



TD
Accessibility
Plan
2023-2026

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General Information

Contact Information

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About TD Bank Group

Headquartered in Toronto, Canada, with approximately 90,000 colleagues in offices around the world, the Toronto-Dominion Bank and its subsidiaries are collectively known as TD Bank Group (TD). TD offers a full range of financial products and services to more than 27 million customers worldwide through three key business lines:

- **Canadian Retail** including Canadian Personal Banking, Commercial Business Banking, TD Auto Finance (Canada), TD Wealth (Canada), TD Direct Investing and TD Insurance
- **U.S. Retail** including TD Bank, America's Most Convenient Bank, TD Auto Finance (U.S.), TD Wealth (U.S.) and TD's investment in Schwab
- **Wholesale Banking** including TD Securities

TD had CDN\$1.9 trillion in assets on October 31, 2022, and ranks among the world's leading online financial services firms, with more than 15 million online and mobile customers. The Toronto-Dominion Bank trades on the Toronto and New York stock exchanges under the symbol "TD."

The Toronto-Dominion Bank is a chartered bank subject to the provisions of the *Bank Act* (Canada). It was formed on February 1, 1955, through the amalgamation of The Bank of Toronto, chartered in 1855, and The Dominion Bank, chartered in 1869.



Executive Summary

The purpose of the *Accessible Canada Act* (ACA) is to create a barrier-free Canada by January 1, 2040, through the proactive identification, removal, and prevention of barriers to accessibility wherever Canadians interact with areas of federal jurisdiction. The ACA came into force on July 11, 2019.

With a presence in many communities across the country, TD has a responsibility to provide accessible programs and services to its customers and colleagues.

Our Social Journey

Inclusion has always been central to TD's purpose, strategy, and culture. As we bring our purpose to life, we aim to contribute to inclusive economic outcomes from four perspectives: as an employer, a business operator, a financial institution and as a corporate citizen.

To further our commitment to our customers and colleagues, and to work towards achieving the goals of the *Accessible Canada Act* (ACA), we created this Accessibility Plan. The Accessibility Plan was developed in collaboration with the Accessibility Plan Working Group and Senior Advisory Group, to cover all focus areas. Also, TD conducted consultations with external consumer focus groups and TD colleagues with disabilities.

We consulted with customers, the public who are not our customers, and colleagues with disabilities to ensure that our Accessibility Plan incorporates their needs. We considered their feedback, and our Plan includes their input.

The Accessibility Plan outlines our achievements to date, in addition to the actions TD will take between 2023 and 2026. We are committed to identifying, removing, and preventing barriers to employment; the built environment and procurement of facilities; information and communication technologies; communication; procurement of goods and services; and within the design and delivery of programs and services.

We commit to review the Plan each year and update it every three years. We will publish progress reports in the years in between and we will incorporate relevant and appropriate feedback we receive on the Plan and on any matter of accessibility at TD.

Accessibility Statement

At TD, we are committed to providing an exceptional experience for all customers and colleagues, including those with disabilities. We strive to identify and remove barriers while not creating or introducing new barriers. Through advancing our processes for communications and training, accommodation measures and recruitment practices, we aim to build a more welcoming, equitable and inclusive environment for all customers and colleagues.

TD is committed to meeting the principles and requirements outlined in the ACA and to meeting the accessibility needs of people with disabilities in a timely manner, through the implementation of the requirements of the ACA and its applicable regulations. While the *Accessible Canada Regulations* (the “ACR”) are in development, TD continues to focus on advancing internal policies and procedures to align with the applicable laws and regulations.

As we progress with our work to make TD products, services, facilities, employment, buildings, structures, and premises more accessible to meet the needs of people with disabilities, we are committed to focusing on:

- Delivering products, services, and facilities in a manner that respects the dignity and independence of people with disabilities.
- Designing products, services, and facilities for people with disabilities by applying accessibility standards and good practices.
 - Alternative measures will be provided temporarily or on a permanent basis to accommodate the individual needs of people with a disability to access, use or benefit from the products, services, and facilities.
- Providing people with disabilities the opportunity to provide insight and input into the design of those product, services, and facilities where barriers may be experienced.

We continue to update our accessibility processes and share that information with our colleagues and through our public websites.

Diversity and inclusion are part of our fundamental values that help us support our customers, colleagues, and communities. From our hiring practices to our accessible building designs, we’re working towards maintaining a welcoming, barrier-free culture for everyone.

