



# ACCESSIBILITY PLAN

## 1. General

### *Our Commitment*

BNP Paribas (Canada) (herein after, the “**Bank**”) is committed to identifying and removing barriers, and preventing new barriers to accessibility, and to achieve accessibility through meeting our requirements under the *Accessible Canada Act* (the “**ACA**”).

This Accessibility Plan (the “**Plan**”) outlines the steps the Bank is taking to reach these important goals, and create work place, and an environment, where all can feel respected. Also, the Plan communicates the importance of an organizational culture that supports accessibility and inclusion.

The Plan is also available in the French language.

### *Feedback*

A feedback process enables the Bank to respond to feedback regarding the manner in which we are implementing this Plan, and the barriers encountered by the Bank’s employees, candidates, clients, stakeholders and the public.

The Accessibility Team is designated to receive feedback on behalf of the Bank with respect to accessibility matters and this Plan. The Bank welcomes such feedback, and individuals are invited to communicate with the Bank in one of the following ways:

- Email: [accessibility@us.bnpparibas.com](mailto:accessibility@us.bnpparibas.com)
- Mail: 2001 Robert Bourassa 4th floor, Montreal, QC H3A 2A6

Once a person provides feedback to the Bank, a designated Bank representative will contact the person to discuss the feedback, in a manner that considers the accessibility concerns identified. The feedback will be escalated as appropriate and, where changes are implemented following the feedback, the person having provided the feedback will be informed, subject to any legal requirements or confidentiality considerations.



Our feedback process is accessible to people with disabilities. The Bank will provide for accessible formats/communication supports to facilitate the feedback process upon request.

## 2. Definitions

**Accessibility:** The degree to which a product, service, program or environment is available to be accessed or used by all.<sup>1</sup>

**Barrier:** Anything 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. Barriers can be physical, architectural, technological or attitudinal.<sup>2</sup>

**Consultation:** Consultation involves communicating with stakeholders to gather comments, opinions, and other information. Stakeholders are the people affected by a policy, program, practice, or service.<sup>3</sup>

**Disability:** 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.<sup>4</sup>

**Disability type:** A form of limitation, be it physical, mental, intellectual, cognitive, learning, communication or sensory or other. In its 2017 Canadian Survey on Disability, Statistics Canada used screening questions to identify the following 10 types of disability:

- seeing
- hearing
- mobility
- flexibility

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<sup>1</sup> Glossary: Accessibility Strategy for the Public Service of Canada.

<sup>2</sup> *Ibid.*

<sup>3</sup> Guidance on the Accessible Canada Regulations - Consulting persons with disabilities.

<sup>4</sup> ACA.



- dexterity
- pain-related
- learning
- developmental
- mental health-related
- memory

The screening questionnaire also contained a question concerning any other health problem or condition that has lasted or is expected to last for six months or more. This question was meant to be a catch-all in case the 10 disability types did not cover the respondent's situation. This question is associated with an 11th "unknown" disability type.<sup>5</sup>

**Employee:** Any person employed by a regulated entity described in paragraph 7(1)(e) or (f) of the ACA and includes a dependent contractor as defined in subsection 3(1) of *the Canada Labour Code*, but excludes:

- (a) a person employed under a program designated by the employer as a student employment program; and
- (b) a student employed solely during the student's vacation periods.<sup>6</sup>

**Persons with disabilities:** Persons who have a long-term or recurring physical, mental, sensory, psychiatric or learning impairment and who a) consider themselves to be disadvantaged in employment by reason of that impairment, or b) believe that an employer or potential employer is likely to consider them to be disadvantaged in employment by reason of that impairment. Persons with disabilities include persons whose functional limitations owing to their impairment have been accommodated in their current job or workplace, as well as clients engaging with the Bank's programs and services.<sup>7</sup>

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<sup>5</sup> Glossary: Accessibility Strategy for the Public Service of Canada.

<sup>6</sup> Accessible Canada Regulations.

<sup>7</sup> Glossary: Accessibility Strategy for the Public Service of Canada.



### **3. Principles**

The main principles underlying this Plan are the following:

- All persons must be treated with dignity, regardless of their disabilities;
- All persons must have the same opportunity to make for themselves the lives that they are able and wish to have, regardless of their disabilities;
- All persons must have barrier-free access to full and equal participation in society, regardless of their disabilities;
- All persons must have meaningful options and be free to make their own choices, with support if they desire, regardless of their disabilities;
- Laws, policies, programs, services, and structures must take into account the disabilities of persons, the different ways that persons interact with their environments and the multiple and intersecting forms of marginalization and discrimination faced by persons;
- Persons with disabilities must be involved in the development and design of laws, policies, programs, services, and structures, and
- The development and revision of accessibility standards and the making of regulations must be done with the objective of achieving the highest level of accessibility for persons with disabilities.

### **4. Areas of Improvement (s. 5 of the ACA)**

The following are the Bank's goals with respect to accessibility, within the areas set out in the ACA, which are the following:

- a) Employment;
- b) The built environment;
- c) Information and communication technologies (ICT);
- d) Communication, other than information and communication technologies;
- e) The procurement of goods, services and facilities;
- f) The design and delivery of programs and services; and
- g) Transportation.



