Accessibility Plan

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1. Message from our Accessibility Leader

At National Bank, our commitment is clear: to help our customers, employees, and communities power their ideas and achieve their ambitions. To this end, we work tirelessly to offer a positive experience based on the inclusiveness, accessibility, and simplicity of our products, services, physical spaces and working conditions.

We are committed to being an inclusive organization that values everyone regardless of their age, culture, religion, gender, orientation, sexual identity, or physical and cognitive abilities.

As an organization, we strive to ensure that everyone feels valued, realizes their full potential and achieves their ambitions.

Because we place people at the heart of our corporate mission, we are constantly redefining our practices to meet the needs of all of our customers, including those with disabilities.

Much work remains to be done to remove all barriers. We are aware of this, and we continue our efforts.

To achieve the goals set out in our Accessibility Plan, we aim to continue and increase our learning about accessibility, raise awareness at every level of the organization of the importance of identifying, removing, and preventing barriers, and continuously improve the accessibility and inclusiveness of our products and services.

We also know that the only way to remove obstacles and enable everyone to reach their full potential is to continue developing our inclusive culture and capitalizing on the richness of diversity. We are committed to ongoing progress and improvement.

Yves-Gérard François
Vice President, Transformation and Client inclusion

2. General information

2.1 About National Bank

National Bank[1] is an organization on a human scale that stands out for its courage, entrepreneurial culture and passion for people. Our mission is to positively impact people's lives by building long-term relationships with our customers, employees and communities.

Founded in 1859, National Bank offers financial services to individuals, businesses, institutions and governments across Canada and abroad.

With a market capitalization of $34 billion, we are one of Canada's six systemically important banks. We serve over 2.7 million people in Canada and almost 5 million customers worldwide. We are a leading bank in Canada, and our headquarters are in Montréal.

Our organization employs more than 30,000 people, 25% of whom are members of cultural communities. Our diverse workforce includes people from over 140 countries, and 65 languages are spoken across our offices and branches. We are proud to be recognized as an employer of choice and for promoting diversity and inclusion.

We strive to meet the highest social responsibility standards while creating value for our stakeholders. National Bank is a founding signatory of the United Nations (UN) Principles for Responsible Banking. One of the core principles of this global framework is a continuous dialogue with stakeholders to proactively and responsibly engage with them to achieve societal goals.

Our mission is in keeping with our efforts to remain a powerful driver of economic and social development; it aims to fulfill a collective need to drive the evolution of banking habits toward a human commitment to achieve our objectives and to enhance our collaboration with the entire community.

2.2 Feedback process and contact information

If you have ideas about how we can improve the accessibility of our products and services or comments and suggestions about the implementation of our Accessibility Plan, contact us:

- By filling out an online contact form: https://www.nbc.ca/forms/contact/contact-us.html
- By telephone: 1-888-300-9004
- By email: complaintappeal@nbc.ca
- By mail: contact your nearest branch

[1] For the purposes of this Accessibility Plan, National Bank includes its Canadian subsidiaries that are subject to the *Accessible Canada Act*.

The representatives receiving your comments and suggestions on behalf of the Bank are responsible for accessibility within our organization. You can submit comments and suggestions anonymously. For all feedback received, other than anonymous feedback, an acknowledgment of receipt will be sent to you within a reasonable time through the same method you used to contact us.

If you are an employee of the Bank, you can use the feedback process for our customers and the public or the internal feedback process. You may reach the internal feedback process team through your preferred method of communication (telephone, email or mail). The different feedback channels are described on the employee platform intended for this purpose. Employees may also make a suggestion or comment anonymously to the Employee Ombudsman's Office. An acknowledgment of receipt will be sent to the employee as soon as possible.

You can request the Accessibility Plan in alternative formats (large print, braille or audio) by contacting us by one of the following means:

- By telephone, email or mail: contact your nearest branch

3. About the Accessibility Plan

3.1 The *Accessible Canada Act*

The *Accessible Canada Act* (the "Act") came into force on July 11, 2019. The purpose of the Act is to make Canada barrier-free by 2040. The Act provides that federally regulated organizations, including financial institutions, must identify, remove and prevent barriers to accessibility in Canada. Under the Act, National Bank must comply with three requirements:

- Publish an Accessibility Plan by June 1, 2023; this plan must detail the steps taken to remove and prevent barriers to accessibility.
- Publish an annual progress report respecting the implementation of the measures set out in the Bank's Accessibility Plan.
- Establish a feedback process that allows our customers, employees, and others to submit comments or suggestions about the Bank's Accessibility Plan and the barriers encountered.

