

## **2025 progress report on accessibility**

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### **1. Our commitment to accessibility**

National Bank is fully committed to advancing accessibility and improving its practices. To that end, the Bank plans to:

- Continue to develop its culture of inclusion and diversity and equity.
- Maintain its zero-tolerance policy on discrimination and keep raising awareness about this topic.
- Continue to learn about accessibility.
- Continue to raise awareness about accessibility standards throughout the organization.
- Include accessibility standards in its new initiatives.

This progress report reflects our efforts to make the Bank more accessible for employees, clients and the general public. As such, we are focusing on four target components to enhance our progress in terms of accessibility:

1. **Corporate culture:** Encourage buy-in and promote an inclusive, non-discriminatory culture within our organization by fostering awareness of accessibility issues, knowledge of the barriers encountered and understanding of impacts.
2. **Training:** Increase knowledge of accessibility across the organization to improve our employees' responsiveness and reflexes while raising awareness about prejudice and negative bias.
3. **Governance:** To facilitate the early detection of possible issues, monitor the evolution of our practices, identify the needs of our clients and employees and ensure the visibility of our accessibility initiatives, various governance mechanisms for inclusion and accessibility are in place and will be maintained.
4. **Action plans:** Each of the different areas have a plan to improve accessibility.

## 2. General information

### 2.1 About National Bank

National Bank is a bank on a human scale that stands out for its courage, entrepreneurial culture and passion for people. Our mission is to have a positive impact on people's lives by building lasting relationships with our clients, our employees and the communities we serve.

National Bank has made a clear commitment to helping clients, employees and the community power their ideas and achieve their ambitions. As such, we're always working to provide a positive experience and ensure our products and services are simple, inclusive and accessible. We also strive to improve the work environment and working conditions for our teams.

Our mission is aligned with our continued efforts to drive social and economic development. In response to changing trends in the banking industry, we've adopted a people-first approach that will help us achieve our objectives and boost the efficiency of our collaboration with society.

In 2025, National Bank acquired Canadian Western Bank (CWB) to provide a better banking choice for all Canadians and Canadian businesses. This report now monitors the CWB action plan features as well.

### 2.2 About accessibility

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 the following requirements:

- Publish a three-year 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, on the anniversary date of the accessibility plan, on the implementation of the measures set out in the plan.
- Establish a feedback process that allows our clients, employees and others to submit comments or suggestions about the Bank's accessibility plan and barriers encountered.

Our commitment to improving our accessibility practices is reflected in this progress report, which specifies how we will gradually remove barriers by focusing on the following seven areas:

- Employment
- Design and delivery of programs and services
- Built environment
- Information and communication technologies (ICT)
- Communications other than ICT
- Procurement of goods, services and facilities
- Transportation

### **2.3 Contact us**

To help us improve the accessibility of our products and services or share feedback and suggestions on the implementation of our 2023-2026 accessibility plan or our 2024 accessibility report, contact us:

- By submitting a request via the following link: <https://www.nbc.ca/forms/contact/contact-us.html>
- By phone: 1-888-300-9004
- By email: [revisionplainte@bnc.ca](mailto:revisionplainte@bnc.ca)
- By mail: Write to your nearest [branch](#)

To obtain the accessibility plan, the accessibility report or the description of the feedback process in another format, such as large print, braille or audio, contact us:

- By phone, email or mail: [Contact your nearest branch](#)

The Senior Manager – Voice of the Client and all Bank representatives receiving your comments and suggestions are responsible for accessibility within the Bank. You can submit comments and suggestions anonymously. For all feedback received, other than anonymous feedback, an acknowledgment of receipt will be provided to you within a reasonable time via the same communication channel you used to contact us.

If you are an employee of the Bank, you can use the feedback process for our clients and the general public or the internal feedback process. The internal feedback process can be used via your preferred communication channel (telephone, email or mail). The different feedback channels are described on the employee platform intended for this purpose. You can also make an anonymous suggestion or comment by contacting the Employee Ombudsman's Office. An acknowledgement of receipt will be provided to you within a reasonable time.

### **3. Progress achieved**

The Bank's 2023-2026 Accessibility Plan contained 14 objectives, each with its own rollout and implementation schedule:

- 10 short-term priorities to be rolled out within 12 months
- 14 medium-term priorities to be rolled out within 1 to 3 years
- 4 long-term priorities to be rolled out within 3 to 5 years
- 16 priorities to be rolled out on an ongoing basis

In 2025, 5 priorities have been added.

Since filing the 2023-2026 plan, the Bank has continued to advance in terms of accessibility. It has delivered initiatives to remove barriers for persons with disabilities. In accordance with its strategic accessibility plan, the initiatives prioritized by the Bank have focused on corporate culture, training and governance. For example:

- Enhancing our training and raising awareness about the challenges experienced by persons with disabilities.
- Increasing the visibility of accessibility challenges and the available tools.
- Developing governance in terms of operational accessibility.
- Improving the consultation process.
- Improving and communicating the process of accommodating persons with disabilities.

## 4. Priority areas

### 4.1 Area: Employment

Under the Bank's 2023-2026 Accessibility Plan, we set three goals for removing barriers to accessibility in terms of employment. Here is a description of those goals and the progress achieved:

**Goal 1** – 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	Progress	Details	Time frame
1	Develop a <i>Reference Handbook for Content Creation</i> to ensure accessibility	2024 delivery	Priority handled under Area 4.5 – Communications	Short term
2	Continue adapting our policies and procedures	In progress	In 2024: <ul style="list-style-type: none"><li>• Delivery of the new accommodation policy which aims to simplify accommodation requests from Bank employees.</li><li>• Tools made available to managers to facilitate conversation.</li><li>• Creation of a management clinic on accommodations for employees with disabilities, which aims to train managers and raise awareness of various types of disabilities.</li><li>• Self-identification process adjusted to:</li></ul>	Ongoing

