

**TD  
Accessibility  
Progress  
Report  
2024**





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# General Information

# Contact Information

To request a copy of TD Bank Group's Accessibility Plan, 2024 Progress Report, and/or Feedback Process in an alternate format, or to provide feedback on accessibility at TD Bank, please contact Accessibility at TD:

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## About TD

Headquartered in Toronto, Canada, with approximately 95,000 colleagues in offices around the world, the Toronto-Dominion Bank and its subsidiaries are collectively known as TD Bank Group ("TD" or the "Bank"). TD is the sixth largest bank in North America by assets and serves over 27.5 million customers in four key businesses operating in a number of locations in financial centres around the globe:

- **Canadian Personal and Commercial Banking**, including TD Canada Trust and TD Auto Finance Canada.
- **U.S. Retail**, including TD Bank, America's Most Convenient Bank®, TD Auto Finance U.S., TD Wealth (U.S.), and an investment in The Charles Schwab Corporation.
- **Wealth Management and Insurance**, including TD Wealth (Canada), TD Direct Investing, and TD Insurance.
- **Wholesale Banking**, including TD Securities and TD Cowen.

TD ranks among the world's leading online financial services firms, with more than 17 million active online and mobile customers. TD had \$1.91 trillion in assets on January 31, 2024. The Toronto-Dominion Bank trades under the symbol "TD" on the Toronto and New York Stock Exchanges.



## Commitment to Accessibility

At TD, diversity, equity, and inclusion are part of our fundamental values. We are committed to creating barrier-free experiences, including identifying and removing barriers, while taking steps to not create or introduce new barriers for our customers, colleagues, and the communities we live in and serve. As we make progress on this commitment, we will continue to consult people with disabilities, and capture and action feedback, to deliver accessible and inclusive experiences.

TD is intent on meeting both the principles and requirements outlined in the *Accessible Canada Act (ACA)* and associated regulations. While the *Accessible Canada Regulations (ACR)* are in development, TD continues to focus on advancing internal policies, procedures, and processes to align with the ACA. We continue to share updates on our accessibility processes with our colleagues and the public through our internal and external websites, as appropriate.

Also, TD is proud to be a member of the Valuable 500, a collective of 500 CEOs and their companies worldwide with the purpose to accelerate inclusion for people with disabilities by transforming business systems. Through this membership, our CEO, and his team, remain committed to making sure accessibility is considered across the Bank, recognizing the benefits of strong processes and practices, and a culture of inclusion.



# TD Ready Commitment



Through the **TD Ready Commitment**, TD aspires to enrich the lives of our customers, communities, and colleagues. TD is targeting **\$1 billion CAD by 2030** towards community giving.

To help create the conditions that we consider necessary so that everyone has the chance to succeed in a changing world, the **TD Ready Commitment** is focused on four areas of impact that we call the Four Interconnected Drivers of Change: **Financial Security, Vibrant Planet, Connected Communities** and **Better Health**. When these drivers are addressed together, we believe they can help people feel included and able to reach their goals in the future.

## **Below are a few examples where the TD Ready Commitment has supported initiatives for disability communities across Canada in 2023 and 2024.**

- TD provided a grant to the Geneva Centre for Autism in Toronto to support expanded access to critical social and communication skills development programs for children and youth who have been diagnosed with autism. The funds will support a new hybrid model offering in-person and virtual services that create inclusive spaces to meet the unique and diverse needs of children in the community living with autism.
- The Children's Hospital Foundation of Manitoba (CHFM) is the 2023 recipient of the \$500,000 Annual Initiative Grant established through the collaboration between TD Bank and Canada's Children's Hospital Foundations. Through the Diabetes Research Envisioned and Accomplished in Manitoba (DREAM) research team at Children's Hospital Research Institute of Manitoba, CHFM aims to improve care for children and adolescents from Indigenous communities with Type 2 Diabetes. Funding will support building meaningful relationships with patient partners, Knowledge Keepers, and the community to design interventions to improve patient health outcomes.