– TD Corporate Site

www.td.com/ca/en/about-td/who-we-are/diversity-and-inclusion

Accessibility Policy

TD's Accessibility Policy aligns to the Accessibility Plan's key focus areas. This policy helps to ensure accessibility is applied consistently across our Canadian businesses and corporate functions.

Budget & Resources

TD budgets for investments in its annual plan to fund a mix of capital and programs to enhance accessibility, focusing specifically on continuous improvement. These programs include capital investments to make offices and buildings accessible.

Additional programs include digital accessibility and the development of policies, practices, and internal/external programs to ensure that TD is continuing to identify, prevent and remove barriers for colleagues and customers and is promoting inclusive business practices.

Accessibility Plan Scope

TD's Accessibility Plan outlines programs, practices, and actions that we are taking within our Canadian footprint to identify, remove and prevent barriers in seven focus areas:

1. Employment
2. The Built Environment & Procurement of Facilities
3. Information and Communication Technologies (ICT)
4. Communication (non-ICT)
5. The Procurement of Goods and Services
6. The Design and Delivery of Programs and Services
7. Transportation





Consultations with People with Disabilities (PWD)

In the spirit of “nothing about us without us”, we conducted a series of consultations with Canadian customers and colleagues with disabilities as well as the general public to help us develop this Accessibility Plan. These consultations enabled the identification of existing barriers as well as the prioritization of actions to remove and prevent barriers based on participant feedback.

External Consultation

In addition to TD’s ongoing consultation practices, TD commissioned a third-party with expertise in the field of accessibility to conduct four external research studies as part of TD’s *Accessible Canada Act* (ACA) consultation process. The third party identified several key trends in how People with Disabilities (PWD) interact with financial institutions in Canada. The studies included participants from Alberta, British Columbia, Manitoba, Ontario, Prince Edward Island and Quebec; and were conducted from November to December 2022.

Studies identified barriers that are common across our banking offerings and services, as well as barriers specific to certain TD services, such as our mortgage pre-approval process, and products. The studies also identified several key accessibility strengths within TD, including highly regarded customer service agents and a generally useable mobile app.

Based on the overall findings, several recommendations were identified for implementation in the first three-year ACA cycle; with additional recommendations to be considered in future ACA cycles.

Key Strengths

- TD Mobile App is generally easy to use for PWD.
- Highly regarded customer service agents.
- Online Mortgage Pre-Approval process rated by respondents as being simpler than most competitors for PWD.

Key Barriers

- Card tactile features.
- Volume of banking-related information received.
- Screen reader interface with autofill and drop-down menus.
- Timeouts.
- Detailed nature of some banking-related information.

Overview of External Studies:

As part of TD's ACA consultation process, four research studies were performed that focused on specific products/services:

- Mortgage pre-approval.
- Opening personal banking account.
- Purchasing an investment.
- Banking using TD Mobile App.

In each study, people with disabilities (PWD) engaged with a TD service or offering followed by a three-hour focus group. For the first three studies, PWD compared offerings across Canadian financial institutions, before proceeding to TD to complete their evaluation. For study one, users completed the pre-approval process. For studies two and three, users proceeded until just prior to the point of completion before stopping. Study four recruited exclusively TD clients and tracked their experience with the TD Mobile App.

Note: Previously, TD completed the following studies whose findings have been considered in preparing the Accessibility Plan: (5) 2021 *Shop and Quote* analysis for TD Insurance (TDI), (6) 2022 Business Banking Customer Experience for small business owners with disabilities, (7) 2022 e-Space and internal communications review for TDI, and (8) 2022 design workshop with customers managing vision and cognitive conditions.

Research Methods

- To gather insights and identify barriers, Canadian PWD Lead Users were recruited from the public and did not include TD employees.
- Unlike traditional market research techniques that collect information from the users at the centre of the target market, the Lead User method takes a different approach, collecting information about both needs and solutions from the leading edges of the target market. PWD represent exactly these leading edges, as they engage with products and services in unique ways.
- To increase the number and quality of insights, the study prioritized Lead Users who were likely to view the world differently and can articulate these views, such as artists, writers, scientists, and public speakers.
 - The study guided Lead Users with minimal direction. The minimal direction allows for an unbiased discovery of the “wow” and “ouch” moments that may be missed by unintended warnings from facilitators.

- For studies that include a comparison of product/service offerings and a purchase (TD studies one to three), Lead Users were given one to two weeks to complete their evaluation. Throughout this period Lead Users were asked to take notes of their experience for later reference in the three-hour virtual focus groups.
- Lead Users in studies intended to track user experience over time, such as the TD Mobile App study, were given three weeks to use the product. Users were asked to keep a diary of their experience throughout this period, as well as attend a three-hour virtual focus group.
- Focus group discussions were structured like an inverted triangle: beginning with general banking experiences and continually narrowing to more specific topics.