#	Priority	Progress	Details	Time frame
			<ul style="list-style-type: none"> <li>o Enhance the visibility of the various diversity segments, including persons with disabilities.</li> <li>o Review the definition of persons with disabilities.</li> <li>o Raise awareness of the importance of self-identification.</li> </ul> <p>These initiatives helped increase the representation of persons with disabilities at the Bank to 4.1% as of January 31, 2024.</p> <p>In 2025:</p> <ul style="list-style-type: none"> <li>• Clarification and improvement of the accommodation procedure based on feedback</li> <li>• Addition of the accommodation procedure in communications to employees returning from disability leave</li> <li>• Progressive implementation of the management clinic (2 out of 8 business lines)</li> <li>• As a result of these initiatives, the representation rate of persons with</li> </ul>	

#	Priority	Progress	Details	Time frame
			disabilities increased to 5% in March 2025	
3	Optimize and promote the use of critical internal feedback tools to encourage ongoing feedback	Completed	<p>In 2024:</p> <ul style="list-style-type: none"> <li>• Feedback procedure delivered, rolled out and integrated into the ongoing activities of the Employee Experience Advisory Centre. This procedure makes it possible to find information about accessibility and report issues.</li> <li>• A communication campaign is being rolled out to promote the use of this procedure.</li> </ul> <p>In 2025:</p> <ul style="list-style-type: none"> <li>• The communication campaign has been implemented.</li> </ul>	Medium term
4	Conduct a review of the performance management process and supporting tools	In progress	<p>In 2024:</p> <ul style="list-style-type: none"> <li>• Finalize an analysis of the impact of membership in the various diversity segments on performance management.</li> </ul>	Medium term

#	Priority	Progress	Details	Time frame
			<ul style="list-style-type: none"> <li>• Continue to refine procedures and adapt performance management practices to the needs of our employees. Case studies will be developed to facilitate understanding.</li> </ul> <p>In 2025:</p> <ul style="list-style-type: none"> <li>• Analysis of the impact of membership in the various diversity segments (including persons with disabilities) on performance management is now carried out annually. The 2024 analysis is in progress.</li> </ul>	
5	Further analyze the accessibility of technological tools	In progress	<p>In 2025:</p> <ul style="list-style-type: none"> <li>• Analysis of a reading tool to facilitate concentration.</li> <li>• Testing of an artificial intelligence-based assistant (Microsoft Copilot) with persons with disabilities to explore its benefits, including simplifying tasks and improving digital accessibility.</li> </ul>	Ongoing

#	Priority	Progress	Details	Time frame
6	Development of accessibility and anti-ableism policies	Not started	<p>In 2025:</p> <ul style="list-style-type: none"> <li>We will be adding this deliverable in line with the employment standards published in December 2024.</li> <li>We will draw inspiration from CWB's existing accessibility policy to carry it out.</li> </ul>	Mid-term

**Goal 2 – Enhance employees’ and managers’ knowledge of accessibility to remove barriers.**

No.	Priority	Progress	Details	Time frame
1	Continue to develop accessibility training material for all National Bank employees	In progress	<p>In 2024:</p> <ul style="list-style-type: none"> <li>Training on understanding accessibility made available to all Bank employees; this training has been completed by all teams involved in accessibility issues.</li> <li>We are developing a strategy for rolling out accessibility training to all Bank employees.</li> </ul> <p>In 2025:</p>	Ongoing

No.	Priority	Progress	Details	Time frame
			<ul style="list-style-type: none"> <li>Development and implementation of the first stage of training to raise awareness about disabilities and accommodations. It was rolled out to all employees in December 2024 and had been completed by 59% of them by the end of February 2025.</li> </ul>	
2	Raise awareness about accessibility and empower those responsible for developing learning, training and content design strategies	In progress	<p>In 2024:</p> <p>Given the upcoming rollout of a new learning platform at the Bank:</p> <ul style="list-style-type: none"> <li>Hold workshops with the project teams to raise awareness of learning differences resulting from diversity, neurodiversity or certain types of disabilities.</li> <li>Account for accessibility needs when designing experiences.</li> </ul> <p>In 2025:</p> <ul style="list-style-type: none"> <li>Development of training courses with improved accessibility for all employees: text versions available, videos that can be watched quickly, systematic subtitling.</li> </ul>	Medium term

No.	Priority	Progress	Details	Time frame
			<ul style="list-style-type: none"> <li>• Completed successful testing of ASL/LSQ interpreting integrated into an online training course for all employees.</li> <li>• Publication of an accessibility newsletter for the people responsible for designing training programs.</li> </ul>	
3	Maintain and improve accessibility training for targeted professions	In progress	<p>In 2024:</p> <p>New priority that encompasses Priority 1 under the information and communication technologies (ICT) area.</p> <p>For information technology professions:</p> <ul style="list-style-type: none"> <li>• Roll out programs to raise awareness of internal requirements, standards and practices in terms of accessibility.</li> <li>• Update IT accessibility training to promote various tools and methodologies.</li> </ul> <p>In 2025:</p>	Short term

No.	Priority	Progress	Details	Time frame
			<ul style="list-style-type: none"> <li>Promote the possibility of sign language training for people in contact with colleagues who speak sign language.</li> </ul> <p>CWB: Study to provide accessibility training for the leadership and culture teams</p>	

**Goal 3 – Attract and recruit persons with disabilities and foster their integration.**

No.	Priority	Progress	Details	Time frame
1	Ensure a smooth attraction, recruitment and integration process for new Bank employees	In progress	<p>In 2024:</p> <ul style="list-style-type: none"> <li>Review certain email communications addressed to candidates to improve accessibility and enhance the accommodations we can offer during interviews.</li> <li>Identify two persons dedicated to the hiring process for persons with disabilities.</li> <li>Roll out a recruitment and onboarding process for neurodivergent people, which may be directly provided by the Bank or</li> </ul>	Ongoing

