

Accessibility Plan

2026-2029

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General

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 clients worldwide. TD also ranks among the world’s leading online financial services firms, with more than 17 million active online and mobile clients.

A Message from TD’s Accessibility Office

At TD, we are committed to removing barriers, strengthening trust and creating environments where everyone can participate and thrive.

Our 2026-2029 Accessibility Plan reflects our promise to be Remarkably Human and Refreshingly Simple. The plan is grounded in meaningful consultation and shaped by the lived experiences shared with us by internal and external participants.

We are grateful to those who have contributed their insights and helped guide this important work. Their voices ensure our actions remain practical, inclusive and focused on real outcomes. Together, we will continue to make accessibility a priority and drive

meaningful change for People with Disabilities (PWD), our colleagues and the communities we serve across Canada.

Sarah Keizer, VP
Accessibility Office

Commitment to Inclusion

TD strives to have the best talent to serve our clients, colleagues, and communities. Our talent development and recruitment activities 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. Only when all colleagues belong, are supported, and have the full opportunity to thrive, can TD succeed. As part of this strategy, TD continues to develop programming and initiatives, available to all colleagues.

Learn more about TD's Diversity and Inclusion Priorities

Contact Us

This report is available in large print, text only, and audio. A 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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Summary

TD Bank's 2026 to 2029 Accessibility Plan, outlines TD's commitments to identify, remove and prevent accessibility barriers for People with Disabilities (PWD). Like all federally regulated businesses, TD must publish a plan every three years showing how it will help create a barrier-free Canada by 2040. This is required by the Accessible Canada Act (ACA), 2019.

The plan focuses on seven key areas to ensure barrier-free access for clients, colleagues, and the public.

1. **Employment:**

Enhance recruitment, workplace accommodations, and career development by:

- embedding sign language into mandatory online learning platforms.
- engaging PWD to identify gaps regularly.
- improving job postings to include environment factors, i.e., volume of noise.

2. **Built Environment:**

Remove accessibility barriers by:

- implementing inclusive design features in branches and office locations.
- providing additional seating for clients with mobility challenges where possible.

- renovating older locations to meet current accessibility standards where possible.

3. Information and Communication Technology (ICT):

Improve digital accessibility by:

- enhancing colleague ICT training.
- formalizing digital accessibility audit.
- following federal ICT standards and regulation (EN 301.549).

4. Communication (non-ICT):

Improve the accessibility of internal and external communication by:

- improving access to sign language interpretation for videos.
- improving communication by phone for people who are D/deaf or hard of hearing.
- simplifying financial information for cognitive accessibility.

5. Procurement of Goods, Services and Facilities:

Continue to integrate accessibility into procurement practices on an ongoing basis by:

- considering accessibility through the entire decision-making process.

- purchasing goods and services tested by PWD despite challenges in finding fully accessible vendors.

6. Design and Delivery of Products and Services:

Enhance how we design and deliver products and services to clients, colleagues and the public by:

- consulting with PWD to remove barriers in existing and future products and services.
- embedding accessibility standards in all stages of new product development.
- improving electronic signature services.

7. Transportation:

Reduce accessibility barriers by:

- meeting accommodations needs in colleague event travel.
- determining branch and workplace locations based on access to public transportation where possible.

TD's 2026-2029 Accessibility Plan

Commitments

1. Employment

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

Identified Barriers

- There are opportunities to enhance the accessibility of our job application descriptions and website to ensure inclusivity and usability for all.
- There are opportunities to more frequently engage colleagues who identify as PWD when drafting people-focused policies and learning opportunities (i.e., Accommodations and mandatory training available via our Learning Management System).
- There are opportunities to improve accessibility in our events and internal forums through availability of American Sign Language (ASL) or Langue des signes québécoise (LSQ) and closed captioning for our in-person and virtual events and mandatory training programs.

- While progress has been made over the last three-year cycle, there continues to be opportunities to improve and refine our workplace accommodation processes and increase awareness of the roles that colleagues and managers have in the process.
- There continues to be a reluctance for colleagues to disclose their accessibility requirements, especially those with non-apparent disabilities, this represents a challenge for identifying necessary and personalized accommodations.

