ACCESSIBILITY PLAN

About ClaimSecure

For over 40 years, ClaimSecure has administered drug, health, and dental benefit plans for businesses and unions across Canada. Our team of Benefits professionals puts our client's needs first. We leverage our expertise in claims management, plan administration, clinical programming, and advanced technology solutions …to deliver results that make a difference.

Introduction

ClaimSecure is committed to meeting the requirements of all applicable accessibility legislation, as well as meeting the needs of all of our clients generally. We strive to provide 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 ClaimSecure and outlines ClaimSecure'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 ClaimSecure's accomplishments to date related to accessibility. This document is available upon request in accessible formats, by contacting Compliance at compliance@claimsecure.com or calling 1-888-513-4464.

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 "**AODA Integrated Standards**"):

- Customer service

- Information and communications
- Employment
- Transportation
- The built environment

Detailed information for each requirement is included below.

Accessibility 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 AODA Integrated Standards.

Compliance Date:
January 2014

Actions Taken:
The "**Accessibility Policy**" was implemented to include ClaimSecure policies related to the information and communication standard under the AODA Integrated Standards.

The Accessibility Policy is available online at https://www.claimsecure.com/wp-content/uploads/2023/07/Accessibility-Policy_May-2023_Final_En.pdf 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 ClaimSecure which address requirements of the employment standards under the AODA regulations and are available on request from the Compliance Office.

Status:
Complete

1.2 **Training (General)**
Objectives:
Ensure accessibility training is provided to every employee, volunteer, and other persons who participate in the development of ClaimSecure's policies. The training

should be appropriate to the duties of the employee or other person.

Compliance Date:
January 2015

Actions Taken:
All ClaimSecure employees complete AODA training, accessibility standards made under the *Ontario Human Rights Code*.

ClaimSecure directly maintains records of the dates training was provided to our employees.

Status:
Complete
All staff have been trained on AODA requirements. Accessibility training is provided to new staff as a part of the onboarding process and is completed as soon as practicable and generally within three months, after joining the Company.

2. Customer Service
2.1 Policies, practices and procedures
Objectives:
Develop, implement and maintain policies on providing 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
-When communicating with a person with a disability, the Company shall do so in a manner that takes into account the person's disability

Compliance Date:
September 2013

Actions Taken:
ClaimSecure's policy on accessibility is publicly available through our website and generally provides that reasonable efforts will be made to provide access to our

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 training in providing our products and services to persons with disabilities.

A copy of the Accessibility Policy can be found on https://www.claimsecure.com/wp-content/uploads/2023/07/Accessibility-Policy_May-2023_Final_En.pdf 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:
Complete

2.2 **Accessibility training (customer service)**
Objectives:
Ensure that the following persons have received training on the provision of ClaimSecure's products and services to persons with disabilities:

-All Employees
-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.

Compliance Date:
January 2012

Actions Taken:
ClaimSecure 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 Compliance.

We provide training to all our employees specifically on accessibility related matters. ClaimSecure directly maintains records of the dates training was provided to our employees.

Status:
Complete
All staff have been trained on AODA requirements. Accessibility training is provided to new staff as a part of the onboarding process and is completed as soon as practicable and generally within three months, after joining the Company.

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 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
-Document policies and procedures detailing the process

Compliance date:
January 2012

Actions taken:
ClaimSecure has a feedback and customer concerns procedure specifically for receiving and responding to feedback on how we provide products and services to people with disabilities. A copy of the Feedback and Customer Concerns Procedure can be found on https://www.claimsecure.com/wp-content/uploads/2023/07/Accessiblilty-Feedback-Procedure_June-2023_En.pdf 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.

