

Accessibility Policy (the “Policy”)

This document is available in other formats on www.greatwestlife.com or on request from Ombudsman@gwl.ca.

1. Introduction and Statement of Organizational Commitment

The Great-West Life Insurance Company and its subsidiaries (collectively, the “Company”) are committed to providing access to the Company’s financial products and services to individuals with disabilities in a timely manner, consistent with the requirements of applicable accessibility legislation, including the *Accessibility for Ontarians with Disabilities Act, 2005* (collectively, the “Accessibility Legislation”).

This Policy is intended to specifically address the requirements of the Accessibility Legislation and describes how the Company will comply with those requirements and what customers may expect from the Company. The Accessibility Legislation does not replace or limit any requirements that have been established under human rights or other legislation that is applicable to the Company, and the Company is committed to meeting those requirements as well.

This Policy is meant to benefit individuals with a wide range of disabilities, as defined below. Whether a person’s disability is apparent or not, everyone should be treated with courtesy and have his or her need for accommodation respected whenever interacting with the Company.

In this Policy, an individual with a disability includes a person with any degree of physical disability, infirmity, disfigurement, mental disorder, learning disability or condition of mental impairment or developmental disability. For the complete definition of disability, and other definitions, see section 14 of the Policy.

2. General

The Company will make reasonable efforts to ensure that individuals with disabilities have the same opportunity to access the financial products and services which the Company provides, in the same place and in a similar way as other members of the public.

The Company will make reasonable efforts to be consistent with the following principles when developing, implementing and maintaining its policies related to accessibility:

- financial products, services and facilities owned and managed by the Company will be provided in a manner that respects the dignity and independence of individuals with disabilities;
- the provision of financial products and services, and access to premises owned and managed by the Company, to individuals with disabilities will be in a manner that is integrated with the way in which such financial products and services are provided to other members of the public unless an alternative measure is necessary, whether

temporarily or on a permanent basis, to enable a person with a disability to access, use or benefit from the financial products and services of the Company;

- the Company will seek to give individuals with disabilities an opportunity equal to that of others to obtain, use or benefit from, the Company's financial products and services and premises owned and managed by the Company; and
- when communicating with a person with a disability, the Company shall do so in a manner that takes into account the person's disability.

3. Assistive Devices

An individual may use his or her own assistive devices to access the Company's premises or its financial products and services, except where this may reasonably pose a security risk or a risk to the health or safety of the individual or others. An assistive device is any device that is designed, made or adapted to assist an individual with a disability in carrying out activities.

In situations where the use of an assistive device could reasonably pose a security risk or a risk to the health or safety of the individual or others, the Company may make other reasonable measures available to assist the individual with a disability in accessing premises, or being able to obtain, use or benefit from the Company's financial products or services. It is the responsibility of the individual with a disability to ensure that his or her assistive device is operated in a safe and controlled manner at all times.

4. Support Persons

An individual with a disability who is accompanied by a support person will be permitted to enter the Company's premises that are open to the public or other third parties with his or her support person.

An individual with a disability who is accompanied by a support person will not be prevented from having access to his or her support person while on the Company's premises unless the health or safety of the person with a disability or of others on the premises would be negatively impacted.

The Company may require that an individual with a disability to be accompanied by a support person when on the Company's premises, but only if, after consulting with the person with a disability and considering the available evidence, the Company determines that:

- a support person is necessary to protect the health or safety of the individual with a disability or the health or safety of others on the premises; and
- there is no other reasonable way to protect the health or safety of the individual with a disability and the health or safety of others on the premises.

Given the nature of information that may be discussed in the presence of a support person accompanying or assisting an individual with a disability, the Company may require that the individual with a disability give his or her consent to the Company to discuss confidential information in the presence of the support person. If an individual with a disability has concerns about discussing confidential information in the presence of the support person, he

or she may ask the support person to leave during the discussion of the confidential information.

5. Service Animals

An individual with a disability who is accompanied by a guide dog or other service animal will generally be permitted to enter premises owned by the Company that are open to the public or other third parties with the guide dog or other service animal, as applicable, and keep the animal with him or her. In the rare occurrence that a service animal's access may be excluded by law, the Company will make reasonable efforts to arrange alternative ways for the individual to obtain, use or benefit from the Company's financial products and services.

The individual with a disability is responsible for the care and control of the guide dog or other service animal at all times.