Commitment	Timeline	Status
Develop job postings that appropriately describe the work environment’s accessibility considerations to applicants (i.e., lighting and noise).	2027-2029	Planned
Embed access to ASL / LSQ into corporate learning platforms for mandatory courses as well as into leadership messaging to further enhance understanding by the D/deaf community through communicating in their preferred language.	2026-2029	Planned

Commitment	Timeline	Status
Engage colleagues at least every two years to identify existing and potential gaps that impede the creation of an inclusive and disability-confident workplace.	2026-2029	Ongoing
Review organizational accommodation processes in consultation with colleagues, including those with varying disabilities.	2027-2029	Planned
Review and enhance required accessibility training every two years to ensure learning modules address new and evolving accessibility-related standards.	2026-2029	Ongoing

2. Built Environment

We strive to make our spaces accessible to everyone. Our goal is to create barrier-free environments that support independence and ease of access.

Identified Barriers

- TD branch and office spaces have been renovated with different jurisdictional building codes based on location and year of renovation, resulting in varied accessibility across our retail and corporate real estate footprints.
- There is a preference for more in-branch seating for public use.
- There is a preference for more than one seat-height service desk per branch for public use.

Commitment	Timeline	Status
<p>TD is committed to adhering to all relevant jurisdictional building codes at time of construction. In net new spaces and when opportunities arise for renovation of existing spaces, we will implement design principles and features that support goals of barrier-free access in all premises, including spaces owned by TD and leased locations wherever possible.</p>	<p>Ongoing</p>	<p>Ongoing</p>

Commitment	Timeline	Status
Where possible, Enterprise Real Estate will incorporate feedback from colleagues and members of the public based on established mechanisms to assess accessibility impacts. Feedback may be integrated into evolving design principles and features.	Ongoing	Ongoing
We will provide accessible wayfinding in all new net spaces and when opportunities arise for renovation of existing spaces.	Ongoing	Ongoing
We will review emergency exit procedures on a regular basis to enable safe and confident evacuation of all clients and colleagues in the event of an emergency.	Ongoing	Ongoing
In response to accessibility-related feedback, in addition to addressing the issue under consideration, we will review the location for other accessibility-related concerns.	Ongoing	Ongoing

3. 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 PWD.

Identified Barriers

- There are opportunities to continue enhancing the usability of TD’s public websites and mobile apps as some pages remain challenging to navigate for individuals using assistive technologies.
- There are opportunities to enhance the knowledge and understanding of employees accountable for digital design and development.

Commitment	Timeline	Status
Launch ICT Training for colleagues accountable for the design, development and testing of digital and web-based tools.	2026-2027	Planned

Commitment	Timeline	Status
Enhance accessibility documentation and test case guidance to strengthen the integration, accuracy, and consistent application of accessibility requirements across all projects with ICT.	2027-2028	Planned
Enhance client and colleague feedback tools to ensure accessibility feedback related to ICT is identified and directed appropriately so it can be fully considered during enhancements, upgrades or in new functionality.	Ongoing	Ongoing
Review and investigate solutions to address accessibility barriers and plain language constraints in our intranet sites as identified during consultations.	2026-2029	Planned
Leverage the Digital Accessibility Audit program (launched in 2025) to proactively identify accessibility barriers on TD public websites, intranet sites, and mobile apps.	Ongoing	Ongoing

4. Communication (non-ICT)

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.

Identified Barriers

- There are opportunities to improve communication with the D/deaf community by providing American Sign Language (ASL) and Langue des signes québécoise (LSQ) translation within external and internal audio/visual products.
- There are opportunities to integrate Plain Language principles in day-to-day internal and external communication.
- There continues to be opportunities to reduce the complexity in both financial and workplace communications by embracing simple and Plain Language principles.

Commitment	Timeline	Status
Include sign language interpretation in videos available on our internal and external websites.	2027-2028	Planned
Expand TD's Plain Language learning series to reflect Accessible Standards Canada's Plain Language Standard.	2026	Started
Simplify web-based content to reduce information overload that may prevent individuals from completing essential tasks like paying bills through digital banking services.	2026-2028	Ongoing
Enhance digital forms and documents to ensure they meet accessibility standards.	Ongoing	Ongoing

5. Procurement of Goods, Services and Facilities

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

While TD’s current procurement processes do not present specific accessibility barriers, sourcing fully accessible platforms, solutions, and tools continues to be challenging. Although market availability of fully accessible products can be difficult, TD is committed to advancing our accessible procurement standards.

