

# Accessibility Canada Act Plan

Progress Report

May 2025

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## 1. Changes from Previous Version

- This is the 2<sup>nd</sup> version of this progress report.

## 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.

### 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 Progress Report 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. General

### Progress Report Summary

JPMorgan engaged in ongoing dialogue with employees on accessibility this year. Through consultation and education the firm sought out and responded to employee feedback through multiple modalities.

- Feedback through the annual Employee Opinion Survey reflected positive sentiment of the efforts from the firm to meet the needs of all employees as evidenced by 93% favourable response rating on the inclusion indices.
- Consultation with external consultants, individual employees and employee-led Business Resource Groups yielded enhancements to the benefits plans and policy review
- Partnership with the talent acquisition team resulted in a strategy to increase connections with community partners, serving persons with disabilities
- Education and information sessions facilitated by local and global programs and initiatives brought relevant content on Autism, mental health issues, accommodations in the workplace, environmental, physical health, and inclusion to Canadian employees.

#### Completed

- ✓ Conducted ongoing consultations
- ✓ Completed a review of Workplace policies
- ✓ Accessibility internal resources available
  - Chase Accessibility Services
  - MyAccessibility Hub
  - Office of Disability Affairs
  - DO&I Committee: Access Ability
  - Autism at Work
  - Captioning Services
  - Firmwide Work Environment Policy
  - Flexible Work Arrangement policy
  - Disability Inclusion Guidelines
  - Mental Health Awareness Resource Page
  - Employee Assistance Program (EAP)
  - Web Content Accessibility Guidelines (WCAG) 2.1 AA compliant
- ✓ Review of Physical Barriers in all Public Spaces across Canada
- ✓ Healthier food and beverage selections in JPMorgan Chase facilities
- ✓ Benefit plan enhancements to provide greater access to referrals and support services
- ✓ Refresh Accessibility Training Curriculums for employees and managers
- ✓ Extend mandatory training to all Canadian employees
- ✓ Access Ability Business Resource Group to host education

#### In Progress

- Identify local organizations to develop partnerships and support recruitment of persons with disabilities
- Consultation with Property Management teams across all sites on planned accessibility initiatives
- Confirm accessibility considerations are included in any sight refresh or relocation plans

#### Planned Activities

- Build relationship with ODEN and affiliated services to increase connectivity to network of candidates with disabilities
- Review of disability definitions for Canada employees
- Employee Opinion Survey to better understand perception of diversity and inclusion culture within the organization

Continued partnership with the property managers for JPMorgan sites to prioritize creating barrier-free spaces remains a focus for the firm.

### Feedback

JPMorgan welcomes feedback on matters related to accessibility, including but not limited to: requests for copies of the Accessibility plan, progress reports, and feedback process descriptions in certain alternate formats, feedback about barriers encountered when dealing with JPMorgan Chase, and feedback on JPMorgan Chase's implementation of its accessibility plan.

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

Shannon Zunn, Executive 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 - 9223

Feedback on the Accessibility plan should be submitted via email or phone to Shannon Zunn. 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.

This feedback process was established in June 2024. Shannon Zunn, JPMorgan Canada's HR Country Head is the member of the Management Committee designated to receive feedback on JPMC's accessibility program. As of the filing of this progress report no feedback has been received.

## 5. Employment

JPMorgan Chase is committed to fair and accessible employment practices and to encourage the full inclusion of persons with disabilities. The following current processes are in place:

- Notify the public and staff that, when requested, JPMorgan Chase will accommodate people with disabilities during the recruitment and assessment processes and when candidates are hired
- Advise of the availability of accommodations for applicants with disabilities in the recruitment and assessment processes, and in the notification to successful applicants
- Implement 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. The disability management team consults with the individual requesting such services to determine a suitable format or support
- Encourage self-identification of employees with disabilities to provide accurate aggregated reporting of employee demographics and create opportunities to engage in supportive dialogue while maintaining employee privacy and confidentiality
- Post job vacancies through Ontario Disability Employment Network (ODEN) to encourage applicants with disabilities to apply for positions at JPMorgan



## 6. 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, 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. The firm made renovations to one site this year and added height adjustable desks for increased flexibility.

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.

## 7. 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. Consultations in 2024 did not identify information and communication technology barriers for persons with disabilities.

### 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. 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. Consultations in 2024 did not identify communication barriers for persons with disabilities.

