

## ACCESSIBILITY PLAN

### General

The Bank of New York Mellon Toronto Branch (“BNY”) is committed to being an accessible organization. As a leading financial institution, we take this responsibility seriously and will endeavour to move forward by implementing meaningful action through self-reflection and feedback.

We are guided by our key principle of “Thriving Together” and will continue to seek feedback from key stakeholders as we implement our accessibility plan. We will work hard to put this plan in place in a way that respects the principles of the Accessible Canada Act and identifies, removes and prevents barriers in the areas of focus set out therein, including:

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

Our Accessibility Plan and a description of our accessibility feedback process were developed in compliance with the Accessible Canada Act and its regulations.

### Feedback Process Description

BNY has developed a process for receiving and responding to accessibility feedback and related requests. We have designated our Principal Officer to receive accessibility feedback and related requests on behalf of BNY. We welcome your feedback, including on our Accessibility Plan, the implementation of our Accessibility Plan, barriers when dealing with our organization, how the identified barriers can be removed, our accessibility feedback process and any other feedback you feel may be relevant to accessibility. We also welcome your request for a copy of our Accessibility Plan or our Feedback Process Description, in an alternate format.

You can provide feedback or request a copy of our Accessibility Plan, or our Feedback Process Description, in an alternate format, in the following ways:

- Email: [AccessibilityCanada@bny.com](mailto:AccessibilityCanada@bny.com)
- Phone: 1-212-495-1784
- Website: [www.bny.com](http://www.bny.com)
- Mail: 1 York Street, 6<sup>th</sup> Floor, Toronto, ON, M5J0B6

Feedback can be provided with your name and contact information or anonymously. We will respond to all feedback in a timely manner. If you require support while providing feedback, please let us know and we will do our best to accommodate your needs.

We will acknowledge receipt of your feedback using the same contact method that you used unless your feedback was provided anonymously.

If you request a copy of our Accessibility Plan or our Feedback Process Description in an alternate format, we will respond as soon as possible and within the required time frames. A copy of our Accessibility Plan or our Feedback Process Description can be requested in the following alternate formats:

- print
- large print
- Braille
- audio format
- an electronic format that is compatible with adaptive technology that assists persons with disabilities.

Requests for a copy of our Accessibility Plan or our Feedback Process Description in the alternate formats set out above will be fulfilled as soon as possible, but not later than:

- for Braille or an audio format: 45 days after the day that the request is received.
- for any other format: 15 days after the day that the request is received.

BNY will use any feedback provided to identify, prevent, and remove accessibility barriers within its Canadian workplace, facilities, policies, programs, practices, products and services, to prepare its Progress Reports and to create its next Accessibility Plan.

## **Consultations**

We invited our entire staff in Canada to participate in multiple surveys over the period of one year. Every active staff member in Canada was given the opportunity to participate in the surveys and to provide feedback to BNY on accessibility, among other things. These surveys provided everyone in our Canadian workforce with an opportunity to identify barriers they believed to exist within each of the focus areas identified in the Accessible Canada Act and its regulations. These surveys also provided an opportunity to identify areas of continuous improvement for BNY's existing efforts of ensuring a barrier-free workplace and environment.

## **Areas of Focus**

The barriers that were identified by BNY and through its consultation process with respect to each of the focus areas in the Accessible Canada Act and its regulations are set out below. Additionally, the timeline and actions BNY intends to take to facilitate the removal or mitigation of the identified barriers is set out below.

### **1. Employment**

At BNY we recognize that who we are defines how we move ahead. We stand by our actions. We prioritize thriving together throughout the talent life cycle, from recruitment and development to retention and advancement. We

provide and engage in industry thought leadership on important issues that affect our employees and society at large.

We strive to create a culture of belonging; that is why we deliver programs that support wellbeing and offer a range of family-friendly, inclusive employment policies and employee forums to support the engagement, development and advancement of our people.

Our enduring ambition is to build the best global team—one that is inclusive of differing perspectives, backgrounds and experiences, and represents the increasingly varied markets and clients we serve.

The following barriers were identified in this focus area:

- **Barrier 1:** Review BNY's Return to Office Policy and the process for requesting reasonable accommodation to address perceived accessibility barriers. All employees currently have access to the Return to Office Policy and can request reasonable accommodation to support them in performing the essential functions of their job. The Reasonable Accommodation Hub is currently available to employees to research and submit accommodation requests.
- **Action and Timeline:** During the next 12 months, BNY will explore whether additional policies or procedures should be implemented specifically to remove perceived accessibility barriers with respect to remote work and reasonable accommodation.
- **Barrier 2:** Review points of contact for employees engage on matters relating to accessibility.
- **Action and Timeline:** During the next 12 months, BNY will review the contacts and coverage model regarding accessibility requests to determine whether procedural adjustments are needed.
- **Barrier 3:** Review BNY's candidate application process to increase accessibility.
- **Action and Timeline:** During the next 12 months, BNY will implement changes to the candidate application process to reduce the number of questions applicants must answer and, where possible, to automate the forms.