Commitment	Timeline	Status
Fully consider accessibility of goods and services, and where possible, tested by PWD prior to selection.	2026-2029	Ongoing
Connect with businesses owned or operated by PWD, via our Responsible Sourcing and Supplier Diversity Team, to understand the barriers that may exist when they compete for contracts with TD.	2026-2029	Ongoing
Maintain an inventory of vendors with accessibility capabilities which meet TD’s standards and requirements.	2026-2029	Ongoing

6. Design & Delivery of Programs & Services

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

Identified Barriers

- There are opportunities to reduce the complexity of engaging with TD’s telephone banking centre.
- There are opportunities to enhance the accessibility of digital signature processes on product application forms, as these may currently pose difficulties for individuals who are blind, visually impaired, or neurodiverse.
- There continues to be opportunities to more deeply embed accessibility-related standards into delivery processes to ensure TD launches tools, functionality and products that are fully accessible.

Commitment	Timeline	Status
Embed accessibility standards throughout tool, platform and product development processes.	2026-2027	Started

Commitment	Timeline	Status
Explore enhancements to electronic signature services related to form accessibility and plain language.	Now to 2029	Started
Indicate branches with drive-through ABMs and accessible parking on TD's Branch Finder Tool.	2027	Planned
As new accessibility standards and regulations are released, we will continuously assess new and/or updated accessibility requirements as part of the annual policy review cycle and client and colleague experience standards.	Ongoing	Ongoing
Explore opportunities to address Interactive Voice Response (IVR) complexity to improve ease of engagement with TD's telephone banking contact center.	2026-2029	Planned

Commitment	Timeline	Status
Continue internal and external consultations to identify areas where improvement may be required in creating barrier-free access to TD’s products, services and built environments.	Ongoing	Ongoing

7. Transportation

We are committed to ensuring that all transportation arranged through third-party vendors is accessible and inclusive for PWD.

When transportation is required for meetings, events, or other business purposes, we proactively ask colleagues and participants to share any accessibility or accommodation needs. Our vendors are required to meet these needs, and to date, all requests have been accommodated successfully. TD encourages colleagues and participants who use vendor-provided transportation to share feedback on accessibility experiences to help strengthen practices and vendor performance.

Identified Barriers

- There are inconsistent “safe” drop-off zones for clients or colleagues relying on paratransit support.

Commitment	Timeline	Status
All event locations and travel will ensure the accessibility needs of colleagues with disabilities are met.	Ongoing	Ongoing
When considering locations for new branch locations, explore opportunities to locate within 100 meters of a public transportation stop where possible & at new branch locations, have a designated parking spot for PWDs.	Ongoing	Planned

Consultation and Feedback

Embracing nothing without us, TD’s plan has been built with consultation with PWDs with both apparent, and non-apparent disabilities, to help ensure we are addressing their needs. Consultation has been conducted through the following mechanisms:

- **External consultations** conducted by Dig Insights between September and November 2025 to understand the needs, experiences, and expectations of PWDs in their interactions with TD Bank.
- **Internal consultations** via TD's Accessibility Employee Consulting Group (ECG) where more than 280 colleagues with disabilities, their caregivers and allies consult on TD's processes, products and services.
- **Through our feedback mechanisms** we receive insights into barriers experienced by PWDs as well as potential solutions that would remove those barriers to engaging with TD.

External Consultations: Client-Focused Interview Sessions

In 2025, TD engaged Dig Insights to conduct our external research study. The study included 28, 45-minute virtual focused-interviews with PWD. Sixty percent of participants indicated they are managing more than one disability.

Study participants were recruited across Canada to provide perspectives from a diverse set of disabilities.

- Physical (including, mobility, dexterity and pain)

- Cognitive (including, neurodiversity and mental health)
- Sensory (including, vision, hearing and speech)

Gender	Language	Disabilities Identified in the Study
17 identified as female 11 identified as male	21 participated in English 7 participated in French	15 Sensory (Vision) 2 Sensory (Hearing) 6 Cognitive/ Neurodivergent 9 Dexterity/Mobility 8 Chronic Pain 6 Mental Health

The focus of the study was to determine:

1. How is TD addressing the needs of PWD?
2. What barriers, if any, do PWD encounter while performing day-to-day banking activities with TD?
 - Using TD Mobile App for day-to-day banking needs (paying bills, transferring funds)
 - Using the TD Mobile App and EasyWeb online banking channels and applying for a product online.
 - Visiting a branch.

- EasyLine (telephone banking).

The following accommodations were available to participants in the study:

- ASL and LSQ interpretation.
- Auto-captioning.
- Chat boxes and comment fields.
- One-on-one interviews.

