

# ACCESSIBILITY ACT PLAN

V2

December 2023

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## 1. Changes from Previous Version

- Updated feedback section and confirmed WCAG compliance with 2.1 AA standard.

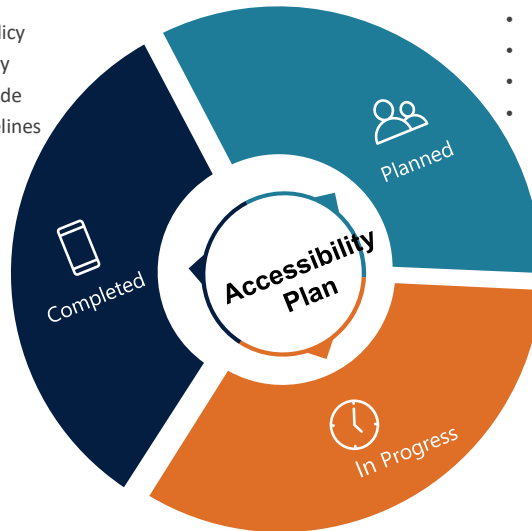
## 2. Executive Summary

The *Accessible Canada Act* is intended to make Canada barrier-free by January 1, 2040. This involves identifying, removing and preventing barriers in federal jurisdiction in the following priority areas:

- employment
- the built environment (buildings and public spaces)
- information and communication technologies
- communication, other than information and communication technologies
- the procurement of goods, services and facilities
- the design and delivery of programs and services, and
- transportation (airlines, as well as rail, road and marine transportation providers that cross provincial or international borders)

JPMorgan Chase’s Multi-Year Accessibility Plan and Policies are developed in accordance with the *Accessible Canada Act* and the following depicts (and is not limited to) what has been Completed, Planned or in Progress as part of the firm’s commitment to prevent/remove barriers and improve opportunities for both internal employees and the public with disabilities.

- Conducted a Consultation
- Completed a review of Workplace policies
- Chase Accessibility Services
- MyAccessibility Hub
- Office of Disability Inclusion
- DE&I Committee: Access Ability
- Autism at Work
- Captioning Services
- Firmwide Work Environment Policy
- Flexible work Arrangement policy
- Disability Inclusion Resource Guide
- Web Content Accessibility Guidelines (WCAG) 2.1 AA compliant
- Review of Physical Barriers in all Public Spaces across Canada
- Add Country-specific requirements to firmwide policies and standards
- Refresh public websites
- Refresh Training Curriculums
- Revisit Manager Accessibility Training
- Healthier food and beverage selections in JPMorgan Chase facilities



- Extend mandatory training to all Canadian employees
- Access Ability Business Resource Group to host education sessions
- Identify local organizations to develop partnerships and support recruitment of persons with disabilities
- expand the partnership with Rangam in Canada through the North American Autism at Work internship program

### 3. Accessibility Statement

JPMorgan Chase strives to meet the needs of its employees and customers with disabilities and is working hard to remove and prevent barriers to accessibility.

Our organization is committed to fulfilling requirements under the *Accessible Canada Act (ACA)*. This Accessibility Plan outlines the steps JPMorgan Chase is taking to meet those requirements and to improve opportunities for people with disabilities.

Our plan shows how JPMorgan Chase will play its role in making Canada an accessible country for all Canadians.

## 4. Employment

JPMorgan Chase is committed to fair and accessible employment practices and to encourage the full inclusion of persons with disabilities. We have taken the following steps to:

- Notify the public and staff that, when requested, JPMorgan Chase will accommodate people with disabilities during the recruitment and assessment processes and when people are hired.
- Advise of the availability of accommodations for applicants with disabilities in its recruitment processes, the assessment process and in the notification process to successful applicants.
- Develop and put in place a process for developing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability.
- Ensure the accessibility needs of employees with disabilities are considered in performance management, career development and redeployment processes.
- Consult with disability management provider to meet accommodation requirements.
- Prevent and remove other accessibility barriers identified and review any complaints relating to accessibility barriers and address them as they arise by escalating through internal stakeholders.
- Provide workplace information and communications in accessible formats and with communication supports for persons with disabilities, upon request, in a timely manner that considers the person's accessibility needs due to disability. We will consult with the individual requesting such services to determine a suitable format or support.

## 5. The Built Environment

JPMorgan Chase must provide Person(s) with Disabilities full and equal access to, and the opportunity for full and equal enjoyment of, Products and Services and Facilities.

JPMorgan Chase will continue to meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces. JP Morgan will address barriers to accessibility in some locations identified during the consultation.

