



## **Primerica Accessibility Policy and Multi-Year Accessibility Plan (the "Accessibility Plan")**

(Ontario Regulation 191/11) of the *Accessibility for Ontarians with Disabilities Act, 2005*  
("AODA")

### **Introduction**

The Integrated Accessibility Standards Regulations ("IASR") under the AODA require that effective January 1, 2014, Primerica establish, implement, maintain and document the Accessibility Plan, which outlines Primerica's strategy to prevent and remove barriers for persons with disabilities and to meet its requirements under the IASR.

The Accessibility Plan has been posted on Primerica's website and will be available in an accessible format upon request. The Accessibility Plan will be reviewed and updated, if applicable, at least once every five years.

### **Application**

The Accessibility Plan applies to all employees, and clients of Primerica, and, where indicated, to Primerica's independent contractor representatives.

### **Our Commitment**

In fulfilling our mission, Primerica strives to treat all individuals in a manner that allows them to maintain their dignity and independence. Primerica promotes integration and equal opportunity and is committed to meeting the needs of people with disabilities in a timely manner. We will seek to achieve this by preventing and removing barriers to accessibility and by meeting accessibility requirements under the AODA. This Accessibility Plan sets out Primerica's policy on how we will achieve accessibility generally, as well as in employment, information and communications and the design of public spaces (built environment).

Under the IASR, the following accessibility strategies set out the requirements that are applicable to Primerica:

1. Workplace Emergency Response Information;

2. Training;
3. Information and Communication;
4. Employment; and
5. Built Environment - Design of Public Spaces Standards

### **Accessibility Standards for Customer Service**

Since January 1, 2012, Primerica has been committed to compliance with the Accessibility Standards for Customer Service Regulation (O.Reg.429/07) under the AODA, which involves the providing of products and services in a way that respects the dignity and independence of people with disabilities. To date, Primerica has implemented the following measures:

- communicating with people with disabilities in ways that take into account their disability;
- training all Primerica independent contractor representatives and Head Office employees on how to interact and communicate with people with various types of disabilities and ensuring that any third parties who act on our behalf are aware of our procedures. The training is provided to each person as soon as practicable after he or she is assigned the applicable duties or in the case of the independent contractor representatives, upon obtaining applicable licence(s) to sell Primerica life insurance and mutual fund products. Such individuals are trained on a regular basis or otherwise when changes are made to the policies, practices and procedures. Primerica's training programs include the following:
  - an overview of the AODA and the requirements of the customer service standard;
  - how to interact and communicate with people with various types of disabilities;
  - how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person and the type of equipment or devices that help people with disabilities access our services;
  - what to do if a person with a disability is having difficulty in accessing Primerica's products and services; and
  - Primerica's policies, practices and procedures relating to the Customer Service Policy Statement for Providing Products and Services to People

with Disabilities (the “Customer Service Policy Statement”) and the Primerica Service Feedback Form;

- ensuring completion of accessibility training is tracked and recorded;
- providing fully accessible telephone service to our clients. We train employees and independent contractor representatives to communicate with clients over the telephone in clear plain language and to speak clearly and slowly;
- offering to communicate with clients by appropriate alternate methods (including TTY) if telephone communication is not suitable to their communication needs or is not available;
- ensuring accommodation of individuals that visit a Primerica related premises that is open to the public if they are accompanied by a guide dog or other service animal;
- ensuring that if a person with a disability is accompanied by a support person, the support person is provided access to Primerica’s premises. If the support person is assisting the individual participating in a Primerica event or program, but that person is not participating in the event/program on his or her own behalf, the support person is not charged a fee to attend the event/program;
- providing clients and visitors with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.
  - depending on the circumstances, the notice will be placed on Primerica Canada’s public website and/or at or near the affected Primerica related facility or service;
- continuing to welcome and appreciate feedback from persons with disabilities through multiple communication channels;
- giving feedback regarding the way Primerica provides goods and services to people with disabilities. Feedback can be provided by completing a **Primerica Service Feedback Form** which can be found on the Primerica Canada website at: <http://www.primericacanada.com/public/canada/feedback-form.pdf>. Primerica service feedback can be given in person, by telephone, in writing, or electronic delivery by email or diskette or otherwise;
- an “Accessibility for Ontarian’s With Disabilities” tab has been added to the footer of the Primerica Canada website <http://www.primericacanada.ca/>, to communicate the Customer Service Policy Statement; and

- reporting compliance with the customer service standard on the Accessibility Compliance Reporting tool at Service Ontario's One-Source for Business website.

## **Integrated Accessibility Standards Regulations (IASR)**

The following sets out how Primerica is committed to complying with the IASR.

