

National Bank – Three-Year Accessibility Plan (2026-2029)

Table of contents

1. Message from the Accessibility Lead	3
2. General Information	5
2.1 Who are we?	5
2.2 Give feedback or contact us	7
3. About the Accessibility Plan	9
3.1 The Accessible Canada Act	9
3.2 Glossary and definitions	11
3.3 Consultations	14
3.4 Timeline for the implementation of priorities	17
National Bank Three-Year Accessibility Plan	1

4. Our Commitment to Accessibility	17
4.1 Measures taken to prevent barriers	18
4.2 Priority areas	20
4.2.1 Area: Employment	20
4.2.2 Area: Design and delivery of programs and services	30
4.2.3 Area: Built environment	44
4.2.4 Area: Information and communication technologies (ICT)	56
4.2.5 Area: Communications other than ICT	71
4.2.6 Area: Procurement of goods, services and facilities	85
4.2.7 Area: Transportation	92
4.3 Implementation	93
4.4 Parties responsible	94
National Bank Three-Year Accessibility Plan	2

1. Message from the Accessibility Lead

At National Bank, our mission reflects our ongoing commitment to building a prosperous future as a bank that puts people first. It meets a collective need to evolve banking practices by putting people at the centre of our decisions and creating a positive and sustainable impact for all our stakeholders.

To achieve this, we focus on delivering simple, accessible and human experiences to our clients and our employees alike, through our products, services, environments and working conditions. We aim to be an inclusive organization that acknowledges and values diversity in all its forms, including age, culture, religion, gender, sexual orientation or identity, and physical or cognitive abilities.

In a rapidly changing environment and amid strong competition for talent, we recognize that accessible and inclusive environments

support both engagement and performance across the organization. Likewise, accessible products, services and channels allow for smoother experiences tailored to diverse abilities, circumstances and literacy levels. By providing clearer, simpler, and more understandable information, we make doing business easier and contribute to better protecting our clients, especially the most vulnerable.

Recognizing that barriers still exist and that achieving full accessibility is an ongoing process, we remain committed to identifying, eliminating, and preventing them through continuous learning and organization-wide engagement.

By putting accessibility and inclusion at the centre of our decision-making and leveraging the range of talents and perspectives, we enhance our collective capacity to innovate,

perform and create a positive impact on society.

Andrea Baldwin

Vice-President – Voice of the Organization,
Culture and Community

2. General Information

2.1 Who are we?

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 and our employees. For the purposes of this plan, National Bank includes its Canadian subsidiaries that are subject to the Accessible Canada Act.

Founded in 1859, the Bank offers financial services to individuals, businesses, institutional clients and governments across Canada and

internationally. We are one of the six systemically important banks in Canada, with a market capitalization of \$61 billion. We serve more than 3.1 million people across Canada. More than 35,000 people are employed in the organization (including more than 23,000 in Canada), of which 32.8% are from cultural communities, representing more than 160 countries and more than 70 languages spoken. In this respect, we position ourselves as an employer of choice in promoting inclusion and diversity.

The Bank strives to meet the highest standards of corporate responsibility while having a positive impact on all its stakeholders. The Bank is a founding signatory of the United Nations Principles for Responsible Banking. One of the core principles of this global framework is ongoing dialogue with stakeholders, aimed at proactively and responsibly partnering with them to achieve societal objectives.

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 collaborate better with communities.

2.2 Give feedback or contact us

To help us improve the accessibility of our products and services, or share feedback and suggestions on the implementation of our accessibility plan, 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: complaintappeal@nbc.ca
- By mail: [write to your nearest branch](#)

Your comments or suggestions can be made anonymously and will be forwarded to the teams concerned at the Bank. 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 give us feedback.

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 My HR platform intended for this purpose. Employees can also make an anonymous suggestion or comment by contacting the Employee Ombudsman's Office. An acknowledgement of receipt will be sent to the employee as quickly as possible.

To obtain the plan in an alternative format, such as large print, braille or audio, please contact us:

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

3. About the Accessibility Plan

3.1 The Accessible Canada Act

The purpose of the Accessible Canada 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. In accordance with the Act, National Bank published its first three-year plan in 2023 and annual progress reports in 2024 and 2025 on the progress made in implementing the measures set out in the accessibility plan.

The feedback processes in place allow the Bank to oversee comments or suggestions from clients, employees or any other individual who

would like to share feedback on barriers encountered. The new plan outlines the methods prioritized by the Bank to continue to prevent and gradually eliminate barriers to accessibility in the following seven areas:

1. Employment
2. Design and delivery of programs and services
3. Built environment
4. Information and communication technologies (ICT)
5. Communications other than ICT
6. Procurement of goods, services and facilities
7. Transportation

3.2 Glossary and definitions

Disability

The Accessible Canada Act (2019) defines disability as follows: “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.”

Barrier

The Accessible Canada Act (2019) defines a barrier as follows: “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.”

Employment

All an employee’s activities and experiences during the full cycle of their career path.

Design and delivery of programs and services

All products and services provided by the Bank through its employees, including the client experience, whether it be digital, in person or remote.

Built environment

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

Information and communication technologies (ICT)

All of the Bank’s technological solutions used by internal and external users, clients and

employees to communicate and access information sources.

Communications other than ICT

All activities intended to spread a message or promote the image of a product or service.

Procurement of goods, services and facilities

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

WCAG (Web Content Accessibility Guidelines)

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.”

