

Accessibility Policy

Effective date: September 1, 2025

ECG Insurance Limited Partnership (“ECGILP,” “we,” “us,” or “our”) is committed to making accessibility a fundamental part of our business and culture.

As a Canadian owned and operated benefits insurance provider, our purpose is to help people across the country protect their health and financial well-being. We recognize that equitable access—to information, products, services, and employment opportunities—is essential to achieving that purpose.

We strive to identify, remove, and prevent barriers to participation, and to provide services and workplaces that respect the dignity, independence, and diverse needs of all individuals. Accessibility and inclusion are core to our values and guide how we interact with our plan members, clients, employees, and communities across Canada.

Our Accessibility Policy is guided by the principles of the Accessible Canada Act and applicable provincial accessibility and human rights legislation across Canada.

1. Purpose and Commitment

ECGILP is committed to providing an accessible, inclusive, and barrier-free environment for all clients, plan members, organizations, associations, partners, employees, and members of the public, ensuring accessibility is embedded in our operations, services, and workplace culture.

We aim to identify, remove, and prevent accessibility barriers in our operations, communications, technology, workplaces, and customer experiences. In doing so, ECGILP will make reasonable efforts to be consistent with recognized accessibility principles when developing, implementing, and maintaining its policies, programs, and practices. These principles guide how we remove barriers, provide accommodations, and deliver accessible services to employees, clients, organizations, associations, plan members, and the public.

2. Scope

To support our commitment to accessibility, this policy applies to the following parties (but is not limited to):

- All ECGILP employees, contractors, and representatives across Canada;
- All goods, services, communications, and environments provided by ECGILP to our plan sponsors, plan members, and other customers;
- All third-party service providers, including outsourced administrative partners such as TPAs, who deliver services on behalf of ECGILP;
- All employment-related practices, including recruitment, onboarding, development, and accommodation;
- Vendors, consultants, and service providers engaged by ECGILP.

ECGILP expects employees, contractors, TPAs, and other service providers, including those involved in captive or outsourced operations, to adhere to applicable accessibility standards when delivering services or performing their duties on our behalf. Employees are expected to integrate accessibility principles into their daily work and interactions with plan sponsors, plan members, organizations,

associations, colleagues, and service providers. Accessibility requirements are incorporated into contracts and service agreements wherever relevant.

3. Legal and Standards Alignment

ECGILP operates nationally and is licensed in Alberta. We comply with, and where possible exceed, the accessibility requirements established by federal and provincial laws across Canada, including the Accessible Canada Act and applicable provincial accessibility and human rights legislation.

Across all jurisdictions, ECGILP voluntarily follows recognized national standards and best practices to ensure accessibility in our services, workplaces, and digital content. Where multiple laws or standards apply, ECGILP follows the most stringent or beneficial standard for accessibility.

4. Definitions

- **Disability:** For the purposes of 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 further definitions, references to applicable federal and provincial legislation apply.
- **Accessibility:** The design and delivery of products, services, environments, and communications that can be used and understood by all people, regardless of ability.
- **Barrier:** Anything that prevents a person from fully participating in society — including physical, architectural, technological, attitudinal, informational, or systemic obstacles.
- **Accommodation:** Adjustments or supports that enable individuals with disabilities to participate equally in employment or services.
- **Support Person:** A person who accompanies an individual with a disability to help with communication, mobility, personal care, or access to goods, services, or facilities.
- **Service Animal:** An animal used by an individual with a disability to assist them with tasks related to their disability. A service animal may be identified through visual indicators, such as a vest or harness, or through documentation provided by a regulated health professional confirming its use. This definition also includes any other animal recognized as a service animal under applicable accessibility legislation.

5. Governance and Accountability

ECGILP is committed to ensuring accessibility is embedded across all operations and services. Accountability for accessibility is shared across leadership, employees, and service providers. Leadership is responsible for providing oversight and resources, while employees are responsible for applying accessibility principles in their work and identifying barriers. For outsourced or captive operations, including TPAs and service providers, accountability for accessibility remains with ECGILP's leadership to ensure consistent standards are applied.

6. Accessible Customer Service

ECGILP is committed to providing accessible customer service that respects the dignity, independence, and diverse needs of all individuals. We ensure that all plan members, clients, and members of the public can access our services equitably, while maintaining a safe environment for

employees, clients, plan members, and visitors. Employees are encouraged to seek guidance if they have concerns regarding safety while delivering accessible services, ensuring accommodations are provided without compromising the well-being of anyone involved.