### **1. Workplace Emergency Response Information**

Where Primerica is aware that an employee has a disability and that there is a need for accommodation, individualized workplace emergency response information will be provided to the employee as soon as practicable if such information is necessary given the nature of the employee's disability.

### **Action Taken:**

The following measures were implemented by Primerica effective January 1, 2012:

- individualized workplace emergency response information procedures have been developed for employees with disabilities, as required;
- workplace emergency response information forms have been prepared for employees who have disclosed a disability and who are being accommodated according to their disabilities;
- where required, Primerica provides assistance to specific disabled employees, with the disabled employees' prior consent, to help them evacuate the workplace in case of an emergency or disaster. These plans for providing assistance have been set out in individualized emergency plans for the employees;
- individualized emergency plans have been communicated to the employees' respective managers and safety personnel on an 'as needed' basis;
- on an ongoing and regular basis, and as per the applicable terms of the IASR, Primerica reviews and assesses general workplace emergency response procedures and individualized emergency plans to ensure accessibility issues are addressed.

### **2. Training**

Primerica is committed to implementing a process to ensure that all employees, independent contractor representatives, volunteers, third-party service providers who provide services related to products, services and facilities on Primerica's behalf, and persons participating in the development and approval of Primerica's policies, are

provided with appropriate training on the requirements of the IASR and on the Ontario Human Rights Code as it pertains to persons with disabilities and are provided with such training as soon as practicable.

**Planned Action:**

In accordance with the IASR, Primerica will:

- determine and ensure that appropriate training on the requirements of the IASR and on the Ontario Human Rights Code as it pertains to persons with disabilities, is provided to all employees, independent contractor representatives, volunteers, third-party service providers who provide services related to products, services and facilities on Primerica's behalf, and persons participating in the development and approval of Primerica's policies;
- ensure that the training is provided to persons referenced above as soon as practicable;
- keep and maintain a record of the training provided, including the dates that the training was provided and the number of individuals to whom it was provided; and
- ensure that training is provided on any changes to Primerica's policies on an ongoing basis.

**Required Legislative Compliance:** January 1, 2015

**3. Information and Communication**

Primerica is committed to making company information and communications accessible to persons with disabilities. Primerica will incorporate new accessibility requirements under the information and communication standards to ensure that its information and communications systems and platforms are accessible and are provided, upon request, in accessible formats that meet the needs of persons with disabilities.

*a. Feedback, Accessible Formats and Communication Supports, Self-Service Kiosks*

**Planned Action:**

In accordance with the IASR, Primerica will:

- ensure that existing and new processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the

provision of accessible formats and communication supports, upon request and in a timely manner;

- more broadly, as a general principle where accessible formats and communication supports for persons with disabilities are requested:
  - provide or arrange for the provision of such accessible formats and communication supports;
  - consult with the person making the request to determine the suitability of the accessible format or communication support;
  - provide or arrange for the provision of accessible formats and communication supports in a timely manner that takes into account the person's accessibility needs due to disability, and at a cost no more than the regular cost charged to other persons;
- notify the public that availability of accessible formats and communication supports are available upon request; and
- Primerica will have regard for accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.

**Required Legislative Compliance:** January 1, 2014 – self-service kiosks, January 1, 2015 - feedback, January 1, 2016 – accessible formats and communication supports.

*b. Accessible Websites and Web Content*

**Planned Action:**

In accordance with the IASR, Primerica will:

- ensure WCAG 2.0, Level A compliance for all new internet websites and web content on those sites as of January 1, 2014; and
- ensure general WCAG 2.0, Level AA compliance for all internet websites and web content on those sites as of January 1, 2021, other than:
  - success criteria 1.2.4 Captions (Live), and
- success criteria 1.2.5 Audio Descriptions (Pre-recorded)

**Required Legislative Compliance:** January 1, 2014 – WCAG 2.0 Level A – new Internet websites and web content, January 1, 2021 – WCG 2.0 Level AA – all Internet websites and web content, except for exclusions set out in the IASR.

#### 4. Employment

##### a. *Recruitment*

Primerica is committed to fair and accessible employment recruiting practices that attract and retain employees with disabilities. This includes providing accessibility across all stages of the employment cycle.

#### **Planned Action:**

In accordance with the IASR, Primerica will do the following:

##### **(i) Recruitment General**

Primerica will notify employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process.

This will include:

- a review and, as necessary, modification of existing recruitment policies, procedures and processes;
- specifying that accommodation is available for applicants with disabilities, on Primerica's website and on job postings; and

##### **(ii) Recruitment, assessment and selection**

Primerica will notify job applicants, when they are individually selected to participate in an assessment or selection process and inform them that accommodations are available upon request in relation to the materials or processes to be used in the assessment/selection process. This will include:

- a review and, as necessary, modification of existing recruitment policies, procedures and processes;
- inclusion of availability of accommodation notice as part of the script in the scheduling of an interview and/or assessment; and
- if a selected applicant requests an accommodation, a consultation with the applicant and arrangement for provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to the disability.

