



Accessibility Progress Report 2024.

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General

Feedback process and contact information

We welcome feedback on this Progress Report and our Accessibility Plan. You may contact us through any of the means below. Your feedback will be reviewed by Associate Director, Inclusion, Diversity, Equity Accessibility and Anti-Racism. **This Accessibility Progress Report and our Accessibility Plan are available in other accessible formats upon request.**

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About Equitable Bank

Equitable Bank (hereinafter referred to as “Equitable Bank”, “Equitable” or the “Bank”) is Canada’s seventh largest bank by assets, playing an increasingly important role in the economy and in the lives and livelihoods of many people and businesses As Canada’s Challenger Bank™, Equitable Bank has a clear mission to drive change in Canadian banking to enrich people’s lives. It leverages technology to deliver exceptional personal and commercial banking experiences and services to over 639,000 customers and more than six million credit union members through its businesses.

The Bank’s headquarters is in Toronto, Ontario, with regional offices in Vancouver, Calgary, Regina, Saskatoon, Montreal, and Halifax and the Bank employs nearly 1,800 challengers who are aligned to drive change in Canadian banking.

Concentra Bank is a wholly owned subsidiary of Equitable Bank and all reports and references in this Progress Report to Equitable Bank include Concentra Bank.

Inclusion, Diversity, Equity, Accessibility and Anti-Racism = IDEA²

We are committed to building a diverse and inclusive workplace where everyone is honored and respected. We believe that diversity drives innovation which leads to better outcomes for employees and customers. We continually invest in community causes that are important to our Challenger workforce and the social fabric of our country. For customers, we choose to offer services that challenge the status quo in banking, and incorporate the talents of our amazing staff to deliver value to underserved Canadians.

Accessibility Statement

Equitable Bank is committed to providing an inclusive and accessible workplace for our employees to ensure that all staff and clients have the support needed to thrive. There can be no 'best in class' customer service without accessibility in mind.

A Message from Equitable Bank's CEO Andrew Moor

As Canada's Challenger Bank™, Equitable Bank is focused on what the evolution of meaningful change in banking looks like, in Canada and beyond. Last year, we were thrilled to produce our first-ever Accessible Canada Act (ACA) report, and to also learn from strong practices happening around us. Our commitment to enriching the lives of employees and customers shows up in part through our constant innovation and ever-expanding inclusivity commitments. Our ACA work and related report reflect this ethos: this work is not born from obligation, but from a determination to ensure challenge-focused, equitable access for all, full-stop.

Throughout the past year, we have continued to consult with and be guided by our employees. Simultaneously, we remain engaged with organizations who specialize in accessibility consulting. This dual approach ensures that we challenge ourselves with the latest thinking in the accessibility field in a way tailored to the Bank and its employees and customers.

Looking ahead, we are steadfast in our commitment to challenge not only ourselves at all turns, but also to challenge the organizations that we do businesses with to ensure that they are showing us how they are expanding accessibility within their own businesses and products and pledge to build a future where every individual can realize their full potential without limitations.

A handwritten signature in black ink, appearing to read 'Andrew Moor', with a long horizontal line extending to the right from the end of the signature.

Andrew Moor

President & CEO of Equitable Bank

A note from Equitable Bank's Chief Human Resource Officer Gavin Stanley

Since the release of our Accessibility Plan last year, our aim has been to genuinely assess our current state of inclusion. Whether physical or digital, we are deeply focused on ensuring accessibility is considered at all stages of both existing and future technologies and human-focused processes. We also commit to demanding the same from our suppliers.

As is the case with all our IDEA² work, we believe that individuals of lived experience are inclusion experts in their life and work, and their wisdom guides our organization forward. Their input, along with a systematic review by accessibility consultants and other experts, ensures that we are constantly gathering crucial data on accessibility challenges within our digital and physical spaces, as well as within our policies, practices, and existing systems.