No.	Priority	Progress	Details	Time frame
			<p>supported by partner organizations.</p> <p>In 2025:</p> <ul style="list-style-type: none"> <li>Reminders to managers, via online tools and automated emails in the candidate management tool, to ask candidates and new hires if they require accommodations.</li> <li>Work underway to integrate the accommodation procedure into the redesign of the onboarding process for new employees</li> </ul>	
2	Document and promote accessibility guidelines and best practices during recruitment	In progress	<p>In 2024:</p> <ul style="list-style-type: none"> <li>Create a workshop for managers on best practices for inclusive recruitment. To date, several hundred managers have completed this workshop. The rollout is still underway.</li> </ul> <p>In 2025:</p>	Medium term

No.	Priority	Progress	Details	Time frame
			<ul style="list-style-type: none"> <li>• Development of an accessibility best practices guide for talent acquisition practices.</li> <li>• Update of the internal website about the recruitment process by integrating accessibility best practices into each step and communicating the practices via a newsletter.</li> <li>• Conducting an audit of the CWB career site.</li> </ul>	
3	Identify and document the various accommodation tools available and confirm their compatibility with the Bank's ecosystem	In progress	<p>In 2024:</p> <ul style="list-style-type: none"> <li>• Create a list of examples of accommodations and measures to better equip managers and make it easier to obtain information; make this list accessible to Bank employees.</li> <li>• Continue to work on improving this list of tools and solutions.</li> </ul> <p>In 2025:</p>	Medium term

No.	Priority	Progress	Details	Time frame
			<ul style="list-style-type: none"> <li>Adding a section on Teams accessibility features including a video clip.</li> </ul>	
4	Develop and increase our partnerships with organizations that support candidates with disabilities.	In progress	In 2025: <ul style="list-style-type: none"> <li>Already in place at CWB through their Disability Solutions partner.</li> <li>Partnerships with Roseph and Autism Unlimited.</li> </ul>	On an ongoing basis

**4.2 Area:** Design and delivery of programs and services

Under the Bank’s 2023-2026 Accessibility Plan, we set three goals for removing barriers to accessibility in terms of the design and delivery of programs and services. Here is a description of those goals and the progress achieved:

Provide ongoing training for all new digital sector employees regarding accessibility standards

**Goal 1** – Increase our knowledge of the barriers encountered by persons with disabilities so we can adapt our programs and services.

No.	Priority	Progress	Details	Time frame
1	Enhance training materials by adding information on digital accessibility standards	Ongoing	<p>In 2024:</p> <ul style="list-style-type: none"> <li>• Create and share training materials to enable us to validate and improve the accessibility of information sites.</li> </ul> <p>In 2025:</p> <ul style="list-style-type: none"> <li>• Creation of training paths and plans on the online learning platform for various roles (designers, developers, content creators, marketing, analysts, leaders).</li> <li>• Communication coming soon</li> </ul>	Ongoing
2	Raise awareness and provide ongoing training for all digital sector employees regarding accessibility standards.	Partially completed	<p>In 2024:</p> <p>This priority was reformulated to include raising awareness.</p> <p>Training available on:</p> <ul style="list-style-type: none"> <li>• Validating and improving the accessibility of our websites, offered to UI/UX webmasters and information-based IT teams</li> </ul>	Short term

No.	Priority	Progress	Details	Time frame
			<ul style="list-style-type: none"> <li>• Creating accessible PDF files for content and UI/UX teams</li> </ul> <p>Awareness initiatives for all digital sector employees:</p> <ul style="list-style-type: none"> <li>• Share knowledge on creating accessible PDF files</li> <li>• Create a SharePoint page on digital accessibility</li> <li>• Roll out a governance framework and a process to identify training tools for new Bank employees</li> <li>• Continue to raise employee awareness via various forums</li> <li>• Create and share training materials to enable us to validate and improve the accessibility of information sites.</li> </ul> <p>In 2025:</p> <ul style="list-style-type: none"> <li>▪ Creation of a digital accessibility page in the UX/UI experts' work tool to include governance, regulations, available tools and training, and dashboards.</li> <li>▪ Training from the Siteimprove service provider on its accessibility module, made available on the work tool for</li> </ul>	

No.	Priority	Progress	Details	Time frame
			<p>UX/UI experts and added to the onboarding process for new team employees.</p> <ul style="list-style-type: none"> <li>▪ Raising awareness with the teams reporting to the Senior Vice-President – Analytics, Data and Digital by using various forums.</li> <li>▪ Raising awareness with advisors about vulnerable persons.</li> <li>▪ Testing in-depth training on accessible PDF files with an initial group of 15 experts. Identifying the people who should take the training and creating a summary of a few clear and simple steps for the experts.</li> </ul>	
3	Improve how we handle feedback we receive from clients with disabilities	In progress	<p>In 2024:</p> <ul style="list-style-type: none"> <li>• Analysis of results of client surveys to improve our upcoming accessibility initiatives.</li> <li>• The customer care process is being improved.</li> </ul> <p>In 2025:</p>	Short term

No.	Priority	Progress	Details	Time frame
			<ul style="list-style-type: none"> <li>Creation of an internal forum on digital accessibility issues to identify the issues and share best practices.</li> </ul>	

**Goal 2** – Address accessibility when designing, reviewing and delivering programs and services.

No.	Priority	Progress	Details	Time frame
1	Create acceptance criteria and validation tests for digital accessibility standards when delivering or updating services and developing information content	Partially completed	<p>In 2024:</p> <ul style="list-style-type: none"> <li>Connect all information sites to an automated validation tool that verifies the digital accessibility of the sites in real time, in accordance with the WCAG 2.1 Standard, Level AA.</li> <li>Certify Chrome extensions that will enable us to validate the accessibility of pages on our sites.</li> <li>Modify the processes used by various teams to integrate acceptance criteria and accessibility testing.</li> </ul> <p>In 2025:</p> <ul style="list-style-type: none"> <li>Implementation of acceptance criteria in all digital applications at the Studio with</li> </ul>	Short term

