

## **Multi-Year Accessibility Plan 2023-2028**

**(Ontario Locations)**

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## Message from the CEO

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Cowan Insurance Group Ltd., which includes Princeton Holdings Limited and Cowan Benefits Ltd. (collectively, “we”), is committed to ensuring equal access and participation for persons with disabilities. We are committed to treating persons with disabilities in a way that allows them to maintain their dignity and independence. Our goal is to provide quality products and services that are accessible to people of all abilities in a way that is consistent with the principles of dignity, independence, integration and equal opportunity.

## Overview

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In 2005, the Ontario Government passed the *Accessibility for Ontarians with Disabilities Act, 2005* (referred to as **AODA** hereafter) to make Ontario accessible by 2025. O Reg 191/11 Integrated Accessibility Standards (the “**IAS**”) was enacted in Ontario to develop specific standards and rules that businesses and organizations in Ontario need to follow to identify, remove and prevent barriers so that people with disabilities have more opportunities to participate in everyday life.

The IAS divides compliance into five categories:

- Information and communication;
- Employment;
- Transportation;
- Design of public spaces; and
- Customer service.

Each category has its own requirements and timelines for compliance. The purpose of the AODA is to benefit all Ontarians by:

- (a) developing, implementing and enforcing accessibility standards in order to achieve accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises on or before January 1, 2025; and
- (b) providing for the involvement of persons with disabilities, the Government of Ontario and of representatives of industries and various sectors of the economy in the development of accessibility standards.

We are a “large organization (private and not-for-profit) with 50+ employees” pursuant to the AODA and will make every reasonable effort to ensure that our policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity. For the balance of this document, “we” will refer to our companies with 50 or more employees.

This **Multi-Year Accessibility Plan for Ontario Locations** (“the **Plan**”), outlines our strategy to prevent and remove barriers to address the current and future requirements of the AODA. It also fulfills our disclosure commitment as outlined in the our Accessibility Policy.

Under the AODA and the IAS, the following accessibility standards set certain requirements that are applicable to the Company:

- (a) Part One: General requirements
- (b) Part Two: Information and Communications
- (c) Part Three: Employment Standards
- (d) Part Four: Design of Public Space
- (e) Part Five: Customer Service

Accordingly, we have committed to:

- (a) Post this Plan on our website ([www.cowangroup.ca](http://www.cowangroup.ca));
- (b) Provide this Plan in an accessible format, upon request; and
- (c) Review and update this Plan at least once every five (5) years, or earlier as required.

## Part One: General Requirements

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### Commitment

The Company will establish policies about how it will meet its obligations under the IAS that are consistent with the principles of dignity, independence, integration and equal opportunity.

### Establishment of Accessibility Policies and Practices

#### Status: Completed

#### Achievements:

- The Company has implemented an Accessibility Policy which governs how the organization achieves and sustains accessibility and highlights the organization's statement of commitment to meet the requirements of the AODA and the IAS.
- Our Accessibility Policy was reviewed and updated in 2023 in accordance with the AODA.
- Our Accessibility Policy is available on our website.

#### Goals:

- Review and update our Accessibility Policy on an ongoing basis and at minimum, every five (5) years.
- Continue to provide our Accessibility Policy in accessible formats.

### Establishment of a Multi-Year Accessibility Plan

#### Status: Completed

#### Achievements:

- The Company has established, implemented, and will maintain this Plan, last reviewed and updated in 2023.
- We filed our Accessibility Compliance Report in June 2021 as required.

#### Goals:

- Post this updated Plan on our website and provide it in accessible formats upon request.
- Review and update this Plan every five (5) years or less based on changes to the AODA and customer feedback.
- Complete and file our next Accessibility Compliance Report as required by the AODA.

## Development and Implementation of Training

**Status: Completed**

### Achievements:

- All employees, as well as people participating in the development and approval of the Company's policies, are trained on the requirements of the IAS and on the Ontario *Human Rights Code* as it pertains to persons with disabilities within legislated timelines.
- Employees received training in 2021 and subsequently training is provided when onboarding all new employees
- All training records are maintained electronically.

### Goals:

- We are in the process of updating our training program and delivering our next refresher session in Q1 2024.
- Keep updated records of training.

## Part Two: Information and Communications

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### Commitment

The Company is committed to complying with the provisions of the AODA in respect of this requirement, with the objective of making applicable company information and communications accessible to persons with disabilities.

### Feedback

#### Status: Completed

#### Achievements:

- We provide an accessible feedback process for customers with disabilities.
- Information about the feedback process is readily available to all customers and notice of the process is available on our website.
- We provide feedback forms, along with alternate methods of providing feedback such as verbally (in person or by telephone) or written (hand written, delivered, website or email), available upon request.
- We acknowledge customer feedback, and provide information about resulting actions based on the concerns or complaints that were submitted.

#### Goals:

- Embed accessibility features in our emails, including accessibility improvements to Company signatures.
- Continue to revise our information processes through feedback received and design future digital services in accordance with the AODA.

### Accessible formats and communication supports

#### Status: Completed

#### Achievements:

- We provide information and communicate in an accessible manner about our goods, services or facilities in a way that takes into account the person's accessibility needs.
- We consult with the person making the request in determining the suitability of an accessible format or communication support.

