

Accessibility Plan

About Great-West

The Great-West Life Assurance Company is a leading Canadian insurance company, with interests in life insurance, health insurance, investments, retirement savings and reinsurance business, primarily in Canada, the United States and Europe. We offer products and services directly and through subsidiaries that include the London Life Insurance Company and The Canada Life Assurance Company (The Great-West Life Assurance Company, together with its subsidiaries, are referred to herein as, “**Great-West**”). Great-West provides products and services under a number of brands, including the Great-West Life, Canada Life and the Freedom 55 Financial™ brands.

Introduction

Great-West is committed to meeting the requirements of all applicable accessibility legislation, including the *Accessibility for Ontarians with Disabilities Act, 2005* (collectively, the “**Accessibility Legislation**”), as well as meeting the needs of all of our clients generally. We strive to provide financial products and services in a way that respects the dignity and independence of people with disabilities.

This document is the accessibility plan (the “**Accessibility Plan**”) for Great-West and outlines Great-West’s strategy for preventing and removing barriers to accessibility and meeting the requirements set out in the applicable regulations. The Accessibility Plan is reviewed and updated every two years or more frequently where required by Accessibility Legislation, and will be posted on the public website.

The Accessibility Plan also highlights some of Great-West’s accomplishments to date related to accessibility. This document is available upon request in accessible formats, by contacting the Ombudsman by email at Ombudsman@gwl.ca or calling 1-866-292-7825.

Accessibility for Ontarians with Disabilities Act (“AODA”)

The AODA was passed by the Ontario legislature for the purpose of recognizing the history of discrimination against persons with disabilities in Ontario and benefiting all Ontarians by, among other goals, developing, implementing and enforcing certain accessibility standards.

To date, accessibility standards have been developed in the following areas, and consolidated under O. Reg. 191/11 *Integrated Accessibility Standards* (the “**Integrated Standards**”):

- customer service;
- information and communications;
- employment;
- transportation; and
- the built environment.

Certain requirements under the Integrated Standards came into force on January 1, 2012, while the remaining requirements are being phased in by the Ontario Government over time until 2021. Detailed information about the due date for each requirement is included below.

The Accessibility for Manitobans Act (“AMA”)

The *Customer Service Standard Regulation* under the AMA was implemented in November, 2015 and will be applicable to private sector organizations on November 1, 2018.

Future updates to this Accessibility Plan will include a discussion of the requirements created by the Regulations under the AMA as those requirements come into effect.

Our Accessibility Strategy

In 2010, Great-West created an Accessibility Steering Committee with representatives from across our organization. The Accessibility Steering Committee reviews Accessibility Legislation, facilitates the implementation of a co-ordinated strategy for applying the accessibility requirements under the Accessibility Legislation, and approves accessibility policies and procedures to help ensure that Great-West is meeting our legal requirements. The Committee meets regularly to review Great-West’s progress in achieving compliance with the Accessibility Legislation.

Great-West has also established a network of Accessibility Co-ordinators in various business units of its organization. Accessibility Co-ordinators are able to answer questions from other staff with respect to Great-West’s policies and procedures related to accessibility matters.

The Integrated Standards

1. General

1.1 Establishment of Accessibility Policies

Objectives:

- Develop, implement and maintain policies on how we will achieve accessibility through meeting the applicable requirements under the Integrated Standards

AODA Compliance Date:

January 1, 2014

Actions Taken:

The “**Accessibility Policy**” was implemented in 2013 to include Great-West policies related to the information and communication standard under the Integrated Standards.

The Accessibility Policy is available online at: www.greatwestlife.com in a PDF format that has been enhanced to provide greater accessibility for users of adaptive technologies. The Accessibility Policy is also available in other accessible formats upon request.

In addition, we have developed policies on employment practices at Great-West which address requirements of the employment standards under the Integrated Standards and are available on request from the Ombudsman’s office.

Status:

The corporate policies were completed in 2013.

1.2 Accessibility of Self-serve Kiosks

Objectives:

- Give consideration to accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks. The Integrated Standards define a “kiosk” as meaning an interactive electronic terminal, including a point-of-sale device, intended for public use that allows users to access one or more services or products or both.

AODA Compliance Date:

January 1, 2014

Actions Taken:

Our Accessibility Policy commits Great-West to taking accessibility into consideration when procuring or acquiring self-service kiosks. At Great-West, few business areas currently use any electronic devices that would be considered “kiosks” for providing access to Great-West’s financial products and services. Those areas that make use of self-serve kiosks will take accessibility for persons with disabilities into consideration when procuring or acquiring self-service kiosks.

Status:

Corporate policies were completed in 2012. Department processes are being reviewed on an ongoing basis to help ensure that processes used by Great-West continue to be in compliance with the Accessibility Policy.