3.3 Consultations

In order to develop its accessibility plan, the Bank used several data collection methods to evaluate the accessibility of the products and services offered to its clients, employees and partners. The combination of all these data collection methods helped guide the drafting of the plan and the actions taken to eliminate or reduce barriers.

I. Inventory: The Bank started by drawing up an inventory of the initiatives, tools, products and services available for each of the applicable areas. This exercise enabled us to carry out a self-assessment of existing accessibility practices and prioritize various action plans.

II. Consultation with clients: Every year, National Bank surveys its clients to better understand their experience, expectations and irritants encountered during their journey. This expanded listening strategy makes it possible

to gather specific insights into our products, services and interactions across all our channels. During the 2026-2029 cycle, the Bank plans to organize focus groups or individual interviews with senior clients, clients with disabilities and/or vulnerable clients to gain deeper insights and involve the people concerned in the decision-making process.

The results of these surveys and interviews will be key in guiding our priorities, measuring the evolution of the client experience and identifying opportunities for continuous improvement. By giving our clients a voice, we strengthen our ability to design solutions that are simpler, more accessible and better adapted to the diversity of needs.

III. Consultation with employees:

Employees are consulted through an annual survey that covers topics such as work organization, the use of technology, services offered, working conditions, etc. Individual and group interviews are also conducted on a

periodic basis with a sample of employees with disabilities who have expressed an interest in taking part in the consultations. In addition, the Bank works closely with the employee resource group R.I.S.E. (Respect, Inclusion, Support, Equity) whose mission is to promote the wellbeing of every person at the Bank, particularly in the areas of mental health, accessibility and disability.

IV. Document review: Different sources of information have been reviewed to evaluate accessibility and monitor market trends, including:

- Accessibility audit reports
- Internal standards, policies and guides
- Action plans
- Complaint reports
- Results of internal surveys and feedback from clients and employees

- Statistics on employee experience

3.4 Timeline for the implementation of priorities

Rollout deadlines for each priority set out in the Bank’s accessibility plan are as follows:

- **Short-term:** Less than 12 months
- **Mid-term:** 1 to 3 years
- **Long-term:** 3 years or more

4. Our Commitment to Accessibility

The Bank is a learning organization that leverages its expertise in inclusivity and diversity to keep improving its accessibility. We are committed to reinforcing accessibility measures so we can offer a better experience to our clients, our teams and our stakeholders. To this end, the Bank plans to:

- Promote its culture of inclusion, diversity and equity
- Adopt a zero-tolerance policy on discrimination
- Promote learning and raise awareness of accessibility issues among its employees
- Use surveys to obtain feedback from employees and clients so it can identify and correct irritants
- Include accessibility standards in its new initiatives, on an ongoing basis

4.1 Measures taken to prevent barriers

To ensure continuity, we recognize the need to put in place preventive measures to avoid barriers in the future and have a positive impact on the experience of our clients and employees, whether or not they have a

disability. To do this, we have focused on three areas:

I. Corporate culture: Encourage buy-in and promote an inclusive, non-discriminatory culture by fostering awareness of accessibility issues, knowledge of the barriers encountered and understanding of the impacts. To this end, we integrate our intrinsic values and organizational priorities into our internal standards and policies to give them maximum visibility. Various forums are also in place and will continue to be used to promote our values of inclusion and accessibility.

II. Training: Increase knowledge of accessibility across the organization and develop the skills in that area to improve our employees' responsiveness and reflexes while raising awareness about prejudice and negative bias. To do this, training will be offered, reference tools provided and discussion forums and information platforms publicized.

III. Governance: To facilitate the early detection of possible barriers, 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. Our goal is to monitor industry best practices, progress made in accessibility and the new tools and trends available.

4.2 Priority areas

4.2.1 Area: Employment

1. Background and statement of commitment

As an employer, the Bank recognizes the importance of specific needs and barriers experienced by some employee groups. Over the past three years, it has carried out structuring work and made significant advances in accessibility, in particular to support how work is delivered, improve quality

of life for employees and enhance their day-to-day experience.

Recognizing that accessibility is an evolving process, the Bank reaffirms its commitment to continue its efforts, as the path to sustainable accessibility is marked by continuous learning, adjustments and improvements in practices. As such, the Bank is committed to being attentive, learning and advancing to prevent and reduce barriers. Fostering an increasingly inclusive, equitable and accessible workplace for everyone is a priority that we acknowledge and share.

2. 2023-2026 plan achievements

In the area of Employment, the Bank benefited from significant advances in the previous three-year cycle.

- The accommodation policy has been simplified, and now employees no longer require a medical certificate, which reduces administrative barriers.

- The disability and accommodations management clinic has started to be rolled out to managers to strengthen their ability to adequately support their teams.
- The rollout of the “Customer Service: Accessible for Everyone?” training across the Bank helped enhance understanding of the different types of disabilities and accommodation practices.
- The proportion self-identified employees with disabilities increased by more than 50% between 2023 (3.9%) and 2026 (5.9%).
- The employee resource group R.I.S.E. (Respect, inclusion, Support, Equity) has redefined its mission and scope at the national level and plays a key role in supporting the conditions for success for all with respect to wellbeing, mental health and disability.

- An action plan to mitigate noise and concentration issues was established following internal consultations.
- Finally, the employee consultation process has been improved, allowing us to identify barriers encountered more proactively.

These examples illustrate the approach used to maintain a high level of organizational compliance with the revised Employment Standard (2025).