We have made much progress towards our 2024 goals, including ensuring our internal processes and systems are consistently assessed for accessibility, reviewing our hiring and onboarding process to remove bias and barriers, conducting research on integrating innovative assistive technology into our workdays, and auditing our office spaces, while also ensuring that new office spaces are access-forward. We are also 'baking in' procurement practices that standardize conversations and requirements from potential vendors around their accessibility and procurement requirements.

In our inaugural year of implementing our Accessibility Plan, we've seen rapid strides in certain areas, while acknowledging steeper challenges in others. As we continue implementing our Accessibility Plan in 2024, we aspire to go beyond seeking equity, and instead challenge all - both internally and external suppliers - to continue the evolution of this work. Together, our commitment is still unwavering: to shape a future where accessibility transcends aspiration to become an inherent reality.

Accessible Canada Act (ACA) Priority Areas:

Overview of Progress

As required by the ACA, this annual progress report outlines our progress against our commitments in our Accessibility Plan published in 2023. Our progress to date has been informed by our organization's journey and actions that we believe are important aspects of laying the foundation for our future work.

- As a digital bank we have placed significant emphasis on the platforms used by our customers. In 2023, we started this work by conducting a robust audit of our web and mobile offerings and we have been working diligently to find and remove any barriers that could prevent customers from accessing our products and services.
- With accessibility at the forefront, we have reimagined the possibilities within our existing and new office spaces. We are also nearing completion of our new head office at 25 Ontario Street in Toronto. Through partnerships with our landlords across the country, we continue to push for greater access in our office spaces and design elements which consider the varying needs of our employees. This push goes beyond our own offices and includes having an eye on all buildings that we occupy (whether we rent or own those properties).
- As a talent-first organization, we have focused on creating an inclusive environment where talented individuals of diverse backgrounds and abilities thrive. This has resulted in accessibility and accommodation training for our Human Resources (HR) team, the formation of our Accessibility Working Group and our new Accessibility Employee Resource Group (Accessibility ERG). We also continuously assess our internal software to ensure best practices are integrated for employees, candidates, external partners, and more.

Below are the objectives we listed in our 2023 Accessibility Plan for each of the seven priority areas under the ACA, along with the respective actions we endeavoured to make and our progress on those actions to date. We note that the actions listed within each priority area below reflect those items that were ongoing at the time of writing our 2023 Accessibility Plan or that were planned to be completed by 2024. These actions are in scope for the purpose of this progress report, whereas longer-term actions will be discussed in future reporting periods.

Employment

We understand that as an employer, we can support the trajectory of people's careers, which can affect their whole lives. It is therefore our duty to ensure that our hiring and talent management practices are considered through the lens of equity and inclusion. We continue to promote active allyship by empowering and prioritizing the sharing of wisdom from diverse backgrounds, which offers valuable moments of education and awareness-building.

Objectives

- Increase the number of employees with disabilities, using labour market availability as a benchmark;
- Promote a culture of inclusion that - through amplification and education - actively seeks to dismantle stereotypes and expand awareness of others' lived experiences; and
- Ensure that expansions and evolutions of our workplace accommodation policies continue to identify barriers and support accessibility practices for all employees.

Actions and Progress Updates

- **Review the hiring process with accessibility in mind while working with Lever, our external hiring software provider, to ensure an inclusive hiring process free of bias and discrimination.**
 - Lever is an applicant tracking system used by our talent acquisition team to streamline recruitment. Candidates already in the Lever database are recommended for open job postings based on a combination of different factors such as candidate scores, interview notes, referrals, insights from previous job postings as well as how far the candidate progressed in the recruitment process.
 - Lever's job application pages were reviewed for accessibility. These pages are readable by screen readers using semantic HTML tags which reveal the purpose of each text element on the screen with appropriate colour contrast for those who are visually impaired.