Study Demographics

- **43 Lead Users**

- 30 women, 13 men
- 18 were pre-existing TD Customers

- **Disability Functionality:**

- 20 Physical
- 27 Sensory (22 Vision and 5 Hearing)
- 16 Cognitive

- Lead Users were recruited based on disability functionality. These functionalities are physical (including mobility and dexterity), cognitive (including neurodiversity, mental health, and learning disabilities), and sensory (vision, hearing, speech). Approximately 40 per cent of PWD participants manage multiple disabilities.
- Recruitment was based on functionality proportionate to relative distribution in the community. Recruitment could also be altered based on the nature of the study topic. For example, in the study of the TD Mobile App, recruitment over-indexed cognitive and vision disability over those managing limited mobility, as limited mobility is likely to have less effect on mobile app useability.
- For the first three ACA consultation studies, recruitment occurred across financial institution customers. This recruitment strategy was to ensure insights were collected from non-TD users, who are unfamiliar with the TD interface and thus have not “learned” how to overcome existing barriers.
- The fourth study, focusing on the TD Mobile App, consisted entirely of TD Bank customers; however, not all participants had previously used the app. This ensured the study captured barriers and insights from the installation process onwards.

Internal Consultation

TD commissioned an external third party, specialized in accessibility, to conduct an internal employee study as part of TD’s *Accessible Canada Act (ACA)* consultation process. This study took place between November to December 2022 and involved employees from across the country.

Drawing on the experiences of TD colleagues, key trends were identified within workplace experiences of colleagues with disabilities.

The study identified barriers faced by colleagues with disabilities, including areas of workplace accommodation, institutional awareness around disability, and career development. Key accessibility strengths were identified within TD, including supportive managers and positive perceptions of TD's progress in this area.

Based on overall findings, the study included nine recommendations that were considered in the three-year Accessibility Plan.

Key Strengths

- PWD see improvement of accessibility over time.
- Supportive teams and managers (as reported within the participant group).
- Colleagues note marked improvement in productivity after self-identifying as having a disability.

Key Barriers

- Colleagues may not know where to find information regarding TD's workplace accommodation program.
- Hesitancy to self-identify as an employee with disability.
- Lack of knowledge around what accommodations/resources are available for PWD.
- Internal security considerations may at times come in conflict with full participation of colleagues with disabilities.

Overview of Internal Study:

The internal study consisted of a TD employee focus group. During the focus group session, facilitators probed on the following topics:

- General attitudes.
- Workplace Culture and Support.
- Accommodations.
- Career Development/Advancement.
- Recruitment and Onboarding.

Discussion was open-ended to capture insights beyond responses to questions directly posed by facilitators. Approximately 700 TD colleagues volunteered to participate in this focus group. These colleagues included those managing cognitive, hearing, and vision disabilities. Many participants managed non-apparent disabilities. Participants varied substantively in how long they have worked at TD, ranging from six months to 28 years. This allowed facilitators to probe on both onboarding practices and changes over time.

Research Methods

- To ensure compliance with internal risk protocols, TD Bank conducted an open recruit of PWD colleagues to participate in an anonymous consultation session.
- To provide a forum in which PWD colleagues could freely share thoughts, all participants were granted anonymity in this final report, and colleagues without disabilities did not participate in the focus group.

- Facilitators organized discussion guides as an inverted triangle: starting with general discussion before moving into sets of specialized topics: Workplace Culture and Support, Accommodations, Career Development/Advancement, and Recruitment and Onboarding. This provided space for participants to guide the discussion to uncover novel findings.
- Where applicable, facilitators probed on specific experiences, changes over time, and differing experience across managers and organizational units.
- To accommodate those who may have challenges or reservations participating orally in consultation sessions, facilitators also engaged with participants via the “chat” function of the virtual conferencing platform.

How Feedback from Consultations was Considered

Feedback from the consultations helped identify barriers in each of the six focus areas of the ACA that apply to TD and helped to prioritize actions to remove and prevent similar barriers in the future. Feedback from the consultations is addressed in TD’s Accessibility Plan for each focus area under the headings:

1. Barriers.
2. Recommended priorities.

Ongoing Consultation

In addition to the consultation completed to inform the development of this Accessibility Plan, we are enhancing current approaches to address ongoing consultations with the community.