No.	Priority	Progress	Details	Time frame
			validation in order to meet WCAG 2.1 AA standards.	
2	Create a dashboard of key performance indicators to measure the accessibility of our digital platforms, programs and services	In progress	<p>In 2025:</p> <ul style="list-style-type: none"> <li>• Creation of a dashboard in the work tool shared by experts to measure our various platforms' accessibility scores.</li> </ul>	Medium term
3	Standardize the implementation of User Experience (UX) and User Interface (UI) accessibility standards within the digital ecosystem for all new deployments	Partially completed	<p>In 2024:</p> <ul style="list-style-type: none"> <li>• Implement and use a design system, which is a collection of reusable components, for internal sites and transaction applications to facilitate compliance with the WCAG 2.0 digital accessibility standards.</li> <li>• Upcoming implementation of a design system for our information sites.</li> </ul> <p>In 2025:</p> <ul style="list-style-type: none"> <li>▪ A design system for our informational sites is currently being created.</li> <li>▪ Standardization of our informational site analyses through Siteimprove.</li> <li>▪ Study of a new tool for real-time analysis of sites' digital accessibility</li> </ul>	Medium term

<b>No.</b>	<b>Priority</b>	<b>Progress</b>	<b>Details</b>	<b>Time frame</b>
			levels to improve performance; the tool has been verified and used by CWB as part of its accessibility plan.	
<b>4</b>	Standardize automated testing scenarios when deploying new digital programs and services	Not started		Long-term
<b>5</b>	Inclusion of accessibility criteria in supplier contracts	In progress	<p>Point added in 2025:</p> <ul style="list-style-type: none"> <li>Working closely with the Digital Asset Risk Management (DARM) team to revise contract management processes in order to include a step to validate the impact of our platforms' accessibility and vendor compliance. The objective is to ensure that our partners comply with our standards right from the contract phase.</li> </ul>	

**Goal 3 – Provide an ecosystem that meets accessibility standards**

<b>No.</b>	<b>Priority</b>	<b>Progress</b>	<b>Details</b>	<b>Time frame</b>
<b>1</b>	Review and improve the information content available on the Bank's public websites	In progress	In 2024:	Long-term

No.	Priority	Progress	Details	Time frame
			<ul style="list-style-type: none"> <li>• Webmasters and writers review the results generated by the automated validation tool and make corrections on an ongoing basis.</li> <li>• Improvement of the nbfwm.ca and nbdb.ca sites underway.</li> </ul> <p>2025:</p> <ul style="list-style-type: none"> <li>• Delivery of 7 ways to optimize the nbfwm.ca and nbdb.ca sites, that were detected with the analyses carried out.</li> <li>• Work coming soon to improve the visibility of branch accessibility on our online branch locator.</li> </ul>	
2	Review and improve transaction services	Not started		Long-term
3	Monitor digital accessibility standards to adapt our tools and practices	Ongoing	<p>In 2024:</p> <ul style="list-style-type: none"> <li>• Define an ongoing monitoring role as part of the governance framework to keep us updated on changing standards.</li> </ul>	Long-term

No.	Priority	Progress	Details	Time frame
4	Create a governance committee on the accessibility of the digital ecosystem to coordinate the activities of the digital sector, define performance criteria and validate the achievement of objectives	In progress	<p>In 2024:</p> <ul style="list-style-type: none"> <li>• Create a committee with representatives from each digital team to monitor delivery of accessibility initiatives.</li> </ul> <p>In 2025:</p> <ul style="list-style-type: none"> <li>• Creation in March 2024 of 2 governance bodies for the Program and Service Design and Delivery domain (monthly operational monitoring and quarterly strategic monitoring).</li> </ul>	Medium term
5	Improve the accessibility information on our informational website, along with our assistance services.	In progress	<p>Point added in 2025:</p> <ul style="list-style-type: none"> <li>▪ Conducting a comparative market analysis of the accessibility of banking products and services in Canada.</li> <li>▪ Analysis and planning of prioritized work.</li> </ul>	

**4.3 Area:** Built environment

Under the Bank’s 2023-2026 Accessibility Plan, we set a goal for removing barriers to accessibility in terms of the built environment. Here is a description of that goal and the progress achieved:

**Goal** – Improve the environment for users of corporate buildings and branches by ensuring it is accessible and adapted to the needs of persons with disabilities

No.	Priority	Progress	Details	Time frame
1	Relocate the head office to a new building that meets current standards, codes and legislation, including universal accessibility regulations	In progress (September 2023 to May 2024)	<p>In 2024:</p> <ul style="list-style-type: none"> <li>• National Bank’s head office relocated to National Bank Place at 800 Saint-Jacques in Montreal. By June 2024, 11,000 people will be working at the new building.</li> <li>• Audit carried out by an external organization specialized in universal accessibility (Altergo) to assess accessibility and recommend ways to improve it.</li> <li>• Creation of an internal SharePoint page summarizing all the accessibility features of National Bank Place, such as:               <ul style="list-style-type: none"> <li>○ Inclusive spaces: Open concept with no thresholds, lounges, focus rooms, work stations with removable partitions, microperforated acoustic walls to promote concentration.</li> <li>○ Inclusive services: Electric switches at an adapted height, braille and vocal announcements in elevators, adjustable, ergonomic work stations, inclusive</li> </ul> </li> </ul>	June 2024

No.	Priority	Progress	Details	Time frame
			<p>washrooms, accessible and permanent lockers for persons with disabilities, fire alarm systems for Deaf and hard of hearing people on specific floors.</p> <ul style="list-style-type: none"> <li>○ Inclusive technology: Automated doors with contactless buttons, Teams rooms with simultaneous transcriptions, smart controllers to adjust the lighting.</li> <li>● Identification of a person responsible for the building's accessibility.</li> </ul> <p>In 2025:</p> <ul style="list-style-type: none"> <li>● Ongoing implementation of recommendations to improve accessibility at 800 Saint-Jacques, as identified in the audit, including: <ul style="list-style-type: none"> <li>○ Improvement of several signs</li> <li>○ Automatic entrance doors on the ground floor now functional</li> <li>○ Establishment of a silent dining room</li> </ul> </li> </ul>	
2	Create a database of physical accessibility features in our branches	In progress	<p>In 2024:</p> <ul style="list-style-type: none"> <li>● Create a file in the building dashboard incorporating virtual plans for certain branches.</li> <li>● Work with external suppliers to draw up a standard list of universal accessibility components for certain environments, such as: <ul style="list-style-type: none"> <li>○ Adapted washrooms</li> </ul> </li> </ul>	Medium term