- **Review new job postings for inclusive language, disability inclusivity and essential job requirements (“Bona Fide Occupational Requirements”) with a focus on competencies required.**
 - The review of new job postings for disability inclusivity is ongoing.
 - The Bank is developing a competency framework which will allow us to identify the actual competencies needed for each role, which will then be incorporated into job postings. Competencies will be defined based on technical requirements which are needed for success in the role to allow for an objective review of candidates.
- **Formalize an onboarding process including accessibility considerations of new hires.**
 - Our approach has been to engage directly with new hires on an individual basis to tailor solutions with the right level of accommodation based on the employee’s needs. While we intend to formalize this process throughout the year, our focus has been placed on enhanced training of our HR team to ensure that we are appropriately considering the needs of candidates and employees.
- **Continue disability-focused hiring, based on employment equity data, for all job levels within the Bank.**
 - The Bank took part in Disabilities Mentoring Day where talented individuals with disabilities were given the opportunity to connect with professionals in their field of interest in the Bank.
- **Expand partnerships with disability-serving organizations to increase the application rate of persons with disabilities.**
 - Our Director of Talent Acquisition became a member of CBDC Restigouche, a National Advisory Committee for removing barriers for persons with disabilities in the Banking and Financial Services Sector. Through this committee, we have been able to learn from peers in the industry, share best practices, and connect with other disability-focused organizations that help employers with the recruitment and retention of persons with disabilities.
- **Develop and deploy special training on disability and accessibility specific to Human Resources (“HR”), recruiters and hiring managers.**

- We have partnered with INNOVA to deliver Disability Confidence training to our HR team. INNOVA is a partner of the Canadian Council for Rehabilitation and Work employing persons with disabilities to help remove barriers to create a more inclusive workplace experience. Their accessibility consultants have curated specialized content, which is being delivered through a phased approach. The training focuses on diversity within disability, inclusive language, intersectionality, anti-ableism, accessibility, and accommodation in the workplace. This training will enable more inclusive hiring methods across the Bank.
- A language guide was also shared with the team to increase disability confidence. This tool has helped to increase the HR team's understanding of the importance of language while providing recommended language.
- **Review our plans to ensure suitable coverage of a range of devices and assistive technologies.**
 - The review of our plans for coverage of assistive technologies has been deferred to the latter half of this year and will be included as part of a broader review.
- **Conduct individual interviews and focus groups with employees, centered around a range of topics including identifying any barriers to accessibility and generating ideas and plans for barrier removal.**
 - We have completed our first round of focus groups with more focus groups slated for later this year.
 - We will also be able to gain insights from our newly formed Accessibility ERG. These employees of lived experience are well positioned to give actionable advice and help in identifying barriers in the workplace.
- **Enhance the self-identification survey through expanded definitions, notices of confidentiality and demonstrated commitment to build trust around non-disclosure of one's disability.**
 - The self-identification survey will be expanded to better reflect the diversity of our employees. An enhanced survey is being built, with expanded categories for equity-seeking groups.

- **Develop and standardize approaches to collecting accessibility-related feedback both internally and externally.**
 - We expect progress in this area as we continue to work with our consultants and other persons with disabilities in standardizing our approach.
- **Develop further the barrier-removal process.**
 - This is ongoing work that will be facilitated through continued implementation of our plan and feedback received from employees.
 - A significant milestone was the creation of our Accessibility ERG made up of employees of lived experience.
- **Research the potential of assistive technology (screen readers, closed captioning and transcription, virtual note-taking tools) and provide that information when used, within first-day onboarding.**
 - The Procurement and Technology teams are undertaking research on assistive technology. This information will be used to determine future investments in tools to remove barriers faced by employees.
 - Over the last year, we have steadily activated more applications within the Microsoft suite of products. This includes features within Microsoft Teams such as meeting recordings and live transcriptions and Microsoft Copilot which uses AI to summarize meeting notes. This has helped increase productivity and will continue to unlock opportunities for more meaningful contributions from persons with disabilities.
- **Deliver Disability Confidence Training informed by people with disabilities through means such as using the support of our consultants, INNOVA, to help in providing such training.**
 - The delivery of HR specific training was prioritized to set an example of the behaviours we want to see throughout Bank. The HR team will also be supporting the creation of our enhanced accessibility training which will be provided for the entire workforce.