3. Barriers identified during consultations

Despite these achievements, several barriers remain:

- Insufficient awareness of invisible disabilities
- Prejudice about disabilities that make it difficult to talk about the subject
- Uneven understanding of accommodation processes

- Issues related to employee benefits, returning to the office and the physical and sensory environment
- Issues related to organizing work with digital tools

For example, the lack of awareness among managers and colleagues sometimes discourages people with disabilities from revealing their barriers and seeking solutions. Some people may also be reluctant to grant accommodations, as they think that they should apply to all employees.

Furthermore, the Bank has taken note of the additions and clarifications made to the revised Employment Standard, which set out the objectives aimed at creating accessible, inclusive, and barrier-free workplaces for people with disabilities at every stage of the employment life cycle. The new Digital Technologies Accessibility Regulations will enable the Bank to continue removing digital

barriers that could hinder people’s abilities to apply for a job, obtain information, integrate into the workplace or keep a job. The revised version of the Employment Standard reinforces the Bank’s responsibility to provide ongoing training and integrate digital accessibility in a systematic way that complies with applicable standards.

4. Priorities to eliminate barriers

Objective 1: Reinforce the culture of inclusion in order to attract, retain and engage employees with disabilities

No.	Metrics and priorities	Timeframe
1	Promote existing training that explains what disabilities are.	Mid-term

No.	Metrics and priorities	Timeframe
2	Raise awareness, including testimonials from employees.	Ongoing
3	Promote the activities of the Employee Resource Group (ERG) dedicated to disability and mental health, including support activities such as trust circles or honest conversations on the topic.	Ongoing
4	Review the mandatory accessibility training for new hires.	Mid-term

No.	Metrics and priorities	Timeframe
5	Get closer to user communities, experts and external partners to involve them in consultations, for example, tests with the UX laboratory (user experience).	Mid-term

Objective 2: Optimize the accommodation process

No.	Metrics and priorities	Timeframe
1	Promote the process, in particular by intentionally rolling out the management clinic on accommodations to all managers.	Mid-term

No.	Metrics and priorities	Timeframe
2	Facilitate and centralize access to information and advice on accommodations.	Mid-term

Objective 3: Improve physical and sensory accessibility

No.	Metrics and priorities	Timeframe
1	Create quiet zones and promote better use of spaces to make it easier for individual work and concentration.	Mid-term
2	Launch an awareness campaign on noise in the office.	Short-term

Objective 4: Improve digital accessibility

No.	Metrics and priorities	Timeframe
1	Collaborate with IT teams to improve our processes, in particular recruitment processes, and to provide adequate support for people who create content across the organization to ensure that it is accessible.	Long-term
2	Develop training for people who create content and a procedure for completing this training.	Mid-term

No.	Metrics and priorities	Timeframe
3	Audit internal web pages to identify and correct barriers to make sure they are accessible.	Mid-term
4	Improve the integration of accessibility by design into processes and projects for the development of HR solutions, including digital initiatives.	Mid-term

4.2.2 Area: Design and delivery of programs and services

1. Background and statement of commitment

The Bank is committed to offering an inclusive, simple client experience that puts people first and focuses on supporting key moments in its

clients' lives. It aims to offer accessible and equitable advice, products and services, regardless of the communication channel chosen.

Our branches, digital platforms and contact centres are designed so that all people can use them, including those with disabilities or who may need special support, such as seniors. The experience offered is based on constant respect for dignity, autonomy and equity. To meet clients' preferences and needs, services can be offered based on the desired communication method: Telephone, email, in person or video call. Accessible technological tools make it easier to access to information, products and services, while supporting certain transactions.

To this end, the Bank is continuously improving the accessibility of its digital programs, services and platforms to reduce barriers and promote clear, simple and autonomous navigation. A digital accessibility best practices

guide helps standardize these practices in accordance with the Web Content Accessibility Guidelines (WCAG), contributing to a more inclusive, barrier-free client experience.

2. 2023-2026 plan achievements

During the 2023–2026 plan, the Bank made significant progress in accessibility with respect to the design and delivery of its programs and services. Three objectives were set:

- Learn more about the barriers faced by people with disabilities so we can adapt our programs and services
- Ensure accessibility when designing, reviewing or delivering programs and services
- Provide an ecosystem that meets accessibility standards

One of the main achievements is the implementation of a Bank-wide design system to apply the WCAG standard to digital content.

Manual independent audits are carried out periodically to document gaps and identify areas for improvement. This work confirms the importance of furthering our understanding of the barriers faced by people with disabilities and reinforcing the integration of accessibility throughout the cycle, from design to service delivery.

Digital accessibility training courses have been developed to meet the specific needs of the various functions involved in the value chain, including developers, designers, analysts, content creators, project managers, etc. The Bank is continuing to make progress and is preparing for the future in terms of accessibility.

3. Barriers identified during consultations

Despite the progress made, findings from assessments and client surveys reveal several persistent irritants in service delivery. For example:

- Some clients may have difficulty completing the verification and authentication processes.
- Low contrast screens and navigation can sometimes be complex for the visually impaired.
- Some procedures still require clients to be physically present, which poses a problem for clients with reduced mobility or sensory limitations.
- Vulnerable individuals, such as clients with visual or cognitive disabilities, may be more exposed to manipulation and financial abuse.
- When rules are applied too strictly without regard for people with disabilities, a perception of discrimination or inadequate support persists.
- The use of telephone lines by some people with disabilities may be a challenge. For

example, people with a hearing impairment using relay transcription services.