## 2. The built environment

BNY does not own or directly manage its physical locations; rather, is a tenant with limited ability to directly impact the physical workplace. We are, however, committed to removing any barriers to employee workplace within our purview and working with the owners/operators of the facilities to raise issues or feedback with them.

The following barriers were identified in this focus area:

- **Barrier 1:** Provision of additional equipment, such as standing desks and monitors, to make the workplace more accessible for employees who suffer from disabilities. All employees can currently request office equipment to support them as they perform the essential functions of their job. The Reasonable Accommodation Hub is a resource for employees to use to research and submit accommodation requests.
- **Action and Timeline:** During the next 12 months, BNY will review its reasonable accommodation process to determine if any adjustments are required and will send a communication to staff in Canada to remind them of the existing request process.

## 3. Information and communication technologies (ICT)

Accessible technology is critical for efficient and effective operation. BNY has made an unwavering commitment to systemic resiliency and continued digitization. Our open and objective stance on technology and innovation means that we work to develop solutions that can help reduce friction and increase transparency throughout the financial lifecycle.

BNY is committed to providing an accessible website experience for all visitors to its website and is actively working to increase accessibility and usability of the website using the recommendations contained in the Web Content Accessibility Guidelines (WCAG) promulgated by the Web Accessibility Initiative (WAI) of the World Wide Web Consortium (W3C).

We are dedicated to progressively implementing the pertinent sections of the WCAG 2.1 Level AA as our accessibility standard in order to enhance the accessibility of our websites and mobile applications. Our goal is to routinely evaluate our websites and mobile applications using assistive technology like screen readers and magnifiers as well as automated techniques.

In addition, we actively interact with the accessibility community on a global level, including through our internal employee networks, advocacy organizations, and subject matter experts to maintain awareness of changing frameworks and technologies.

The following barriers were identified in this focus area:

- **Barrier 1:** Increase internet connectivity and conciseness of tooling, automation and data consolidation to increase accessibility while working remotely.
- **Action and Timeline:** During the next 12 months, BNY will address internet connectivity reports, monitor the same to determine if further action is required.

4. Communication, other than information and communication technologies

BNY strives to be a place where employees are proud to work and excited to grow their careers. Our intent is to ensure a dynamic culture that is both human and high-performing, working alongside our clients and acting as one integrated organization. Our focus is always to deliver solutions with excellence and speed.

At BNY, our principles set the tone for our culture. They describe how we behave, how we act, how we treat each other and how we show up for our clients. Simply stated: It's how we get things done together.

The following barriers were identified in this focus area:

- **Barrier 1:** Improve cross-departmental collaboration and communication to improve accessibility and engagement in Canada.
- **Action and Timeline:** During the next 12 months, will review and encourage more robust use of our internal employee recognition program, continue to break down siloes and foster collaboration and clear communication.

5. Procurement of goods, services and facilities

BNY has adopted three strategic pillars that define and drive how we approach all aspects of our work. One of those pillars is "Run Our Company Better". To that end, the Firm has adopted a robust enterprise sourcing function with support from both the first and second lines of defense.

During BNY's consultation process, no specific accessibility barriers were identified for this focus area. Despite this, BNY will continue its commitment of accessibility and continue to move forward and develop its efforts within the area of procurement of goods, services and facilities.

#### 6. Design and delivery of programs and services

The following barriers were identified in this area of focus:

- **Barrier 1:** Review programs and services offered with respect to mental health support and comprehensive health benefits.
- **Action and Timeline:** During the next 12 months, BNY will review and make necessary adjustments to its Canadian benefits plans, including increasing certain benefit amounts, covering additional mental and behavioral health services, and the potential addition of a health savings account. These program updates will improve our current offerings, which will address the barriers identified. Additionally, BNY maintains a "Right to Disconnect" policy, which also helps address the barriers identified.

#### 7. Transportation

While transportation is the seventh pillar of accessibility importance in the Accessible Canada Act, BNY does not operate or provide transportation services and, therefore, this focus area is not within the purview of this Accessibility Plan.

### Conclusion

BNY will implement this Accessibility Plan to remove the barriers that were identified. We welcome accessibility feedback and will use any additional feedback provided to identify, prevent, and remove accessibility barriers within its Canadian workplace, facilities, policies, programs, practices, products and services, to prepare its Progress Reports and to create its next Accessibility Plan.