

PC Bank's Accessibility Plan

1.	General	1
1.1	Description of PC Bank	1
1.2	Statement of Commitment	1
1.3	How to Provide Feedback	1
1.4	Alternative Formats	2
1.5	Definitions	2
2.	Areas Described under Section 5 of the ACA	3
2.1	Employment	3
2.2	Built environment	4
2.3	Information and Communication Technologies (ICT)	5
2.4	Communication (other than information and communication technologies)	6
2.5	Procurement	6
2.6	Design and Delivery of Programs and Services	7
2.7	Transportation	7
3.	Consultations	8
3.1	Internal consultations	8
3.2	External consultations	8
	Conclusion	8

1. General

1.1 Description of PC Bank

President's Choice Bank ("PC Bank") is a Schedule I bank under the Bank Act (Canada) that provides retail banking products to customers across Canada. As a subsidiary of Loblaw Companies Limited., we share the CORE values of Care, Ownership, Respect and Excellence. PC Bank offers payment solutions and services that reward our customers every day. We strive to simplify financial products to let Canadians spend more time to Live Life Well®.

1.2 Statement of Commitment

PC Bank recognizes that accessibility is a key feature of inclusivity for all Canadians. We are dedicated to identifying, removing, and preventing barriers for colleagues, customers, and stakeholders with disabilities. PC Bank's Accessibility Plan reflects the lived experiences of people with disabilities through feedback we received from internal and external surveys and reviews. This plan was developed by a diverse working group with members from across PC Bank.

This plan outlines our three-year (2023 – 2025) commitment to PC Bank's accessibility efforts.

1.3 How to Provide Feedback

PC Bank welcomes feedback about this Accessibility Plan or the barriers encountered related to accessibility at PC Bank. We are committed to reviewing all feedback in a timely manner.

If you choose to include your contact information, we will acknowledge your feedback in the same format that we receive it in. You may also choose to submit feedback anonymously.

Please use one of the contact methods below to provide your feedback. The person responsible to receive feedback on behalf of PC Bank is the SVP & GM Payment Products.

Accessibility feedback submitted is shared with our PC Bank Accessibility Office and may be shared as required with other teams to respond to feedback.

We are committed to keeping your privacy protected and information confidential - any personal information shared will be used and safeguarded in accordance with Loblaw Companies Limited [Privacy Policy](#).

Any accessibility feedback shared will be considered for use to remove barriers at PC Bank. In addition, feedback will be aggregated and shared at a thematic level in our annual accessibility reports and retained in accordance with record keeping requirements.

Feedback process for colleagues -

When providing feedback, please specify that it is related to accessibility

- Anonymous option via our [Integrity Action Line](#)
- By emailing or phoning our Human Resources team
- Mail: PC Bank Human Resources department (600-500 Lakeshore Blvd. West, Toronto, ON M5V 2V9)

Feedback process for members of the public (including customers) -

When providing feedback, please specify that it is related to accessibility

- Phone: 1 866 246 7262
- [Webform: click here](#)
- Mail: SVP & GM Payment Products c/o PC Bank Accessibility Office (600-500 Lakeshore Blvd. West, Toronto, ON M5V 2V9)

1.4 Alternative Formats

You can request this Accessibility Plan and/or a description of our feedback process in an alternative format through one of the contact methods outlined above in our feedback process.

PC Bank will provide alternative formats in a timely manner:

- Print: fifteen (15) days
- Large print (larger text): fifteen (15) days
- Braille (a system of raised dots that people who are blind or who have low vision can read with their fingers): forty-five (45) days
- Audio (a recording of someone reading the text out loud): forty-five (45) days

1.5 Definitions

In accordance with the Accessible Canada Act (ACA), the following definitions are used in this plan:

Disability: Any impairment, or difference in physical, mental, intellectual, cognitive, learning, or communication ability. Disabilities can be permanent, temporary, or can change over time.

Accessibility: The design of products, devices, services, environments, technologies, policies and rules in a way that allows all people, including people with a variety of disabilities, to access them.

Barrier: Anything that might prevent people with disabilities from achieving full and equal participation. Barriers can include features of the built environment, technology, attitudes, information communication. Policy and procedures that are inaccessible can also create barriers.

Procurement: Buying goods and services for business purposes

2. Areas Described under Section 5 of the ACA

PC Bank identified barriers in six of the seven areas identified in the ACA, as well as the actions required to address each barrier.

2.1 Employment

As part of recruitment activities, accommodation and accessibility will be provided as needed including physical space requirements, adaptive technology and alternative solutions to assessments such as providing more time to complete such assessments.

PC Bank's Accommodation Policy provides colleagues with the necessary workplace support, including but not limited to, physical modifications to workstations, adaptive technology, and flexible working arrangements to meet work, family, or life needs. Colleagues can access our Accessibility and Accommodation page on our Intranet.

