

## **Multi-Year Accessibility Plan and Customer Service Policy**

### **Introduction**

The Integrated Accessibility Standards Regulations (“IASR”) under the Accessibility for Ontarians with Disabilities Act (“AODA”) require that effective January 1, 2014, AZGA Service Canada Inc (operating as “Allianz Global Assistance” which is referred to as “the company”) establish, implement, maintain, and document its accessibility policies and multi-year accessibility plan (the “Accessibility Plan”) which outlines the company’s strategy for preventing and removing barriers for persons with disabilities.

This Accessibility Plan will be posted on Allianz Global Assistance’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, independent contractors, and customers of Allianz Global Assistance.

### **Statement of Commitment**

Allianz Global Assistance is committed to achieving the highest level of accessibility through our products and services. Our goal is to continually provide customer service in a manner that respects the dignity and independence of persons with disabilities. We strive to ensure that we provide equal opportunity in terms of our policies and practices in relation to the delivery of our goods and services to persons with disabilities.

Allianz Global Assistance is committed to becoming a barrier free environment and meeting the requirements of all existing legislation and its own policies and goals related to identifying, removing, and preventing barriers to people with disabilities that might interfere with their ability to make full use of the services provided by Allianz Global Assistance.

As an organization, we are committed to continuing to implement the goals and objectives as outlined in the IASR as the law requires.

## Accessible Customer Service Policy

### Intent

This policy is intended to meet the requirements of *Accessibility Standards for Customer Service, Ontario Regulation 429/07* under the *Accessibility for Ontarians with Disabilities Act, 2005*, and applies to the provision of goods and services to the public or other third parties, not to the goods themselves.

All goods and services provided by AZGA Canada Service Inc. (operating as “Allianz Global Assistance”) shall follow the principles of dignity, independence, integration and equal opportunity.

### Scope

This policy will apply to all Allianz associates as well as contractors, third parties or any other individuals who interact with the public or other third parties, who represent or act on behalf of Allianz in any manner.

### Definitions

Assistive Device – is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that customers 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 reading.

Barrier – a barrier is anything that prevents a person with a disability from fully taking part in society because of that disability. Some examples of barriers include the following:

- Physical barriers (e.g. a step at the entrance to a building; a door that is too heavy to be opened by an individual with limited upper body strength or mobility)
- Architectural barriers (e.g. a hallway or door that is too narrow for a wheelchair or scooter)
- Information or communication barriers (e.g. a publication that is not available in large print)
- Attitudinal barriers (e.g. assuming people with a disability cannot perform a certain task when in fact they can)
- Technological barriers (e.g. a website that is not in an accessible format)
- Barriers created by policies or practices (e.g. not allowing service animals on the premises)

Disability – the term disability as defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*, refers to:

- 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;
- a condition of mental impairment or a developmental disability;
- a learning disability, or 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 and Insurance Act, 1997.

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.

Service Animal – as reflected in *Ontario Regulation 429/07*, 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.

Service Dog – as reflected in *Health Protection and Promotion Act, Ontario Regulation 562* a dog other than a guide dog for the blind is a service dog if:

- it is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability;
- or the person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.

Support Person – as reflected in *Ontario Regulation 429/07*, a support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to goods and services.

## General Principles

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

- A. The Provision of Goods and Services to Persons with Disabilities;
- B. The Use of Assistive Devices
- C. The Use of Guide Dogs, Service Animals and Service Dogs
- D. The Use of Support Persons
- E. Notice of Service Disruptions
- F. Customer Feedback
- G. Training
- H. Notice of Availability and Format of Required Documents

### A. The Provision of Goods and Services to Persons with Disabilities

Allianz 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:

- ensuring that all customers receive the same value and quality;
- allowing customers with disabilities to do things in their own ways, at their own pace when accessing goods and services as long as this does not present a safety risk;
- using alternative methods when possible to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner;
- taking into account individual needs when providing goods and services; and
- communicating in a manner that takes into account the customer's disability.

## **B. Assistive Devices**

### Customer's own assistive device(s):

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by Allianz.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services. For example, open flames and oxygen tanks cannot be near one another. Therefore, the accommodation of a customer with an oxygen tank may involve ensuring the customer is in a location that would be considered safe for both the customer and business. Or, where elevators are not present and where an individual requires assistive devices for the purposes of mobility, service will be provided in a location that meets the needs of the customer.

## **C. Guide Dogs, Service Animals and Service Dogs**

A customer with a disability that is accompanied by guide dog, service animal or service dog will be allowed access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to guide dogs, service animals and/or service dogs.

### Food Service Areas:

A customer with a disability that is accompanied by guide dog or service dog will be allowed access to food service areas that are open to the public unless otherwise excluded by law.

Other types of service animals are not permitted into food service areas due to the *Health Protection and Promotion Act, Ontario Regulation 562 Section 60*.

### Exclusion Guidelines:

If a guide dog, service animal or service dog is excluded by law Allianz will offer alternative methods to enable the person with a disability to access goods and services, when possible (for example, securing the animal in a safe location and offering the guidance of an employee).

### Recognizing a Guide Dog, Service Dog and/or Service Animal:

If it is not readily apparent that the animal is being used by the customer for reasons relating to his or her disability, Allianz may request verification from the customer.

Verification may include:

- a letter from a physician or nurse confirming that the person requires the animal for reasons related to the disability;
- a valid identification card signed by the Attorney General of Canada; or,
- a certificate of training from a recognized guide dog or service animal training school.

### Care and Control of the Animal:

The customer that is accompanied by a guide dog, service dog and/or service animal is responsible for maintaining care and control of the animal at all time.