#### Goals:

- Continue to train our employees on accessible formats, including recent technological improvements.

## Emergency Procedures

**Status: Completed**

Achievements:

- We provide emergency information to our employees in accessible formats upon request.

Goals:

- Continue to improve public emergency procedures with accessibility features.

## Accessible Website and Web Content

**Status: In progress**

Achievements:

- The Company website is compliant with World Wide Web Consortium Web Content Accessibility Guidelines: WCAG 2.0 Level AA – new Internet websites and web content.; with the exception of PDFs; in which case Cowan will accommodate any requests for PDF reviews via converting documents.

Goals:

- Consider applying AODA guidelines to our intranet content. Via an accommodation process set up for internal requests.



## Part Three: Employment Standards Requirements

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### **Commitment:**

The Company is committed to complying with the provisions of the AODA in respect of all stages of the employment life cycle, with the objective of making the recruitment process accessible to persons with disabilities.

### **Recruitment**

#### **Status: Completed**

#### Achievements:

- The Company notifies employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process.
- We have modified existing recruitment policies, procedures, processes and templates for accessibility.
- The Company website and all job postings state that accommodation is available for applicants with disabilities.
- The Company notifies job applicants individually selected to participate in an assessment or the selection process that accommodations are available upon request in relation to the materials or processes to be used in the assessment/selection process.
- We maintain an accessible interviewing checklist and include an availability of accommodation notice as part of the script in the scheduling of an interview and/or assessment.
- If a selected applicant requests an accommodation, we will arrange for the provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to disability.
- When making offers of employment, we will notify the successful applicant of our policies for accommodating employees with disabilities, including in offer of employment letters.

#### Goals:

- Continue to post accommodation and accessibility notices on all job postings and provide this information in interviews and employment letters.

### **Informing Employees of Supports and Accessible Formats**

#### **Status: Completed**

#### Achievements:

- We inform employees of our policies used to support employees with disabilities, including, but not limited to, our Accessibility Policy, our Accommodation Policy and other policies on the provision of job accommodations that take into account an

employee's accessibility needs due to disability.

- We provide information to new employees as soon as practical and updated information whenever there is a change to these policies.
- We provide or arrange for the provision of accessible formats and communication supports for upon request by an employee where information is needed to perform the employee's job or for information that is generally available to employees in the workplace.
- We consult with our employee making the request in determining the suitability of an accessible format or communication support.
- Provide ergonomic assessments and other modifications to employee workstations, as needed.

#### Goals:

- Update all employee training, including our Accessibility Policy, and provide these changes to new and existing employees.
- Continue supporting applicants and employees with disabilities in the above ways.

### **Workplace Emergency Response Information**

#### **Status: Completed**

#### Achievements:

- We provide individualized emergency response plans that are confidential and disclosed only with employee consent on a need to know basis.
- We review individualized workplace emergency response information when: the employee moves to a different location in the organization; the employee's overall accommodations needs or plans are reviewed; and/or the Company reviews its general emergency response policies.
- Yearly survey of employees to capture individuals who need assistance during Health and Safety fire drills and evacuation, this is done thru internal communications to Leaders and all employees.

#### Goals:

- Review and revise existing plans as often as required under the AODA

### **Accommodation Plans and Return to Work**

#### **Status: Completed**

#### Achievements:

- Our Accommodation Policy was reviewed and updated as of 2023.
- We provide accommodation and return to work processes in accordance with the AODA.

Goals:

- Continue to review and update our policies as needed.

**Performance Management, Career Development and Redeployment**

**Status: Completed**

Achievements:

- We provide accommodation to employees with disabilities throughout all stages of employment.

Goals:

- Continue to update our policies as needed.

## Part Four: Design of Public Space

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### Design of Public Spaces

**Status: Completed**

Achievements:

- We have met technical requirements for roadways, sidewalks and waiting areas.

Goals:

- Continue to ensure that any new developments meet AODA and Building Code requirements.
- Develop a plan for accessible public off-street parking.

## Part Five: Customer Service

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### Customer Service

#### Achievements:

- We have trained our employees on providing accessible customer service, including interacting with persons with disabilities and working with service animals, assistive devices and support persons.
- We keep records of all employee training.
- We welcome support persons and service animals on our premises.
- We have provided information regarding temporary disruptions in service.

#### Goals:

- Refresh training for all employees in Q1 2024 .
- Continue to revise our customer service based on feedback received.
- Review emergency procedures to ensure all customers are assisted in an emergency.

## Measuring Progress

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We will continually monitor and update our progress with respect to this Plan by:

- Comparing our action plan goals against real-time results;
- Reviewing customer feedback on this Plan and our customer service and making adjustments accordingly; and
- Reviewing and revising this Plan as needed and at least every five (5) years.

We welcome customer feedback about our Plan and our efforts to meet AODA and IAS requirements.

For comments about this Plan, or to request accessible formats, please contact us at [hr@princetonholdings.com](mailto:hr@princetonholdings.com).

**Current Revision Date: June 30, 2023**

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