No.	Priority	Progress	Details	Time frame
			<ul style="list-style-type: none"> <li>○ Booths for persons with disabilities</li> <li>○ Outside ramps</li> </ul> <p>2025:</p> <ul style="list-style-type: none"> <li>● This deliverable will be continued with the new property management service provider for the branch network, with particular attention to ABM accessibility, as indicated in CWB's accessibility plan.</li> </ul>	
3	Implement an interior signage system	In progress	<p>In 2024:</p> <ul style="list-style-type: none"> <li>● Rollout of interior signage at the new head office currently underway. The proposed signage accounts for universal accessibility best practices.</li> </ul> <p>In 2025:</p> <ul style="list-style-type: none"> <li>● New real estate strategy for the branch network now approved. Within 5 years, 40% of the network will be reviewed. The new concept will include signage.</li> </ul>	Ongoing progressive implementation
4	Assess and adapt lighting levels in our branches (photometric analysis)	In progress	<p>In 2024:</p>	Ongoing progressive implementation

No.	Priority	Progress	Details	Time frame
			<ul style="list-style-type: none"> <li>• A specific mandate has been assigned to an engineering firm. Initiative gradually rolled out to all internal and external stakeholders.</li> </ul> <p>In 2025:</p> <ul style="list-style-type: none"> <li>• As with the previous objective, the new concept will include photometric studies.</li> </ul>	
5	Implementation of new layout guidelines, including the principles of inclusion, diversity, equity and accessibility.	In progress	<p>Point added in 2025:</p> <ul style="list-style-type: none"> <li>• New concept currently being developed by our Conception and Design team.</li> <li>• A site will be chosen to implement this new concept.</li> <li>• In the process of retaining a firm of architecture/engineering professionals.</li> <li>• Document on the new layout guidelines available upon request to internal stakeholders.</li> </ul>	

**4.4 Area:** Information and communication technologies (ICT)

Under the Bank’s 2023-2026 Accessibility Plan, we set two goals for removing barriers to accessibility in terms of information and communication technologies. Here is a description of those goals and the progress achieved:

**Goal 1** – Support the business lines in providing IT solutions that make our systems more accessible to persons with disabilities.

No.	Priority	Progress	Details	Time frame
1	Continue to implement accessibility requirements and standards in our technology systems, including applications for employees and clients	Ongoing	<p>In 2024:</p> <p>Grammatical correction of priority labels.</p> <ul style="list-style-type: none"> <li>• With help from an external firm, integrate accessibility standards and requirements into some of our technology systems, including applications for employees and clients.</li> <li>• Ongoing monitoring of our systems to identify accessibility issues while prioritizing our digital interfaces.</li> <li>• Continue to integrate the WCAG 2.0 standards into technology systems.</li> <li>• Monitor the WCAG 2.1 and 2.2 standards and integrate some of these accessibility standards into our technology platforms.</li> </ul> <p>In 2025:</p> <ul style="list-style-type: none"> <li>• Finalization of the inventory of the current state of the Bank's applications to define a comprehensive compliance plan with WCAG 2.0 and WCAG 2.1 international standards.</li> <li>• Establishment of automated banking machines that offer audio assistance. Requirement of the ABM manufacturer</li> </ul>	Ongoing

No.	Priority	Progress	Details	Time frame
			to comply with international accessibility standards for screen height, button and card insertion slot positioning, cash deposits and withdrawals, and slip or statement printing.	
2	Ensure that IT accessibility compliance requirements are included in our search for IT solutions on an ongoing basis	In progress	In 2024: <ul style="list-style-type: none"> <li>Analyze strategies to permit standardized, cross-sector implementation of accessibility requirements and standards (in line with the WCAG 2.0, 2.1 and 2.2 standards).</li> </ul>	Long-term

**Goal 2 – Enhance employees’ knowledge of accessibility.**

No.	Priority	Progress	Details	Time frame
1	Maintain and enhance IT accessibility training for employees and expand training delivery	In progress	This priority has been integrated into a cross-sector initiative in the employment area under Goal 2, Priority 3.	Medium term

No.	Priority	Progress	Details	Time frame
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)	Completed	<ul style="list-style-type: none"> <li>Implement a process to monitor accessibility feedback to ensure feedback related to ICT is consolidated and processed.</li> <li>Monitor recommendations for IT accessibility requirements to improve accessibility on an ongoing basis (national and international level).</li> </ul>	Short term

**4.5 Area:** Communications other than information and communication technologies

Under the Bank’s 2023-2026 Accessibility Plan, we set three goals for removing barriers to accessibility in terms of communications other than information and communication technologies Here is a description of those goals and the progress achieved:

**Goal 1** – Communicate in plain language.

No.	Priority	Progress	Details	Time frame
1	Introduce guiding principles that promote inclusive writing to employees creating internal and external content	Completed	<p>In 2024: Initiatives to advance our practices in terms of inclusion, diversity and equity:</p> <ul style="list-style-type: none"> <li>Adoption of the principles of inclusive writing in all our communications, with</li> </ul>	Short term

No.	Priority	Progress	Details	Time frame
			<p>the goal of ensuring equity for everyone regardless of their gender identity and expression.</p> <ul style="list-style-type: none"> <li>• Rollout of an inclusive writing guide.</li> <li>• Creation and rollout of inclusive writing training for employees.</li> </ul> <p>As of February 5, 2024, 55% of Bank employees had completed the training and the guide had been consulted more than 3,400 times.</p> <p>In 2025:</p> <ul style="list-style-type: none"> <li>• Update of inclusive writing principles based on feedback received from users. 5650 views of the inclusive writing guide in French as of March 2025.</li> <li>• Training on inclusive writing completed by 71% of employees as of March 2025</li> </ul>	
2	Develop a reference handbook for content creation to ensure accessibility	In progress	<p>In 2024:</p> <p>Initiatives to provide tools for employees who produce written, video, audio or multimedia content:</p>	Short term

