

## **Bank of America Canada**

### **A Progress Report under the *Accessible Canada Act* and *Accessible Canada Regulations*, 2023-24**

#### **Overview**

Bank of America (the “Bank”) is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of people with disabilities and meeting accessibility requirements under the *Accessible Canada Act*. Pursuant to this legislation and the Accessible Canada Regulations, SOR/2021-241 (the “Regulations”), the Bank has put into place accessibility plans, feedback tools and progress reports.

The following constitutes the progress report of the Bank on the implementation of the accessibility plans under the *Accessible Canada Act* and *Accessible Canada Regulations* for the period up to May 30, 2024.

#### **Feedback process and contact information**

If clients of the Bank or members of the public have any questions or comments regarding the Bank’s compliance with the *Accessible Canada Act*, or their respective regulations, they can contact Canada Human Resources through the following:

- Email: [human\\_resources\\_canada@bofa.com](mailto:human_resources_canada@bofa.com)
- Phone: 1.416.369.7400
- Mail: Human Resources: 181 Bay Street, Suite 400 Toronto, ON M5J 2V8

This contact information is provided so that individuals may:

- request copies of the Bank’s accessibility plans, progress reports, and feedback process descriptions in certain alternate formats;
- submit feedback about barriers they have encountered when dealing with the Bank; and
- submit feedback on the Bank’s implementation of its accessibility plan.

**Section 5 of the Accessible Canada Act**

<b><u>Subsection</u></b>	<b><u>Plan</u></b>	<b><u>Progress (2023-2024)</u></b>
<b>a) employment</b>	<p>The Bank accommodates people with disabilities during the recruitment and assessment processes and when people are hired as follows:</p> <p>a) Recruitment, Assessment and Selection Process</p> <ul style="list-style-type: none"> <li>The Bank fosters an environment of respect and inclusivity in our recruitment process. Language is incorporated in each job posting to make applicants aware that accommodation is available upon request to assist with the recruitment and selection process. Talent Acquisition partners are educated on inclusive selection strategies developed by the Ontario Human Rights Commission and on how to implement and request support for accommodation related requests. When making offers of employment, the Bank will notify the successful applicant of its policies for accommodating employees with disabilities. If support is requested through the recruitment process, Human Resources Canada should be notified.</li> </ul> <p>b) Informing Employees of Supports</p> <ul style="list-style-type: none"> <li>The Bank will inform its employees of its policies, and any changes to its policies used to support employees with disabilities on an annual basis, taking into account various employee accessibility needs due to a disability. This information will be provided to new employees as soon as practicable after commencing employment.</li> </ul> <p>c) Accessible Formats and Communication Supports for Employees</p> <ul style="list-style-type: none"> <li>Upon request of an employee with a disability, the Bank will consult with the employee to provide or arrange for the provision of accessible formats and communications supports for information that is needed to perform his/her job and information that is available to other employees.</li> </ul>	<ul style="list-style-type: none"> <li>Talent Acquisition has enhanced the Bank's recruitment systems to immediately ask and identify if a candidate needs an accommodation in our new hire selection process. This is to ensure inclusivity in our selection processes.</li> <li>To reinforce our commitment to accessibility at the Bank, our new hire onboarding program (offered virtually and in person) has been enhanced to include information on the Bank's diverse employee network groups, including DAN, (Disability Action Network), with links to provide easy access to our accessibility plan and guidelines.</li> </ul>