Built environment

Our overarching goal for our built environment is to ensure we extend beyond specifications in the legislation and instead optimize the working environment for greater productivity for all employees.

Our new head office at 25 Ontario Street in Toronto is expected to be complete in January 2025. We remain committed to designing our future office space with accessibility at the forefront. One of the benefits of this opportunity is the flexibility it offers in partnering with our landlord to include structural elements that facilitate accessible workspaces and are suited to the varying needs of our employees.

Some of the accessible design features of the new head office will include:

- Universal washrooms on every floor with powered door access;
- Power Door Operators (PDOs) entry doors;
- Accessible clearance for computer network rooms;
- Meeting room tables at standard desk height rather than bar height;
- Accessible sinks in the café, common spaces and first aid room;
- Undercounter drawers and cupboards in the café and printer areas;
- Assistive listening devices system incorporated into the town hall meeting rooms; and
- Sensory barriers, related to lighting, noise mitigation, ensuring quiet, distraction free workspaces.

Objective

- Equitable Bank is committed to building and creating spaces that are accessible to all users: customers, employees and other stakeholders.

Actions and Progress Updates

- **In 2023, each office space (in Toronto, Vancouver, Calgary, Regina, Saskatoon, and Montreal) was evaluated in order to assess each built environment. As a result of these evaluations, we created an internal list of recommended remediations.**
 - Our plans for leased spaces have changed over the past year as the leases for some of our regional offices are set to expire within the year. There has been a greater emphasis on finding new spaces with accessibility considerations at the forefront during our decision-making

process. We remain diligent in demanding greater accessibility and plan to work with landlords to address any required modifications for greater accessibility.

- **Incorporate alarm/evacuation systems integrating visual alarms in all office spaces.**
 - When enhancing the physical accessibility of the built environment our goal is to move beyond the specific built environment requirements as laid out in legislation and draft standards to ensure that any alarm system includes visual and not just auditory alarms.
- **Commit to sharing inclusive procurement suppliers with building managers.**
 - This work has been deferred to later this year as part of our procurement team's plans to look at our procurement processes and procedures for accessibility-related barriers.
- **Create a stronger communication system (including researching fire/building applications) to keep track of individuals on each floor who need support, be it temporarily or permanently.**
 - As we transition to new office spaces, we will be assessing and updating our emergency plans and expect this will be completed by the end of next year.

Information and communication technologies (ICT)

We launched an in-depth Accessibility audit of Web, Mobile and Mobile Web accessibility in 2023 using automated and manual testing and reviewed for Web Content Accessibility Guidelines (WCAG) 2.1. Our focus this year has been on building a stronger development process to reduce potential accessibility issues while increasing automated testing for quality assurance.

Objectives

- Ensure our website, apps and digital interfaces that we use are accessible for persons with diverse disabilities; and
- Assess and implement improvement-based recommendations from the 2023 Digital Accessibility Audit that we undertook.

Actions and Progress Updates

- **Use a combination of automated testing and manual testing by Deque's senior accessibility team, to understand the accessibility issues. Conduct a detailed audit of those screens across web and mobile platforms to identify and rank issues based on severity and frequency of occurrence.**
 - Deque Systems Inc. performs web accessibility audits and provides training and testing tools to improve digital accessibility. Deque's automated and manual testing results were reviewed, with a focus on addressing identified bugs on our mobile apps and web platforms. A representative screen strategy allowed us to maximize coverage to prioritize screens with common components and layouts, high visibility and customer actions and unique and complex interactions.
- **Establishing a system of ticket assignment for progress tracking and bug reporting so that the highest priority tickets are remediated as soon as possible with the guidance and support of our consultants.**
 - Our system for tracking and bug reporting is being developed as we continue to work collaboratively across our digital banking and technology teams. We expect this work to be completed by the end of this year.