No.	Priority	Progress	Details	Time frame
			<ul style="list-style-type: none"> <li>• Define guidelines for creating accessible content for all internal and external audiences:               <ul style="list-style-type: none"> <li>○ Apply plain language standards and the ISO 24495-1 standard.</li> <li>○ Apply an “Inclusion by design” methodology when designing and developing content in order to minimize unconscious bias.</li> </ul> </li> <li>• Review the plain language writing guide.</li> <li>• Create a reference handbook for content creation that consolidates guidelines for creating accessible content, a plain language writing guide and a guide to best practices for accessible videos.</li> </ul> <p>In 2025:</p> <ul style="list-style-type: none"> <li>• Guide being made available through various channels.</li> </ul>	

No.	Priority	Progress	Details	Time frame
3	Raise awareness about plain language and accessibility and empower key personnel responsible for content design	In progress	<p>In 2024:</p> <ul style="list-style-type: none"> <li>• Create and roll out plain language workshops. More than 90 content creators have completed these workshops.</li> </ul> <p>In 2025:</p> <ul style="list-style-type: none"> <li>• Strengthened communication of the importance of information conveyed by colours for people who are colourblind.</li> </ul>	Ongoing
4	Enhance the reference handbook for content creation to ensure that it meets specific accessibility needs	In progress	<ul style="list-style-type: none"> <li>• Priority combined with Priority 2 under this goal.</li> </ul>	Medium term
5	Use AI tools to promote plain writing	In progress	<p>In 2024: New priority.</p> <ul style="list-style-type: none"> <li>• Carry out an internal pilot project involving 300 employees to test an artificial intelligence tool that executes various tasks, including generating text in plain language. After the pilot</li> </ul>	Short term

No.	Priority	Progress	Details	Time frame
			<p>project, we will issue recommendations concerning a larger-scale rollout.</p> <p>In 2025:</p> <ul style="list-style-type: none"> <li>• Rollout of the tool to content producers.</li> <li>• Design of a skill development plan for content producers about using Copilot to write in plain language.</li> </ul>	

**Goal 2** – Ensure information is accessible on our various communication channels.

No.	Priority	Progress	Details	Time frame
1	Create and distribute a guide on best practices for producing accessible videos for persons with information processing difficulties or persons with a visual impairment or hearing loss	Completed	<p>Grammatical correction of priority labels.</p> <ul style="list-style-type: none"> <li>• Create and distribute a guide on best practices for producing accessible videos.</li> <li>• Internal consultation via individual interviews with persons with disabilities to identify the main accessibility issues they experience when consulting videos.</li> </ul>	Short term

No.	Priority	Progress	Details	Time frame
			<ul style="list-style-type: none"> <li>• Review our practices further to the results of the consultation:               <ul style="list-style-type: none"> <li>○ Systematically provide readouts of video content.</li> <li>○ Adjust font sizes and colours.</li> <li>○ Offer video transcripts in the same language.</li> </ul> </li> </ul>	
2	Provide presentation notes and a copy of the presentation in advance of corporate conferences to facilitate understanding	Ongoing	<p>In 2024:</p> <p>This priority has been rephrased to be more inclusive.</p> <p>Our goal is to make the content of corporate conferences easier to understand for all Bank employees.</p> <ul style="list-style-type: none"> <li>• Material can be obtained in advance.</li> <li>• Presentation documents and summaries of the information presented are made available during or after the event, as applicable.</li> </ul> <p>In 2025:</p> <ul style="list-style-type: none"> <li>• Activation of systematic transcriptions of organizational conferences.</li> </ul>	Ongoing

No.	Priority	Progress	Details	Time frame
			<ul style="list-style-type: none"> <li>Quarterly follow-up of National Bank's main achievements available in video format in addition to the written format.</li> </ul>	
3	Make live corporate conferences accessible through simultaneous sign language interpretation or an accessible technology solution	Repositioning underway	<p>In 2024:</p> <ul style="list-style-type: none"> <li>Analysis further to the release of new simultaneous sign language interpretation solutions involving artificial intelligence.</li> </ul> <p>In 2025:</p> <ul style="list-style-type: none"> <li>Pilot project of simultaneous LSQ interpretation by SIVET at two events (one online and one in person).</li> </ul>	Medium term

**Goal 3** – Promote accessibility to stakeholders.

No.	Priority	Progress	Details	Time frame
1	Promote our accessibility efforts in our internal communications	Delivery of 2023	In 2024, this priority has evolved:	Ongoing

No.	Priority	Progress	Details	Time frame
		activities - Completed	<ul style="list-style-type: none"> <li>• All internal communication activities (Priorities 1, 2 and 3) have been merged under this priority.</li> <li>• External communications are handled under Priority 4.</li> </ul> <p>We promoted the actions taken to foster inclusion of persons with disabilities in our internal communications such as newsletters, conference calls, corporate social media and videos. In 2023, the following topics were covered in our internal communications.</p> <ul style="list-style-type: none"> <li>• Inclusion and accessibility at National Bank Place. Overview of workspaces, services and technology that promote the principles of inclusion and accessibility in National Bank’s new head office.</li> <li>• “I identify myself: promoting diversity and the inclusion of all talents at the Bank” campaign. Bank employees are encouraged to self-identify so we can get a better overview of our workforce, including persons with disabilities, to streamline the rollout of initiatives that ensure equity. The self-identification</li> </ul>	