	<p>d) Workplace Emergency Response Information</p> <ul style="list-style-type: none"> <li>The Bank is committed to providing employees with emergency information in an accessible way upon request. We will also provide employees with disabilities with individualized emergency response information when necessary. Where an employee requires assistance, the Bank will, with consent of the employee, provide the individualized emergency response information to the person designated to provide assistance to the employee.</li> </ul> <p>di) Documented Individual Accommodation Plans</p> <ul style="list-style-type: none"> <li>The Bank has a process in place for developing individual accommodation for employees that have identified themselves as needing accommodation due to a disability. <ul style="list-style-type: none"> <li>i. The Bank will develop individualized accommodation plans for employees with disabilities, as the Bank is made aware</li> <li>ii. The Bank is committed to ensuring that such accommodation is made available to point of undue hardship.</li> <li>iii. We review all our accommodation policies and plans to ensure they are compliant with all applicable laws, including the AODA and Ontario Human Rights Code, and the Canada Accessibility Act.</li> <li>iv. The Bank will implement and maintain measures effective to maintain the privacy of its employees with disabilities.</li> <li>v. If an employee requires an accommodation due to a disability, please contact Human Resources Canada at <a href="mailto:human_resources_canada@bofa.com">human_resources_canada@bofa.com</a></li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>To support a successful work from home experience, the Bank's medical accommodations now extend to home office, including ergonomic adjustments, upon request.</li> </ul>
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	<p>f) Return to Work Process</p> <ul style="list-style-type: none"> <li>• The Bank has a documented process that details the process to request an accommodation as well the responsibilities of each party (employee, manager, and third- party benefits partner).</li> <li>• The Bank partners with a third-party benefits provider to deliver a proactive, high communication disability management program that facilitates individualized return to work plans.</li> </ul> <p>g) Performance Management, Career Development &amp; Redeployment</p> <ul style="list-style-type: none"> <li>• The Bank takes into account the accessibility needs of employees with disabilities and employees with individual accommodation plans when conducting performance reviews, providing career development and when redeploying employees.</li> </ul> <p>h) Training</p> <ul style="list-style-type: none"> <li>• The Bank provides annual online training to all employees and contract staff on Canada's accessibility laws and on the human rights legislation as it relates to people with disabilities. This training is provided to new employees as soon as practicable after the employee is assigned the applicable duties.</li> <li>• Training is provided on an ongoing basis in connection with any changes to the policies, practices and procedures governing the provision of goods or services to persons with disabilities.</li> <li>• Training includes the following:             <ol style="list-style-type: none"> <li>i. A review of the purposes of the Accessible Canada Act.</li> <li>ii. How to interact and communicate with people with various types of disabilities.</li> <li>iii. How to interact with people with disabilities who use assistive devices, service animals, or support persons.</li> <li>iv. How to use equipment or devices available on the premises or provided by the business that may help with the provision disabled persons of goods or services to people with disabilities.</li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>• Engaged an external vendor that specializes in attitudinal awareness of accessibility as an additional manager training opportunity.</li> </ul>
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	<p>v. What to do if a person with a disability is having difficulty accessing a particular good or service offered by the business.</p> <p>vi. The processes that businesses in Canada must follow to create, provide, and receive information and communications in a manner that is accessible to people with disabilities.</p>	
<b>b) the built environment</b>	<p>The Bank has offices in Toronto, Vancouver, Calgary and Montreal. Our offices are in spaces that we rent and have many accessibility features. These features include:</p> <ul style="list-style-type: none"> <li>• Universal washrooms with automatic doors</li> <li>• Automatic doors throughout the buildings</li> <li>• Many different places to sit and work or take a break</li> </ul> <p>As the environment continues to be built, we will work with Property Management and Facilities to ensure a barrier free and accessible workplace.</p>	<p>As part of the Bank's built environment refresh, the following have been updated:</p> <ul style="list-style-type: none"> <li>• Elevators selection upgraded to a touchscreen pad, that highlights the elevator number. Upon selection, the elevator number both lights up and notifies users with an alert sound, for easier navigation.</li> <li>• Additional braille signage has been added to outside lunchroom and at elevators. Additional braille signage will be added with all new refreshes and updates.</li> <li>• Auto-door entry - additional hand sensors added for auto entry access to kitchen and public spaces. Building access passes programmed for accommodations.</li> </ul>

