

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 Assurance Company the “**Company**”) is committed to providing access to the Company’s financial products and services to individuals with disabilities in Ontario in a timely manner, consistent with the requirements of the *Accessibility for Ontarians with Disabilities Act, 2005* and related standards and regulations (collectively, the “**AODA**”).

This Policy is intended to specifically address the requirements of the AODA and describes how the Company will comply with those requirements and what customers may expect from the Company. The AODA 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 will be implemented in accordance with the time frames for compliance established by the AODA.

The Policy applies to every person who deals with members of the public or who deals with other third parties in Ontario on behalf of the Company.

This Policy is meant to benefit persons 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 establishing policies, practices and procedures:

- financial products and services will be provided in a manner that respects the dignity and independence of individuals with disabilities;

- the provision of financial products and services to persons 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.

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 security, health or safety of the person with a disability or of others on the premises would be negatively impacted.

The Company may require a person with a disability to be accompanied by a support person when on the Company's premises, but only if a support person is necessary to protect the security, health or safety of the person with a disability or the security, 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 service animal will generally be permitted to enter premises owned by the Company with the service animal 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 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. Starting on the date specified in the AODA, and upon request, 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 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 AODA.

7. Accessibility Plan

The Company will establish, maintain and document a multi-year accessibility plan to outline its strategy to prevent and remove barriers and meet its requirements under certain AODA standards. The accessibility plan will be reviewed and updated as required, but not less frequently than every five years, and will be posted online. 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. 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 training to employees working in a Canadian location on the Policy, the requirements of the AODA and, where appropriate, the Human Rights Code (Ontario) as it pertains to persons with disabilities. The Company will also ensure that other persons who require training pursuant to the AODA are provided with the appropriate training.

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 persons with disabilities by the date specified in AODA. It will do this by providing or arranging for the provision of accessible formats and communication supports upon request.

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 AODA within the time frames specified.

13. Review

This Policy will be reviewed and revised from time to time. When new or revised standards are developed under the AODA, 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) an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997* (Ontario).

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

- (a) it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- (b) the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

“**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 or services.

For inquiries please contact:

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