##### **(iii) Notice to Successful Applicants**

When making offers of employment, Primerica will notify the successful applicant of its policies for accommodating employees with disabilities.

This will include:

- a review and, as necessary, modification of existing recruitment policies, procedures and processes; and
- inclusion of notification of Primerica's policies on accommodating employees with disabilities in offer of employment letters.

**Required legislative compliance:** January 1, 2016

*b. Informing Employees of Supports and General Provision of Accessible Formats and Communications Supports*

In accordance with the IASR, Primerica will inform all employees of policies that support employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability. This will include:

- informing current employees and new hires of Primerica's policies supporting employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's needs due to disability;
- providing information as soon as practicable after the new employee begins employment, specifically in the orientation process;
- keeping employees up to date on changes to existing policies on job accommodations with respect to disabilities;
- where an employee with a disability so requests it, Primerica will provide or arrange for provision of suitable accessible formats and communications supports for:
  - information that is needed in order to perform the employee's job;
  - information that is generally available to employees in the workplace; and
- in meeting the obligations to provide the information that is set out above, Primerica will consult with the requesting employee in determining the suitability of an accessible format or communication support.

**Required legislative compliance:** January 1, 2016

*c. Documented Individual Accommodation Plans/Return to Work Process*

Primerica will incorporate new accessibility requirements under the IASR to ensure that barriers in accommodation and return to work processes are eliminated and corporate



policies surrounding accommodation and return to work are followed, where applicable.

**Planned Action:**

Primerica's existing policies include steps that Primerica will take to accommodate an employee with a disability and to facilitate an employee's return to work after absenteeism due to disability.

Primerica will review and assess the existing policies to ensure that they include a process for the development of documented individual accommodation plans for employees with a disability, if such plans are required.

In accordance with the provisions of the IASR, Primerica will ensure that the process for the development of documented individual accommodation plans includes the following elements:

- include in the process the manner in which the employee requesting accommodation can participate in the development of the plan;
- include in the process the means by which the employee is assessed on an individual basis;
- include in the process the manner in which Primerica can request an evaluation by an outside medical or other expert, at Primerica's expense, to assist Primerica in determining if and how accommodation can be achieved;
- ensure steps are in place to protect the privacy of the employee's personal information;
- outline the frequency in which individual accommodation plans will be reviewed and updated and the manner in which this will be done;
- provide the employee with the reasons for the denial if an individual accommodation plan is denied;
- include in the process the means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs;
- if individual accommodation plans are established, ensure that they include:
  - individualized workplace emergency response information that is required;
  - any information regarding accessible formats and communication supports that have been provided for or arranged, in order to provide the employee with:
    - information that is needed in order to perform the employee's job;

- information that is generally available to employees in the workplace; and
- identify any other accommodation that is to be provided to the employee.

Primerica will ensure that the return to work process as set out in its existing policies outlines the steps Primerica will take to facilitate the employee's return to work after a disability-related absence, outlines the development of a written individualized return to work plan for such employees, and requires the use of individual accommodation plans, as discussed above, in the return to work process.

**Required Legislative compliance:** January 1, 2016

*d. Performance Management, Career Development and Redeployment*

Primerica will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans:

- when using its performance management process in respect of employees with disabilities;
- when providing career development and advancement to its employees with disabilities; and
- when redeploying employees with disabilities.

**Planned Action:**

In accordance with the IASR, the Primerica will:

- review, assess and, as necessary, modify existing policies, procedures and practices to ensure compliance with the IASR;
- take the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account when:
  - assessing performance;
  - managing career development and advancement; and
  - redeployment is required.
- review, assess and, as necessary, include in performance management workshops, accessibility criteria;
- take into account the accessibility needs of employees with disabilities when providing career development and advancement to its employees with disabilities, including notification of the ability to provide accommodations on internal job postings; and

- take into account the accessibility needs of employees with disabilities when redeploying employees, including review and, as necessary, modification of employee transfer checklist.

**Required legislative compliance:** January 1, 2016

***Built Environment - Design of Public Spaces***

Primerica is committed to incorporating barrier free design principles in newly constructed and redeveloped public spaces set out in the IASR. Primerica will also take steps to ensure that its independent contractor representatives also comply with the IASR.

For more information on this Accessibility Plan or for accessible formats of the Accessibility Plan, please contact the Regulatory Compliance Department at [canada\\_compliance@primerica.com](mailto:canada_compliance@primerica.com) or (905) 812-2900.