



Accessibility Policy for Customer Service

Business Policy Owner: Marcia Mendes-d'Abreu, Chief Human Resources Officer

Review and Approval Cycle: Every five years

Last Review Date: December 2018

Next Review Date: December 2023

Regulatory Reference: Accessibility for Ontarians with Disabilities Act 2005 (AODA)

Document Number: 411896 CAN/US (12/18)

Purpose and Scope

This Policy outlines the actions that Foresters Financial will put in place to improve opportunities for people with disabilities.

Foresters Financial purpose is to enhance family well-being. Our heritage as a fraternal benefit society, a member-based life insurance provider for everyday families, is the foundation for our guiding principle. We endeavor to enrich the lives of our members, their families and the communities where they live.

We strive at all times to provide our products and services in a way that respects the dignity and independence of people with disabilities.

Policy Statement

Foresters Financial is committed to giving people with disabilities the same opportunity to access our products and services and allowing them to benefit from the same services, in the same place and in a similar way as other customers.

Principles

Foresters Financial is committed to treating all people in a way that allows them to maintain their dignity and independence.

We believe in integration and equal opportunity.

We are committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Integrated Accessibility Standards Regulation (IASR) enacted under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA).

Our Commitments

Accessibility emergency information

Foresters Financial is committed to providing members and clients with publicly available emergency information in an accessible way upon request. We will also provide employees with disabilities with individualized emergency response information when necessary.

Training

Foresters Financial will provide training to employees, volunteers and other staff members on applicable accessibility laws and on the Human Rights Code as it relates to people with disabilities. Training will be provided in a way that best suits the duties of employees, volunteers and other staff members.

Information and communications

Foresters Financial is committed to meeting the communication needs of people with disabilities. We will consult with people with disabilities to determine their information and communication needs. The information we provide and ways we communicate are key to developing our products, programs and services for our customers, members and the public.

We will continue to make our website and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA. Our Internet and intranet websites, technology solutions, communications materials, telephone communications and in-person interactions will be based on accessibility best practices.

Employment

Foresters Financial is committed to fair and accessible employment practices.

Built Environment

Foresters Financial is committed to making accessibility throughout the organization a reality. We will continue to identify and remove barriers in order to create accessible spaces and services that everyone can use.

Service Disruption

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, Foresters will typically provide notice of the disruption. The notice will be in a conspicuous location, which may include our corporate website, and will include information about the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if available.

Glossary

Assistive devices are auxiliary aids such as communication aids, cognition aids, personal mobility aids and medical aids (e.g., canes, crutches, wheelchairs or hearing aids).

Disability as defined in the *Ontario Human Rights Code*, means:

- 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, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, blindness or visual impairment, 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.
- A condition of mental impairment or a developmental disability.
- A learning disability or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language.
- A mental disorder; or
- An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety Act

Employees mean every person who deals with members of the public other third parties, or any other persons on behalf of Foresters, whether the person does so as an employee, agent, volunteer, or otherwise.

Persons with disabilities are individuals who have a disability as defined above.

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

Support persons are any persons, whether a paid professional, volunteer, family member, or friend, who accompany a person with a disability in order to help with communications, personal care or medical needs, or with access to goods or services.

Related Material

- Multi-Year Accessibility Plan
- Appendix to this Policy on the Statement of Commitments for Accessibility Standards

Feedback process

Foresters will establish a feedback process on our corporate website to receive feedback on how we are meeting accessibility needs.

Customers and members of the public may visit our [Contact Us](#) page, write to us by regular or electronic mail, or reach us by telephone or using TTY services, or by other accessible formats upon request. We will use our best efforts to address or respond to your feedback immediately. However, it may sometimes be necessary to refer feedback to another Foresters representative for response or to be handled through our regular complaint handling procedures.

For more information

Please contact us through any of the following ways:

By Mail:	In Canada: 789 Don Mills Road, Toronto, ON M3C 1T9 In USA: P.O. Box 179, Buffalo NY 14201 In UK: Foresters House, 2 Cromwell Avenue, Bromley Kent BR2 9BF
By Phone or TTY Replay:	In Canada and USA: 800 828 1540 In UK: 0333 600 0333
By email:	In Canada and USA: service@foresters.com In UK: services@foresters.co.uk
On the web:	foresters.com/contact

Appendix: Statements of Commitments for Accessibility Standards

Integrated Accessibility Standards

Commitments

Under the Accessibility for Ontarians with Disabilities Act (AODA), Ontario Regulation 191/11, entitled "Integrated Accessibility Standards Regulation" the "Integrated Regulation" came into force July 1, 2011. As of July, 2016 it is the only regulation enacted under AODA and incorporates the Customer Service Standard in addition to accessibility standards for information and communications, employment, training and built environment.

