



Policy Name	TDI Accessibility Policy
Business Segment / Corporate or Oversight Function	TD Insurance
Effective Date	September 1, 2023

1. Purpose

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

2. Scope/Application

This Policy applies to TD Insurance Canadian legal entities herein collectively referred to as TD insurance or TDI to the following companies:

Security National Insurance Company
Primum Insurance Company
TD Home and Auto Insurance Company
TD General Insurance Company;
TD Direct Insurance Inc. (currently inactive); and
TD Life Insurance Company and the following brokers and Agencies: Meloche Monnex Insurance and Financial Services Inc., TD Insurance Direct Agency Inc., and TD Assurance Agency Inc.

All of these companies are subsidiaries of The Toronto Dominion Bank and members of the TD Bank Group (TDBG).

This Policy will be available to all colleagues via the company intranet and incorporated as set out below.

3. Policy Details/Requirements/Commitments

TDI is committed to ensuring that every employee and customer receives equitable treatment with respect to employment and products 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 customers and colleagues and complying with legal and regulatory requirements.

TDBG and TDI support one in another in advancing their respective commitments to accessibility. As such, this Policy is aligned with and fully adopts the contents of the *TDBG Accessibility Policy* (effective March 31, 2023). This Policy outlines a Canada-wide approach to applicable Accessibility Legislation through:

- **Employment:** TDI will accommodate the accessibility needs of colleagues in the workplace and applicants with disabilities in its recruitment processes, including providing accommodation for persons requiring assistance in workplace emergency or evacuation in accordance with an applicable emergency handbook. Where a barrier cannot be removed and is a legitimate occupational requirement, TDI will comply with applicable law(s) and *Workplace Accommodation Policy*.

- **Employee Training:** TDI will provide accessibility training in the workplace, which includes the provision of products, services and facilities to persons with disabilities regarding customer service. Training will be provided (and in alternative formats as requested) as soon as practicable for colleagues, volunteers (e.g., paid, and unpaid positions), persons that participate in the development of accessibility policies and third parties acting on behalf of TDI.
- **The Built Environment and Procurement of Facilities:** Access to public facilities over which TDBG/TDI have care and control will meet accessibility needs of persons with disabilities and will align with the *TD Public Spaces Accessibility Procedure*. This includes design consideration and impact on accessibility as part of new construction, major renovations/projects, in response to requests for accommodation and as part of ongoing maintenance.
- **Information and Communications, Technology (ICT):** Technology applications and content that are controlled by TDI or indirectly through a contractual relationship that permits for modification ought to be accessible in accordance with applicable laws and the *TD IT Accessibility Policy* and *IT Accessibility Standards*.
- **Communication (Other than ICT):** TDI is responsible for providing its internal and external communications in an accessible format for persons with disabilities as requested and this includes instances in which the information or communication is controlled directly by TDBG or indirectly through a contractual relationship that allows for modification. Once an accessibility request is received, it will be answered in a timely manner that considers the person's accessibility needs. The cost of conversion must not exceed the regular cost charged to other persons. Should the information or communication requested be unconvertible, an explanation must be provided to the person with a summary of the unconvertible information provided.

TDI is also responsible for notifying colleagues and the public about the availability of accessible formats and communication supports as well as establishing internal and external processes to receive and respond to feedback in a manner that is accessible to persons with disabilities, upon request.

- **The Procurement of Goods and Services:** TDI is committed to procuring and/or acquiring products, services and facilities that meet the accessibility needs of persons with disabilities, including customers, colleagues, members of the public and third parties to whom TDI provides products or services.
- **Design and Delivery of Programs and Services:** TDI is responsible for the enabling persons with disabilities to utilize their own assistive devices to obtain, use or benefit from TDI's products, services and/or facilities. In instances in which a person with a disability is accompanied by a support person, both persons are permitted to enter TDI premises together. Service animals are permitted by the public and third parties on TDI premises, unless excluded by law. In instances in which a service animal is excluded by law, TDI will consult with the impacted individual to find a suitable method to deliver the relevant program, product or service.
- **Feedback Process:** TDI will continue to develop and continuously improve its accessibility feedback process, including overseeing that its processes function effectively and follow applicable accessibility procedures, including incorporation of **Communications (Other than ICT)** process described above.
- **Accessibility Plan and Assessment:** TDI will complete an Accessibility Assessment and support input and/or action(s) toward TD's Accessibility Plan as requested by TDBG.