Capturing and Responding to Feedback:

We will leverage our existing sources to capture and respond to customer comments and feedback related to accessibility. This includes customer experience surveys, customer complaints processes, and social media sentiment monitoring. We will also enhance our existing accessibility with respect to TD website to ensure comments and inquiries are routed to a team who is trained to navigate accessibility related questions and topics.

Ongoing Proactive Consultation:

To inform the development and optimization of our new and existing programs, policies, products, and services we will embed PWD in our key market and consumer research to ensure that the perspectives of the community are reflected in our insights.

Colleague Consultation:

Like the colleague consultations we conducted to inform this Plan, we will work with our HR and colleague feedback teams to establish regular PWD colleague consultation to capture feedback and insights into the colleague experience, barriers, and opportunities.

Learning and insights from the ongoing consultation with consumers, customers and colleagues who identify as PWD will be shared in the regular progress report.



Focus Areas for Barrier Removal

Employment

About:

At TD, we believe a great colleague experience is built on a culture of care. We share a vision that encourages everyone to bring their best, and authentic, selves to work. This includes our ongoing commitment to providing accessible workplaces and flexible accommodations.

Accomplishments to date:

- We have a dedicated Workplace Accommodation Program team for supporting colleagues with disabilities and people managers as well as a centralized accommodation fund to support accommodation costs.
- Our Assistive Technologies team actively researches accessibility best practices and technologies, supports colleague accommodation requests, and coaches TD businesses on accessibility requirements and considerations as they buy or build colleague-facing technology to include accessibility considerations.
- Our Diversity Sourcing team includes an intentional focus on meeting skilled, external candidates with disabilities and supporting recruitment efforts.
- We provide in-house interpretation for D/deaf colleagues who use American Sign Language, providing accessible communications for meetings, career development and events.
- We provide a Document Accessibility Service to streamline creation of accessible PDFs.
- Through TD's colleague surveys, TD engages and requests feedback from colleagues with disabilities to track and improve colleague experiences.
- Accessibility best practices are in place for communications and meetings.
- TD incorporates accessibility standards, testing and guidelines for internal Learning & Development programs.

Barriers:

- Colleagues may not know where to find information regarding TD's workplace accommodation program.
- Stigma related to disability can inhibit colleagues from self-disclosing or asking for accommodations.
- Colleagues and hiring managers may not be consistently informed about accessibility options in recruitment and hiring practices and processes.
- Job requirements and descriptions may not include sufficient detail to allow candidates with disabilities to determine what accommodation(s) they may require.

As part of the Accessibility planning process, the following actions were prioritized:

- Continue to identify and execute against opportunities that promote accessible environments and provide a more inclusive experience for those with disabilities.
- Enhance the end-to-end colleague experience by incorporating feedback from colleagues about accessibility in the workplace.

Our plans to address barriers in employment:

- Socializing the workplace accommodation program to improve awareness and frequently reviewing and updating support options available to colleagues.
- Investigating additional opportunities for colleagues to share self-disclosure stories about disability and career success to support a disability confident workplace.
- Raising awareness with Talent Acquisition partners and hiring managers to increase disability inclusive recruitment activities.
- Offering clarity to candidates regarding interview processes and job requirements, including accommodation options available.
- Socializing and raising awareness of accessibility best practices for communications, meetings, and videos.
- Enhancing existing training for people managers to reduce stigma around disability to better support their colleagues with disabilities.
- Sharing accessibility training design guidelines for business-specific training created outside of HR.
- Considering feedback from colleagues with disabilities about their unique needs and preferences when building benefit and wellness options.

Built Environment & Procurement of Facilities

About

TD Bank occupies a variety of premises that reflect its long history as a place of business in Canada. Locations that have been built or undergone major renovations in the recent past will continue to meet the needs of our colleagues and customers in addition to aligning to, or exceeding, current regulations.

Accomplishments to date:

Over recent years TD has implemented a variety of improvements as part of new buildouts and renovations including:

- Assessment of barrier-free access as part of new location procurement.
- Adjustable height teller stations in newly constructed or renovated retail branches (since 2019).
- Wave-to-open automated doors.
- Universal and barrier-free washrooms beyond code requirements to reduce undue hardship.
- Wheelchair access to Automated Teller Machines (ATMs), vaults and service areas.
- Wayfinding systems and interior signage mounted at appropriate height, with high-contrast graphics, braille incorporation.
- Providing accessible parking.
- Adjustable height sit-stand and ergonomic furniture in our corporate workplaces, including client-facing TD Wealth offices.
- Standing height furniture settings are offset with matching seated height furniture settings.
- Enhanced information touchpoints related to the built environment.
- Print counters are designed at barrier-free height.
- Staff café millwork is designed with barrier-free sections and ensure equipment, smallware and coffee machines are in accordance with AODA recommended reach dimensions.
- Provide all-inclusive spaces in our corporate workplace settings, including lactation rooms, wellness rooms, and prayer rooms that are barrier-free with additional provisions, such as folding seats in the prayer rooms.