- **Ensuring that new pages/new technology are assessed re: inclusive access.**
 - Preventing the occurrence of new issues is still a paramount concern, with proactive strategies being used to learn from the results of the audit in building new web pages.
- **Develop further design specifications with our internal Quality Assurance and Development teams to prevent the occurrence of accessibility issues before release of new code across mobile and web applications.**
 - The product design team is revising our internal design specifications to ensure accessibility considerations are integrated from the onset. We are paying close attention and testing to ensure that our web pages are:
 - Perceivable so persons with low vision can to view all information on the page;
 - Operable so persons can navigate the page to accommodate motor impairment; and
 - Robust so the website works under various conditions such as with a screen reader for persons with vision impairments.
- **Ensure that disability access details are delivered in training modules taken by customer care staff.**
 - Our customer care team's disability access training modules are being reviewed for potential enhancements.

Communication, other than ICT

Our focus has been on reviewing our existing communications policies to assess potential areas of improvement. Our goal is still to ensure that our communications issued internally and externally are clear and accessible.

Objectives

- Issue clear and transparent written communications to encourage full participation of people with diverse abilities; and
- Working towards having both internal and external documents available in multiple formats, simultaneously.

Actions and Progress Updates

- **Educating staff on standardizing available alternate formats (internally and externally), and timelines for providing these formats when requested.**
 - The standardizing of alternate formats and set timelines is still in the initial stages, with simultaneous launches as our intended future goal.
 - We have engaged INNoVA to better learn of the most likely alternative formats needed, and which future alternative formats may be requested.
 - The next phase of this work includes looking at the existing process and making changes as needed to ensure we deliver within the appropriate timeframe.
 - We are working with our procurement team to find a list of providers for these services to be able to efficiently deploy as needed.
- **Develop and deploy plain-language communication guidelines for internal and external documents.**
 - Continue to create clear and understandable communication with the audience's needs in mind. We plan to share communication guidelines next year as we focus on standardizing timelines for alternate formats.

- **Update existing communication policies to ensure they are inclusive of accessibility considerations and speaking inclusively re: people with disabilities.**
 - Training has been completed by all HR staff on inclusive language and communications.

Design and delivery of programs and services

We are in the preliminary stages, focusing on benchmarking and integrating accessibility into the product design lifecycle. The development of accessibility-specific requirements and guidelines has begun with further research planned over the coming months.

Objective

- Ensuring Equitable employees are equipped and empowered to design and deliver accessible offerings and services.

Actions and Progress Updates

- **Continuing to roll out unconscious bias training to new employees to ensure the staff has a fundamental understanding of how bias negatively affects people's lives and long-term outcomes, including specifically people with disabilities. Enhancement of this program is ongoing.**
 - Work on enhancing our unconscious bias training is ongoing.
- **Research the process of collecting data about clients with a disability and use data to tailor programs and services to enhance accessibility.**
 - Informed by the accessibility audit of our web pages, we have started to use general design principles for design best practices that enhance accessibility and prevent future issues.
 - We plan to complete more consultation and user testing with individuals with lived experience as part of the process of designing products and services.
 - We're constantly assessing how to best measure success, especially from the customer's perspective. We are working on creating more robust quantitative measures to track change outcomes from accessibility initiatives.

Procurement of goods, services and facilities

We have become aware of challenges in implementing accessibility within areas of procurement of goods, services and facilities, and we continue to learn about best practices both locally and internationally. While it is clear that there is substantial groundwork to cover, we commit to continuing to partner with our vendors.

Objective

- Commit to expanding accessible company considerations with respect to purchasing of products and services.

Actions and Progress Updates

- **Commence a review of our internal processes to identify any existing accessibility-related barriers in procurement.**
 - We are currently working towards improving our procurement processes. We have found the need to create a more comprehensive policy that embeds accessibility considerations into our procurement practices.
 - We are working towards having a formalized process for evaluating vendor accessibility documentation.
- **Include diversity, inclusion and accessibility principles in our Third-Party Code of Conduct to guide our evaluation criteria during our procurement process, and as we manage our relationships with our vendors on a regular basis.**
 - A review of has been completed to integrate accessibility principles into our Third-Party Code of Conduct.
- **Include statements on existing procurement documents to prioritize accessibility for vendor solicitations as a best practice.**
 - Standardized procurement templates are being developed which will prioritize accessibility for all vendor solicitations.