The Policy Owner must be notified in a timely manner of any breaches to this Policy.

4. Monitoring and Control

VP, Strategy, Customer and Colleague Experience in conjunction with TDI Accessibility Designate will maintain appropriate processes to monitor compliance with this Policy. Specifically, TDI will monitor ongoing effectiveness of this Policy and mitigate associated risks and/or operating activities through:

- TDI's adherence to the TDBG Accessibility Policy is monitored by TDI's Accessibility Designate. This individual will maintain a Tracking Log containing accessibility feedback received from TDBG's Accessibility Office and feedback received directly by TDI. This Tracking Log will include the date, the source of the feedback received, the line of business responsible for responding to the feedback provided and resolution. It will be reviewed by the Policy Owner on a quarterly basis.
- This Policy will be posted for Colleagues to view on TDI's intranet site including a link to TDBG's Accessibility Page containing TDBG's Accessibility Plan and Policy.

5. Exception Management (Policy Exemption)

There are no exceptions to this Policy in line with the TDBG Accessibility Policy referenced above.

6. Ownership and Review Frequency

6.1 Policy Owner

VP, Strategy, Customer and Colleague Experience, TD Insurance.

6.2 Policy Approval

Policy approval and amendments thereto will be approved by the VP, Strategy, Customer and Colleague Experience, TD Insurance.

6.3 Committee Review/Endorsement

N/A

6.4 Policy Contact

Accessibility Designate/Senior Manager Strategy, Customer and Colleague Experience Team, at TDI-Accessibility@tdinsurance.com

7. Roles and Responsibilities

Role	Responsibility
TDBG (Accessibility Office)	<ul style="list-style-type: none"> • Receives and records accessibility feedback, including direct feedback initially received by Accessibility Designates • Provides feedback to appropriate business segment's Accessibility Designate. • Follow up with Accessibility Designate for review and response to feedback within a reasonable time frame (e.g., 30 day mark, 90 day mark, 150 day mark from date feedback was received and 60 days thereafter).
TDI Accessibility Designate	<ul style="list-style-type: none"> • Reviews and using Tracking Log records and tracks feedback to resolution by: <ul style="list-style-type: none"> ○□ Disseminating feedback to appropriate line of business for actioning in a timely manner as set out by the Accessibility Office; and ○□ Communicating with the Accessibility Office and advising Policy Owner of response and/or resolution to the feedback received.

8. Policy Review Cycle

Dates/Timing	Details
Approval Date	August 8, 2023
Effective Date	September 1, 2023
Review Frequency	3 years
Next Review Date	August 31, 2026, including Risk Challenge & Review by Risk Management

9. Related Policies & Supporting Documents

- Workplace Accommodation Policy
- TDI Workplace Accommodation Policy

- IT Accessibility Standards
- TD IT Accessibility Policy
- TD's Supplier Code of Conduct and TD's Enterprise Procurement Policy
- TD Accessibility Policy (Canada)
- Respectful Workplace Policy (Canada)
- TD Public Spaces Accessibility Procedure
- TD Integrated Accessibility Procedures
- MCC (Marketing, Citizenship & Customer Experience)

10. Legal and Regulatory Requirements

- Accessible Canada Act
- Accessible Canada Regulations
- Canadian Human Rights Act
- Provincial Human Rights Legislation
- Provincial Accessibility Legislation, including the Accessibility for Ontarians with Disabilities Act, 2006 (AODA)

11. Definitions / Acronyms list

TDBG	TD Bank Group
TDI	TD Insurance
ICT	Information and Communications, Technology
MCC	Marketing, Citizenship & Customer Experience