



Policy Name | Accessibility Policy

**Business Segment /
Corporate or Oversight
Function** | TD INSURANCE

Effective Date | September 1st 2020

Purpose

The purpose of this Policy is to establish how TD Insurance (TDI) achieves or will achieve accessibility for persons with disabilities, including customers, employees, members of the public and third parties to whom TDI provides products, services, or facilities.

Scope/Application

This policy applies to the following legal entities:

- Security National Insurance Company;
 - Primmum Insurance Company;
 - TD Home and Auto Insurance Company;
 - TD General Insurance Company;
 - TD Direct Insurance Inc. (currently inactive); and
 - TD Life Insurance Company;
- (herein referred to collectively as TDI).

Policy Details/Requirements

Commitment

TDI is committed to ensuring that every employee and customer receives equitable treatment with respect to employment and services, without discrimination, and receives accommodation where required. Through progressive policies, communication and training, accommodation measures and recruitment practices, TDI strives to provide a fully inclusive, barrier-free environment. TDI is dedicated to creating a welcoming, fair and inclusive environment for TDI clients and employees and complying with legal and regulatory requirements.

This Policy is aligned with the TD Accessibility Policy which includes the following commitments:

TD is committed to meeting the accessibility needs of persons with disabilities in a timely manner. TD goods, services, facilities, employment, accommodation, buildings, structures or premises will be made accessible to meet the needs of persons with disabilities:

- TD will accommodate the accessibility needs of employees in the workplace and applicants with disabilities in its recruitment processes.

- TD will provide training on accessibility in the workplace and with respect to providing products, services and facilities to persons with disabilities.
- TD will design and provide products, services and facilities to meet the accessibility needs of persons with disabilities.
- TD communication and information processes will meet the accessibility needs of persons with disabilities.

IT Accessibility Policy

Specific requirements for IT solutions used by employees and customers are set out in the IT Accessibility Policy. This includes both internally developed solutions as well as those provided by 3rd party providers.

Multi-Year Accessibility Plan

In support of its commitment, TD will establish, implement, maintain and document a multi-year accessibility plan, which outlines TD's strategy to prevent and remove barriers to meeting the accessibility needs of persons with disabilities. The plan will address information and communication, human resources, design of public spaces and accessibility training requirements.

The plan will be posted on TDI's website and will be available in an accessible format, upon request. The plan will be reviewed and updated at least once every five years.

Identification and Escalation of Breaches

Breaches of this policy are to be notified to the Policy Owner in a timely manner.

Monitoring and Control

TD Insurance businesses are responsible for ensuring that processes exist, are functioning effectively and in compliance with this Policy and related Standards and Procedures. VP, Strategy, Customer and Innovation will maintain appropriate process to monitor compliance.

Ownership and Review Frequency

Policy Owner

VP, Strategy, Customer and Innovation

Policy Approval

This policy will be approved by the VP, Strategy, Customer and Innovation. Amendments to this policy require the approval of the VP, Strategy, Customer and Innovation.

Committee Review/Endorsement

N/A

Policy Contact

Senior Manager, Practice Management

Policy Review Cycle

Dates/Timing	Details
Approval Date	August 31st, 2020
Effective Date	September 1st, 2020
Review Frequency	3 years
Next Review Date	August 31st, 2023

Related Policies & Other Supporting Documents

Policy Name

- TD Accessibility Policy
 - IT Accessibility Policy
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Legal or Regulatory Requirements

- W3C Web Accessibility Guidelines (WCAG 2.0)
- Canadian Human Rights Act
- Accessibility for Ontarians with Disabilities Act 2006 (AODA)
- Americans with Disabilities Act of 1990 (ADA)
- Section 508 of the U.S. Rehabilitation Act
- UK Discrimination Disability Act