- The accessibility of the products and services offered by some of the Bank's partners varies, which may be reflected in our service offering.

These irritants stem in part from a lack of expertise in accessibility, which limits the Bank's capacity to effectively implement WCAG standards and integrate and operationalize the approach from the design phase. Furthermore, accessibility remains insufficiently integrated in processes and the execution cycle, leading to delays in corrections and an elevated risk of technical debt as compliance gaps continue to emerge. The uneven prioritization of accessibility by design in digital initiatives is also a major barrier, especially when it needs to be integrated retroactively. Certain paths and services remain less accessible, which has a direct impact on the experience of clients

with limitations or disabilities.

4. Priorities to eliminate barriers

In response to these findings, the Bank has established four priorities for 2026-2029.

The first priority is to develop capacity and expertise in digital accessibility, in particular by implementing a structured and ongoing skills development program, which includes training for developers, design teams and key stakeholders, as well as adopting accessible writing principles.

Objective 1: Strengthen capacity and expertise in digital accessibility

No.	Metrics and priorities	Timeframe
1	Assess gaps in the current processes using a recognized maturity model.	Short-term
2	Strengthen expertise in digital accessibility by continuously developing skills and adopting accessible design and writing practices.	Ongoing
3	Provide training on the fundamentals of accessibility to all employees.	Short-term

The second priority is to integrate accessibility by design by implementing formal mechanisms and aligning accessibility requirements with processes, tools and key steps in the execution cycle, particularly by using the design system as a structuring driver. To ensure consistency from end to end, accessibility requirements will have to be integrated into sourcing processes, allowing for the selection of third parties that comply with the Bank's accessibility standards and principles.

Objective 2: Embed accessibility by design into processes, tools and the execution cycle, including with the Bank's third-party partners

No.	Metrics and priorities	Timeframe
1	Prepare the proof required by the Phase 1 Digital Technology Accessibility Regulations (audits, reports, etc.).	Ongoing
2	Ensure that the specialized tools used by the Bank to advance accessibility by design meet the criteria and requirements of the Regulations.	Ongoing

No.	Metrics and priorities	Timeframe
3	Implement an accessibility by design model when moving from phase to phase in the delivery cycle.	Mid-term

The third priority involves structuring governance and practices through dedicated resources and strengthening expertise to ensure the consistency of interventions, follow-up on required adjustments and compliance with regulatory requirements.

Objective 3: Structure governance and compliance support to ensure the sustainability of practices

No.	Metrics and priorities	Timeframe
1	Implement and consolidate governance by relying on dedicated resources and expertise to ensure compliance and the sustainability of practices.	Mid-term
2	Monitor indicators (key risk indicators and key business indicators) to enable the authorities concerned to monitor and actively participate in the implementation.	Mid-term

No.	Metrics and priorities	Timeframe
3	Periodically analyze complaints, comments and feedback from clients in order to fix barriers, as applicable.	Ongoing

The fourth priority is to better equip and raise awareness among the teams that support clients in assisted channels to ensure consistent interventions, quickly identify adjustments needed and support the Bank's commitment to offering services that are accessible to all.

Objective 4: Raise employee awareness of assisted service channels

No.	Metrics and priorities	Timeframe
1	Provide accessible customer service training to proactively meet the needs of seniors, vulnerable persons or persons with disabilities in a caring manner. For example, use of the relay transcription service by hearing impaired people.	Mid-term
2	Inform assisted channel employees of the comments and feedback collected in order to continually improve service.	Mid-term

Lastly, the Bank will continue to optimize its information sites to improve the client experience in concrete terms, including through targeted audits of web pages and improving the structure, readability and compatibility of content. These orientations will help us consolidate what we've learned, reduce barriers to accessibility in the long term and offer programs and services that are more inclusive, consistent and comply with applicable standards for all clients.

4.2.3 Area: Built environment

1. Background and statement of commitment

In 1992, the Bank made a commitment to the Canadian Human Rights Commission to ensure its branches and other buildings comply with universal accessibility standards. National Bank therefore continues to make significant investments in its branches and points of service to offer clients an environment that

lives up to their expectations. For example, in 2025 we:

- Opened, renovated or relocated 40 branches to offer modern, more accessible spaces.
- Gradually updated our branches to meet new diversity, inclusion and universal accessibility standards for people with cognitive and physical limitations, with the help of the guidelines in the [Code of Conduct for the Delivery of Banking Services to Seniors](#).

The Bank recognizes that accessibility to the built environment is an essential driver to promote the inclusion of people with disabilities and to meet the diversity of needs of its clients and employees. This commitment applies to corporate buildings and 382 branches located in Canada. Our Real Estate Business Strategy is the main pillar for supporting the development of the built environment and

ensuring the progressive integration of IDEA (Inclusion, Diversity, Equity and Accessibility) principles into projects with a view to continuous improvement.

2. 2023-2026 plan achievements

Over the period covered by the 2023–2026 plan, the Bank took several important steps to ensure the inclusive accessibility of the built environment. The inauguration of the new head office located at 800 Saint-Jacques Street West is one of the major achievements. It was designed in accordance with standards, codes and legislation in effect, including universal accessibility requirements. Improvements were also made based on feedback collected through surveys and audits carried out with an external accessibility firm. Signage was modified to better support people with disabilities, notably by adding braille to furnishings to make orientation easier. Implementing photometric studies when designing projects also helped optimize visual comfort and meet different user

profiles.

