed to perform the employee's job.
- information that is generally available to employees in the workplace.

Ives Insurance Brokers Ltd. will consult with the employee making the request in determining the suitability of an accessible format or communications support.

### Employment:

We are committed to welcoming people with disabilities with respect to recruitment, employment, training, career development and career progression.

### Employee Support:

Ives Insurance Brokers Ltd.'s employees are made aware of policies used to support employees with disabilities and accommodations available in accordance with the Ontario Human Rights Code. Ives Insurance Brokers Ltd. provides this information to new employees through orientation materials and will provide updated information to all employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.

### Individual Accommodation Plans:

Ives Insurance Brokers Ltd.'s Accommodation Policy describes the mandatory process for the development and maintenance of documented individual accommodation plans to support employees with disabilities. The process set out in the policy meets requirements of the AODA. If applicable, individual accommodation plans may include information regarding plans for accessible formats and communication supports, as well as individualized workplace emergency response information.

### Return to Work

Ives Insurance Brokers Ltd provides a supportive return-to-work program and develops and implements return-to-work processes for employees who are absent from work due to a disability and require accommodations to return to work. The company works with the employee to develop an individualized return-to-work plan and support the employee in the transition period by identifying and eliminating or reducing any barriers. The return-to-work process outlines the steps the company will take to facilitate the employee's return to work and any individualized accommodation needs.

### Redeployment

If an employee cannot be accommodated in their current position, even with accommodations to either the job processes or hours, Ives Insurance Brokers Ltd will consider redeployment by placing the employee in an alternative position in the company. Depending on the employee's needs, redeployment to an alternative position may be temporary or permanent. The company will work with (insert appropriate authority) and the employee to determine whether there is another available and suitable position to accommodate the employee's needs. If the accommodation requires a substantial change in the position, involving duties or hours, the position may be redesigned.

### Performance Management, Career Development, and Redeployment:

Ives Insurance Brokers Ltd. will ensure employees with disabilities or individual accommodation plans are provided equitable access to career development, performance management and redeployment opportunities.

### Recruitment, Assessment and Selection Process:

Ives Insurance Brokers Ltd. posts information about the availability of accommodation for internal and external job applicants with disabilities in its recruitment process. Job applicants who are individually selected for an interview and/or testing must be notified that accommodation is available on request.

Ives Insurance Brokers Ltd. will consult with applicants who request an accommodation and, in accordance with the Ontario Human Rights Code will provide or arrange for the provision of a suitable accommodation in a timely manner that takes into account the applicant's accessibility needs due to disability. Successful applicants will be notified about Ives Insurance Brokers Ltd.'s policies for accommodating employees with disabilities as part of their offer of employment.

### Workplace Emergency Response Information:

Ives Insurance Brokers Ltd. will provide individualized emergency response information to employees who identify potential accessibility barriers when responding to emergency situations. Information on individualized



workplace emergency response will be provided to the employee as soon as practicable after becoming aware of the need for accommodation due to the employee's disability. If the employee requires assistance, Ives Insurance Brokers Ltd. must receive consent from the employee to provide the individualized emergency response information to the person(s) designated to provide assistance. The information will be reviewed when the employee moves to a different location, when the employee's accommodation needs change, when overall accommodation plans are reviewed and when Ives Insurance Brokers Ltd. reviews its general emergency response plan.

### Emergency Notifications

Ives Insurance Brokers Ltd provides emergency and public safety information, plans, procedures, maps and warning signs at evacuation points, and any other emergency alert information in accessible formats or with appropriate communication supports, upon request.

The company will:

- Work with any individuals requesting information to best meet their needs;
- Ensure emergency information can be seen, read, and heard by anyone, including people with disabilities; and
- If a person with a disability requires assistance in an emergency, make sure an employee is available to assist.

### Transportation Standard Requirements:

#### Transportation:

While Ives Insurance Brokers Ltd. is not primarily in the business of transportation, we do periodically provide or arrange for transportation services for certain organization related functions. In these instances, accessible transportation or equivalent services is provided (upon request) for persons with disabilities and is provided at no additional cost. Individuals must contact the coordinator of their particular event to request this accommodation.

Please be advised that most services, events, and normal operations that the organization undertakes does not include providing transportation services to any individuals. In these circumstances, persons with disabilities are responsible for their own accessibility needs when they are to provide their own transportation.