Barriers:

Barriers within our built environment may continue to exist in locations that:

- Were built in a different era, and still require renovation.
- Or where renovations have been completed but premises reflect accessibility requirements of a different era, and therefore present an opportunity for enhancement.

As part of the Accessibility planning process, the following actions were prioritized:

- TD will implement design features that support the underlying goals of barrier-free access in all premises, whether owned or subject to conditions of a lease.
- Continue to identify and execute against opportunities that promote a barrier-free environment to provide an inclusive experience for those with disabilities.
- Incorporate testing and feedback mechanisms for colleagues and members of the community to assess accessibility impacts.

Our plans to address barriers in our built environment and procurement of facilities:

- Convening a working group dedicated to identifying and resolving accessibility issues and concerns relative to our real estate footprint. Led by Architectural and Design Standards, it will include representation from the architecture and design, leasing, facility management, construction, and hospitality teams.
- Continuing to develop the pipeline of new and renovated retail and workplace facilities, expanding the implementation of barrier-free features to provide open access to all TD spaces.
- Continuing to reinforce and enhance engagement with our customers and colleagues with disabilities; action items to follow current process for evaluating and actioning improvement opportunities.

Information and Communication Technologies (ICT)

About:

TD's digital platforms deliver information and services to customers. Every day, colleagues use thousands of desktop applications, mobile apps, and electronic documents to complete their work. TD recognizes the importance of removing barriers and creating accessible digital experiences for customers and colleagues so they can bank and work effectively.

Accomplishments to date:

- TD has a dedicated Assistive Technologies team that coaches TD businesses as they buy or build colleague-facing technology and includes TD's Assistive Technologies Lab where they research accessibility best practices and technology that can be used to help accommodate colleagues with disabilities.
- TD's Digital Accessibility team works to ensure the design and implementation of new websites and mobile applications meet Web Content Accessibility Guidelines (WCAG) 2.1 AA standards and are accessible to customers with disabilities.
- TD reviews accessibility of customer-facing digital platforms annually to identify and help prioritize removal of accessibility gaps.
- A focus group of people with cognitive disabilities reviewed and provided feedback to help improve designs for new mobile platforms.
- Procedures are in place to verify PDF documents are accessible before they are uploaded to internet or intranet pages.
- Launched an accessibility chatbot on TD's intranet designed to make it easy for colleagues to find accessibility resources and support customers with disabilities.
- Marketing emails were reviewed and updated to improve accessibility.
- Auto-captioning has been enabled on all internal teleconferencing platforms to make online meetings and events more inclusive.
- Centralized TD branch intranet accessibility resources for colleagues to find accessibility support documentation and processes.

- Access to Video Remote Interpreting (VRI) in American Sign Language (ASL) is available at all TD Canada Trust branches.
- A dedicated number for Relay calls has been established to ensure customers using third-party relay services are supported effectively.
- TD ATMs feature tactile numeric buttons, speech output as well as an accessibility feature that reduces reach requirements.

Barriers:

- Some of our websites and mobile apps are not yet fully accessible. Customer consultations have identified barriers including:
 - Websites that have defects making screen reader use challenging.
 - Digital design patterns that may be difficult to use, including input boxes without clear boundaries, the need to enter the same information repeatedly and unexpected time-outs.
 - Mobile app barriers that have been identified including challenges with resizing text, lack of dark mode, and limited voice guidance.
- Some electronic documents, including statements, forms, and other documentation, make it challenging for people with disabilities to consume the information or interact with the forms effectively.
- Legacy platforms and some internal applications used by colleagues present barriers to completing their work activities effectively.
- Entering PINs on physical devices or when calling contact centres is difficult or impossible for some customers.

As part of the Accessibility planning process, the following actions were prioritized:

- Document procedures to gather and incorporate customer and colleague feedback to improve the design of our ICT platforms, products, and services.
- Improve the accessibility of our customer digital platforms through automated and manual testing of project activities and through ongoing audit activities.
- Ensure electronic documents, forms and statements are designed to be accessible, and procedures are in place to provide alternate formats when requested.
- Provide colleagues with technology that allows them to complete their job activities either natively or using assistive technology.