We also developed a support offer to help employees with specific needs move around more easily and become familiar with their work environment, so they can adapt their workspace, in coordination with Human Resources. Incorporating accessibility requirements into the project design process has become a driver of both efficiency and effectiveness.

The Bank has also strengthened its internal knowledge through awareness-raising and training activities, particularly for the teams responsible for its buildings. Accessibility audits were carried out in some buildings by a specialized firm, with particular attention to the sensory, cognitive, and communication accessibility of the premises.

These initiatives are significant achievements in documenting the current state of existing environments and supporting a progressive

and sustainable approach to improvements.

In addition to being accessible in six languages (English, French, Spanish, traditional Chinese, Punjabi, Arabic), all our automated banking machines (ABMs) are equipped with an audio guide to assist people with visual disabilities.

3. Barriers identified during consultations

Consultations and work conducted as part of the 2023–2026 plan identified challenges in some buildings, notably related to ease of access (ramps, automatic doors, etc.), reserved parking near entrances, sometimes poorly adapted furniture, complex vertical circulation, accessible washroom facilities, ambient noise management and workstation ergonomics. Barriers involving ABMs mainly concern people with visual impairments (e.g., text size, contrasts).

These findings reflect the diversity and complexity of existing facilities, some of which were designed or renovated to meet the

standards in place at the time. While recent projects meet the applicable regulatory requirements, the systematic integration of IDEA principles and other more advanced criteria vary from site to site. The various standards published since 2023, as well as those to come, will allow us to continue identifying, eliminating and preventing barriers in the built environment.

4. Priorities to eliminate barriers

The Bank plans to consolidate its achievements and further structure its accessible built environment practices in its projects over the 2026-2029 period. Several initiatives are underway in the built environment area, such as the development of a standards guide that integrates IDEA principles, including space acoustics, signage, ergonomics, lighting and emergency measures in buildings. Over time, these tools will help harmonize the layout design for major projects and ensure property management teams commit to offering more

accessible and inclusive spaces.

Future projects will follow the guidelines of our real estate strategy in order to find a balance between the need for collaboration, concentration and confidentiality in work areas. A detailed inventory of real estate and rental facilities and their components will allow us to prioritize corrective measures to reduce gaps with current and future provincial and federal standards.

Objective 1: Continue rolling out real estate accessibility best practices

No.	Metrics and priorities	Timeframe
1	Implement the standards guide for applying IDEA principles in layout and design concepts, including acoustics, photometric considerations, reserved parking, access ramps, comfort of furniture and seating in waiting areas.	Mid-term
2	Standardize, structure, and consistently apply accessibility practices across real estate projects.	Mid-term

No.	Metrics and priorities	Timeframe
3	Organize work areas based on business needs and feedback from employees and clients (collaboration, confidentiality, concentration, etc.).	Ongoing
4	Continue accessibility audits and exploratory walks on new sites, particularly in Edmonton, Calgary and Montreal (1155 Metcalfe, 700 Saint-Jacques, etc.).	Ongoing

No.	Metrics and priorities	Timeframe
5	Provide training on accessibility principles and standards to the Real Estate Business Strategy team and its suppliers/partners to support the adoption of best practices.	Short-term
6	Complete a detailed inventory of the building installations/components to identify gaps and prioritize interventions.	Mid-term

The standard on emergency evacuations is a reminder that people with disabilities want the same level of security as their colleagues when a building needs to be evacuated. The following objective has therefore been

developed:

Objective 2: Promote behaviours to adopt during emergency situations

No.	Metrics and priorities	Timeframe
1	Remind stakeholders of the importance of following evacuation instructions and that participation is mandatory.	Short-term
2	Reinforce awareness of the behaviours to adopt in emergency situations.	Ongoing
3	Monitor the emergency staircases after the evacuation drills.	Ongoing

No.	Metrics and priorities	Timeframe
4	Make sure that assembly areas are clearly identified and communicated in the buildings.	Mid-term

Objective 3: Explore ways to improve ABMs

No.	Metrics and priorities	Timeframe
1	Assess the possibility of implementing dark mode with light-coloured text for ABMs.	Long-term

4.2.4 Area: Information and communication technologies (ICT)

1. Background and statement of commitment

As part of its 2023–2026 accessibility plan, the Bank continued its efforts to boost the accessibility of its digital and technological ecosystem. The ICT area has helped to progressively improve the experience of people with disabilities, for both clients and employees, by relying on recognized standards, the evolution of its design and development practices, and the rollout of monitoring tools. With this in mind, the Bank will continue working to make accessibility a shared mindset in IT teams and to keep improving digital systems and services so they are accessible to the widest possible audience.

2. 2023-2026 plan achievements

The last three-year plan helped establish solid foundations for digital accessibility and showed

a tangible commitment. The main advances include:

- **Structured rollout of digital accessibility training:** Training programs tailored to the different roles have been implemented to reinforce teams' knowledge of accessibility, including specialized training, and practical resources to help them apply best practices.
- **Strengthening awareness in IT teams:** Ongoing awareness-raising initiatives were implemented to support ownership of accessibility issues and encourage more inclusive digital practices on a daily basis.
- **Tangible and measurable improvements to digital platforms:** Continuous improvements were rolled out across selected technology systems, notably in navigation, key components and forms, leading to solid progress in

accessibility over time.