Our commitment to improving our accessibility practices is reflected in this Accessibility Plan, which sets out how we will progressively remove barriers by focusing on the following seven areas:

- employment;
- the built environment;
- information and communication technologies (ICT);
- communications, other than ICT;
- the procurement of goods, services and facilities;
- the design and delivery of programs and services; and
- transportation.

3.2 Glossary

- Barrier

The Act defines the term "barrier" as:

"anything — including anything physical, architectural, technological or attitudinal, anything that is based on information or communications or anything that is the result of a policy or a practice — that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation."

- Disability

The Act defines the term "disability" as:
"any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment — or a functional limitation — whether permanent, temporary or episodic in nature or evident or not, that, in interaction with a barrier, hinders a person's full and equal participation in society."

- ESG

ESG refers to our environmental, social and governance (ESG) principles, which demonstrate National Bank's commitment to building a sustainable future while maintaining the optimal balance of interests for all of society.

- WCAG

The *Accessible Canada Regulations* (2021) define the term "WCAG" as:
"the most recent version available in both English and French of the Web Content Accessibility Guidelines, published by the World Wide Web Consortium." The *Accessible Canada Regulations* provide that accessibility plans must meet the requirements for Level AA conformance set out in the WCAG.

For the purposes of this Accessibility Plan, National Bank defines the priority areas as follows:

- Built environment

All physical spaces intended for employees, customers and the public.

- Communications

All activities are aimed at disseminating information or promoting the image of a product or service.

- Design and delivery of programs and services

All products and services the Bank offers through its employees; this priority area includes the customer experience, whether digital, in-person, or remote.

- Employment

All activities and experiences of persons throughout the employment lifecycle.

- Information and communication technologies (ICT)

All of the Bank's technological solutions used by internal and external users, customers, and employees to communicate and access information sources.

- Procurement of goods, services and facilities

All procurement activities include the identification of goods or services required, the method of selecting suppliers, the implementation of that method and the awarding of contracts.

- Transportation

Activities related to transportation.

3.3 Consultation

To develop this Accessibility Plan, the Bank used several data collection methods to assess the accessibility of products and services offered to its customers, employees and partners. The combination of all of these data collection methods helped to guide the drafting of our plan and the actions to be taken to alleviate barriers.

I. **Survey:** The Bank first surveyed the various initiatives, tools, products and services available for each of the seven priority areas. This work provided a basis for evaluating the Bank's existing practices concerning accessibility and prioritizing the different action plans.

II. **Consultation with a group of customers:** The Bank mandated an external firm to conduct individual interviews. The individuals surveyed were members of a target sampling group of customers with disabilities and persons who expressed dissatisfaction regarding accessibility.

III. **Consultation with employees:**
   a. Consultations are carried out mainly through surveys on various topics, such as the design of the new headquarters, branches and work environments, the programs offered, etc.
   b. The Bank retained an external firm to conduct individual interviews. The group surveyed included employees with disabilities who expressed an interest in participating in the consultations.

IV. **Document review:** To take stock of the current state of accessibility at the Bank, various sources of information were reviewed:
   - Accessibility audit reports
   - Pay equity reports
   - Internal standards, policies and manuals
   - Action plans
   - Dissatisfaction reports
   - Results of internal surveys and employee feedback
   - Employee experience statistics

3.4 Time frame for the implementation of priorities

The Bank established the following time frames for the various priorities included in this Accessibility Plan:

- Short term: less than 12 months
- Medium term: 1 to 3 years
- Long term: 3 years or longer

4. Our commitment to accessibility

National Bank is fully committed to advancing accessibility and improving its practices. Reinforcing accessibility measures is essential to improving the experience of our customers, employees, and partners.
National Bank is an organization that is constantly learning and that leverages its expertise in inclusion and diversity to continue learning about accessibility. To this end, the Bank wishes to:

- maintain and further develop its culture of inclusion and diversity;
- maintain its zero-tolerance policy on discrimination and continue to raise awareness among its employees in this regard;
- continue and increase its efforts to learn about accessibility;
- continue to raise awareness about accessibility standards throughout the organization; and
- include accessibility standards in new initiatives.

4.1 Measures taken to prevent barriers

From a continuity perspective, we recognize the need to implement measures to prevent future barriers and positively impact the experience of our customers and employees, with or without disabilities. In particular, we are focusing on three target components:

I. **Organizational culture:** Encouraging buy-in and promoting an inclusive, non-discriminatory culture by fostering awareness among our employees regarding accessibility issues, knowledge of barriers encountered and understanding of impacts. This component embeds our core values and organizational priorities in our internal policies and standards to ensure maximum visibility. Various existing forums will continue to promote our values of inclusion and accessibility.

