



TD Insurance's Multi-Year Accessibility Plan

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Introduction and Statement of Commitment

In 2005, the Ontario government passed the Accessibility for Ontarians with Disabilities Act (AODA). The goal of the Ontario Government is to ensure accessibility in Ontario by 2025. The Integrated Accessibility Standards Regulations (IASR) under the AODA require that effective January 1, 2014 TD Insurance establish, implement and maintain a multi-year accessibility plan which summarizes our commitment to accessibility.

Although the IASR is considered an Ontario regulation, TD Insurance has decided to implement nationally to ensure a consistent experience nationwide and align with their corporate responsibility focuses. This multi-year plan last updated in 2020 outlines TD Insurance's strategy to prevent and remove barriers in order to fulfill TD Insurance's commitment to foster an inclusive environment as outlined in the TD Insurance Accessibility Policy.

Our Plan

Accessibility Policies

Commitment:

Diversity and inclusiveness play a big part in TD Insurance's corporate responsibility model. TD Insurance is committed to be a welcoming place for all our customers and employees. Although TDI has implemented many policies and processes relating to accessibility for our customers and employees, we are committed to reviewing these policies and enhancing them as our reality changes.

Achievements:

- Analysis of all current policies and procedures relating to accessibility;
- Established a committee with representation from key business units to ensure all policies are considered during our review;
- Leveraged policies already in place along with the IASR and the Ontario Human Rights Code to ensure new policies created are in line with the regulation;
- Published policies on internal and external sites and ensured its availability in an accessible format.

Actions planned:

- Review and update the multi-year accessibility plan at least once every five years;
- Our existing policies and procedures relating to accessibility will be reviewed on a regular basis for any updates required to the process, as needed

Training

Commitment:

TD Insurance is committed to implementing a process to ensure that all employees, volunteers, third party contractors and outsourced services are informed about TDI's accessibility policies and plans relating to the IASR and the Ontario Human Rights Code.

Achievements:

- Established key contacts within our Learning and Development Team focused on developing the appropriate training;

- Determined and ensured 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 in alignment with the legislation;
- Kept and maintained records of the training provided, including the dates the training was provided and all the individuals who completed it;
- Ensured training requirement is added to all new hire and onboarding checklists.

Actions planned:

- Whenever an amendment is made or deadline approaching, review and ensure training is re-issued in alignment with the legislation and/or TD Policies should there be changes;

Information and Communication Standards

Commitment:

TD Insurance is committed to ensuring company information and communications are accessible to persons with disabilities. TD Insurance will develop and implement new accessibility requirements under the information and communication standard to ensure that information and communication systems and platforms are accessible and are provided in an accessible format that meet the needs of persons with disabilities.

1. Feedback, Accessible Formats and Communications Support

Achievements:

- Ensured 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 an accessible format and communication supports, upon request and in a timely manner;
 - More broadly, as a general principal where accessible formats and communication supports for persons with disabilities are requested:
 - TD Insurance provides or arranges for the provision of such accessible formats and communications supports (consulting with the person making the request to determine the suitability of the accessible format or communication support);

- Provides or arranges for the provision of accessible formats and communications 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 charge to other persons;
- Notifies the public, employees, third-party contractors who provide goods, services and facilities on behalf of TD Insurance, and persons participating in the development and approval of TD Insurance's policies about the availability of accessible formats and communication supports.

Actions planned:

- We will review our feedback, accessible formats, and communication support current state to find where we can make improvements to how customers or employees can access the support required

2. Accessible Websites and Web Content

Achievements:

- Ensured that all new TD Insurance websites and content published on those sites will be compliant with WCAG 2.0 level AA by January 1 2014

Actions planned:

- TD Insurance will make websites accessible to people with disabilities by conforming to international standards for website accessibility: World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0
- Ensure that TD Insurance websites and content on those sites, published after January 1 2012 will be compliant with WCAG 2.0 level AA by January 1st 2021

3. Self-Service Kiosks

Achievements:

- Took inventory of all self-serve kiosks and debit terminals at each of our offices
- Confirmed that all offices used the same Merchant (TD Merchant Services)
- Confirmed that there was a standard model across the country
- Performed accessibility test by ensuring self-serve kiosks and debit terminals could accommodate accessibility needs including visual impairments and mobility limitations

Actions planned:

- Review of self-service kiosks, including debit terminals, to ensure any changes since initial review continue to be accessible to customers and employees

4. Temporary Disruption

Commitment:

In the event of a planned or unexpected disruption in facilities or services, we will provide information about the reason for the disruption, how long it is expected to last, and a description of any alternative facilities or services available (where applicable).