JPMorgan Chase will have procedures in place to notify the public of any service disruptions and alternatives available in the event of a service disruption to accessible parts of its public spaces.



## 6. Information & Communication Technologies



JPMorgan Chase provides equal access to information communicated in writing, orally, digitally or in person. We will continue to consult with people with disabilities to determine their information and communication needs to meet the requirements of ACA.

### Accessible Formats and Communication Supports

- JP Morgan Chase will upon request arrange for the timely provision of accessible communication formats of publicly available information and communication supports for persons with disabilities that considers each person's particular accessibility needs.
- We will work with the person with a disability and determine the appropriate method of communication or accessible communication format for documents, based on their needs.

JPMorgan Chase provides accommodations in the form of Auxiliary Aids and Services, reasonable modifications to policies and procedures, and other services, for the purpose of effective communication, equal access to and opportunity for full and equal enjoyment of Products and Services and Facilities.



## 7. Communication, other than ICT

JPMorgan Chase provides equal access to information communicated in writing, orally, digitally or in person. We will continue to consult with people with disabilities to determine their information and communication needs to meet the requirements of ACA.

### Accessible Formats and Communication Supports

- JP Morgan Chase will upon request arrange for the timely provision of accessible communication formats of publicly available information and communication supports for persons with disabilities that considers each person's particular accessibility needs.
- We will work with the person with a disability and determine the appropriate method of communication or accessible communication format for documents, based on their needs.

JPMorgan Chase provides accommodations in the form of Auxiliary Aids and Services, reasonable modifications to policies and procedures, and other services, for the purpose of effective communication, equal access to and opportunity for full and equal enjoyment of Products and Services and Facilities.

## 8. The Procurement of Goods, Services & Facilities

New Business, Initiatives, Eliminations or Changes to Products or Processes must follow the JPMorgan Chase established process in adherence with New Business Initiative Approval Policy - Firmwide framework. JPMorgan Chase must have program framework including but not limited to: Procedures, Risk and Controls, Issue Management, Training, Complaint Monitoring, Quality Assurance, Reporting and Analysis, and when applicable, Supplier Oversight.

## 9. The Design & Delivery of Programs and Services

New Business, Initiatives, Eliminations or Changes to Products or Processes must follow the JPMorgan Chase established process in adherence with New Business Initiative Approval Policy - Firmwide framework. JPMorgan Chase must have program framework including but not limited to: Procedures, Risk and Controls, Issue Management, Training, Complaint Monitoring, Quality Assurance, Reporting and Analysis, and when applicable, Supplier Oversight.

JPMorgan Chase must provide accommodations in the form of Auxiliary Aids and Services, reasonable modifications to policies and procedures, and other services, for the purpose of effective communication, equal access to and opportunity for full and equal enjoyment of Products and Services.

## 10. Transportation

Not Applicable

## 11. Consultations

### 11.1 Who was consulted

JPMorgan consulted with employees who self-identified as persons with disabilities, members of the Diversity and Inclusion Committee, and members Access Ability, an internal Business Resource Group that serves as a resource on disability issues, a voice for employees with disabilities, and a partner in the success of all JPMorgan Chase colleagues. The mission of Access Ability is to complement JPMorgan Chase's global diversity efforts by maximizing the contributions of employees affected by disabilities, long-term illness or caregiving responsibilities.

The employee's who participated in the consultations identified as persons with chronic medical conditions, physical disabilities, neurodivergent conditions, learning disabilities, and allies.

### 11.2 Consultation topics

The purpose of the consultations was to better understand the experience of employees with disabilities and where they may encounter barriers to a fulsome employee experience at JPMorgan Chase. Questions were asked about experiences pertaining to the employment cycle (recruiting, onboarding, training and development, promotion, retention) employee resources (i.e. communication and accommodation), barriers to inclusion and success at JPMorgan, and opportunities for improvements.

The responses provided generated dialogue, greater awareness about systemic and physical barriers, and suggestions on ways to address these barriers. The feedback is summarized in this plan and will be used to inform future enhancements to our policies, procedures, communication, training and physical environment.

### 11.3 Consultation timing

JPMorgan met with the Diversity and Inclusion Committee to share results from the annual Employment Equity Review in 2022, prior to the development of the Accessibility Plan. JPMorgan consulted with the Access Ability Business Resource Group and individual employees who self identified as persons with disabilities in Q2 of 2023 during the process of creating the Accessibility Plan.