- **Request accessibility information and documentation of practices from vendors and contractors.**
 - We continue to ask questions of our suppliers before investing with them and communicate our commitment to accessibility in discussions with them.
- **Collect data for measurement of improvements to the procurement process.**
 - Measuring improvements will be prioritized once we have completed work on updating our policy and standardizing templates.

Transportation

Not Applicable as Equitable Bank does not provide transportation services as defined under the ACA.

Consultation with persons with disabilities

The phrase “Nothing about us, without us” is one we continue to live by, underscoring the importance of listening to those of lived experience and being led by their wisdom. We have adopted this approach because we believe that engaging with impacted individuals is important as it not only helps to identify barriers for removal but also to evaluate whether proposed solutions genuinely support their needs.

Accessibility Working Group

An Accessibility Working Group made up of 18 employees, many of whom were involved in preparing our Accessibility Plan, was officially formed after the publication of our Accessibility Plan in June 2023. The group has met on several occasions as a larger group and more often in sub-working groups for more focused discussions based on each of the priority areas. The members provided advice based on their subject matter expertise related to areas within the ACA and asked for input from employees outside of the working group to further refine our actions.

The Accessibility Working Group was also instrumental in raising awareness of our Three-Year Accessibility Plan across the Bank and supported the implementation of actions found within the Accessibility Plan. They also helped to evaluate the impact of our actions in achieving our overarching accessibility goals and the specific goals in each priority area. A considerable amount of time was also spent researching, discussing, and setting the foundation for longer-term actions noted in our Plan.

External Consultants

INNOVA Research and Accessibility Consultants

We have once again partnered with INNOVA to support the research and implementation of plans based on the commitments outlined in our Accessibility Plan. INNOVA specializes in developing inclusive solutions for greater accessibility and is a partner of the Canadian Council for Rehabilitation and Work. INNOVA’s expertise in human rights in business and inclusion by design allows us to enhance our approach to diversity, inclusion, equity, accessibility, disability, and accommodations for the implementation of actions and reporting connected to the Accessibility Plan published on June 1st, 2023.

Deque Systems Inc.

Deque is an industry leader comprised of a team of subject matter experts offering audit, training, and testing tools to enable digital accessibility. We decided to partner with Deque for our web accessibility audit because they are passionate about digital equality. Deque employs people with disabilities to perform manual testing and provide issue management software and remediation support post audit.

Feedback

We published the Accessibility Plan on our website, along with details on how to give feedback on the Accessibility Plan and/or report any barriers encountered while interacting with the Bank. Since initial publication, we have not received any formal feedback through our feedback process however we continue to remain vigilant to the concerns of our employees, customers, and members of the public and steadfast in our commitment to the removal of barriers that otherwise could prevent the full participation of all individuals.

Beyond 2024

In accordance with the ACA, Equitable will publish an updated Accessibility Plan every 3 years. Progress reports such as this one will be published every year in between, also in accordance with ACA, where we will present an overview of our movements forward, feedback we have received and how we have used it.

Moving forward, the Accessibility ERG will be a source of valuable insight through frequent consultations. Like the Bank's other employees resource groups, the Accessibility ERG will be empowered to create their own 3- year plan and have their own budget and will be supported by an Executive Sponsor and HR Partner with a direct line to Executive Leadership team at the Bank. We will also seek their input in refining our Accessibility Plan.

Over the next year, we expect that our Accessibility ERG's guidance will be especially impactful for our new head office project at 25 Ontario Street in Toronto as we finalize designs. We also look forward to their wisdom as we strengthen our existing community partnerships with disability serving organizations.

In conclusion

As stated in our Accessibility Plan, undertaking this work at Equitable has never been thought of as an obligation, but rather an opportunity to prioritize accessibility within all the important work we do. We continue to push forward, demanding justice, equity and fairness. Our commitment remains unwavering: to shape a future where accessibility transcends aspiration to become an inherent reality.