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## 9. 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 To remain competitive, JPMorgan Chase must be timely with new to market, expanded or modified products and services. Introducing new or modifying existing products or services introduces risk to the firm. Making sure the relevant risks are understood and appropriate controls are in place to help launch the New Business Initiative (NBI) in a controlled manner. The Office of the Comptroller of the Currency (OCC) expects bank management and the board to oversee all new, expanded, or modified products and services through an effective risk management process.. JPMorgan Chase must have a 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.

## 10. 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 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.

## 11. Transportation

Not Applicable

## 12. Consultations

### 12.1 Who was consulted

JPMorgan consulted with employees who self-identified as persons with disabilities, members of the Diversity and Inclusion Committee, and members of AccessAbility, 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 AccessAbility 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 Canada Management Committee was also consulted in the finalizing of this Plan.

The employees who participated in the consultations identified as persons with chronic medical and mental health conditions, physical disabilities, neurodivergent conditions, learning disabilities, and allies.

### 12.2 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. Employees who had previously participated in consultation were asked to opine on any changes they had noticed since the prior consultation period. 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 review and will be used to inform future enhancements to our policies, procedures, communication, training and physical environment.

### 12.3 Consultation timing

JPMorgan consulted with the Access Ability Business Resource Group and individual employees who self identified as persons with disabilities during the 2024-2025 progress report period.

### 12.4 Consultation methods

JPMorgan met with employees virtually 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 was completed virtually due to the meeting cadence with the AccessAbility Business Resource Group, and individual discussions with the employees who self-identified as persons with disabilities to ensure confidentiality.

## 12.5 Consultation results

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

### 12.5.1 Physical barriers

Barriers to accessibility for persons with disabilities in the physical spaces of the sites was raised. The access doors and doors to the washrooms are not barrier-free at some sites. Consultation with the property managers at each of the 6 sites across Canada confirmed that access to washrooms do meet the accessibility code guidelines, however only 1 site would be considered barrier free. At this time the property managers do not have plans to update the washroom doors at the other 5 sites. JPMorgan will continue discussions with the property managers and consider the need for barrier free upgrades when sourcing new sites or renovating the current sites.

### 12.5.2 Accommodation barriers

JPMorgan is transitioning from a hybrid work model to full-time in office attendance effective 2025. Employees noted that there is an opportunity for greater awareness regarding medical accommodation options as employees return to the office full-time.

There were some opportunities identified in the area of accommodations.

- Accommodation request reviews, particularly when medical conditions have not changed (i.e. chronic conditions) could be streamlined with less need to provide information that is repetitive.
- Employees also indicated a more fluid process upon return from leave of absence would be supportive of re-entry.
- Concerns were raised about sufficient accessible and the adequacy of fridge space at the office as well as parking due to increased in-office attendance.
- Options for accommodations for short term medical conditions are not clearly understood (i.e. recovering from surgery).

How managers interact with employees with disabilities continues to be an opportunity. Employees expressed their intent to disclose their disability was highly dependent on the relationship with their manager, and some had not done so due to concerns on how the information would impact perception.

### 12.5.3 Manager and employee Training

Employees had positive feedback about the web-based accessibility training that was introduced in 2024. They also shared a desire for more manager and employee training, particularly in the areas of invisible disabilities and neurodivergent conditions.



#### **12.5.4 Communication**

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. Assistive technology supports (i.e. headsets, close captioning for Zoom calls) were appreciated by employees, allowing greater access to content and ability to participate in online forums.

JPMorgan included content on benefits, employee assistance, accommodation and inclusion during town hall meetings and in written communications to increase awareness and promote support programs. For 2024-2025 increased coverage for mental health practitioners was noted and appreciated by employees consulted. Vaccination coverage and paramedical services were also viewed favourably.

#### **12.5.5 Recruiting**

Employees shared feedback on their experience, with some expressing they had experienced anxiety during the recruitment process due to delays between verbal offers and official offer letters, particularly affecting those with ADHD. The onboarding process was also described as feeling decentralized, with orientation occurring a month later, leading to difficulties in finding information. JPMorgan continues to work with the Access Ability and the Recruiting team to identify local organizations to develop partnerships and support recruitment of persons with disabilities. Lastly, JPMorgan will share the work done internally in support of persons with disabilities through social media to create greater awareness of the firm's commitment to being an inclusive employer of choice.

## 13. Training

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

- In addition to training on the Accessibility for Ontarians with Disabilities Act (AODA) provided to provincially regulated employees, JPMorgan launched mandatory Accessibility training for all employees in Canada and non-Canadian employees and managers who support employees in Canada.
- JP Morgan Chase will continue to maintain a record of the training provided