

TD Accessibility Progress Report 2025

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About TD

Contact Us

This report is available in large print, text only, and audio. An executive summary is also provided in American Sign Language (ASL) and Langue des signes Québécoise (LSQ) on our website.

If you require this report in Braille or have feedback on our accessibility efforts, please contact us:

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About TD

Headquartered in Toronto, Canada, The Toronto-Dominion Bank (“TD”) and its subsidiaries offer a full-range of financial products and services to more than 27.9 million customers worldwide. TD also ranks among the world’s leading online financial services firms, with more than 17 million active online and mobile customers.

Commitment to Inclusion

TD strives to have the best talent to serve our customers, clients, and communities. Our talent development and recruitment activities support our ability to build a highly engaged and competitive workforce from across the communities where we live and work. To build a diverse, empowered,

high-performing organization, leaders at the Bank are expected to nurture an inclusive organization, where all colleagues belong, are supported, and have the full opportunity to thrive and contribute to TD's success. As part of this strategy, TD continues to develop programming and initiatives, available to all colleagues. The Bank supports experiences and events across several demographic groups.

A message from TD's Accessibility Office

Established in 2023, our Accessibility Office was created with a clear mission: to take a unified approach to identifying, removing, and preventing accessibility barriers—ultimately improving the experience for everyone, including our customers and colleagues.

Since our inception, we have built a solid foundation by implementing a robust internal policy, solid governance structure and unified strategy. We have also launched an Employee Consulting Group (ECG), ensuring that the voices of all colleagues shape our work.

Our progress is only possible because of the dedication of so many—from our Executive Council to our workstream leads driving accessibility across the

organization, to our Accessibility Designates and members of our ECG. It takes a village, and together, we are working toward the same goal: providing an exceptional experience for all.

As we continue this journey, we remain steadfast in making accessibility and inclusion a priority at TD.

Ashleigh Thacker

AVP, Operational Excellence, Accessibility Office, and Quebec French Language Policy

Executive Summary

Over the past year, TD has continued to make progress against its 2023 Accessibility Plan (Canada). Our approach is anchored in the identification and removal of existing barriers, while avoiding new barriers.

Through engaging our internal community and allies, more than 280 colleagues are contributing to strategic decision-making across the six pillars of the **Accessible Canada Act** (ACA) relevant to our operating environment. Combined with our Accessibility Designates (launched in 2023, to be the first point of contact for each business line/segment for accessibility-related matters), we are continuing to

drive progress to reduce and prevent barriers.

Our **2025 Accessibility Progress Report** provides highlights of enhancements we have made in part because of feedback and consultation with colleagues, customers, and external communities. At TD, we are committed to creating a barrier-free experience that empowers all.

Progress on our Commitments in TD's 2023 Accessibility Plan (Canada)

Employment

At TD, we continue to foster an inclusive workplace where colleagues of all abilities can thrive. We prioritize accessible recruitment, workplace accommodations, and career development to remove barriers and create fair opportunities for everyone.

Commitment	Progress	Status
Ensure the availability of internal colleague documents in alternate formats.	In 2024, TD launched a process for colleagues to easily request alternate, accessible formats for critical employment documentation (e.g., tax documents, etc.).	Complete
Reduce the time it takes for colleagues to receive accommodative equipment.	The TD Workplace Accommodation team has established an equipment ordering best practice for our vendor to use when making equipment	Complete

Commitment	Progress	Status
	recommendations for our colleagues. This best practice reduces questions and streamlines the order process.	
Enhance existing training for people managers.	In 2025, TD is working to expand its accessibility training to include a dedicated workstream for people managers. This program aims to educate managers on hiring and supporting employees with disabilities, enhancing their understanding of their responsibilities and the resources available to assist them and their teams.	In Progress
Promote self-disclosure of People with Disabilities (PWD).	At TD, we encourage colleagues to review, add, or update their information via their Personal Information	Ongoing

Commitment	Progress	Status
	page in MyHR Workday. While this is completely voluntary, this information helps us understand the experiences of different people and communities across TD so that we can continue fostering inclusive experiences.	
Increase disability inclusive recruitment.	In 2025, to streamline our operational process, diversity sourcing initiatives related to PWD were integrated into the Talent Acquisition Sourcing team.	Ongoing

Built Environment & Procurement of Facilities

We strive to make our spaces accessible to everyone by integrating inclusive design principles into our buildings, branches, and workplaces. Our goal is to create barrier-free environments that support independence and ease of access.