		<ul style="list-style-type: none"> <li>• Kitchen refresh included lower counter and sink level, with hand swiping activated water access.</li> </ul>
<b>c) information and communication technologies (ICT)</b>	<p>The Bank is committed to meeting the communication needs of people with disabilities. We will continue to consult with individuals with disabilities to determine their specific information and communication needs.</p> <p>a) Feedback</p> <ul style="list-style-type: none"> <li>• The Bank will ensure that its processes for receiving and responding to feedback are accessible to persons with disabilities via providing multiple feedback processes including online, phone and printable formats upon request. Accommodation Services are available to respond to any inquiries related to accessible formats.</li> <li>• Current feedback processes allow for multiple communication channels such as email, telephone, or regular mail.</li> <li>• To submit feedback on the Canada Accessibility Plan or Guidelines, please reach out to Human Resources Canada at <a href="mailto:human_resources_canada@bofa.com">human_resources_canada@bofa.com</a></li> </ul> <p>b) Accessible Formats &amp; Communication Supports</p> <ul style="list-style-type: none"> <li>• Accommodation Services are available to respond to any inquiries related to accessible formats. The Bank will notify the public about the availability of accessible formats and communications supports for persons with disabilities.</li> </ul> <p>c) Accessible Websites and Web Content</p> <ul style="list-style-type: none"> <li>• The Bank conducted an assessment of current web functionality to ensure compliance and adequate accessibility features. Both our internal intranet and external websites (<a href="https://careers.bankofamerica.com">careers.bankofamerica.com</a>) comply with the WCAG 2.1 Guidelines at Level AA requirements.</li> <li>• The Bank ensures all publicly available information is made accessible upon request.</li> </ul>	<ul style="list-style-type: none"> <li>• Technical upgrades include larger computer screens for all employees, that assist those with visual impairments.</li> <li>• Braille signage for accommodation services has been added upon arrival at reception.</li> </ul>

<b>c.1) communication other than ICT</b>	Web conferencing continues to be popular with employees and clients for connecting virtually, so we look for ways we can help ensure our tools for virtual meetings provide an inclusive environment for team collaboration. In April 2023, BofA added closed captioning for Webex and Zoom meetings on demand. The Bank will continue to look for ways to ensure communications are accessible for employees and clients.	
<b>d) procurement of goods, services and facilities</b>	The Bank purchases goods and services from suppliers. Purchasing of goods and services occurs through the Bank's internal online systems, complying with WCAG 2.1 Guidelines at Level AA requirements.	
<b>e) design and delivery of programs and services</b>	This section is not applicable to Bank of America in Canada.	<b>N/A</b>
<b>f) transportation</b>	This section is not applicable to Bank of America in Canada.	<b>N/A</b>

## 1. Consultations

The Bank engaged in consultation with people with disabilities within its organization by consulting with employees and asking questions about accessibility in one-on-one virtual and in-person meetings, based on the participants' preferences.

Participants were asked specific questions to understand whether they had experienced barriers, and if so, what those barriers were. We also asked our participants what improvements they have experienced and how we can continue to improve accessibility for our employees, and in general at the Bank.

The themes that stood out were related to physical barriers with respect to accommodations such as door automated swipe cards, larger monitors and specialized equipment, including accessibility support while working from home and ergonomic assessments. Many of these upgrades were made in response to feedback from the consultations.

BofA recognizes that there are opportunities to improve accessibility in our organization. We will continue to listen to people with disabilities to become more accessible and provide organization-wide disability sensitivity and accessibility training at the Bank.

This accessibility plan will guide the Bank and keep us accountable as we work towards becoming an organization that is barrier free.

## **2. Feedback**

The Bank ensures that its processes for receiving and responding to feedback are accessible to persons with disabilities via providing multiple feedback processes including online, phone and printable formats upon request. Accommodation Services are available to respond to any inquiries related to accessible formats. Current feedback processes allow for multiple communication channels such as email, telephone, or regular mail.

The Bank has not received any accessibility feedback since the implementation of the feedback process. We will continue to promote awareness and monitor any feedback received. Even in the absence of feedback through our formalized process, the Bank engages with employees, our D&I Committee, and external subject matters experts.