



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 workplace, 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
- 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.¹

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.²

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.³

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.⁴

Disability type: A form of limitation, be it physical, mental, intellectual, cognitive, learning, communication or sensory or other. In its 2022 Canadian Survey on Disability, Statistics Canada used screening questions to identify the following 10 types of disability:

- seeing
- hearing
- mobility
- flexibility

¹ Glossary: Accessibility Strategy for the Public Service of Canada.

² *Ibid.*

³ Guidance on the Accessible Canada Regulations - Consulting persons with disabilities.

⁴ 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.⁵

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.⁶

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.⁷

⁵ Canadian Survey on Disability, 2022: Concepts and Methods Guide

⁶ Accessible Canada Regulations.

⁷ 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



The barriers we wish to address are as follows: information gaps that prevent employees from understanding the definition of disability, the stigmas around disability and the benefits or accommodations that exist; procedural hurdles in promotion, performance-review, and onboarding processes; and attitudinal biases that undervalue disability inclusion and limit peer advocacy. Removing these barriers ensures that all staff can access the resources, accommodations, and career opportunities they need to thrive, thereby fostering a truly equitable and productive workplace.

- Review additional mental health related and broader accommodation/accessibility options from our benefits providers and review benefit coverage options for persons with disabilities;
- Review language regarding the promotion process to ensure that explicitly states that accommodations are permitted through the selection stage;
- Specifically communicate that performance reviews will consider any accommodation-related adjustments;
- Review onboarding process with the goal to simplify and make the process more accessible for employees with disabilities;
- Develop a plan to train all employees on accessibility in the workplace, including digital accessibility for employees involved in the development of applications;
- Continue to host Disability Strikes Back sessions within the Canadian Platform;
- Add centralized budget for accommodations.

Built Environment

The barriers we wish to address are as follows: the physical inaccessibility of our primary entrance and certain shower facilities; and the need for a revised and inclusive emergency-evacuation protocol for employees with disabilities.

- Coordinate with the Landlord to improve accessibility to the lobby by building a direct access elevator from De Maisonneuve entrance;



- Review accessibility options for showers on each floor;
- Evacuation Safety: Framed approach for employees with disabilities, RACI definition from onboarding to exit with associated procedure.

Information and Communication Technologies (ICT)

The barriers we wish to address are as follows: employees often lack awareness of built-in accessibility tools (e.g., colour filters, high-contrast mode, keyboard shortcuts, on-screen keyboards), which limits their ability to perceive and operate digital workspaces independently; and the need to ensure that accessibility is considered in the governance of AI tools.

- Distinguishable : Develop a plan to train and/or communicate to employees on the different Microsoft's accessibility features like Colour filters, Alternative Text Tool, High Contrast, Mono Audio, Nightlight, Focus Assist;
- Operable – Keyboard : Develop a plan to train and/or communicate to employees on Microsoft's accessibility features like Consistent Keyboard Shortcuts, Mono Audio, Mouse Key, On-screen keyboard;
- Review the possibility to deploy a ticketing feedback channel (e.g., ServiceNow) that captures accessibility related matters, stores them in a central repository, and routes them to the responsible product team;
- Collaborate with the regional and central teams responsible for IT/AI development procedures and guidelines to ensure that accessibility is considered in their preparation;
- As part of the AI upskilling program led by the region, trainings to be made available including content on accessible and equitable AI.

Communication, other than ICT

The barriers we wish to address are as follows: when there is a lack of video, audio and image asset captions, transcripts or alt-text, it can prevent people who are deaf, hard-of-hearing, blind or have low vision from understanding the content.



- Ensure all video/audio content produced by the bank in Canada comes with subtitles or a transcript, and keep adding alternative text on our images;
- Conduct a review on how we can improve accessibility during local digital events (AI powered live-subtitles, etc.);
- Study with the Paris team the feasibility to have an audio alternative for all/some content on our website and intranet, as well as emails.

The procurement of goods, services and facilities

The barriers we wish to address are as follows: the absence of mandatory accessibility clauses in procurement contracts allows vendors to supply products and services that may not be accessible, leaving people with disabilities exposed to inaccessible tools; without explicit accessibility criteria in RFP evaluation, organizations cannot assess a supplier's capacity to deliver inclusive solutions.

- Integrate accessibility clauses into our procurement documentation with suppliers (RFP, contracts, suppliers' agreement...) to ensure that goods, services, and deliverables comply with applicable accessibility standards and recognized best practices;
- Review how we can integrate accessibility criteria into our RFP evaluation frameworks to assess supplier's ability to deliver accessible solutions (and meet the needs of users with disabilities);
- Ensure that RFP related documentation are accessible so that all suppliers can participate on an equitable basis.

The design and delivery of programs and services

The barriers we wish to address are as follows: client-facing staff often lack the knowledge and skills to interact effectively with clients who use assistive devices, support persons, or service animals, which can lead to misunderstandings, discomfort, and exclusion; and the bank's client-facing materials (pitchbooks, product presentations, etc.) should be assessed to avoid preventing people with visual, auditory, cognitive or language disabilities from receiving the same information and support as other clients.



- Train all personnel involved in service delivery on accessibility principles and practices that promote inclusive service delivery, and interacting with persons with disabilities using various assistive devices or accompanied by support persons or animals.
- Assess how the bank can offer information directed to clients (e.g. pitchbooks, services & products presentations, etc.) in accessible formats where requested by the clients, or interpretation services upon request.

Transportation

The barriers we wish to address are as follows: employees with limited mobility encounter physical obstacles—such as non-accessible workstations, pathways, restrooms, and parking—that prevent them from moving freely and performing their duties on an equal footing with colleagues.

- Support accommodations, where appropriate, for employees with limited mobility

5. Consultations

The Bank held an in-person and virtual accessibility plan consultation event in April 2026. All employees were invited to the event, of which 25 persons attended. 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. Employees shared their feedback through Teams and In-Person meetings on an individual level on the draft plan in the months of April and May of 2026. The Bank has also partnered with Synclusiv, a consulting firm with expertise on the subject of accessibility, to assist with the preparation of this Plan. The organization offered guidance and recommendations to help the Bank elaborate the present Plan.

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):

- Providing more information on accommodations during the internal mobility process
- Advertise the accommodations process
- Allow persons with disabilities to visit the premises before they start employment
- Explore adding check-in for persons with long term accommodations
- Review the Evacuation Safety process (to include contractors & communicate twice a year on the need for employees to inform Safety team if specific need)
- Review job description criteria to ensure that only necessary requirements are included

Range of disabilities represented:

- Autism spectrum disorder
- Hearing loss
- Dyslexia
- Chronic disease

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

Employees are invited to contact the Accessibility Team at accessibility@us.bnpparibas.com, or their designated Human Resources Business Partner.