Key elements include:

- **Alternative Formats and Communication Supports:** We provide documents, communications, and materials in accessible formats upon request, including large print, electronic formats, and plain language.
- **Assistive Technologies:** Digital portals and customer service platforms are designed to support accessibility features to the extent possible and in accordance with recognized accessibility standards.
- **Physical Spaces and Event Accessibility:** ECGILP facilities and event venues are designed or modified to ensure accessibility wherever possible. Where ECGILP owns or manages premises that include public spaces and undertakes new construction or major renovations, we are committed to meeting the design and accessibility requirements of applicable legislation within the required timeframes. Reasonable efforts are made to ensure that all structural features intended to facilitate barrier-free access are available and functional for use as intended. We consider accessible parking, entryways, signage, washrooms, meeting spaces, and emergency procedures.
- **Support Persons and Service Animals:** An individual with a disability who is accompanied by a support person or service animal will be allowed to enter ECGILP offices, events, and other areas that are open to the public or third parties. Employees will provide reasonable assistance to ensure services are delivered in a way that accommodates both the individual and their support person or service animal. The individual with a disability is responsible for the care and control of the guide dog or other service animal at all times.

When confidential or sensitive information may be discussed in the presence of a support person, the individual with a disability may be asked to provide consent for the discussion to take place. If they prefer, they can request that the support person step out while confidential matters are addressed.

- **Assistive Devices:** Individuals using assistive devices to support their mobility, hearing, vision, or other needs are welcome when accessing ECGILP services. Employees will offer reasonable assistance and ensure that services are provided in a way that accommodates the use of these devices.
- **Feedback and Accommodation Requests:** Individuals can request accommodations or provide feedback regarding accessibility through multiple channels (phone, email, mail), and all requests will be handled promptly and confidentially.
- **Notice of Disruption:** In the event that an accessible service, facility, or digital platform is temporarily unavailable due to maintenance, technical issues, or other unforeseen circumstances, ECGILP will provide reasonable notice. Notice will include the expected duration of the disruption and any available alternative ways to access the service or information.

- **Continuous Improvement:** ECGILP regularly reviews and updates customer service processes to remove barriers, improve accessibility, and ensure compliance with applicable laws and best practices.

ECGILP's accessible customer service principles apply to all employees, contractors, TPAs, and service providers delivering services on our behalf.

7. Training

All employees who interact with customers receive accessibility and disability awareness training to ensure they provide respectful, inclusive service. ECGILP provides periodic training to employees on this Accessibility Policy, the requirements of applicable accessibility legislation, and, where appropriate, human rights legislation as it pertains to individuals with disabilities. The training provided will take into consideration and be appropriate to the duties of those receiving the training. Training is designed to equip employees with the knowledge and skills needed to accommodate plan members, clients, and the public effectively and respectfully.

8. Digital Accessibility

ECGILP is committed to ensuring that all digital content—including websites, portals, applications, and customer service platforms—is accessible to people with a wide range of abilities. Our digital accessibility practices follow recognized national standards and best practices.

Digital platforms and portals used to deliver services are designed to support accessibility features to the extent possible, ensuring customers can access information and complete transactions effectively.

ECGILP regularly reviews digital content and platforms to identify and remove barriers, improve accessibility, and ensure compliance with applicable laws and industry standards.

9. Procurement and Vendor Management

ECGILP expects all third-party suppliers, technology partners, and service providers to demonstrate compliance with applicable accessibility standards when delivering products or services on our behalf. Accessibility requirements are considered during procurement and incorporated into contracts and agreements wherever relevant.

10. Continuous Improvement and Modifications to the Policy

ECGILP is committed to continuously improving accessibility across all operations and services. This policy will be reviewed and updated periodically to ensure it remains current and consistent with applicable accessibility legislation and standards. Feedback received from plan sponsors, organizations, associations, plan members, employees, and other stakeholders will inform updates to policies and practices, helping ECGILP remove barriers and improve accessibility on an ongoing basis.

11. Feedback, Concerns and Privacy

ECGILP welcomes feedback on how we provide accessible products, services, and experiences to all individuals. Feedback can be submitted in writing, by email, telephone, in person, or through any communication method that best meets the needs of the person providing it.

We are committed to ensuring that all processes for receiving and responding to feedback are accessible. Upon request, accessible formats or communication supports will be provided to allow

individuals to submit feedback or raise concerns regarding accessibility. ECGILP will review and respond to feedback in a timely and respectful manner and will use this input to continuously improve accessibility across our operations and services.

Information shared as part of an accommodation request or accessibility feedback process is confidential and handled in compliance with privacy laws and ECGILP's Privacy Policy.

12. Inquiries and Contact

ECGILP has designated a contact responsible for accessibility-related inquiries and compliance with applicable legislation.

Any questions, requests for accommodation, or accessibility-related concerns may be directed to:

Accessibility Inquiries
ECG Insurance Limited Partnership
1345 Taylor Avenue
Winnipeg, MB, R3M 3Y9
Email: accessibility@ecginsurancegroup.ca

Inquiries received through this contact will be addressed promptly, including assistance with accessible formats or communication supports as required.