## *Employment*

- Review our recruitment and selection practices to include accessibility measures. Goal to be implemented by: May 2024
- Review what accessibility options are available for employee trainings within existing technological framework and update such trainings thereafter. Goal to be implemented by: May 2024
- Evaluate what form, if any, of accessibility training may be implemented as part of employee onboarding, and update such training thereafter. Goal to be implemented by: January 2024
- Revise and update existing policies, procedures and processes to ensure accessibility is taken into account. Goal to be implemented by: ongoing
- Develop a plan to try to increase the number of persons hired who recognized themselves as having diverse abilities. For the past few years, the bank has been working on a plan to improve this number. Throughout the years, progress has been made. This year we will be updating our 3 year strategy and we are also in the process of updating our barrier analysis to continue to increase the representation of Diverse Ability employee and ultimately decrease the gap between our representation numbers and LMA. Goal to update the strategy and barrier analysis by: December 2023.

## *Built Environment*

- Work with building management so that they ensure that physical locations are up to building codes and compliant with applicable laws and regulations in each jurisdiction. Goal to be implemented: ongoing
- Ensure that our physical locations each have accessible routes for people with physical disabilities (e.g. ramps and/or elevators, where required). Goal to be implemented by: March 2024
- Review and modify accordingly the emergency evacuation process to ensure the safe evacuation of persons with disabilities. Goal to be implemented by: December 2023



### *Information and Communication Technologies (ICT)*

- Perform a global study digital platforms/tools controlled by the Canadian Branch to evaluate existing accessibility functionality. Goal to be implemented by: March 2024
- Provide recommendations to senior management on improving accessibility functionality on digital platforms/tools controlled by the Canadian Branch. Goal to be implemented by: December 2024.
- Conduct local accessibility audit of online content owned by the Canadian Branch (as opposed to the content owned by Group BNP Paribas in France): Goal to be implemented by: September 2023.
- Evaluate and implement accessibility changes which can be implemented for online content within the current technological framework following the global study and recommendations. Goal to be implemented by: December 2023
- Implement all relevant accessibility measures on online content available once the Group (the global BNP Paribas offices in France) has completed their update of website infrastructure: Goal to be implemented by December 2024

### *Communication, other than ICT*

- Conduct an assessment of existing accessibility options with respect to client/public communications/documentation. Goal to be implemented by: December 2023
- Provide recommendations to senior management on improving accessibility of client/public communications/documentation. Goal to be implemented by: March 2024
- Implement recommendations accepted by senior management by December 2024

### *The procurement of goods, services and facilities*

- Review local contracts with suppliers that have passed through relevant procurement procedures and review them with the aim to include clauses referencing the principles BNPP follows and



expects suppliers to follow from an accessibility standpoint. Goal to be implemented by: March 2024

*The design and delivery of programs and services*

- Any video delivered by the Bank as a program or service will be made available in closed captioned and/or in descriptive video format. Goal to be implemented by: September 2023
- Continue existing partnerships and explore additional partnerships with organizations supporting persons with disabilities. Goal to be implemented by: Ongoing

*Transportation*

- **Not applicable**

## **5. Consultations**

This Plan has been shaped through thoughtful consideration with key stakeholders.

The Bank has partnered with Humanity and Inclusion Canada, an independent charity working in situations of poverty and exclusion, conflict and disaster, to assist with the preparation of this Plan. Through meetings, the organization offered guidance and recommendations to help the Bank develop this Plan and meet our requirements under the ACA. Particularly, Humanity and Inclusion Canada emphasized the need for appropriate governance regarding the implementation of the plan, which has already been established internally. Specific stakeholders are responsible for each element of the Plan, regular check-ins will be scheduled and said stakeholders will need to provide progress updates directly to the executive sponsor, which is our CEO.

The Bank has also consulted its employees in two ways:

- The Bank held an in-person accessibility plan consultation event in March 2023. All employees were invited to the event. During this event, a draft accessibility plan, covering all of the above subjects, was shared with the attendees for their feedback. Employees were also invited to share their feedback on an individual level directly



with the VP Employee Relations. Employees shared their feedback through Teams and In-Person meetings on an individual level on the draft plan in the months of March and April of 2023.

During the consultations, ideas were shared about how to remove barriers in the above-mentioned areas, bearing in mind that the Bank needs to conduct a fulsome review of what is currently feasible as well as what could potentially be implemented in the future.

Ideas, such as the following, were shared during the consultations (and were subsequently shared with those responsible for implementing the various sections of the Plan):

- Promote adequate signage for persons that require a wheelchair so they know where to go to access the various areas of the building.
- Review evacuation plans for persons with disabilities so they can easily evacuate in the event of an emergency.
- Advertise the accommodation program so that persons with disabilities know where to go to discuss accommodation needs.
- Incorporate accessibility into trainings, for example, ensuring that there are sufficient breaks and asking if any accommodations are required for the trainings themselves.
- Ensure that the fonts used in communications are sufficiently bold and that there is sufficient contrast between the text and the background for employees with vision impairments.

These ideas shall be reviewed by the relevant stakeholders responsible for their respective subject matters.

Range of disabilities represented:

- Autism spectrum disorder
- Attention deficit/hyperactivity disorder
- Dyslexia
- Macular hole/low vision





## **6. Review and Update**

The Bank will continue to consult with persons with disabilities in the preparation of its progress reports.

The Bank will also continue to monitor the legal requirements applicable to the organization and update this Plan in consequence. It will update this Plan as often as necessary or required by law.

## **7. Notice of Temporary Disruption of Service**

The Bank will ensure any expected temporary disruption of service will be communicated on the home page of our website and through our phone system.

## **8. Questions?**

For more information on this Plan, please contact [accessibility@us.bnpparibas.com](mailto:accessibility@us.bnpparibas.com)

Employees are invited to contact the Accessibility Team at [accessibility@us.bnpparibas.com](mailto:accessibility@us.bnpparibas.com), or their designated Human Resources Business Partner.