### Allergies:

If a health and safety concern presents itself for example in the form of a severe allergy to the animal, Allianz will make all reasonable efforts to meet the needs of all individuals.

#### **D. Support Persons**

If a customer with a disability is accompanied by a support person, Allianz will ensure that both persons are allowed to enter the premises together and that the customer is not prevented from having access to the support person.

There may be times where seating and availability prevent the customer and support person from sitting beside each other. In these situations Allianz will make every reasonable attempt to resolve the issue.

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

Where fees for goods and services are charged, Allianz shall ensure that notice is given in advance about the amount, if any that would be charged to a support person.

#### **E. Notice of Disruptions in Service**

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Allianz. In the event of any temporary disruptions to facilities or services that customer's with disabilities rely on to access or use Allianz's goods or services, reasonable efforts will be made to provide advance notice. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

##### Notifications will Include:

In the event that a notification needs to be posted the following information will be included unless it is not readily available or known:

- goods or services that are disrupted or unavailable
- reason for the disruption
- anticipated duration
- a description of alternative services or options

##### Notifications Options:

When disruptions occur Allianz will provide notice by:

- posting notices in conspicuous places including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption and/or on the Allianz website;
- contacting customers with appointments or
- by any other method that may be reasonable under the circumstances.

## F. Feedback Process

Allianz shall provide customers with the opportunity to provide feedback on the service provided to customers with disabilities. Allianz will maintain a feedback process to enable customers to comment on the provision of goods and services to persons with disabilities. Feedback is welcomed as it may identify areas that require change and encourage continuous service improvements.

Feedback shall be received in any form (i.e. in person, by telephone, in writing, fax, or in electronic format including email) and all such feedback will be logged for reporting purposes.

All feedback will be kept in strict confidence and used to improve customer service. An answer to feedback is not mandatory, however depending on the situation, it may be appropriate to respond to the customer. Should an answer be deemed appropriate and should the customer have chosen to supply his or her contact information, the customer will be provided with a response.

Information about the feedback process will be readily available to the public and notice of the process will be provided on Allianz's website and/or in other appropriate locations.

## G. Training

Training will be provided to:

- a) all employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of Allianz.
- b) those who are involved in the development and approval of customer service policies, practices and procedures.

### Training Provisions:

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 Regulation 429/07*.
- 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 (including the handling of admission fees).
- How to use equipment or devices that are available at our premises or that we provide that may help people with disabilities.
- Instructions on what to do if a person with a disability is having difficulty accessing your services.
- Allianz's policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

### Training Schedule:

Allianz will provide training as soon as practicable. Training will be provided to new employees, volunteers, agents and/or contractors who deal with the public or act on our behalf. Revised training will be provided in the event of changes to legislation, procedures and/or practices.

### Record of Training:

Allianz will keep detailed records of the training provided for reporting purposes.

## H. Notice of Availability and Format of Documents

Allianz shall notify customers that the documents related to the *Accessibility Standard for Customer Service* are available upon request and in a format that takes into account the customer's disability. Notification will be given by posting the information in a conspicuous place owned and operated by Allianz, the Allianz's website and/or any other reasonable method.

If you have any questions or concerns about this policy or its related procedures please contact:

Allianz Global Assistance  
Attention: Human Resources  
4273 King Street E  
Kitchener, Ontario Canada  
N2P 2E9  
Toll-Free: 1-800-461-1079  
Fax: 519-742-2581  
Email: [infocanada@allianz-assistance.ca](mailto:infocanada@allianz-assistance.ca)

This policy and its related procedures will be reviewed as required in the event of legislative changes.

## Employment Policy

Allianz Global Assistance is committed to fair and accessible employment practices. We will take the following steps to notify the public that, when requested, that Allianz Global Assistance will accommodate people with disabilities during the recruitment and assessment process when people are hired:

- Post this policy on our website at [www.allianz-assistance.ca](http://www.allianz-assistance.ca)
- Include our commitment to accessibility and accommodation within job postings
- Inform applicants selected for an interview that accommodations are available, upon request.

Allianz Global Assistance will take the following steps to develop and put in place a process for developing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability:

- Allianz Global Assistance supports a gradual return to work program following a short or long-term disability
- Pursuant to Allianz Global Assistance's Workplace Accommodation Policy, Allianz Global Assistance will accommodate an employee with accessibility needs. We will work with the employee to develop an individual accommodation plan.

Allianz Global Assistance will take the following steps to ensure the accessibility needs of employees with disabilities are taken into account for performance management, career development, and redeployment processes:

- Pursuant to Allianz Global Assistance's Workplace Accommodation Policy, Allianz Global Assistance will accommodate an employee with accessibility needs. We will work with the employee to develop an individual accommodation plan.

## **Workplace Emergency Response Policy**

Where Allianz Global Assistance 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 practical if such information is necessary given the nature of the employee's disability.

## **Design of Public Spaces Policy**

Allianz Global Assistance will meet the IASR for the design of public spaces when building or making major modifications to public spaces.

## **Information and Communications Policy**

In accordance with the IASR, Allianz Global Assistance will work toward making its websites and web content conform with the World Wide Consortium Web Content Accessibility Guidelines (WCAG 2.0) Level AA.

Questions about this policy should be directed to:

Allianz Global Assistance  
Attention: Human Resources  
4273 King Street East  
Kitchener, Ontario Canada  
N2P 2E9  
Tel : 519-742-2800  
Fax: 519-742-2581  
Email: [infocanada@allianz-assistance.ca](mailto:infocanada@allianz-assistance.ca)