Commitment	Progress	Status
Develop the pipeline of new and renovated retail and workplace facilities.	<p>In 2024, TD successfully invited 15,000 colleagues into the newly constructed TD Terrace office space at 160 Front Street in Toronto. Across 33 floors of new, state-of-the-art corporate workspace, 100% of all workstations, meeting rooms, and social spaces are fully accessible.</p> <p>As we continue to design, build, and remodel our retail branches and corporate workspaces, designs leverage industry</p>	Ongoing

Commitment	Progress	Status
	standards and jurisdictional building codes for accessibility and universal design best practices.	
Implement design features that support the underlying goals of barrier-free access.	<p>All our new branches are designed with accessibility as a priority, and existing branches are continuously being upgraded to improve accessibility in accordance with local and provincial regulations.</p> <p>TD ATMs are accessible in English and French and by plugging in a standard headset, customers can be guided through their transaction with directional audio. Our ATMs also feature lower screens and buttons to aid in wheelchair accessibility.</p>	Ongoing

Information & Communication Technologies (ICT)

We are dedicated to ensuring our digital platforms are accessible to all users. By following industry standards such as Web Content Accessibility Guidelines (WCAG), we enhance the usability of our websites, mobile apps, and internal systems for people with disabilities.

Commitment	Progress	Status
Improve the accessibility of our customer digital platforms.	Customer feedback clearly indicated the need for a "dark mode" in our mobile application. Launched in March 2025, dark mode provides a more comfortable experience for customers with a wide variety of visual disabilities.	Complete
Improve the design of our ICT platforms, products, and services	In 2024, TD onboarded a technology solution to test accessibility of our customer-facing web and mobile solutions. The insights from this tool are being used to	Ongoing

Commitment	Progress	Status
	<p>monitor accessibility and identify gaps for remediation. Common gaps include non-accessible PDF documents, lack of alternate text on images, and inconsistent page structure (e.g., headings, lists, etc.), making navigation difficult for some. A quarterly accessibility report of all public sites was developed to support public site owners to develop plans for remediation of webpages.</p> <p>Also, an annual platform review process is underway. This process provides an additional opportunity for discussion with platform owners and deeper analysis of results, as well as hands-on testing</p>	

Commitment	Progress	Status
	where appropriate.	
Ensure electronic documents, forms and statements are designed to be accessible, with procedures to provide alternate formats.	Processes exist in all TD businesses to provision alternate formats for customers on request. Available to all TD colleagues, the Accessible Document Service (ADS) provides accessibility remediation for PDF files, as well as alternate formats, in a cost-effective way.	Ongoing
Equip colleagues with technology that supports their ability to work.	TD was the first bank in Canada with a lab dedicated to assistive technology research and education. Our labs are adaptable spaces used for four main purposes – research, testing, teaching, and touring. Our workplace accommodations solutions are often identified, developed,	Ongoing

Commitment	Progress	Status
	and tested in our labs.	
Continuously investigate solutions to address accessibility barriers.	A review of our Design System was completed, and several components were enhanced to improve accessibility. Updates included enhanced borders on input boxes as well as adding single touch controls for carousels and draggable elements. This will improve the accessibility of new and updated web pages and applications.	Ongoing

Communication

Clear, inclusive communication is essential to accessibility. We provide alternative formats, accessible documents, and interpretation services to ensure information is available to everyone, including those who use assistive technologies.

Commitment	Progress	Status
Develop guidelines on accessible communication and create awareness for all colleagues of the accessibility resources available to them.	To support consistent interpretation of, and conformance to, the TD Accessibility Policy, the Accessibility Office has developed Information and Communication Technology and Plain Language standards. Both were developed to reflect the standards published by Accessible Standards Canada. Additional standards will be developed through 2025.	Ongoing
Invest in informal	The Accessibility Office	Ongoing

Commitment	Progress	Status
accessibility-related training.	developed a six-part video series on Plain Language, a training resource available to all TD colleagues on our Learning Management System. Three of the six videos have been launched. Several tools and resources including a colour contrast analyser, accessible event planning toolkit, multimedia guide, and meeting planner are all centralized for colleague use on our Accessibility at TD internal resource page.	
Use employee resource groups to create a community of support for colleague.	In June 2024, the Employee Consulting Group (ECG) was launched. This volunteer group, made up of ~280	Ongoing

Commitment	Progress	Status
	<p>Canadian colleagues, takes part in research activities to inform the development, design, and launch of new products and services.</p> <p>To date, the ECG has executed 10+ consultation engagements with ~120 employees taking part.</p>	

Procurement of Goods & Services

We integrate accessibility considerations into our procurement processes, working with vendors and partners to ensure that the products, services, and facilities we acquire meet high accessibility standards.