1.3 Training (General)

Objectives:

- Ensure training is provided on the accessibility standards in the Integrated Standards and on the *Ontario Human Rights Code* to every employee, volunteer, and other persons who participate in the development of Great-West’s policies or provide goods, services or facilities on behalf of Great-West; and
- The training should be appropriate to the duties of the employee or other person.

AODA Compliance Date:

January 1, 2015

Actions Taken:

All of our employees in Canada completed training on the accessibility standards in the Integrated Standards, and on the *Ontario Human Rights Code*. For third party service providers that deal with the public or other third parties in Ontario on behalf of Great-West, we ensure that they are aware of the requirements and our expectations for accessibility training. Third party service providers are also able to access the Accessibility Policy and Feedback and Customer Concerns Procedures from certain of our websites.

Great-West directly maintains records of the dates training was provided to our employees in Canada. For third party service providers that deal with the public or other third parties in Ontario on behalf of Great-West, we ask that they maintain training records, including dates when training was provided and the number of personnel who received training, and provide access to those records to Great-West, on request.

Status:

Completed in 2014 for current staff at that time. Accessibility training is provided to new staff as soon as practicable, and generally within three months after they join the Company. Additional training will be provided to staff where necessary should relevant accessibility policies and procedures change.

2. Customer Service

2.1 Policies, Practices and Procedures

Objectives:

- Develop, implement and maintain policies on providing financial products and services to persons with disabilities in ways that are consistent with the following principles:
 - Respect for dignity and independence;
 - Integrated provision of products and services, unless an alternate measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the products or services,
 - Equality of opportunity to obtain, use and benefit from the goods and services, 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.

AODA Compliance Date:

January 1, 2012.

Actions Taken:

Great-West's corporate policy on accessibility is publicly available through our websites and generally provides that reasonable efforts will be made to provide access to our financial products and services in accordance with the above principles (the "**Accessibility Policy**").

Our Accessibility Policy includes provisions for the use of assistive devices by persons with disabilities, and addresses access by support persons and service animals. The Accessibility Policy also generally describes our policy on providing notice of temporary service disruption and on training on providing our financial products and services to persons with disabilities.

A copy of the Accessibility Policy can be found on: www.greatwestlife.com in a PDF format that has been enhanced to help provide greater accessibility for users of adaptive technologies. The Accessibility Policy is also available in other accessible formats upon request.

Status:

Corporate policies were completed in 2012. Department processes are being reviewed on an ongoing basis to help ensure that processes used by Great-West continue to be in compliance with the Accessibility Policy.

2.2 Accessibility Training (Customer Service)

Objectives:

- Ensure that the following persons have received training on the provision of Great-West's financial products and services to persons with disabilities:
 - All employees;
 - Every person involved in the provision of financial products and services on our behalf; and
 - Persons involved in developing our policies.
- This training includes instruction on the purpose of the AODA, how to interact and communicate with people with various types of disabilities and how to interact with people 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.

AODA Compliance Date:

January 1, 2012

Actions Taken:

Great-West has written procedures for providing accessibility standards training that include a summary of the training and details on when training is to be provided. A copy of the procedure is available on request from the Ombudsman's office.

We provide training to all of our employees in Canada specifically on accessibility related matters. For third party service providers that deal with the public or other third parties in Ontario on behalf of Great-West, we ensure that they are aware of the requirements and our expectations for accessibility training. Third party service providers are also able to access the *Accessibility Policy* and *Feedback and Customer Concerns Procedures* from certain of our websites.

Great-West directly maintains records of the dates training was provided to our employees in Canada. For third party service providers that deal with the public or other third parties in Ontario on behalf of Great-West, we ask that they maintain training records, including dates when training was provided and the number of personnel who received training, and provide access to those records to Great-West, on request.

Status:

Completed in 2012 for current staff at that time. Accessibility training is provided to new staff as soon as practicable and generally within three months after they join the Company. Additional or updated training is provided to staff where necessary should relevant accessibility policies and procedures change, where an employee changes jobs or moves to a different area within the Company or as may be otherwise required by the Accessibility Legislation.

2.3 Feedback Process Regarding Provision of Services to Persons with Disabilities

Objectives:

- Establish an accessible process for receiving and responding to feedback and concerns about the manner in which we provide financial products and services to persons with disabilities, including the process for accepting and responding to feedback on the accessibility of our feedback processes;
- Make information about the feedback process readily available to the public; and
- Document policies and procedures detailing the process.

AODA Compliance Date:

January 1, 2012.

Actions Taken:

Great-West has a feedback and customer concerns procedure specifically for receiving and responding to feedback on how we provide financial products and services to people with disabilities. A copy of the Feedback and Customer Concerns Procedure can be found on: www.greatwestlife.com in a PDF format that has been enhanced to provide greater accessibility for users of adaptive technologies. The Feedback and Customer Concerns Procedure is also available in other accessible formats upon request.