II. **Training:** Increasing accessibility knowledge across the organization to improve the responsiveness and sharpen reflexes of our employees and raise awareness about prejudice and negative bias. This will be achieved through training, reference tools, discussion forums and promoting informational platforms.

III. **Governance:** To facilitate the early detection of possible issues, monitoring the evolution of our practices, identifying the needs of our customers and employees and ensuring the visibility of our accessibility initiatives, various governance mechanisms for inclusion and accessibility are in place and will be maintained. Our monitoring efforts will build on industry best practices, advances in accessibility, and new tools and trends available.

4.2 Priority areas

4.2.1 Area: Employment

Current state:
As an employer, National Bank recognizes the importance of the specific needs or barriers experienced by certain groups of employees. The organization wishes to foster employee growth through various measures to support their work performance and improve their quality of life and day-to-day experiences.

The Bank implements measures to ensure that everyone feels valued, reaches their full potential and achieves their ambitions. Our accommodation program allows us to adapt our physical, technological and organizational environment by reorganizing the workspace, schedule or tasks to the needs and specific reality of our employees, particularly those with disabilities. The measures in place are intended to consider individual differences and allow each person to reach their full potential. We aim to provide equal opportunities for everyone.

To improve accessibility, the Bank continues to address issues by ensuring the availability of human resources advisors who are trained and aware of the unique needs of persons with disabilities, salary transparency analyses in the context of employment equity, targeted hiring strategies and awareness training.

The Bank also encourages ongoing employee feedback through surveys, forums and statistics to identify and overcome potential barriers to accessibility promptly.

At all levels of the organization, employees are advocating for their peers:

- The “Around Disability” is a support group to recognize and share stories, realities and events regarding disability, whether or not it is visible;
- The “One-on-one Around Disability” program provides a personalized orientation to new employees with disabilities.

Priorities for removing barriers:

Goal 1 – To provide an inclusive workplace that respects individual differences and where each person can develop their full potential by fostering a culture of compliance with accessibility standards.

#	Priority	Time frame
1	Develop a *Reference Handbook for Content Creation* to ensure accessibility	Short term
2	Continue adapting our policies and procedures	Ongoing
3	Optimize and promote the use of critical internal feedback tools to encourage ongoing feedback	Medium term
4	Conduct a review of the performance management process and supporting tools	Medium term
5	Further analyze the accessibility of technological tools	Ongoing

Goal 2 – To enhance employees’ and managers’ knowledge of accessibility to remove obstacles.

#	Priority	Time frame
1	Continue the development of accessibility training material for all National Bank employees	Ongoing

#	Priority	Time frame
2	Raise awareness about accessibility and empower those responsible for developing learning strategies and training, as well as content design	Medium term

Goal 3 – To attract and recruit persons with disabilities and foster the integration of these individuals.

#	Priority	Time frame
1	Ensure a smooth process of attraction, recruitment, and integration of new employees of the Bank	Ongoing
2	Document and promote accessibility guidelines and good practices in recruitment	Medium term
3	Identify and document the various accommodation tools available and confirm their compatibility with the Bank's ecosystem	Medium term

4.2.2 Area: Design and delivery of programs and services

Current state:
National Bank wishes to offer a simple and personable experience that focuses on supporting our customers at every milestone in their life. Our organization is focused on providing advice, products and services that are accessible and tailored to the needs of our customers, whichever channel they choose. We want our branches, digital platforms and customer contact centres to offer adapted support to seniors or customers with disabilities or special needs.

All our employees must always respect dignity, autonomy, integration and equity principles. They have access to awareness training on the accessibility standards for the Bank's products and services. To better serve the needs of our customers, services are offered via the desired communication method (telephone, email, in-person or video conference). Our customers have access to technological tools, such as the virtual assistant, which is a tool that provides information on products and services and support to complete certain transactions.

We continue to improve our accessibility practices in the design and delivery of our programs and services by making the content of our platforms clear and simple to support our customers during browsing sessions. We have created a guide on good practices in digital accessibility to promote and standardize our practices in this area. We continuously optimize the accessibility of our platforms in accordance with the Web Content Accessibility Guidelines (WCAG). All new ABMs in National Bank branches must comply with accessibility standards, including height requirements, support bar, accessible signage and display, and availability of audio assistance.

Priorities for removing barriers:

Goal 1 – To increase our knowledge of the barriers encountered by persons with disabilities to adapt our programs and services.

#	Priority	Time frame
1	Enhance training materials by adding information on digital accessibility standards	Ongoing
2	Provide ongoing training on accessibility standards to new digital group employees	Short term
3	Improve our handling of feedback we receive from customers with disabilities	Short term

Goal 2 – To address accessibility in designing, reviewing, and delivering programs and services.