Foresters Financial is committed to working towards being compliant with all the standards under AODA and other similar laws that may apply in the jurisdictions Foresters Financial does business. Foresters Financial will do this as follows:

- By committing to the principles of independence, dignity, integration, and equality of opportunity as described in the AODA;
- By committing to establish, maintain and implement policies and standards to comply with the Integrated Regulation, specifically in the areas of information and communications, employment and customer service to meet the accessibility needs of people with disabilities;
- When providing information to, or communicating with a person with a disability, we will provide the information and communication in a manner that takes into account the person's disability;
- By committing to ongoing improvements to accessibility in its premises and facilities as required by law, as well as to the services offered to customers, employees, volunteers and members of the general public;
- By committing to promote values that support relationships between people with disabilities and the organization;
- Establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under the Integrated Regulation;
- By committing to have regard for accessibility for persons with disabilities when designing, procuring or acquiring self-serve kiosks, when it is necessary; and
- By committing to the training of all employees, volunteers, persons who deal with customers and the public on Foresters Financial's behalf, and persons participating in the development and approval of Foresters Financial policies, practices and procedures on the requirements under the Integrated Regulation and the Human Rights Code, or similar applicable laws, as it pertains to persons with disabilities.

Purpose

This Statement of Commitment provides a framework within which accessibility plans and initiatives are to be created in order to move Foresters Financial towards the goal of improved accessibility for people with disabilities. Foresters Financial endeavors to provide accessibility and accommodation as prescribed by applicable law.

The commitments are intended to ensure that accessibility remains a priority in Foresters Financial's decision-making process and will serve to assist in ensuring that decisions improve accessibility and do not inadvertently create barriers.

Scope

This Statement of Commitment applies to:

- Customers
- Employees
- Volunteers
- Applicants for employment with Foresters Financial who may require employment accommodation through the recruitment assessment, selection, and hiring process
- Visitors
- Contractors and subcontractors engaged by Foresters Financial
- Any other third party providing goods, services or facilities on Foresters Financial behalf

Responsibility

Foresters Financial will establish an Accessibility Advisory Committee which will be the administrative body responsible for the administration of this Policy. It will be the responsibility of this committee to ensure the application of these commitments, that the organization achieves compliance with applicable laws and creates an environment that provides the widest feasible scope of accessibility, which is the right or opportunity to reach, use or participate in the organization's systems, facilities and services.

Managers, immediate supervisors and department heads are responsible for ensuring that all employees follow the guidelines established.

Each manager, immediate supervisor and department head is responsible to ensure all employees are trained under applicable accessibility and human rights laws, regulations and standards and all related policies, practices and procedures.

All employees, volunteers, contractors and sub contractors, any other person acting on behalf of Foresters Financial, and persons involved in the creation of Foresters Financial policies are responsible for adhering to and following the commitments set out in this policy.

Definitions

"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.

"Accommodation" means the special arrangements made or assistance provided so that persons with disabilities can participate in the experiences available to persons without disabilities. Accommodation will vary depending on the person's unique needs.

"Communication supports" may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language, and other supports that facilitate effective communications.

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

“Dignity” means service is provided in a way that allows the individual to maintain self-respect and the respect of other persons.

“Equal opportunity” means service is provided to individuals in such a way that they have an opportunity to access goods or services equal to that given to others.

“Independence” means when a person is able to do things on their own without unnecessary help or interference from others.

“Information” includes data, facts and knowledge that exist in any format, including text, audio, digital or images, and that convey meaning.

“Integration” means service is provided in a way that allows the individual to benefit from equivalent services, in the same place, and in the same or similar way, as other individuals, unless an alternate measure is necessary to enable the individual to access goods or services.

“Reasonable measures” means taking approaches that meet the required needs of the individual.

Procedures

Foresters Financial through its Accessibility Advisory Committee will monitor and evaluate accessibility initiatives and changes to applicable legislation and/or regulations. Changes to policies, plans and initiatives will be incorporated as required. Foresters Financial will also report on performance in relation to established accessibility goals and targets.

If you have questions on this policy, want to provide feedback or have a complaint, contact by email at service@foresters.com or call 800 828 1540 in Canada and USA and 0333 600 0333 in the UK.

Website(s)

Accessibility is communicating with people with disabilities in ways that take into account their disability. When required, we will consult with people with disabilities to determine their information and communication needs. We will strive to communicate in a manner that enables people with disabilities to communicate effectively or to use or receive information on our products and services.

Foresters Financial will strive to provide a website(s) that is accessible to the widest possible audience, which will include conforming to the standards of the Web Content Accessibility Guidelines (“WCAG”) 2.0 AA Standard by 2021. Currently, Foresters Financial has taken steps to make all new websites and content on those sites conform with WCAG 2.0, Level A, to the extent practicable which may include:

- Achieving compliance with the Web Content Accessibility Guidelines (WCAG) commitments in the Information and Communication section of the Integrated Accessibility Standards Regulation (IASR) to ensure websites are accessible.