- **Changes to development practices:** The ICT area has started transforming its practices to better integrate digital accessibility. The development, which is already well-established in some teams, is continuing so that it becomes a shared mindset across the organization.
- **Accessibility monitoring and control tools implemented:** Automated audit and monitoring tools have been rolled out to regularly assess the accessibility of information websites. These assessments allow us to identify gaps, track progress and support continuous improvement based on objective data.
- **Structuring the IT support offered to employees:** A dedicated section of the Intranet helps employees and managers identify IT adaptation needs for persons with disabilities. It provides a framework

for the processes used to make requests for non-standard devices and equipment, while documenting the use of accessibility features integrated into digital tools, including Microsoft Teams. This approach helps clarify IT processes and makes it easier to implement suitable technology solutions.

3. Barriers identified during consultations

The consultations helped identify structural challenges associated with integrating digital accessibility in a complex organizational and technological environment. These include challenges related to cross-sector alignment of priorities and resources, varying approaches to integrating digital accessibility depending on contexts and initiatives, and limits to the standardization of processes and tools supporting these practices.

The evolving regulatory framework, particularly the coming into force of Phase 1 of the Digital

Technologies Accessibility Regulation, further underscores the importance of these challenges by introducing new progressive requirements that apply across the entire digital technology lifecycle. These findings helped guide discussions on the priorities of the next three-year plan.

Lack of cross-sector alignment of priorities, responsibilities and resources

Implementing digital accessibility requires a clear alignment of objectives and responsibilities among teams. Without fully coordinated prioritization across the organization, there may be gaps in the pace, scope and consistency of the rollout of accessibility practices.

Varying maturity in integrating digital accessibility

In line with the alignment challenges identified, the integration of accessibility into digital practices is still uneven across teams and

projects. While some teams have already developed strong maturity and well-established reflexes, others are still in the buy-in phase, which limits systematic application across the organization.

Incomplete standardization of processes and tools

The lack of standardized processes and shared automated tools, combined with alignment and maturity challenges, limits the consistent integration of accessibility across the entire lifecycle of digital solutions. The coming into force of Phase 1 of the Digital Technologies Accessibility Regulation reinforces these findings and introduces new progressive requirements, particularly with respect to the design, updating, assessment, and acquisition of digital technologies, as well as the training of the teams involved. These findings have made it possible to better target the priorities in the next three-year plan, particularly in terms of standardization, reinforcing capacity,

training and governance, in order to continue progressing towards a fully accessible digital ecosystem.

4. Priorities to eliminate barriers

Objective 1: Strengthen IT teams' skills sustainably to make accessibility a shared and sustainable skill

No.	Metrics and priorities	Timeframe
1	<p>Structure training in digital accessibility and make it sustainable</p> <p>Maintain and develop training paths for the various IT roles, taking into account changes in standards and regulatory requirements.</p>	Ongoing

No.	Metrics and priorities	Timeframe
2	<p>Embed accessibility in IT team culture and practices</p> <p>Continue efforts to ensure accessibility is understood, applied and promoted by IT teams in terms of developing, maintaining and acquiring digital solutions.</p>	Mid-term

Objective 2: Consolidate digital accessibility metrics to ensure efforts continue and facilitate accountability

No.	Metrics and priorities	Timeframe
1	Reinforce IT governance in digital accessibility Clarify roles, responsibilities, and monitoring mechanisms to ensure a consistent approach to digital accessibility and effective accountability.	Short-term

No.	Metrics and priorities	Timeframe
2	<p>Develop monitoring and measurement tools</p> <p>Implement and improve tools that automate the measurement of digital accessibility and help identify gaps to meet our obligations through monitoring, audits, and documentation.</p>	Mid-term

No.	Metrics and priorities	Timeframe
3	<p>Support decision-making with objective data</p> <p>Guide priorities, investments and plans to upgrade digital platforms using monitoring results, analytics and audits.</p>	Mid-term

These governance and monitoring mechanisms are the foundations needed to systematically integrate accessibility into IT projects.

Objective 3: Systematically integrate digital accessibility into IT practices to ensure an integrated, consistent approach across all projects.

No.	Metrics and priorities	Timeframe
1	<p>Strengthen the integration of accessibility requirements into existing IT processes</p> <p>Make sure that accessibility requirements are consistently integrated into IT projects, alongside other technical and operational constraints.</p>	Long-term

No.	Metrics and priorities	Timeframe
2	<p>Standardize the integration of accessibility into the lifecycle of digital solutions</p> <p>Integrate accessibility by design, from development through to production, leveraging automated control and validation mechanisms.</p>	Mid-term

No.	Metrics and priorities	Timeframe
3	<p>Reduce gaps between teams and platforms</p> <p>Align practices to deliver a more equitable user experience for both internal and external solutions.</p>	Ongoing

Objective 4: Improve the accessibility of technology for employees

No.	Metrics and priorities	Timeframe
1	<p>Continue integrating accessibility into technology for employees</p> <p>Reinforce and value the role of IT in ensuring the availability of the technological solutions needed to accommodate employees with disabilities.</p>	Long-term

4.2.5 Area: Communications other than ICT ¹

1. Background and statement of commitment

The Bank implements measures to ensure that everyone has access to information, presented in clear and understandable language and delivered through the communication channel best suited to their needs — digital platforms, telephone, email, in-person meetings, or videoconferencing. To this end, guidelines have been developed to encourage the use of plain and simple language in all documents and communications. These guidelines are intended to align practices related to inclusive and accessible communications, both internally and

¹ The communications covered here encompass all communications issued by the Bank, whether internal communications to employees or external communications to clients.

externally.