Our plans to remove barriers in ICT:

- Ongoing investigation of solutions to address accessibility barriers identified during customer consultations including screen reader compatibility problems, clear boundaries for input fields, avoid unnecessary requests for repetitive information, unexpected time-outs, resizable text in mobile apps and audio guidance.
- Establishing a Digital Accessibility Audit program to proactively identify accessibility barriers in TD websites and mobile apps in 2023.

- Enhancing our customer and colleague feedback mechanisms to ensure accessibility feedback related to ICT is identified and directed appropriately so it can be fully considered as we enhance the design of our ICT.
- Ongoing communication to colleagues about technology supports that are available to ensure they have access to the tools and resources to work effectively and to help them create accessible documents, technology and alternate formats that can be used effectively by customers and colleagues with disabilities.
- Enhancing TD Project Methodology and Change Management practices so ICT solutions can be accessible, or alternatives are in place where full accessibility is not possible.
- Educating Branch-based colleagues on alternatives to PIN entry that are available to authenticate customers.
- Researching opportunities to enhance the Contact Centre experience for customers with disabilities.

Communication (Other than ICT)

About:

TD interacts with customers, colleagues, and communities in which it serves in many ways, including in-person, print, online, and by phone. TD is committed to providing communications that are accessible and inclusive to its customers, colleagues, and communities.

Accomplishments to date:

TD already has initiatives underway to address the priorities listed below. To date, TD has achieved the following:

- Established guidelines on how to create accessible Word and PDF documents.
- Working with external partners responsible for creating content for TD (e.g., marketing research agencies who generate reports for TD colleagues) to ensure that the content produced meet accessibility guidelines. This reduces the effort of TD colleagues to transform content into an accessible format.
- TD's business lines are in various stages of transforming their content to meet accessibility requirements.
- Developed a new process to evaluate content for ease of understanding using customer feedback; TD Marketing has already established guidelines and best practices for creating plain language communications.
- We provide ongoing accessibility training (including changes to policies, practices and procedures) to colleagues, agents, and volunteers as to how to interact and communicate with people with various types of disability.
 - Training is provided through the TD Learning & Management System (LMS), is refreshed regularly, and the successful completion of the training is documented.

Barriers:

- Communicating by phone can be difficult for people who are D/deaf or hard of hearing, and/or have a cognitive condition that acts as a barrier for the absorption of information delivered in spoken form.
- Communication in-person can be difficult for people who have difficulty coming into a physical location. In some cases, an in-person interaction is mandated by our regulators.
- Communicating in print can be difficult for people who are blind, have limited vision, and/or have a cognitive condition(s) that acts as a barrier for the absorption of information delivered in written form.
 - In some cases, the format and content of printed content is mandated by regulation and TD does not have the ability to change the content and/or format to accommodate different needs.
- Financial information can be complex which represents a barrier for those with cognitive conditions that make the absorption of complex financial information difficult.
- Sign language is not provided for in videos on our external or internal sites; it is provided, upon request, for both internal and external events.
- American Sign Language (ASL) interpreters are a scarce resource and in high demand.
- Not all colleagues are familiar with the entire suite of accessibility resources available to both customers and colleagues.
- Some colleagues feel reluctant to disclose their accessibility requirements, especially those with non-apparent disabilities, this represents a challenge for identifying necessary accommodations.

As part of the Accessibility planning process, the following actions were prioritized:

- Develop guidelines on accessible communication that will be applied throughout TD for the creation of both internal and external communications. Ensure documents, forms and statements are designed to be accessible and procedures are in place to provide alternate formats when requested.
 - For pre-existing content, transform this content to meet accessibility requirements.
- Further simplify the language to reduce complexity and quantity of documentation.
- Develop a plan to create awareness for all colleagues of the accessibility resources available to them to support their own work and the needs of customers.

Our plans to remove barriers in communication:

TD is committed to providing specific tools and resources to its colleagues and employment candidates to help foster an inclusive, barrier-free workplace, including:

- Ensuring internal and external content meets accessibility standards to minimize the need of customers and colleagues having to request the content in an accessible format.
- Continuing to invest in accessibility people leader and employee training through our formal channels like our Learning Management System (LMS) and our informal channels (e.g., ad-hoc, custom-built training).

- Using internal, colleague feedback tools that protect colleague identities and creates a forum for them to raise issues related to accessibility.
- Using employee resource groups to create a community of support for colleagues with different accessibility needs and to generate awareness among colleagues interested in understanding how they can better support accessibility.