We track all accessibility concerns we receive and ensure that they are handled in accordance with our usual process for resolving customer concerns. We also track feedback related to accessibility that does not specify a concern, to help ensure that the needs of customers with disabilities continue to be properly addressed.

Status:

Completed implementation of processes in 2012.

2.4 Notice of Temporary Service Disruptions

Objectives:

- Provide notice of any temporary disruption in facilities or services that people with disabilities usually use to obtain, use or benefit from Great-West's financial products and services;
- Document the steps to be taken in connection with the temporary disruption in facilities or services;
- Provide notice that a copy of that document is available on request; and
- Establish policy and procedures regarding provision of notice on temporary service disruption.

AODA Compliance Date:

January 1, 2012.

Actions Taken:

Great-West has a policy in place to provide notice of a temporary disruption in the facilities or services owned or controlled by Great-West that are typically used by persons with disabilities to obtain, use or benefit from the Company's financial products and services. Certain of Great-West's websites indicate that a copy of the procedure is available on request from the Ombudsman's office.

Status:

Completed implementation of processes in 2012.

3. **Information and Communication Standards**

3.1 Accessible Feedback/Complaints Processes

Objectives:

- Ensure that any process for receiving or responding to feedback is accessible to persons with disabilities by providing for accessible formats or communication supports on request.

AODA Compliance Date:

January 1, 2015

Actions Taken:

Great-West has established a Feedback and Customer Concerns Procedures that is available from our website www.greatwestlife.com in an enhanced PDF format to enable greater accessibility. The Feedback and Customer Concerns Procedures provide for a number of ways for a person to contact Great-West.

In addition, Great-West is identifying other processes that we have that enable individuals to provide feedback to us and will work to ensure that accessible formats or communication supports are available on request.

Status:

Completed implementation of processes in 2014.

3.2 Accessible Formats and Communication Supports

Objectives:

- Provide alternative formats or communication supports for persons with disabilities, upon request;
- Provide these alternative formats or communication supports in a timely manner and at the same cost charged to other persons; and
- Consult with the person making the request to determine the suitability of an accessible format or communication support.

AODA Compliance Date:

January 1, 2016

Actions Taken:

Great-West has put in place processes for providing or arranging for suitable alternative formats or communication supports upon request. The person with a disability requesting an alternative format or communication support is consulted to determine the most appropriate accessible format and communication support. A centralized area has been tasked with handling all requests for alternative formats and communications support to ensure that the request can be completed in a timely and effective manner.

Status:

Complete.

3.3 Accessible Websites and Web Content

Objectives:

- Make all of our public internet websites (and any non-exempt content on those websites) conform with certain sections of the World Wide Web Consortium's Web Content Accessibility Guidelines ("WCAG") 2.0.

AODA Compliance Date:

- January 1, 2014: All new internet websites must conform with WCAG 2.0 Level A; and
- January 1, 2021: All internet websites must conform with WCAG 2.0 Level AA

The Integrated Standards define a "new internet website" as meaning either an internet website with a new domain name, or an internet website with an existing domain name undergoing a significant refresh.

Actions Taken and Planned:

In developing new internet websites and refreshing existing internet websites, Great-West takes into account the applicable WCAG requirements. Training on accessible website development and accessible PDF creation has been provided to employees specializing in these areas.

Status:

In progress.

4. Employment Standards

4.1 Recruitment, Assessment and Selection Process

Objectives:

- Notify employees and the public about the availability of accommodations for applicants with disabilities in the recruitment processes;
- Notify selected job applicants during the recruitment process that accommodations are available upon request in relation to materials or processes to be used; and
- If, during the recruitment process, a selected applicant requests an accommodation, consult with the applicant and provide or arrange for the provision of a suitable accommodation that takes into account the applicant's accessibility needs.

AODA Compliance Date:

January 1, 2016

Actions Taken:

Appropriate notifications and messaging have been added to job postings (both internally and externally). Career landing pages on websites have been updated accordingly. Processes have been put in place to address any accommodation requests made during the recruitment process.

Status:

Complete.

4.2 Notice to Successful Applicants

Objectives:

- When making an offer of employment, notify the successful applicant of our policies for accommodating employees with disabilities.

AODA Compliance Date:

January 1, 2016

Actions Taken:

Processes are in place to notify successful applicants of our policies for accommodating employees with disabilities. The accommodation policy and employee accessibility policy are included with all job offers.

Status:

Complete.

4.3 Informing Employees of Supports

Objectives:

- Inform employees of our policies to support employees with disabilities, including policies on the provision of job accommodation;
- Provide new employees with this information as soon as practicable after they begin their employment; and
- Provide updated information whenever there is a change in policy.

AODA Compliance Date:

January 1, 2016

Actions Taken:

Offer letters are accompanied with copies of the Accommodation Policy and the Employee Accessibility Policy. Accommodation for employee accessibility needs is imbedded in the return to work process and individual accommodation plans.