Actions planned:

- Review temporary disruption plan to assess where improvements can be made to ensure an effective application of any temporary disruption process

Employment Standards

5. Recruitment

Commitment:

At TD Insurance, we believe that diversity is key to our success. We are committed to fostering a unique and inclusive employee culture where we attract and retain the best talent which requires providing accessibility at all stages of the employment cycle.

Achievements:

- Recruitment General: TD Insurance notifies employees and the public of the availability of accommodations for applicants with disabilities in the recruitment process. This includes:
 - A review, and, as necessary, modification of existing recruitment policies, procedures and processes;
 - Specifying that accommodation is available for applicants with disabilities, on TDI's websites and job postings;

- Working with suppliers to ensure external web pages and job postings are compliant with the Information and Communication Standards under the IASR's requirements.
- Recruitment, assessment and selection: TD Insurance notifies job applicants, when they are individually selected to participate in an assessment or selection process 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, modifications of existing recruitment policies, procedures and processes;
 - Inclusion of accommodation notice as part of the script in the scheduling of an interview and/or assessment;
 - If a selected applicant requests an accommodation, consult with the applicant and arrange for provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to disability.
- Notice to Successful Applicants: When making offers of employment, TD Insurance notifies the successful applicant of its policies for accommodating employees with disabilities. This includes:
 - A review and, as necessary, modification of existing recruitment policies, procedures and processes;
 - Inclusion of TDI's policies on accommodating employees with disabilities in offer of employment letters.

Actions Planned:

- Our accommodations policies will be reviewed on a regular basis for any updates required to the process, as needed

6. Informing Employees of Supports

Commitment:

TD Insurance 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.

Achievements:

- Inform current employees and new hires of TDI's policies on the provision of job accommodations that take into account an employee's need due to disability;
- Provide information under this section as soon as practicable after the new employee begins employment, specifically during the onboarding process;
- Keep employees up to date on changes to existing policies on job accommodations with respect to disability;
- Where an employee with a disability so requests it, TDI 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.
- In meeting the obligations to provide the information that is set out in the paragraph above, TDI will consult with the requesting employee to determine the suitability of an accessible format or communication support

Actions Planned:

- Our accommodations policies will be reviewed on a regular basis for any updates required to the process, as needed

7. Documented Individual Accommodation Plans/Return to Work Process

Commitment:

TD Insurance will incorporate new accessibility requirements 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. TD Insurance's existing policies and processes include steps that TDI will take to accommodate an employee with a disability and to facilitate an employee's return to work after absenteeism due to disability or injury.

Achievements:

- Reviewed and assessed the existing policies and processes to ensure that they included steps for the development of a documented individual accommodation plan for employees with a disability, if such plans are required.
- Ensured that the process for the development of documented individual accommodation plans included the following:

- How employees requesting accommodations can participate in the development of the individual accommodation plan;
- How the employee is assessed on an individual basis;
- How TDI can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved, and if so, how accommodations can be achieved;
- Steps taken to protect the privacy of the employee's personal information;
- The frequency with which the individual accommodation plan will be reviewed and updated, and how it will be done;
- If an individual accommodation plan is denied, how the reasons for the denial will be provided to the employee;
- The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.
- Ensured the individual accommodation plan included:
 - Any information regarding accessible formats and communications supports provided by TDI, if requested;
 - Individualized workplace emergency response information that is required;
 - Any other accommodation that is to be provided.
- Ensured that the return to work process as set out in existing policies outlines the steps TDI will take to facilitate the employee's return to work after a disability-related absence or injury, outlines the development of a written individualized return to work plan for such employees, and if required the use of individual accommodation plans, as discussed above, in the return to work process.

Actions Planned:

- Our accommodations policies will be reviewed on a regular basis for any updates required to the process, as needed

8. Performance Management, Career Development and Redeployment

Commitment:

TD Insurance 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
- Providing career development and advancement to its employees with disabilities

- Redeploying employees with disabilities

Achievements:

- Reviewed, assessed, and modified existing policies, procedures, and practices as necessary to ensure the accessibility needs of employees with disabilities are met;
- Ensure we 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
 - Redeployment is required
- Reviewed, assessed, and modified if required existing processes to ensure that performance management process and tools take into consideration the accessibility needs of employees with disabilities.
- Ensured we take into account the accessibility needs of employees with disabilities when providing career development and advancement to its employees with disabilities;
 - Provide people managers with appropriate support to assist in the career development of their employees with disabilities
- Develop and document redeployment process for employees with disability in conjunction with the individualized accommodation plans;

Actions Planned:

- Our accommodations policies will be reviewed on a regular basis for any updates required to the process, as needed