Commitment	Progress	Status
Include the requirement to be accessible in contracts for Third Parties that work with TD.	TD's contracting standards include a standard for accessibility to be addressed in contracts with vendors, and TD's contract templates, as applicable, include accessibility requirements.	Complete
Strive for goods and services that are bought to be accessible.	To improve monitoring of onboarding of accessible vendor solutions, the accessible vendor assessment process was integrated into the Third-Party Risk Management process. This change enables automated requests to	Ongoing

Commitment	Progress	Status
	vendors for submission of a Voluntary Product Accessibility Template (VPAT) and improved monitoring and reporting of completed internal vendor assessments.	
Review our procurement policy and processes annually.	The Enterprise Procurement Policy is reviewed annually to ensure that vendors adhere to the Supplier Code of Conduct, which includes a commitment for the provision of accessible products and services. The most recent policy review was completed in March 2025.	Ongoing
Connect with businesses owned or operated by people with disabilities.	The Responsible Sourcing and Supplier Diversity team regularly liaises with Inclusive Workplace and Supply Council of Canada	Ongoing

Commitment	Progress	Status
	<p>(IWSCC) and Disability:IN in the U.S., which certifies businesses that are owned and operated by people with disabilities. Through our corporate memberships with these organizations, we meet with, and mentor businesses owned and operated by people with disabilities to help understand barriers to doing work with TD.</p>	

Design & Delivery of Goods & Services

Our commitment to accessibility extends to the programs and services we offer. We continuously seek feedback and adapt our offerings to ensure people with disabilities can fully take part and benefit from our services.

Commitment	Progress	Status
Raise awareness about accessibility-related services and alternative formats available upon request.	Canadian Personal Banking led two key accessibility initiatives: <ul style="list-style-type: none">• First, an initiative focused on integrating accessibility measures into the how we govern our projects and initiatives, to ensure inclusion in applications, documentation, and digital assets. It introduced the Accessible Document Service (ADS), a cost-effective solution for making PDFs	Ongoing

Commitment	Progress	Status
	<p>accessible. The entire initiative will be offered to all TD businesses to scale.</p> <ul style="list-style-type: none"> • Second, enhancements were made to the Assisting Customers with Disabilities' internal resource page to better present features and services available to colleagues and customers. 	
Consult with people with disabilities when designing and developing new products and services.	<p>Since its launch in June 2024, the ECG has completed 10+ consultation engagements to gather feedback from various colleagues with lived experiences. This volunteer group, made up of Canadian colleagues, takes part in research activities to inform the</p>	Ongoing

Commitment	Progress	Status
	<p>development, design, and launch of new products and services.</p> <p>The ECG has taken part in research, testing, and consultation on topics such as the TD Accessibility Adapter Campaign, redesign of the Accessibility at TD webpage on TD.com, and in-Branch video remote interpretation (VRI) service experience.</p>	
<p>Investigate solutions that will allow customers to differentiate cards using tactile means.</p>	<p>TD continues to offer Braille and large print card sleeves that have the card number, expiry date and CVV2 printed in either Braille or large font on a sleeve for the card to make it accessible for visually challenged customers.</p>	<p>Ongoing</p>

Commitment	Progress	Status
Launch a Digital Inclusive Design program.	<p>TD launched an Accessibility Champions Network designed to raise awareness about accessibility in our Design community. The Network has three levels of achievement and leverages engaging selfpaced learning as well as monthly activities to keep members engaged and actively learning. The goal of this program is to ensure people with disabilities are considered from the beginning of the design process for every technology-based product and service. The program has since</p>	Ongoing

Commitment	Progress	Status
	expanded to include Developers, Testers, Document Specialists with over 250 active members and work is underway on developing new learning paths for Content Developers and Platform Owners.	
Integration of accessibility into existing process and procedure.	TD has integrated accessibility considerations into Next Evolution of Work (NEW), an operating model transformation that enables improved customer and colleague experiences, speed-to-market, greater efficiency, and reduced complexity.	Ongoing
Remediate customer and colleague forms and templates.	Canadian Personal Banking remediated 8,460 static forms and documents for Canadian Banking	Ongoing

Commitment	Progress	Status
	customers. Also, in partnership with our Digitization and Automation business partners, they enhanced 132 existing form templates for accessibility in the e-composition platform for a more inclusive customer interaction.	