Status:

Complete.

4.4 Accessible Formats and Communication Supports for Employees

Objectives:

- On request by an employee with a disability, consult with that employee to arrange for accessible formats and communication supports for information that is needed to allow that employee to perform his or her job and information that is generally available to employees in the workplace; and
- Consult with the employee in determining the suitability of an accessible format or communication support.

AODA Compliance Date:

January 1, 2016

Actions Taken:

Processes are in place to consult with employees and provide appropriate accessible formats and communication supports upon request. Leaders are required to work with HR leaders and consult with the employee with a disability to determine the most appropriate accessible format and communication support.

Status:

Complete.

4.5 Workplace Emergency Response Information

Objectives:

- Provide individualized workplace emergency response information to each employee who has a disability if that employee needs it and if Great-West is aware of the need for accommodation due to that employee's disability;
- Where required and with the consent of the employee with a disability, provide the individualized workplace emergency response information to a designated person;
- Provide the required emergency response information as soon as practicable after Great-West becomes aware of the need for an accommodation due to an employee's disability; and
- Review individualized workplace emergency response information when required.

AODA Compliance Date:

January 1, 2012

Actions Taken:

Employees can complete an online questionnaire, available on Great-West's intranet site, requesting individualized workplace emergency response assistance or information. The Health and Safety department at Great-West works with the employee to help ensure that appropriate emergency response measures are in place for that employee.

Status:

Complete.

4.6 Documented Individual Accommodation Plans

Objectives:

- Establish written processes for the development of a documented individual accommodation plan for employees with disabilities that meets the requirements described in the Integrated Standards.

AODA Compliance Date:

January 1, 2016

Actions Taken:

Accommodation guidelines and processes have been updated to meet this requirement. An accommodation template is used to document an individual's accommodation plan for employees with disabilities.

Status:

Complete.

4.7 Return to Work Process

Objectives:

- Develop and have in place a documented return-to-work process for employees who have been absent from work due to disability and require disability-related accommodations in order to return to work; and
- Return to work process must outline the steps Great-West will take to facilitate the return to work of these employees and use documented individual accommodation plans.

AODA Compliance Date:

January 1, 2016

Actions Taken:

The return to work process highlights the need to develop a plan and a requirement to monitor and evaluate the return to work process to its completion.

Status:

Complete.

4.8 Performance Management

Objectives:

- In performance management processes, take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans; and
- Performance management in this context means activities related to assessing and improving employee performance, productivity and effectiveness.

AODA Compliance Date:

January 1, 2016

Actions Taken:

Wording on performance assessment forms and internal communications on performance management has been updated to help ensure that performance management processes take into account the accessibility needs of employees with disabilities and individual accommodation plans.

Status:

Complete.

4.9 Career Development and Advancement

Objectives:

- Take into account the accessibility needs of employees with disabilities and any individual accommodation plans when providing career development and advancement opportunities to employees.

AODA Compliance Date:

January 1, 2016

Actions Taken:

Policies have been reviewed and updated accordingly. The accessibility needs of employees with disabilities and individual accommodation plans as required are taken into consideration during recruitment, interviewing and assessment, notification to successful applicants, performance management and redeployment phase. Wording on performance assessment forms have been updated to account for the accessibility needs of employees with disabilities.

Status:

Complete.

4.10 Redeployment

Objectives:

- Take into account the accessibility needs of employees with disabilities as well as individual accommodation plans when reassigning employees within the company as the result of the elimination of a particular job or department.

AODA Compliance Date:

January 1, 2016

Actions Taken:

HR policies and guidelines have been updated to reflect the accessibility needs of employees with disabilities and individual accommodation plans when reassigning employees as a result of the elimination of a job or department. The leader may attempt to identify new work within their department, taking into consideration any existing accommodation needs of the staff member.

If it is established that there is no further work for the staff member within the department, Human Resources will work with the impacted employee to make every attempt to find a suitable position in another division of the company, taking into consideration any existing accommodation needs of the staff member.

Status:

Complete.

5. Built Environment Standards

5.1 Built Environment Standards

Objectives:

- The Built Environment Standards in the Integrated Standards are designed to remove barriers in public spaces, such as service counters and waiting areas, outdoor public eating or rest areas, outside walk ways and accessible off-street parking; and
- These standards for the design of public spaces apply to new constructions and major changes to existing features.

AODA Compliance Date:

January 1, 2017

Actions Taken:

Great-West implemented an Accessibility Design Standard Guideline for property managers and other employees responsible for projects impacted by the Built Environment Standards. An online training module corresponding to the Guideline was completed by affected employees. Additionally, Building Operations and Maintenance Procedures have been updated to include preventative and emergency maintenance of accessible elements.

Status:

Complete.