Procurement of Goods and Services

About:

TD works to ensure the products and services it sources are designed to be accessible for people with disabilities. By ensuring accessibility requirements are embedded in our best practices we can avoid creating new barriers.

Accomplishments to date:

- TD has developed a contract standard for Third-Party Suppliers who are providing a user interface as part of their deliverables to TD. The following industry standards apply:
 - Automated banking machines in Canada, CSA B651.1-09.
 - Website and mobile user interfaces, Web Content Accessibility Guidelines (WCAG) 2.1 Level AA.
 - Software and documentation, WCAG 2.1 Level AA.
 - Hardware, section 508 of the *Rehabilitation Act*, as amended.
 - The Third-Party Supplier is also required to test deliverables that have a user interface to assure compliance with accessibility standards.
- TD requires software remain compliant with Web Content Accessibility Guidelines (WCAG) 2.0 AA standards throughout the platform's life.
- Requests for Proposal contain a questionnaire for vendors to complete regarding accessibility (i.e., how they can help enhance accessibility and inclusion for our customers).
- Our Third-Party Risk Management Program identifies goods and services that contain a user interface and triggers a notification to the Accessibility Team for further review and assessment.

Barriers:

- For several technical solutions, currently there are very few vendors available who can adhere to the same level of accessibility as sought by TD.

As part of the Accessibility planning process, the following actions were prioritized:

- Strive for goods and services that are bought to be accessible and tested by people with disabilities.
- Continue to include the requirement to be accessible in contracts for Third Party's that work with TD.

Our plans to address barriers to the procurement of goods and services:

- Reviewing our procurement policy and processes annually, to determine where barriers exist and to develop corporate guidelines on procurement practices. The guidelines also outline what we expect of suppliers with regards to accessibility, social responsibility, and diversity in their business practices.
- Monitoring vendors regularly for enhancements related to accessibility by our new centralized Vendor Relationship Office which launched on March 20, 2023. Over the next few years, the following will be embedded into our target operating model:
 - Maintaining an inventory of vendors with accessibility capabilities which meet TD's requirements as established through our accessibility assessments.
 - Acting as a liaison between TD and its vendors, working with them to understand their current capabilities for accessible products and services as well as understand their roadmap for improvement.
 - Listing vendors who are required to have accessibility plans per ACA requirements based on the product or service they provide TD and the accessibility requirements within those products or services.
 - Including an accessibility review during the contract renewal process to enhance the contract where appropriate to include any new, or existing regulatory requirements.
- Connecting with businesses owned or operated by people with disabilities, via our Responsible Sourcing and Supplier Diversity Team, to understand the barriers that may exist when they compete for contracts with TD. Their feedback will help us determine the actions we can take to provide inclusive business opportunities.

Design & Delivery of Programs and Services

About:

TD is committed to conducting all its affairs with fairness and equity and fostering a unique and inclusive culture by providing an accessible, safe, and respectful work environment that is free from harassment, discrimination, or violence. Every employee, potential employee, and Director, as well as every customer, vendor, or other person in a business relationship with TD must be treated with dignity and respect.

Accomplishments to date:

- TD continuously assesses new and/or updated accessibility requirements as part of the annual policy review cycle.
- Consults with PWD when designing and developing new products and services.
- Enhance TD branch customer authentication resources for assisting PWD customers who are unable to use the PIN Pad on alternative authentication methods.
- Development of an Accessibility Ambassador role in numerous TD branches to create awareness and help educate colleagues on assisting customers with disabilities and available programs, tools, and resources.

- Canadian Banking PWD colleague focus groups to gather feedback related to accessibility needs and areas of focus.
- An Accessible Document Service has been established to streamline the ability for TD colleagues to have PDFs remediated for accessibility.
- When developing and deploying a new product or improving an existing one, accessibility is part of the planning process.

Barriers:

The barriers related to the Design and Delivery of Programs and Services identified through consultations and feedback mechanisms include:

- The volume and complexity of information presented and shared during banking interactions can be challenging for those with cognitive conditions or using a screen reader.
- Alternative formats of documents are not readily available in branches. This problem is compounded when documents must be signed in the branch.
- Physical Debit and Credit cards lack tactile features to identify the card number and other important details making it challenging for customers with low vision to read card numbers.
- Opening new products and services have strict identification requirements. Commonly requested are a driver's license or passport. PWD managing limited vision or mobility often do not drive and may not have a driver's license; passports are less frequently carried day-to-day.
- Fear of stigma may prevent our customers and colleagues from informing us and/or providing us with feedback about the accessibility of our products.