Communications published on the Bank's digital platforms also help, in part, to adequately support people with disabilities. The Bank also acknowledges the importance of showcasing its values and inclusive culture within the organization to support the sustainable evolution of accessibility practices. These messages are conveyed through various internal channels, such as discussion forums, information tools and corporate communications.

Finally, the Bank regularly collects feedback from its employees and clients, using tools such as surveys, discussion forums and data analytics, in order to quickly identify potential accessibility barriers in communication and respond proactively to them.

The 2023-2026 three-year plan helped us understand the universal scope of the practices and processes used to produce accessible

communications. The progress made in the areas of Employment and Communications (internal) will be used in the next three-year plan to improve the accessibility of communications with clients.

2. 2023-2026 plan achievements

Our achievements in 2023-2026 include several major advances:

Improved communications and content

Several tools have been rolled out to help content creators to communicate in plain language:

- Guide to inclusive writing
- Plain language writing guide
- Guide on best practices for producing accessible videos
- Training program for content creators

Improvements to the different communication channels

The following initiatives have made information more accessible on our various communication channels:

- Transcriptions can be activated for corporate conferences.
- Quarterly follow-up of major achievements in video format as well as in writing.

Improved awareness of accessible communications

Several initiatives were carried out to address accessibility in our communications to employees.

3. Barriers identified during consultations

Internal communications (employees)

- Overuse of acronyms across the organization does not promote

understanding.

- Financial information can be complex or difficult to understand depending on the level of knowledge or expertise.
- The large number of content creators with varying proficiency in the guidelines leads to information overload.
- Web accessibility standards and criteria are not known/followed by everyone.
- Quality of content is not always tested before publication.
- Sign language is not provided in our videos. LSQ/ASL interpreters are rare and in high demand.
- The resources and tools available to meet employees' accessibility needs are not well understood.
- The needs associated with several invisible disabilities are not well understood,

making it more difficult to identify appropriate accommodation measures.

External communications (clients)

- No comprehensive centralized inventory of client requests regarding accessibility of communications.
- No exhaustive inventory of initiatives and services implemented by the business lines to accommodate clients' accessibility needs in communications.
- Information on clients' communication accessibility preferences (braille, large print, etc.) is not centrally collected or stored for future reference.
- In many cases, templates for sending communications to clients based on their accessibility needs (i.e., accessible or alternative formats) are not readily available.

- Employees in charge of communications with clients must be trained to select the right channel and/or make sure that the documents sent meet the accessibility criteria requested, while reflecting the brand.
- Some web pages require a higher than average level of proficiency in French or English, which is a barrier for many clients.

4. Priorities to eliminate barriers

Objective 1: Communicate in plain and simple language internally

No.	Metrics and priorities	Timeframe
1	Develop a training program on plain language for creators of authoritative content.	Short-term

No.	Metrics and priorities	Timeframe
2	Train creators of authoritative content on using plain and simple language.	Mid-term
3	Train content creators to use the SharePoint feature to determine if their content is plain and simple.	Mid-term
4	Implement governance to ensure that the content published adheres to accessibility principles.	Mid-term

No.	Metrics and priorities	Timeframe
5	In the publication process, include a step for proofreading (test) by another content creator.	Mid-term
6	Train all new creators of authoritative content.	Ongoing

Objective 2: Make information accessible via our various communication channels

No.	Metrics and priorities	Timeframe
1	Make corporate conferences available for playback with subtitles.	Ongoing

No.	Metrics and priorities	Timeframe
2	When relevant, use several formats (video and written) to communicate information as well as several degrees of information (summary and full text) to take into account employees' time and attention.	Ongoing
3	Make sign language interpretation accessible for corporate conferences and other targeted events internally and externally.	Mid-term

Objective 3: Promote accessibility to stakeholders

No.	Metrics and priorities	Timeframe
1	Promote our accessibility efforts in our internal communications.	Ongoing
2	Increase internal visibility of the Accessibility Plan and initiatives implemented.	Ongoing
3	Publicize and increase the external visibility of our accessibility actions.	Ongoing

Objective 4: Improve the accessibility of external communications for clients

No.	Metrics and priorities	Timeframe
1	Train content creators on using plain and simple language.	Short-term and ongoing
2	Continue to raise awareness on accessibility and the importance of accessibility in communications with our clients.	Short-term and ongoing

No.	Metrics and priorities	Timeframe
3	<p>Promote quick adoption of the new brand image in our communications with clients, including ongoing communications, which must all be reviewed (migration plan under development).</p>	<p>Short- or mid-term (depending on prioritization)</p>
4	<p>Determine priority actions with the clients concerned by:</p> <ul style="list-style-type: none"> - Improving surveys - Enhancing consultations (e.g., focus groups). 	<p>Short-term</p>

No.	Metrics and priorities	Timeframe
5	Develop an AI agent to help us validate the points raised as critical by the clients concerned in order to test the accessibility of our external communications.	Short- or mid-term (depending on prioritization)
6	Implement and promote a dedicated communication channel to collect client feedback, suggestions and complaints on accessibility, building on the rollout of ServiceNow .	Mid-term

No.	Metrics and priorities	Timeframe
7	In collaboration with product managers: Provide a summary in plain language of certain content, including contracts (e.g., www.enclair.ca/en).	To be confirmed based on prioritization

4.2.6 Area: Procurement of goods, services and facilities

1. Background and statement of commitment

The Bank is committed to fostering inclusion and accessibility in all aspects of its operations, including procurement and sourcing activities. We recognize that meaningful progress in these areas requires the active participation of all stakeholders, including our business partners, suppliers, and employees. To this

end, we regularly review and update our standard contract templates for the acquisition of goods and services. This process ensures that our contractual clauses remain aligned with evolving legal and regulatory requirements, industry best practices, and emerging accessibility standards. By prioritizing these reviews, the Bank demonstrates its dedication to creating an equitable and accessible environment for everyone involved in our procurement processes.