No.	Priority	Progress	Details	Time frame
			<p>form was improved based on the feedback received.</p> <ul style="list-style-type: none"> <li>• National AccessAbility Week and the International Day of Persons with Disabilities provided opportunities to raise awareness about accessibility, increase the visibility of the proposed activities and encourage employees to participate.</li> <li>• The Bank's commitment under its Accessibility Plan.</li> <li>• The feedback process to follow for all target audiences.</li> </ul> <p>We raised awareness through internal activities intended to promote the rights and wellbeing of persons with disabilities:</p> <ul style="list-style-type: none"> <li>○ Meeting with Paralympic athlete Karolina Wisniewska</li> <li>○ Panel – National AccessAbility Week: Achieving your potential in a more inclusive world</li> <li>○ Testimonial video to better understand neurodivergence</li> <li>○ Conference on living with a disability in the workplace</li> <li>○ Presentation of the internal initiatives underway to support</li> </ul>	

No.	Priority	Progress	Details	Time frame
			<p>the inclusion of persons with disabilities, including: the intentional recruitment process for neurodivergent people and the One On One Around Disability program that leverages the experiences of colleagues with disabilities</p> <p>In 2025:</p> <ul style="list-style-type: none"> <li>• Planning and kick-off of an internal communication campaign to present the accessibility plan, explain the feedback mechanism, and introduce the stakeholders involved.</li> <li>• Raising awareness with internal activities to promote the rights and wellbeing of persons with disabilities: <ul style="list-style-type: none"> <li>○ For AccessAbility Week: organization of a panel discussion on the audit approach to accessibility at the head office, in partnership with Altergo.</li> <li>○ Fundraising campaign for the Mira foundation, with an explanatory video to raise colleagues' awareness about</li> </ul> </li> </ul>	

No.	Priority	Progress	Details	Time frame
			<p>the behaviours to adopt around a service dog.</p> <ul style="list-style-type: none"> <li>○ For the International Day of Persons with Disabilities, production of a video about how accommodations help promote accessibility.</li> <li>○ Employee testimonials on bipolar disorder, eating disorders and neurodivergence.</li> <li>○ Visual impairment awareness activity on a team in partnership with the Louis Braille Institute.</li> <li>○ Organization of a quiz to test people's knowledge about disabilities during AccessAbility Week and International Day of Persons with Disabilities.</li> <li>○ Various publications in the internal network to raise awareness, including Paralympic Games, International Day of the Deaf, etc.</li> </ul>	

No.	Priority	Progress	Details	Time frame
2	Promote and enhance accessibility in our forums and corporate communications		Combined with Priority 1	
3	Increase internal visibility of the Accessibility Plan and initiatives implemented		Combined with Priority 1	
4	Publicize and increase the external visibility of our accessibility actions	Completed	<p>In 2024:</p> <p>This priority has been reformulated to include all external communication activities.</p> <p>The Bank’s accessibility commitments are disclosed each year in reports intended for the general public:</p> <ul style="list-style-type: none"> <li>• 2023 ESG Report - report-esg-2023.pdf (nbc.ca)</li> <li>• Inclusion and Diversity Booklet - inclusion-diversity-booklet-2023.pdf (nbc.ca)</li> </ul> <p>In 2025</p> <ul style="list-style-type: none"> <li>• For International Day of Persons with Disabilities, publication on social networks of the video about accommodations.</li> <li>• 2024 Sustainability Report, including an Inclusion, Diversity and Equity</li> </ul>	Short term

No.	Priority	Progress	Details	Time frame
			<p>section: <a href="https://www.nbc.ca/content/dam/bnc/a-propos-de-nous/esg/pdf/sustainability-report-2024.pdf">https://www.nbc.ca/content/dam/bnc/a-propos-de-nous/esg/pdf/sustainability-report-2024.pdf</a></p>	
		In progress	<p>The Bank has made a commitment to accessibility during events held by the following organizations:</p> <ul style="list-style-type: none"> <li>• Special Olympics Québec</li> <li>• Paralympic Foundation of Canada</li> <li>• Autisme sans limite</li> <li>• Mental health organizations (Douglas, FIUSSM)</li> </ul>	Medium term

**4.6 Area:** Procurement of goods, services and facilities

Under the Bank’s 2023-2026 Accessibility Plan, we set a goal for removing barriers to accessibility in terms of the procurement of goods, services and facilities. Here is a description of that goal and the progress achieved:

**Goal 1** – Provide an ecosystem, assets and services that meet accessibility standards.

No.	Priority	Progress	Details	Time frame
1	Lines of business should put in place an ongoing governance framework to oversee compliance with contractual clauses and deliverables	Ongoing	<ul style="list-style-type: none"> <li>• Before the Bank signs a contract with a supplier or partner, clauses must be integrated to ensure compliance with our accessibility commitments.</li> <li>• Ongoing improvement of supplier and partner governance to ensure compliance with contractual clauses.</li> </ul>	Ongoing
2	Update contractual clauses in response to emerging accessibility needs	Ongoing	<p>In 2024:</p> <ul style="list-style-type: none"> <li>• Annual review of contractual clauses included in contract templates to incorporate emerging accessibility needs and requirements.</li> </ul> <p>In 2025:</p> <ul style="list-style-type: none"> <li>• New clause being added to new contracts and contract renewals informing suppliers and subcontractors that they are subject to the same legal obligations as the Bank. This includes legal obligations related to accessibility.</li> </ul>	Ongoing

No.	Priority	Progress	Details	Time frame
3	Incorporate emerging accessibility needs into contracts as required	Ongoing	<ul style="list-style-type: none"> <li>As needed, add requirements to contracts in line with accessibility best practices.</li> </ul>	Ongoing

**4.7 Area:** Transportation

Under the Bank’s 2023-2026 Accessibility Plan, we set a goal for removing barriers to accessibility in terms of transportation. Here is a description of that goal and the progress achieved:

**Goal 1 – Ensure accessibility via private transport (passengerless transport).**

No.	Priority	Progress	Details	Time frame
1	Document accommodation requests in a centralized record		This priority has evolved and will now be handled under the existing priorities for the Employment area.	Ongoing
2	Facilitate access to buildings and facilities via transport		<p>In 2024, new priority:</p> <p>At National Bank Place (new head office of the Bank located at 800 Saint-Jacques in Montreal):</p> <ul style="list-style-type: none"> <li>Set up spaces for adapted vehicles to stop without blocking traffic on the Notre-Dame and Saint-Jacques sides.</li> </ul>	

No.	Priority	Progress	Details	Time frame
			<ul style="list-style-type: none"> <li>• Design the main entrances of the building on Saint-Jacques, Notre-Dame and Michel-Bélanger park to facilitate circulation for persons with disabilities, helping to ensure an inclusive environment where everyone can move around independently and comfortably.</li> <li>• Seven parking spaces for persons with reduced mobility in Level 2 of the basement, with easy wheelchair access to elevators.</li> <li>• Direct connection to the metro via an underground passageway (automatic opening of intermediate doors to be finalized shortly).</li> </ul> <p>In 2025:</p> <ul style="list-style-type: none"> <li>• Improvements to signage in the corridors between 800 Saint-Jacques and the metro.</li> <li>• Some doors in these same corridors have been made accessible.</li> </ul>	

## 5. Lessons learned and challenges

While work to implement short-term measures was underway, we noted that the barriers identified continued to evolve in tandem with our business environment, our operational environment and the needs of employees and the general public. The person responsible for accessibility at the Bank will therefore keep adapting these measures to ensure they meet changing accessibility needs.

In 2024, the Bank felt the need to advance its governance framework to allow for cross-sector management of accessibility priorities. This new governance framework also makes it possible to establish a more robust strategic plan and raise employee awareness about our organizational culture so we can continue to enhance our accessibility practices.

In 2025: As we move forward with the analytical work, one of the challenges is to understand all the actions required to make some areas accessible. As such, publishing certain standards and carrying out a comparative market analysis of banking products and services has allowed us to deepen our understanding of the subject and to better identify our shortcomings. In addition, the past year was a year of transformation for National Bank with the acquisition of Canadian Western Bank (CWB). All our teams mobilized for this change. It has given us the opportunity to revamp our ways of working on accessibility, in large part thanks to the work already done by our colleagues at CWB.

## 6. Consultations

To improve the Bank's accessibility practices, we need persons with disabilities to contribute. As such, we listen to persons with disabilities and adapt our initiatives in response to their needs. A number of data collection methods have been rolled out internally and externally. The data collected guided us in drawing up our 2023-2026 Accessibility Plan and the review of our priorities included in this report.

1. **Inventory:** The Bank started by drawing up an inventory of the initiatives, tools, products and services available for each of the 7 areas. This exercise enabled us to carry out a self-assessment of existing accessibility practices and prioritize various action plans.
2. **Consultation of client groups:** Individual interviews were carried out via an external firm. We selected a targeted sample of clients with disabilities and persons who had expressed complaints linked to accessibility and collected their comments.
3. **Consultation of Bank employees:** Individual interviews were carried out via an external firm. The sample was made up of employees with disabilities who demonstrated an interest in participating in consultations.

4. **Client and employee surveys:** Consultations were carried out mainly through surveys on various topics, such as the design of the new head office, the design of branches and work environments and the programs offered. An annual survey is sent to Bank employees with disabilities who have agreed to participate in consultations, as well as a representative sample of other National Bank employees. We also conduct an annual survey of clients.

The survey of Bank employees revealed 3 key points:

- Persons with disabilities encounter more barriers than persons without disabilities.
- The greatest number of barriers are encountered in the Employment and Built environment areas.
- The most frequent disabilities involve sensory issues, especially in the work environment.

The client survey also revealed 2 key points:

- Overall, National Bank is seen as accessible by most of the clients surveyed. More than 90% of respondents consider the Bank to be fairly accessible or very accessible.
- The disabilities most frequently reported by our clients in the survey were associated with mobility, flexibility and dexterity.

In 2024, we will pursue our efforts to consult with Bank employees and members of the public with disabilities so we can keep improving our accessibility practices. The Bank is aware that persons living with accessibility issues are in the best position to explain them to us. As such, we are committed to continuing to consult with persons with disabilities so we can better meet their needs.

In 2025, we will continue to guide our actions based on feedback from persons with disabilities. We do this by consulting surveys completed by our clients and employees. Once a year, we conduct a survey of employees and clients focused specifically on accessibility.

Findings with employees remain largely the same as those of last year. Employment and buildings present the greatest number of barriers for employees. The barriers mentioned most often are the need for awareness and knowledge of disability and accessibility. Better, more regular communication about what is available at the Bank could be helpful for a number of people.

For clients, building accessibility at some branches remains the issue mentioned most often, as well as the layout of certain points of service. We will continue working to improve these points.

## **7. Feedback**

Since the release of our Accessibility Plan, we've received a number of comments via our internal feedback mechanisms regarding accessibility measures at the Bank. We've also collated employee feedback received informally. The main comments addressed certain accessibility issues encountered at the new head office at National Bank Place. To address these comments quickly and show that we're taking them seriously, we mandated the Altergo firm to carry out an exploratory visit of National Bank Place together with persons with disabilities. Altergo will issue a report on its findings and issue recommendations to help the Bank keep improving its accessibility.

The feedback process for clients and the general public has also enabled us to collect comments, mainly concerning barriers to accessing banking services, interacting with Bank employees and accessing our buildings. The three areas of focus selected by the Bank to enhance its accessibility practices (corporate culture, employee training and governance) are laying the groundwork for these improvements. We've also improved our processes by analyzing the feedback received.

The comments received have influenced how we prioritize our accessibility initiatives. They also remind us that we need to keep monitoring our progress and encouraging persons with disabilities to contribute.

In 2025, as mentioned in our objectives, an employee communication campaign was held to raise awareness about basic accessibility concepts and the existing feedback channels for reporting issues. There are still relatively few issues or reports (less than 5 in the past year) raised in the channels available to employees, and those that are reported are detected quickly. Actions to resolve the issues can therefore be taken.