6. Information and Communication

When communicating with an individual with a disability, the Company will do so in a manner that takes into account the individual's disability. The Company will endeavour to provide, or arrange to provide, communications in accessible formats and communication supports to a person with a disability in order to facilitate access to the Company's financial products and services. The Company will do this in consultation with the person with a disability, in a timely manner that takes into account the person's accessibility needs due to his or her disability and at a cost that is no more than the regular cost charged to other persons.

On request and where applicable, the Company will provide emergency procedures, plans and public safety information that is available to the public in an accessible format or with appropriate communication supports as soon as practicable.

The Company will, except where impracticable, ensure that its internet websites that are accessible to members of the public conform with the applicable requirements of the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 by the dates specified in the Accessibility Legislation.

7. Accessibility Plan

The Company will establish, implement, maintain and document a multi-year accessibility plan to outline its strategy to prevent and remove barriers and meet its requirements under certain Accessibility Legislation. The accessibility plan will be reviewed and updated every two years or more frequently where required by Accessibility Legislation, and will be posted on the Company's website. Upon request, the Company will provide a copy of the accessibility plan in an accessible format.

8. Notice of Service Disruption

The Company will, when reasonable, provide notice in the event of a disruption in the facilities or services owned or controlled by the Company that are usually used by individuals with disabilities to access, use or benefit from the Company's financial products

and services. Further information about the steps the Company will take to provide notice of a service disruption is available from the Company upon request. Please contact Ombudsman@gwl.ca or call: 1-866-292-7825.

9. Training

The Company will provide appropriate periodic training to employees working in a Canadian location on this Policy, the applicable requirements of the Accessibility Legislation and, where appropriate, applicable human rights legislation as it pertains to individuals with disabilities. This includes training on:

- how to interact and communicate with persons with various types of disabilities;
- how to interact with individuals with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person;
- how to use equipment or devices that may be provided by the Company that may help with the provision of the Company's financial goods and services to a person with a disability; and
- what to do if a person with a particular type of disability is having difficulty accessing the Company's financial goods or services.

The Company will also ensure that other persons who require training pursuant to the Accessibility Legislation are provided with the appropriate training.

If applicable, updated training will be provided if an employee changes jobs or moves to a different area within the organization, or as may otherwise be required by Accessibility Legislation.

10. Self-service Kiosks

If the Company purchases self-service kiosks that allow public users to access the Company's financial products or services, including credit/debit payment machines, regard will be given to the accessibility features of such self-service kiosks and preference will be given to self-service kiosks that are accessible.

11. Feedback and Concerns

Feedback regarding the way the Company provides access to its financial products and services to individuals with disabilities should be made in writing, if reasonable. Feedback may be made by e-mail, letter, telephone, in person, or in another way that better meets the communication needs of the person providing the feedback.

The Company will ensure that every process for receiving and responding to feedback is accessible to individuals with disabilities. It will do this by providing or arranging for the provision of accessible formats and communication supports upon request and accepting feedback on the accessibility of its feedback processes generally.

Further information on how to provide feedback and the actions the Company will take on receiving notice of a concern is available on www.greatwestlife.com or on request from Ombudsman@gwl.ca.

12. Public Spaces

Where the Company owns real property that includes public spaces and undertakes to build new structures or make major changes to existing structural features, the Company is committed to meeting the design and accessibility requirements of the Accessibility Legislation within the time frames specified therein.

13. Review

This Policy will be reviewed and revised from time to time. When new or revised standards are developed under the Accessibility Legislation, this Policy will be reviewed and updated as may be necessary to ensure consistency with such standards.

14. Definitions

For the purpose of this Policy, the following terms have the meanings indicated:

“disability” means:

- (a) 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;
- (b) a condition of mental impairment or a developmental disability;
- (c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- (d) a mental disorder; or
- (e) as may be otherwise defined in the Accessibility Legislation.

“service animal” means, for a person with a disability, an animal:

- (a) if the animal can be readily identified as one that is being used by the person for reasons relating to the person’s disability, as a result of visual indicators such as the vest or harness worn by the animal;
- (b) if the person provides documentation from a regulated health professional specified in the Accessibility Legislation, confirming that the person requires the animal for reasons relating to the disability; or
- (c) as may be otherwise defined in the Accessibility Legislation.

“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 or medical needs or with access to goods, services or facilities.

For inquiries please contact:

Ombudsman, The Great-West Life Assurance Company

Email: Ombudsman@gwl.ca

Letter: 255 Dufferin Avenue, London ON, Canada N6A 4K1

Fax: 1-519-435-7679

Tel.: 1-866-292-7825

TTY (Teletype) line for the hearing impaired: 1-800-990-6654