Participants indicate a strong preference for the TD Mobile App and EasyWeb banking website and have seen significant improvements over the last three years as feedback was received and adopted:

- TD Mobile App works well with screen readers and magnifiers (voice-over, large-text, high-contrast settings).
- Biometric login and call-from-app reduce friction (Face ID/Touch ID, voiceprint).
- Web layout improvements, newer EasyWeb pages are simpler to scan and “just work” with tools like Dragon using both “click by name” and “show links.”
- Core digital tasks feel stable and repeatable (check balance, pay bills, move money).
- Notably, while inconsistent, participants recognized colleagues who go above and beyond to solve problems (e.g., branch managers, phone agents).

While improvements have been made, and client sentiment around TD's accessibility-related options within our mobile banking app have been well received (dark mode, biometrics, voice-over and high contrast settings), participants have identified the following barriers:

- Volume of information and complexity of some banking-related information.
- Perceived level of training of some customer service advisors in phone and branch channels.
- Lack of mobile-banking options to complete application and some general banking functionality requiring a visit to a branch or phone call.
- Complex and confusing phone channel Interactive Voice Response (IVR) system.

Internal Consultation

In 2025, TD's Accessibility Office partnered with TD's Human-Centred Design Practice (HCD) to understand barriers colleagues who identify as having a disability encounter in finding, using and understanding the information on our intranet. The study included a survey completed by 48 members of TD's Employee Consulting Group (ECG), 10 colleague interviews with Intranet subject matter experts and 19 colleagues with

disabilities—sensory (3), cognitive (8), and physical (8).

Throughout the research, colleagues identified the following barrier:

- Navigation issues are more pronounced for PWD colleagues (those with apparent or non-apparent disabilities). As screen readers do not always function well with internal sites, these colleagues can't always access information needed to do their jobs. This puts them at a disadvantage and creates a barrier in the way colleagues receive and share information.

As a result of the research, a key commitment within our 2026-2029 Accessibility Plan is to remediate and improve the accessibility capabilities related to navigation and search functionalities available on our intranet.

Employee Consulting Group (ECG)

Established in 2024, TD's ECG—a 280-strong volunteer-based team of PWDs and allies contributing their lived experience and strategic counsel to remove accessibility barriers across the seven pillars of the Accessible Canada Act (ACA). Embracing the principle

of nothing without us, since its inception, ECG members have participated in more than 29 consulting engagements to identify, remove and prevent future barriers to accessibility.

As an outcome-focused group, the ECG has made significant impacts across the following key areas:

- Participating in multiple focus groups for the redesign of TD's corporate **Accessibility page** to enhance the web-based experience for clients, colleagues, and the public.
- Providing lived experience insights into two marketing campaigns for TD's Accessibility Adaptor (TDAA) focused on colour-blindness and ADHD.
- To support internal colleagues, the ECG partnered with TD's Colleague Journey team, to review onboarding materials and processes.

How Feedback was Considered

Our feedback processes helped identify barriers across the seven pillars covered by the ACA. TD has prioritized its efforts in these areas and accomplished the following to date:

Dark mode

As a result of client feedback, dark mode functionality within TD's Mobile Banking App was officially launched in February 2025.

Colleague Onboarding

Feedback from 51 Employee Consulting Group (ECG) members who participated in consultations across three engagements directly resulted in the optimization of content, from design to plain language, ensuring colleagues and potential colleagues have an optimal onboarding experience.

TD Accessibility Adaptor (TDAA) Spring Campaign

Feedback provided by colleagues with ADHD and colour blindness ultimately changed core elements of TD's Spring TDAA marketing campaign leading to significant positive impressions from the community for addressing their set of accommodation requirements.

TD Accessibility Page Redesign

The focus group contributed their lived experiences to ensure those who are blind, hard-of-sight or who identify as neurodivergent have access to information written in plain language and laid out in a meaningful and systematic way that is easier to digest.

TD commits to continue using feedback received through its feedback mechanisms as well as client, colleague and public consultation to address barriers as they arise.

Conclusion

At TD, we are bound by our vision and purpose to be Remarkably Human, Refreshingly Simple. We understand that providing a barrier-free environment for our clients and colleagues is an ongoing process, and TD is dedicated to making accessibility a priority.

Glossary of Terms

Accessibility is the design of products, devices, services, environments, technologies, policies, and rules that make 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 removing disadvantages and barriers to employees, prospective employees or clients resulting from policy or practice that has adverse impacts 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 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 dialogue 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.

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) describe 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 PWD—but also for all user agents, including highly limited devices, such as mobile phones. WCAG 2.0, was 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.