Consultation and Engagement

Consultation with people with disabilities is essential to ensuring that our initiatives, products, and services are truly inclusive. By actively engaging individuals with lived experiences, we gain valuable insights that help us identify and address barriers, ensuring we meet the needs of all stakeholders. This collaborative approach is central to our dedication to creating accessible experiences for everyone.

At TD we believe in a multi-faceted approach to consultation—engaging both internal colleagues and external customers, and non-customers.

External Consultation

In 2024, we consulted directly with the Canadian National Institute for the Blind (CNIB) for their insight on TD Accessibility Adapter (TDAA) fall campaign. The campaign focused on the accessibility needs of colour-blind individuals, and how our free TDAA Chrome plug-in could improve online visual experiences for customers, colleagues, and communities. The campaign reached 92 million total impressions and 57,000 clicks across offline and online touchpoints. This successful engagement was featured in 16 publications including Forbes, Fast Company,

Wired, Bloomberg, and Time for its impact on the colour-blind community.

Since 2018, TD has conducted a proprietary Diverse Communities Study (DCS). Respondents in the study self-identify experiencing cognitive, sensory and/or dexterity disabilities, and indicate having visible or non-visible disabilities. The study is conducted among TD customers and non-TD customers to get a sense for challenges faced by those in the community, and to identify intersectionality within communities to provide deeper understanding and support for those with functional needs. In 2024, the Customer Experience and Insights team released a PWD summary to key stakeholders across the Enterprise and shared with the Accessibility Office at the October 2024 Accessibility Designate meeting.

Colleague Consultation

The ECG, made up of ~280 Canadian colleague volunteers that take part in research activities to inform the development, design, and launch of new products and services, has completed 10+ consultation engagements since June 2024.

In the development of this progress report, this group was engaged to read and review the **TD Accessibility Plan (2023)** and previously published **Progress**

Report (2024). Participants were asked a total of 16 questions pertaining to their reaction to the overall progress report, the progress made, and opportunities for improvement. Highlights include:

- Effective communication of the company's commitment to accessibility – 72% “very effective” or better
- Inclusive and respectful tone and language – 100%
- Easy to understand without prior knowledge of the Accessibility Plan – 100% “easy” or better
- Adequate references to the various needs of individuals – 63% “a lot” or better
- Key areas or issues related to accessibility that are missing from the plan – 27% “yes”
- Does the progress report resonate with colleagues as a meaningful commitment to accessibility – 70% “a lot” or better

There are several learnings from colleague feedback, including the desire for better awareness of workplace accommodations and accommodation programs and people manager training. We have made progress on these opportunities to improve the colleague experience and will continue to monitor progress in advance of the publication of next year's 2026 Accessibility Plan.

Accessibility Feedback

At TD, we offer multiple avenues for customers, non-customers, and colleagues to provide accessibility feedback. These methods, which include telephone, email, and mail, are outlined on our website, in our **Accessibility Plan**, and within this progress report.

We value feedback as it helps us continuously improve our accessibility initiatives and better serve our communities.

Since publication of our **2024 Accessibility Progress Report**, the top three themes of accessibility feedback received include:

1. Design & Delivery of Programs and Services, most prominently the request for dark mode for TD's mobile app that was enabled
2. Information & Communication Technologies, specifically formatting improvements for EasyWeb to enable a better screen reader user experience.
3. Communication, including alternatives to TTY in contact centres.

All feedback is closely monitored, addressed, and reported as part of our accessibility feedback process. We analyze trends and themes from the feedback to guide future actions and business decisions, aiming to

uncover opportunities for improvement in our processes and services and enhance the experiences of both customers and colleagues.

Next Steps and Future Commitments

Moving forward, our focus will continue to be on identifying, removing, and preventing accessibility barriers across all aspects of our business. Over the next several years, we are committed to establishing a strong accessibility foundation by embedding accessibility considerations into our processes and procedures. Using human-centred design, we will ensure that accessibility is a key factor in the development of our products, services, and solutions. We will also continue to leverage the expertise of our Employee Consulting Group (ECG), engaging them in research, testing, and consultation to refine and enhance our accessibility efforts. As we progress, we remain steadfast in our commitment to enabling inclusive experiences for all, ensuring that everyone can fully participate and engage with our services.

Glossary of Terms

Accessibility is the design of products, devices, services, environments, technologies, policies, and rules that makes their access possible for all people.

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.

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**, 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.

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 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.

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.