2. 2023-2026 plan achievements

As part of our ongoing commitment, the Bank has implemented a standard clause in all contract templates requiring suppliers to comply with Canadian federal and provincial legislation. Our business lines actively ensure that suppliers uphold these legal requirements. In addition, the Supplier Code of Conduct outlines expectations regarding inclusion and diversity, reinforcing our commitment to

accessible procurement.

3. Barriers identified during consultations

Accessibility procurement is a challenging area considering vendors are in different jurisdictions and sometimes lack the understanding of the requirements under the Accessible Canada Act. Several challenges have been identified:

- **Insufficient contractual clauses and monitoring mechanisms:** Some contracts lack specific provisions that mandate suppliers to comply with accessibility legislation, and do not require suppliers to demonstrate their ability to deliver accessible goods and services.
- **Lack of awareness and training:** Employees involved in procurement processes may not receive adequate training on accessibility requirements and best practices, leading to gaps in implementation and oversight. Products

and services acquired through procurement do not consistently incorporate accessibility principles and requirements from the outset.

- **Accessibility of the procurement system:** The SAP Ariba platform, processes, and documents used in procurement could pose barriers for certain users, employees, or vendors, hindering their ability to fully participate in procurement activities.
- **Accessibility of payment terminals:** An increased number of touchscreen payment terminals with touch screen are inaccessible to blind or visually impaired people as they lack tactile markers.
- **Food services:** From time to time, at the Montreal head office, employees with disabilities encounter barriers in the cafeteria, especially during busy periods. Issues are related to acute noise levels

and/or lighting, stairs restricting certain areas, carrying food trays and other physical barriers.

4. Priorities to eliminate barriers

Objective 1: To provide an ecosystem, assets and services that meet accessibility standards

No.	Metrics and priorities	Timeframe
1	Training In 2027, the Bank will provide targeted training to sourcing advisors, ensuring that accessibility-related terms and conditions are incorporated into applicable procurement contracts. This initiative aims to build awareness and expertise among	Mid-term

No.	Metrics and priorities	Timeframe
	procurement professionals, facilitating the inclusion of accessibility requirements in all relevant agreements.	
2	<p>Strengthening contractual terms and conditions</p> <p>For new or renewed contracts with accessibility requirements that are managed by Sourcing, we plan to include accessibility-specific terms and conditions.</p>	Mid-term
3	Procurement system	Long-term

No.	Metrics and priorities	Timeframe
	Conduct an ICT Standard conformity assessment by Dec 5, 2028, for the procurement platform, processes and documents used in procurement.	
4	<p>Cafeteria</p> <p>Discuss complaints and possible improvements with the food services provider and explore solutions with the building manager.</p>	Mid-term

Through these initiatives, the Bank seeks to eliminate barriers in the procurement of goods and services.

4.2.7 Area: Transportation

1. Background and statement of commitment

Although the Bank is not a transportation service provider within the strict meaning of the Act, travel is sometimes required to carry out certain functions or in order to perform certain tasks. To promote accessibility, the Bank's accommodation program analyzes requests submitted by employees with disabilities and evaluates alternative solutions, such as:

- Adapted transportation
- Parking spaces
- Flexible work schedules
- Working remotely

The Bank continues to use its mobile branch to better reach clients, based on their needs, across its network. It is mainly used when

major renovations are done to a branch in order to reduce inconvenience due to construction work and any risks related to health and safety at work. When designing new corporate buildings and branches, the Bank also makes sure to include accessibility requirements in its specifications, including creating and choosing parking spaces for persons with disabilities with a permit, subject to municipal regulations.

4.3 Implementation

The filing of our second three-year accessibility plan represents a new step in reducing and preventing accessibility barriers at the Bank. In the years ahead, several key milestones must still be reached to achieve our objectives, including:

- Producing an annual progress report to document progress and track the status of initiatives in the plan.
- Continuing consultations to adapt our interventions to the needs of people with disabilities.
- Using feedback and recommendations received through the feedback process to guide further improvements in accessibility.

4.4 Parties responsible

Accessibility Lead at National Bank: Andrea Baldwin, Vice-President – Voice of the Organization, Culture and Community

Leaders per area:

1. **Employment:** Cristina Cistellini, Vice-President – Human-Centred Evolution and Delivery

2. **Design and delivery of programs and services:** Caroline Roy, Vice-President – Special Projects, Digital
3. **Built environment:** Lise-Anne Amyot, Vice-President – Real Estate Business Strategy
4. **Information and communication technologies (ICT):** Anne Marie Roy, Senior Vice-President – IT Delivery and Operations, Personal Banking, Banking Services, Financing, Insurance and Channels.
5. **Communications:** Rebecca Fleetwood, Senior Director – Corporate Communications
6. **Procurement of goods, services and facilities:** Danny Dery, Vice-President – Procurement Ecosystem
7. **Transportation:** Not applicable