As part of the Accessibility planning process, the following actions were prioritized:

- Raise awareness about alternative formats available upon request.
- Consult with people with disabilities when designing and developing new products and services.
- Enhance training for TD colleagues to raise awareness about disability and accessibility.
- Investigate solutions that will allow customers to differentiate cards using tactile means.

Our plans to address barriers in the design and delivery of programs and services:

- Implementing a feedback process to receive and respond to feedback about the way we design and deliver programs and services to people with disabilities.
- Launching a Digital Inclusive Design program to consult and fully consider the needs of people with disabilities early in the design of new websites and mobile app.

Transportation

TD does not coordinate a transportation system, or a fleet of transportation vehicles as defined in the *Accessible Canada Act*. This means that standards for transportation are not in the scope of this plan. However, we provide accommodations to colleagues travelling for TD business and training.

Conclusion

At TD, we are bound by our vision and purpose to be the better bank; and, to enrich the lives of our customers, communities, and colleagues. We understand that providing a barrier-free environment for our customers and colleagues is an ongoing process. TD is dedicated to making accessibility a key priority.

Glossary of Terms

Accessibility is the design of products, devices, services, environments, technologies, policies, and rules that makes their access possible for all people, including people with a wide range of disabilities.

Accessible Canada Act (ACA) came into force on July 11, 2019. The legislation was enacted with the goal of removing barriers and achieving accessibility within areas of federal jurisdiction on, or prior to, January 1, 2040.

Accommodation is the legal obligation of eliminating disadvantages and barriers to employees, prospective employees or customers resulting from policy or practice that has more have an adverse impact on individuals or groups protected under the *Canadian Human Rights Act*.

American Sign Language (ASL) is the language of D/deaf Canadians. ASL uses signs, facial expressions, body language and finger spelling to convey information. Its vocabulary and grammar constructs are different from that of English.

- **Langue des signes québécoise (LSQ)** is a sign language originating in Québec, which like ASL uses signs, facial expressions, body language and finger spelling to convey information. The grammar and vocabulary are different than that of French.

Barriers are defined by the *Accessible Canada Act (ACA)* as anything that hinders the full and equal participation of people with an impairment in society. The impairment could include, cognitive, communication, functional, intellectual, learning, mental, sensory, or physical limitations. The barriers could be architectural, attitudinal, physical, or technological; barriers could be based on information or communication or the result of a policy or practice.

Captions are text displayed on videos to enable people to read dialogued sounds. Closed Captioning (CC) can be turned on or off by the user whereas open captions are part of the video itself and cannot be turned off. Automated captioning, such as those available on Microsoft Teams.

D/deaf is used as a collective noun to refer to both people who identify with the Deaf culture and people who have little to no functional hearing who do not identify with the Deaf culture.

Deaf with a capital “D” refers to individuals who are deaf or hard of hearing and who identify with and participate in the language, culture, and community of Deaf people, using sign language as the first choice of communication. Deaf culture does not perceive hearing loss and deafness as a disability, but as the basis of a distinct cultural group. Culturally, Deaf people may use speech reading, gesturing, spoken language and written English to communicate with people who do not sign.

Deafened and late deafened describes individuals who grew up hearing or hard of hearing and either suddenly, or gradually, experienced a profound loss of hearing. Late-deafened adults usually understand speech with visual clues like captioning or computerized notetaking, speech reading or sign language.

Disability is defined by the *Accessible Canada Act* as any impairment that, in interaction with a barrier, hinders an individual’s full and equal participation in society. The impairment could include, cognitive, communication, functional, intellectual, learning, mental, sensory, or physical limitations. The impairment may also be permanent, temporary, or episodic in nature, and either visible or hidden.

People with Disabilities (PWD) describes people who have long-term physical, mental, intellectual, or sensory impairments who interact with various barriers that may hinder their full and effective participation in society on an equal basis with others.

Teletypewriter (TTY) is a device that enables people who are D/deaf, hard of hearing or people with speech impairments to use the phone by typing messages.

Universal Design is the planning and configuration of an environment, building, product, program, or service so that it can be accessed and used to the greatest extent possible by all people.

Web Content Accessibility Guidelines (WCAG) are a set of recommendations for making Web content more accessible, primarily for people with disabilities—but also for all user agents, including highly limited devices, such as mobile phones. WCAG 2.0, were published in December 2008 and became an ISO standard, ISO/IEC 40500:2012 in October 2012. WCAG 2.1 became a W3C Recommendation in June 2018.