Status:
Complete

2.4 **Notice of temporary service disruptions**

Objectives:

-Provide notice of any temporary disruption in facilities or services that people with disabilities usually used to obtain, use or benefit from ClaimSecure's 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

-Establish policy and procedures regarding provision of notice on temporary service disruption

Compliance Date:

January 2012

Actions Taken:

ClaimSecure has a policy in place to provide notice of a temporary disruption in the facilities or services owned or controlled by ClaimSecure that are typically used by persons with disabilities to obtain, use or benefit from the Company's products and services.

Status:

Complete

3. **Information and Communications**

3.1 **Accessible feedback/complaint 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.

Compliance date:

January 2015

Actions taken:

ClaimSecure has established a Feedback and Customer Concerns Procedure that is available from our website https://www.claimsecure.com/wp-content/uploads/2023/07/Accessiblilty-Feedback-Procedure_June-2023_En.pdf in an enhanced PDF format to enable greater accessibility. The Feedback and Customer

Concerns Procedure provides for a number of ways for a person to contact ClaimSecure.

In addition, ClaimSecure 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:
Complete

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
-Consult with the person making the request to determine the suitability of an accessible format or communication support

Compliance Date:
January 2016

Actions taken:
ClaimSecure 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 Digital Accessibility Standards.

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

The AODA 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:

In developing new Internet websites and refreshing existing internet websites, ClaimSecure takes into account the applicable Digital Accessibility Standards. Training on accessible website development and accessible PDF creation has been provided to employees specializing in these areas. A Digital Accessibility Standard was implemented to promote a consistent, accessible customer experience of ClaimSecure public websites.

ClaimSecure's website is WCAG AA 2.1 compliant.

Status:
Complete

4. Employment
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
-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

Compliance Date:
August 2023

Actions Taken:
Appropriate notifications and messaging have been added to job postings (both internally and externally). Career landing pages on websites will reflect accordingly. Processes will be 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.

Compliance Date:

January 2023

Actions Taken:

Processes have been put in place to notify successful applicants of our policies for accommodating employees with disabilities. The accommodation policy and accessibility policy are included in our Employee Manual and review of the manual is part of the Onboarding Process.

Status:

Complete

4.3 Informing employees of support

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
-Provide updated information whenever there is a change in policy

Compliance Date:

August 2023

Actions Taken:

The accommodation policy and accessibility policy are included in our Employee Manual and review of the manual is part of the Onboarding Process. Accommodation for employee accessibility needs will be embedded 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.

Compliance date:
December 2023

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 ClaimSecure is aware of the need for accommodation due to that employee's disability
-Where required and with the consent of the employee with the disability, provide the individualized workplace emergency response information to a designated person
-Provide the required emergency response information as soon as practicable after ClaimSecure becomes aware of the need for an accommodation due to an employee's disability
-Review individualized workplace emergency response information when required

Compliance Date:

January 2012

Actions Taken:

Employees can speak with their Leader to request individualized workplace emergency response assistance or information. The Health and Safety Committee at ClaimSecure 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 AODA Integrated Standards.

Compliance Date:

December 2023

Actions Taken:

Accommodation guidelines and processes have been developed 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
-Return to work process must outline the steps ClaimSecure will take to facilitate the return to work of these employees and use documented individual accommodation plans

Compliance Date:
December 2023

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.

Performance management in this context means activities related to assessing and improving employee performance, productivity, and effectiveness.

Compliance Date:
December 2023

Actions Taken:
Wording on performance assessment forms and internal communications on performance management have 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.

Compliance Date:

December 2023

Actions Taken:

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.

Compliance Date:

December 2023

Actions Taken:

HR policies and guidelines reflect the accessibility needs of employees with disabilities and individual accommodation plans when reassigning employees as a result of the elimination of the 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

5.1 Built Environment

Objectives:

The Built Environment Standards in the AODA 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.

These standards for the design of public spaces apply to new constructions and major changes to existing features.

Compliance Date:

January 2017

Action Taken:

ClaimSecure will follow the Accessibility Design Standard Guideline for projects impacted by the Built Environment Standards.

Status:

Complete