### Built Environment and Public Spaces Requirements:

#### Accessibility Requirements in Codes and Standards:

The *Ontario Building Code*, which has a section on Barrier-Free Design, and the AODA, IASR Design of Public Spaces Standards are both standards to which Ives Insurance Brokers Ltd. adheres to. These standards establish the minimum threshold for accessibility in the built environment.

We will meet accessibility laws when building or making major changes to public spaces.

Our public spaces include:

- Accessible off-street parking

- Service-related elements like service counters, fixed queueing lines and waiting areas

We put procedures in place to prevent service disruptions to the accessible parts of our public spaces.

### Modifications to this or other policies

Ives Insurance Brokers Ltd. is committed to developing and enhancing AODA and customer service plans and policies that respect and promote the dignity and independence of persons with disabilities.

Questions Regarding Ives Insurance Brokers Ltd.'s AODA Policy or inquiries may be directed to Human Resources at [askhr@ivesinsurance.com](mailto:askhr@ivesinsurance.com).

### DEFINITIONS

**Accessibility:** A concept integral to human rights that refers to the absence of barriers that prevent individuals and/or groups from fully participating in all social, economic, political, and cultural aspects of society. The term is often linked to people with disabilities and their rights to access, and refers to design characteristics of products, devices, information, services, facilities or public spaces that enable independent use, or support when required, and access by people with a variety of disabilities.

**Accessible:** Refers to products, devices, information, services, facilities, or public spaces that provide for independent, equitable and dignified access for people with disabilities, including but not limited to those with visual, auditory, sensory, cognitive and mobility related disabilities. The concept of accessible design ensures both "direct access" (i.e., unassisted) and "indirect access," referring to compatibility with a person's assistive technology.

**Assistive Device:** means an assistive device is a piece of equipment a person with a disability uses to help with daily living. Most assistive devices are "personal assistive devices," such as a wheelchair or walker, white cane, hearing aid, oxygen tank or communication board. They belong to the person using them and are part of their personal space.

**Accessible Formats:** may include, but are not limited to, large print, recorded audio and electronic formats, braille, and other formats usable by persons with disabilities.

**Accessibility Standard:** means an accessibility standard made by regulation under section 6.

**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 a physical barrier, an architectural barrier, information or communications barrier, an attitudinal barrier, a technological barrier, a policy, or a practice

**Communications:** means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent, or received.

**Communication Supports:** may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, and sign language and other.

**Conversion Ready:** An electronic or digital format that facilitates conversion into an accessible format such as Braille, large print, audio cassettes CDs DVDs, etc.

**Dignity:** Policies, procedures and practices that respect the dignity of a person with a disability are those that treat them as customers and clients who are as valued and as deserving of effective and full service as any other

customer. They do not treat people with disabilities as an afterthought or force them to accept lesser service, quality or convenience. Service delivery needs to take into account how people with disabilities can effectively access and use services and show respect for these methods.

**Disability means:**

(a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,

(b) a condition of mental impairment or a developmental disability

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

**Equal Opportunity:** Equal opportunity means having the same chances, options, benefits, and results as others. In the case of services, it means that people with disabilities have the same opportunity to benefit from the way you provide goods or services as others. They should not have to make significantly more effort to access or obtain service. They should also not have to accept lesser quality or more inconvenience.

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

**Independence:** In some instances, independence means freedom from control or influence of others, freedom to make your own choices. In other situations, it may mean the freedom to do things in your own way. People who may move or speak more slowly should not be denied an opportunity to participate in a program or service because of this factor. A staff person should not hurry them or take over a task for them if they prefer to do it themselves in their own way.

**Information:** includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.

**Integration:** Integrated services are those that allow people with disabilities to fully benefit from the same services, in the same place and in the same or similar way as other customers. Integration means that policies, practices, and procedures are designed to be accessible to everyone including people with disabilities. Sometimes integration does not serve the needs of all people with disabilities. Alternative measures, rather than integration, might be necessary because the person with a disability requires it or because you cannot provide another option at the time. If you are unable to remove a barrier to accessibility, you need to consider what else can be done to provide services to people with disabilities.

**Mobility Aid:** means a device used to facilitate the transport, in a seated posture, of a person with a disability.

**Mobility Assistive Device:** means a cane, walker, or similar aid.

**Performance Management:** Defined by the AODA as a program that defines and assesses employee performance, productivity, and effectiveness, with the goal of facilitating employee success.



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**Support Person:** An individual who accompanies a person with a disability to help with communication, mobility, personal care, or medical needs or with access to goods or services.