### 11.4 Consultation methods

JPMorgan met with employees virtually and in person to conduct the consultations. The virtual consultations via Zoom technology were most used to include employees across the country and those working remotely. The consultation consisted of small group discussions with the Diversity and Inclusion Committee and Access Ability Business Resource Group, and individual discussions with the employees who self-identified as persons with disabilities to ensure confidentiality.

## **11.5 Consultation results**

The results from the consultations yielded feedback in the following areas:

### **11.5.1 Physical barriers**

JPMorgan identified some barriers to accessibility for persons with disabilities in the physical spaces of the sites. The access doors and doors to the washrooms are not barrier-free at some sites. As part of the Accessibility Plan, JPMorgan will work with the facilities team and the property management of each site to identify how entrances and washroom doors can be updated to be more accessible.

### **11.5.2 Accommodation barriers**

Employees appreciated the hybrid work structure and for some roles fully remote working arrangements, and identified opportunities to better support persons with disabilities in their remote working technical set up. This included being able to walk employees through their technical set up and being available for ongoing support if required.

Some employees indicated there were concerns in requesting accommodation from their manager due to their disability. This was not the case for all, indicating an inconsistency in how managers interact with employees with disabilities. Additional training for managers was suggested as an approach to provide a more consistent and supportive response to employee requests for accommodation.

### **11.5.3 Manager and employee Training**

Employees expressed a need for further training for managers and the broader employee population on how to open dialogue around support for employees with disabilities. Currently 60% of the JPMorgan population receive formal training in accessibility; JPMorgan will extend mandatory training to all employees in Canada. The Access Ability Business Resource Group will also host education sessions for greater engagement, awareness and learning.

### **11.5.4 Communication**

Some employees consulted who had accessed internal resources (i.e. benefits, disability leave, accommodation) were aware of the supports available for persons with disabilities at JPMorgan, however the consultations revealed greater awareness of resources and policies and how to access them would be beneficial. JPMorgan will provide additional written and verbal communications (through town hall and smaller group meetings) to employees on available resources and the process to access as part of the Accessibility plan.

Continued education and messaging on inclusion as a priority at JPMorgan can increase the comfort level of persons with disabilities to self identify and seek support where needed. JPMorgan saw an increase in employees choosing to self-identify in 2022 and will continue to promote the benefits of self-identification to ensure the support mechanisms in place are reflective of the population needs.

Employees indicated the food and beverage selection in the office pantries could include a greater variety of healthy options, and small appliances (i.e. toaster, toaster oven, blender) to support employees bringing healthier snacks. JPMorgan will consult with the facilities team to explore adding healthier food choices and small appliances at the sites.

#### **11.5.5 Recruiting**

Employees consulted did not express any particular barriers from the recruiting process to persons with disabilities, but acknowledged this community is underrepresented at JPMorgan. Employees consulted suggested partnering with community organizations to attract persons with disabilities. JPMorgan will work with the Access Ability Business Resource Group and the New Joiner Experience team to identify local organizations to develop partnerships and support recruitment of persons with disabilities. JPMorgan will also explore opportunities to expand the partnership with Rangam in Canada through the North American Autism at Work internship program.



## 12. Training

JPMorgan Chase provides training to all employees and volunteers on providing accessible customer service and how to interact with people with various types of disabilities

- JP Morgan Chase will continue to maintain a record of the training provided
- The current training is tailored to Ontario's Accessibility laws and on the Ontario Human Rights Code as it relates to people with disabilities. The Modules include:
  - Accessibility for Ontarians with Disabilities Act
  - The Customer Service Standard
  - Our Policies and Procedures
  - Interacting and Communicating
  - Integrated Accessibility Standards Regulation
  - The Ontario Human Rights Code and the AODA

Efforts are underway to review the current training to ensure ACA requirements are incorporated for all employees in Canada.



## 13. Feedback

All inquiries, customer feedback and complaints may be submitted to:

Wade Cole      Managing Director, Human Resources

In writing:      66 Wellington St W, Suite 4500

Toronto, Ontario, M5K 1E7

Canada

By email:      [canada.accommodations.feedback@chase.com](mailto:canada.accommodations.feedback@chase.com)

By phone:      (416) 981 - 9228

Feedback on the ACA plan should be submitted via email or phone to Wade Cole. An email acknowledging receipt of the feedback will be sent to the contributor within 72 hours. A summary of feedback received will be reviewed quarterly with Human Resources, the Diversity Committee, and the Management Committee where relevant. Feedback contributors will receive a response to their submission including any action items subsequent to the review process. Requests to receive the feedback response in an alternate format can be made at the time the feedback is shared.