- Developing guidelines and best practices for creating accessible documents for common desktop applications including MS Word, Excel, PowerPoint and Adobe Acrobat.
- Ensuring that information, including emergency procedures, plans, and public safety, is readily available in a variety of alternate formats such as large print, HTML and tagged PDFs.
- Developing a training strategy to ensure that employees have the knowledge, tools and technical advice to create accessible materials.
- Continuing to expand knowledge and use of accessible devices.

Employment Standards (Ontario)

This Statement of Commitment sets out Foresters Financial's commitment and strategy to remove barriers to accessibility in employment and to encourage the full inclusion of persons with disabilities at Foresters Financial.

Accessible Format

This Statement of Commitment is available in an accessible format upon request.

Recruitment

Foresters Financial will commit to ensure that reasonable accommodations are made available to persons with disabilities during the recruitment, assessment and selection processes and, in consultation with job applicants, provide reasonable accommodations upon request. In particular, Foresters Financial will:

- Notify job applicants about the availability of accommodations during the recruitment, assessment and selection processes;
- Consult with job applicants to ensure reasonable accommodations are provided, taking into account individual accessibility needs; and
- Notify successful job applicants about its policies for supporting employees with disabilities (including policies for accommodating employees with disabilities).

Employment

Foresters Financial will ensure that reasonable accommodations are made available to employees with disabilities throughout the employment relationship. In particular, Foresters Financial will:

- Inform employees of its policies for supporting employees with disabilities (including policies for accommodating employees with disabilities) as soon as practicable after commencing employment;
- Notify employees of any changes to existing policies for supporting employees with disabilities (including policies for accommodating employees with disabilities);
- Provide accessible formats and/or communication supports to employees, upon request;
- Consult with employees to determine the suitability of an accessible format and/or communication support;

- Provide individualized workplace emergency response information to employees (or to any person designated to provide assistance to an employee) if necessary, and reviews this information as required;
- Develop and document individual accommodation plans for employees with disabilities;
- Develop return to work processes for employees who have been absent from work due to disability, and require reasonable accommodations to return to work; and
- Consider the accessibility needs of employees with disabilities, and any individual accommodation plans, throughout the performance management, career development and advancement, and redeployment processes.

Training

Foresters Financial will ensure training is provided, as it relates to their role, to all employees, volunteers, persons who deal with customers and the public on Foresters behalf, and to persons participating in the development and approval of policies, practices and procedures on the requirements of the Regulation and on the Human Rights Code as it pertains to persons with disabilities.

Information and Communication Standard

Foresters Financial will commit to making information and communication systems and platforms accessible to persons with disabilities and address how it will be achieved. We will establish policies and standards for providing accessible information and communications that take into account a person's disability when communicating or providing information. This may include:

- Posting the policy in a visible place on the premises and on the corporate website.
- Providing the policy in an alternative format upon request.
- Ensuring that the cost of providing the policy in an accessible format is not more than the regular cost charged to other people.
- Reviewing the policy on a periodic basis, including when there are changes to the law or practices and procedures or when an incident/breach occurs.

Providing information and communication in accessible formats and with communications support

Foresters Financial will, upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability. This may include:

- Assessing and reviewing the communication needs of people with visual, hearing, learning, and cognitive disabilities and the barriers to communication that may exist in the organization;
- Explaining how we plan to produce and deliver alternately formatted material essential to our organization and our customers and what those materials are;
- Notifying the public about the availability of accessible formats and communication supports;
- Consulting with a person with a disability when alternative accessible formats and communication supports are requested;

- Establishing a process for customers to request and to be provided with information and communication in an accessible format and explaining when an accessible format is not feasible;
- Posting this information on the corporate website; and
- If the information or communications are unconvertible, upon request, the organization will provide an explanation of why it is unconvertible, and provide a summary of the unconvertible information or communications.

Multi-year plan

Foresters Financial will include requirements under the information and communications standard in its multi-year plan, which will outline the organization's strategy to provide accessible information and communications. This will include:

- Assessing barriers to information and communications systems/platforms;
- Determining the accessibility of the organization's information components and systems;
- Establishing a practice that documents be created in a structured electronic format to allow for easier conversion to accessible formats;
- Establishing an organizational standard for documents that will be as accessible as possible without the need for accessible formats (i.e., font style, font size, color contrast, plain language);
- Posting the multi-year plan on the corporate website and providing the plan in accessible format upon request; and
- Reviewing and updating the plan at least once every five (5) years.

The establishment of an Accessibility Advisory Committee promotes the sharing of initiatives and helps to develop a culture of accessibility and inclusion. Foresters Financial will establish an Accessibility Advisory Committee which will be responsible for following up on progress of the plan, and if necessary, reminding responsible parties of their roles in implementing the plan. The Committee will meet periodically, as required, to review implementation to remove and prevent barriers and achieve accessibility under AODA and any other similar applicable laws.

Feedback

Foresters Financial will ensure that its feedback processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request. This will include:

- When an accessible format is requested, the person making the request is consulted to determine suitability of format
- The public is notified about the availability of accessible formats and communication supports