#	Priority	Time frame
1	Create acceptance criteria and validation tests for digital accessibility standards when delivering or updating services and developing information content	Short term
2	Create a dashboard of key performance indicators to measure the accessibility of our programs, services and digital platforms	Medium term
3	Ensure the homogeneous implementation of the User Experience (UX) and User Interface (UI) accessibility standards within the digital ecosystem for all new deployments	Medium term
4	Standardize automated testing scenarios when deploying new digital programs and services	Long term

Goal 3 – To provide an ecosystem that meets accessibility standards.

#	Priority	Time frame
1	Review and improve the information contents available on public websites	Long term
2	Review and improve transactional services	Long term
3	Monitor digital accessibility standards to adapt the Bank's tools and practices	Long term
4	Create a governance committee on the accessibility of the digital ecosystem to coordinate the activities of the digital group, define performance criteria, and validate the achievement of objectives	Medium term

4.2.3 Area: Built environment

Current state:
National Bank is dedicated to providing accessible facilities to its customers and employees with disabilities, including accessible branches and working environments across Canada.

The Bank's new head office at 800 St-Jacques Street West was designed in compliance with the standards, codes and laws in force, including universal accessibility rules. All new or reorganized spaces will be designed in compliance with these accessibility rules. The collaborative workspaces in the new head office will be accessible and meet the physical and cognitive needs of employees and partners. Some members of the Premises Department team attended awareness training on disabilities and *Barrier-Free Design* offered by the Ordre des architectes du Québec.

We are committed to adapting our existing built environment to meet the accessibility, safety and inclusion standards applicable under the various codes, laws, and regulations in force in each province. In addition, through our employee accommodation program, we ensure that our corporate buildings and branches are adapted, as needed, to reduce barriers and provide work spaces that meet various accessibility needs.

Priorities for removing barriers:

Goal – To improve and make available to users of corporate buildings or branches an environment that is accessible and adapted to persons with disabilities.

#	Priority	Time frame
1	Relocate the head office to a new building that meets current standards, codes and laws, including universal accessibility rules	Short term
2	Create a database of physical accessibility features in our branches	Medium term
3	Implement an interior signage system	Ongoing progressive implementation
4	Assess and adapt lighting levels in our branches (photometric analysis)	Ongoing progressive implementation

4.2.4 Area: Information and communication technologies (ICT)

Current state:
National Bank recognizes the importance of implementing measures to support ICT accessibility by applying the international WCAG 2.0 standards to our digital platforms, the use of the design system, our requirements for accessible computer equipment, audio assistance at ABMs and the availability of support. The Bank will monitor evolving accessibility standards, including the WCAG, in the coming years. An audit of the Bank's main digital tools was carried out to get an overview of the current situation and prioritize upgrading the various tools and technological platforms.

Most of the tools used by the Bank are accessible remotely, including secure cloud-based tools, allowing employees to work from home and providing greater flexibility. The ABM manufacturer must meet international accessibility standards. The screen, buttons, card slots used for depositing/withdrawing cash and printing slips and statements must be at a certain height.

Priorities for removing barriers:

Goal 1 – To support the business segments in providing IT solutions that are accessible to persons with disabilities.

#	Priority	Time frame
1	Continue to implement accessibility requirements and standards in our technology systems, including applications for employees and customers	Ongoing
2	Ensure that IT accessibility compliance requirements are included in our search for IT solutions on an ongoing basis	Medium term

Goal 2 – To enhance employees' knowledge of accessibility.

#	Priority	Time frame
1	Maintain and enhance IT accessibility training intended for employees and expand training delivery	Medium term
2	Monitor the recommendations of the technical committee on accessibility requirements for IT, including those approved by the International Organization for Standardization (ISO) and the International Electrotechnical Commission (IEC)	Short term

4.2.5 Area: Communications, other than information and communication technologies

Current state:
National Bank takes concrete measures to ensure that everyone can access information in plain language and through the desired communication method (digital platform, telephone, email, in-person or video conference). For example, the Bank has adopted guidelines to promote the use of clear and simple language in its documentation and communications. In particular, these guidelines aim to standardize the Bank's practices for inclusive and accessible communications, both internally and externally. Our employees are trained to write content in clear and inclusive language.

Some communications on our digital platforms are intended to support persons with disabilities adequately.

We also recognize the importance of promoting our inclusive values and culture within our organization to accelerate the paradigm shift in accessibility. These messages are conveyed through our internal channels, such as discussion forums, informational tools and corporate communications.