We recognize that there are further barriers and opportunities relating to employment. We have identified the following barriers to employment and action items to address these barriers.

Barriers:

- **Representation of employees with disabilities:** There is a lower representation of colleagues who self-identify as persons with disabilities than current labour market availability.
- **Accommodations:** Greater clarity is required on the types of accommodations available for people with disabilities.
- **Accessibility and disability knowledge:** There is a knowledge and awareness gap on accessibility and disability among colleagues, hiring managers and senior leaders.

Actions:

- We will define diversity and inclusion goals to increase the representation of people with disabilities.
- We will partner with disability employment partners to improve the number of colleagues hired with disabilities.
- We will ensure the availability of guidance and funding for accommodation requests.
- We will enhance our online careers page to increase visibility of and provide clarity on the types of available accommodations for persons with disabilities.
- We will identify areas of our business that can more readily accommodate persons with disabilities.
- We will continue to provide mandatory training to colleagues and people leaders, educating on accessibility and disability.

2.2 Built environment

PC Bank's built environment is the physical space of facilities and features for colleagues and customers. PC Bank's head office is located at 500 Lakeshore Blvd. West, Toronto, Ontario, Canada. Our head office includes accessibility features including:

- Gender-neutral accessible washrooms, kitchen with lower level sinks and microwaves, adjustable desks.
- Options for different types of working styles such as a quiet room and adjustable desks.
- Other features including prayer room, gym and women's room.

For the public, PC Bank leverages the Loblaw retail stores to serve our customers through our pavilion channel. Our pavilions have been designed in a manner that includes accessible features such as an office, table and chairs. In addition, we have ABMs at most pavilion locations which currently meet the CSA Standard (B651) for accessibility ABMs including:

- Being positioned to allow 6' clearance being usable by persons seated in a mobility aid such as a wheelchair or scooter;
- Text to audio speech, text to audio functionality/headphone jack active
- High screen visibility

PC Bank strives to make our built environment as accessible as possible for all Canadians.

We have identified the following potential barriers to the built environment and action items to assess these potential barriers.

Barriers:

- **Physical barriers at PC Bank Head Office:** People with disabilities may encounter physical barriers with access to PC Bank buildings, offices, facilities. PC Bank will review current physical set up including lighting in office and accessibility to meeting rooms.
- **Physical barriers for public:** People with disabilities may encounter limited physical barriers to access our services. PC Bank will review current physical set-up and design for Pavilions and ensure the space fully accommodates wheelchairs, walkers, support persons, etc.

Actions:

- We will work with our landlord, Choice Properties, to determine options for office enhancements based on barriers identified.
- We will work with our ABM vendor to review current compliance with the most up-to-date accessibility standards in order to determine whether enhancements are required.

2.3 Information and Communication Technologies (ICT)

Information and communication technologies are the tools we use to create and share information.

For our colleagues, we offer accessibility features such as closed captioning on Microsoft Teams. In addition, training sessions are held to bring awareness of accessible features that are in technology offered by Microsoft.

For our public facing websites and applications, our team designs and builds products with accessibility in mind and has it included as part of our development processes. Accessibility testing is conducted before new initiatives are released and we are partnered with a third-party to assist with training and testing. In addition, we review existing core functionality and customer journeys to ensure there are no changes in accessibility compliance. If we do identify issues, they are prioritized and worked through as part of our development work.

We have identified the following barriers to information and communication technologies and action items to address these barriers.

Barriers:

- **Accessibility features for colleagues:** Accessibility features for colleagues may not always be available or known resulting in limitations in meeting and collaboration spaces including lack of Microsoft teams enabled rooms to enable better virtual collaboration.
- **Knowledge of accessibility requirements:** PC Bank teams may not have full and current comprehension of key accessibility considerations and principles.

Actions:

- We will review and explore opportunities to enhance capabilities regarding virtual meetings to support a hybrid working environment for our colleagues including modifying all meeting rooms to be Microsoft teams enabled.
- We will continue to explore opportunities to hold training sessions for our colleagues on inclusive technology and capabilities for colleagues.
- We will continue to work with external stakeholders to conduct website accessibility audits to ensure continued accessibility compliance.
- We will engage a third-party organization that support peoples with disabilities to conduct accessibility training.
- We will review onboarding and ongoing training opportunities in order to gain and refresh accessibility knowledge across all levels of PC Bank.

2.4 Communication (other than information and communication technologies)

PC Bank recognizes that people share information in different ways and may require alternative communication methods.

For colleagues, key policy documents are on our intranet and available in alternative formats through an immersive reader tool which provides ability for large text and auditory mode. Our all-staff meetings (e.g., Town Hall) includes and/or provides opportunity for colleagues to specify any accessibility requests/considerations.