The Bank also encourages ongoing customer and employee feedback through surveys, forums, and statistics to identify and overcome potential barriers to accessibility promptly.

Priorities for removing barriers:

Goal 1 – To communicate in plain and simple language.

#	Priority	Time frame
1	Introduce guiding principles that promote inclusive writing to employees creating internal and external content	Short term
2	Develop a *Reference handbook for content creation* to ensure accessibility	Short term
3	Raise awareness about plain language and accessibility and empower key personnel responsible for content design	Ongoing
4	Enhance the *Reference handbook for content creation* to ensure that it meets specific accessibility needs	Medium term

Goal 2 – To ensure the information is accessible on our various communication channels.

#	Priority	Time frame
1	Create and distribute a guide on good practices for videos to advance accessibility for persons experiencing information processing difficulties and hearing and visually impaired individuals	Short term
2	Provide presentation notes and a copy of the presentation in advance of corporate conferences to facilitate understanding for persons across the neurodiversity spectrum	Ongoing
3	Make live corporate conferences accessible through simultaneous sign language interpretation or an accessible technology solution	Medium term

Goal 3 – To promote the Bank's accessibility initiatives and efforts to stakeholders.

#	Priority	Time frame
1	Promote our accessibility efforts in our ESG reports and various publications	Ongoing
2	Promote and improve accessibility in our forums and corporate communications	Ongoing

3	Increase internal visibility of the Accessibility Plan and the initiatives in place	Short term
4	Increase external visibility of our accessibility initiatives	Medium term

4.2.6 Area: Procurement of goods, services and facilities

Current state:
National Bank recognizes that all stakeholders, including our business partners in procurement processes, must be involved in discussions about inclusion and accessibility. For this reason, the contractual clauses in our procurement contract templates are reviewed regularly to ensure that any new legal or regulatory requirements, practices or trends are included. Any new agreement or renegotiation processed by the procurement team should be reviewed against accessibility criteria.

Procurement recommends that every line of business undertake contract governance to ensure that the accessibility clauses and criteria included in the contracts have been met.

Priorities for removing barriers

Goal 1 – To provide an ecosystem, assets and services that meet accessibility standards.

#	Priority	Time frame
1	Lines of business should put in place an ongoing governance framework to oversee compliance with contractual clauses and deliverables	Ongoing
2	Update contractual clauses in response to emerging accessibility needs	Ongoing
3	Incorporate emerging accessibility needs into contracts as required	Ongoing

4.2.7 Area: Transportation

Current state:
Although National Bank is not a transportation service provider under the Act, mobility is sometimes required in the context of specific functions or the performance of certain tasks.

To promote accessibility, the accommodation program team analyzes the requests submitted by employees with disabilities and proposes alternative solutions. The accommodation measures include:

- Reimbursement for paratransit
- Assigned parking space whenever possible
- Work arrangements
- Remote work

In addition, the Bank has a mobile branch that can travel anywhere in Canada as needed, for example, during the reorganization of a branch, a significant event, an emergency, etc. This mobile branch is equipped with a lifting platform to meet the needs of customers with reduced mobility. When developing its new corporate buildings and branches, the Bank also includes accessibility requirements in its specifications, including creating and choosing the location of accessible parking for persons with a parking sticker, subject to municipal regulations.

Priorities for removing barriers

Goal 1 – To ensure the accessibility of passengerless transport activities.

#	Priority	Time frame
1	Document the accommodation requests in a centralized record	Ongoing

4.3 Implementation

Submitting the Accessibility Plan is the first step in reducing and preventing all types of barriers to accessibility at the Bank. To fulfill our ambitions, several milestones must be achieved in the years to come:

- Submission of annual progress reports to document the progress made and status reports on the various initiatives included in the Plan.
- Ongoing consultations to adapt our approach to the needs of persons with disabilities.
- Incorporating the comments and recommendations received through the feedback process into our ongoing accessibility improvements.

4.4 Accountable stakeholders

Accessibility leader: Yves-Gérard François, Vice President, Transformation and Client inclusion

Leader(s) responsible for each area:

- Employment: Cristina Cistellini, Vice President, Employee Experience
- Design and delivery of programs and services: Jean-François Hanczakowski, Senior Vice President, Client and Digital
- Built environment: David Annett, Vice President, Sourcing

- Information and communication technologies (ICT): Alain Goffi, Vice President, IT Strategy, Architecture and Engineering
- Communications: Debby Cordeiro, Senior Vice President, Communications, Public Affairs and ESG
- Procurement of goods, services, and facilities: David Annett, Vice President, Sourcing
- Transportation: David Annett, Vice President, Sourcing and Cristina Cistellini, Vice President, Employee Experience