For the public, accessibility is integrated into our regular processes, including content on our websites. All marketing and external facing communications goes through a legal marketing review which includes consideration for clear language. For communications on our website and mobile app, we also work closely with our third-party vendor to test and review these communications, including language, to confirm the content is understandable.

We recognize that there are always opportunities to improve communication and engagement with people with disabilities. We have identified the following barriers to communication (other than information and communication technologies) and action items to address these barriers.

Barriers:

- **Internal communications:** The format and type of internal communications may not be fully inclusive of people with disabilities.

Actions:

- We will continue to ensure that registration for all-staff meetings and events held at the organization-wide level (e.g., Town Hall) will include an accessibility request question so that accommodations can be provided upon request.
- We will continue to ensure that key policy documents are available in alternative formats through the immersive reader tool
- We will review and update training materials and guidelines as required on any considerations from the Standard on Plain Language when published.

2.5 Procurement

We have identified the following barriers to procurement and action items to address these barriers.

Barriers:

- **Procurement considerations in contracts:** PC Bank's contract templates do not currently have a standard accessibility clause and as such, accessibility criteria and features may not be fully considered during the procurement stage for PC Bank.
- **Accessibility in vendor attestations:** Accessibility compliance is not always considered for our third-party vendors.

Actions:

- We will explore the feasibility of including a standard accessibility clause in PC Bank contracts.
- We will review and add requirement(s), as needed, for accessibility to monthly vendor attestations with third parties such as our third-party sales representatives.

2.6 Design and Delivery of Programs and Services

PC Bank works hard to simplify financial services and maximize earnings for all Canadians. Accessibility is a key part of our practice from product ideation through execution to launch. Our sales representatives receive accessibility and sensitivity training as part of the onboarding process.

We offer alternate methods to contact the call centre for people with disabilities including TTY Service and Relay Support. Alternative formats for account statements are also available for customers upon request for our PC® Mastercard® and PC Money™ Account including Braille (Grade 1), Braille (Grade 2), e-text, audio and large print.

We have identified the following barriers to the design and delivery of programs and services and action items to address these barriers.

Barriers:

- **Access to services:** Customers with disabilities have more limited options to contact and access services.
- **Communication to customers with disabilities:** Public facing colleagues may not know how to communicate effectively with customers with disabilities.
- **Accommodating invisible disabilities:** Customers with invisible disabilities may face additional barriers.
- **Potential training gaps:** Current training for sales representatives may not adequately cover all accessibility considerations.
- **Accessible customer collateral:** All customer collateral is not provided in accessible formats.
- **Accessibility features used for PC Bank tablets:** Functionality for PC Bank tablets, used by our sales representatives, may not be fully equipped for all accessibility requirements.

Actions:

- We will review and explore opportunities to expand options on accessible formats offered and access services.
- We will review and enhance accessibility training for third-party agents and sales representatives.
- We will review and explore opportunities to provide customer collateral in more accessible formats, upon request.
- We will review tablet functionality for accessibility formats and determine enhancement opportunities.
- We will continue to work closely with our third-party vendor to review new and existing core functionalities and customer journeys on our website and mobile apps to ensure no change in accessibility compliance is needed. If we do identify issues, they will be prioritized and worked through as part of our development work.

2.7 Transportation

PC Bank does not currently have transportation services. Therefore, the standards for transportation are outside the scope of this plan.

3. Consultations

PC Bank is committed to listening to and learning from peoples with disabilities. Our mandate for inclusivity means we will amplify the voices of people with disabilities.

To obtain both an internal and external perspective, this Accessibility Plan was developed in consultation with:

- our colleagues, including those with disabilities and their allies;
- our external partners, including our employee resource group, Able at Loblaw, who act as a voice and support centre of hiring people with disabilities, and also a third party organization, Level Access, a leading digital accessibility solution provider.

We are committed to using this feedback to make our organization more accessible at every level.

3.1 Internal consultations

PC Bank sent out an anonymous survey to colleagues. Colleagues were encouraged to share their experiences with accessibility and barriers at work. This survey invited feedback and suggestions to improve accessibility throughout our workplace.

3.2 External consultations

PC Bank sent an anonymous external survey to our external partners at Able at Loblaw and Level Access that invited feedback on accessibility barriers, with a special focus on barriers related to a virtual perspective (including Social Media, Online chat, Website, Customer Service, etc.).

Furthermore, PC Bank reviewed our Accessibility Plan with Level Access, whose input was used to refine identified barriers and action plans.

Conclusion

PC Bank recognizes there are opportunities to improve accessibility throughout our organization. Our accessibility goals are constantly evolving and we will continue to listen to people with disabilities in order to become more accessible. This Accessibility Plan will serve as a guide to keep PC Bank accountable as we address current and future barriers. As per the ACA requirements, we will update this plan every three years and report on our progress moving forward.

PC Bank looks forward to working towards a barrier free future.