- Plan Institute is a national non-profit and social enterprise based in Burnaby, BC that supports people with disabilities and their families. They provide educational materials and resources, collaborate on community-based projects, and engage with a variety of partners to host innovative initiatives for change and policy reform. Funding from TD, totaling \$140,000, will support several programs currently offered by Plan Institute, including:
  - The Disability Planning Helpline, which provides one-on-one support on a range of financial planning topics for people with disabilities, including the Registered Disability Savings Plan (RDSP).
  - Monthly RDSP workshops, which offer basic and more advanced information on the RDSP and the RDSP resources that are available.
  - [RDSP.com](https://www.rdsp.com), a website that provides information and resources about the RDSP, including the RDSP Calculator which allows users to assess the potential of opening and contributing to an RDSP.
  - Advocacy projects that promote more inclusive practices and policy change.









**The TD Ready Commitment is a true embodiment of TD's purpose in action.**



# Progress to Date

In June 2023, TD identified and documented accessibility barriers in our three-year Accessibility Plan and made 46 commitments to improve accessibility across TD. This Progress Report provides an overview of the progress we have made since the Accessibility Plan was published, in six focus areas:

	<b>Employment</b>
	<b>Built Environment &amp; Procurement of Facilities</b>
	<b>Information &amp; Communication Technologies (ICT)</b>
	<b>Communication (non-ICT)</b>
	<b>Procurement of Goods &amp; Services</b>
	<b>Design and Delivery of Programs &amp; Services</b>

Over the past year, TD has made purposeful progress on the commitments outlined in our Accessibility Plan, establishing a foundation designed to sustain continued progress in identifying, removing, and taking steps to avoid the creation of new barriers.





Since publishing our Accessibility Plan in 2023, through the course of executing activities to act on our commitments, there were several lessons learned identified. These lessons learned, outlined below, have been leveraged to inform the development of this progress report and our future roadmap to continually improve accessibility for our customers and colleagues.

- Identified duplicate commitments across the focus areas of the original plan and the opportunity to organize internal key stakeholders differently, to better address the commitments collectively on behalf of the organization.
- The plan and progress reports will be available on TD.com in an accessible PDF format, large print, audio file, and American Sign Language (ASL) and Langue des signes Québécoise (LSQ).
- Some of the commitments made in the original plan may not progress as fast as anticipated as they will require partnership with third parties and other key stakeholders to address.
- Increasing accessibility in our organization requires focused attention to support the identification, removal, and prevention of new barriers; for long-term success, we must embed accessibility into business planning practices.
- New barriers have been identified for remediation, including:
  - Disability-inclusive best practices in recruitment are not always consistently applied.
  - People Managers require additional training to support their colleagues who have self-identified as having a disability and to create a safe space for colleagues to self-disclose.
  - While there are many resources related to accessibility and inclusion available, colleagues are not always aware of where to find or how to access the tools and are not consistently using accessibility best practices.
  - Procedures are in place to make sure formal training through our learning management system meets accessibility standards, but informal training may not consistently meet these standards.
  - Design changes on EasyWeb, our online banking website, resulted in smaller text on the Account screen that was hard to read.
  - TD's existing plain language policy requires enhancements to better address accessibility.



**Supporting accessibility and inclusion at TD, the following activities, while not aligned to any of the focus areas of the ACA, were completed since the Accessibility Plan was published in 2023:**

- Identification and establishment of Business Accessibility Designates (August 2023)
- Establishment of the TD Accessibility Office (November 2023)
- New Accessibility Governance (January 2024)
- Annual review of the *TD Accessibility Policy (Canada)* (March 2024)

### **Accessibility Designates**

Accessibility Designates have been identified in each business as the first point of contact for accessibility-related matters. The Designates act as a liaison with the Accessibility Office, ensure feedback related to their business is considered and actioned (where required), and ensure Accessibility Plan commitments related to their business are planned for and delivered.

### **New Accessibility Governance**

Since June 2023, TD has updated our accessibility governance structure to better support our business segments in delivering on our Accessibility Plan commitments. Our new structure is designed to facilitate collaborative discussions, sharing of ideas, and removal of duplicative efforts across distinctly different business models in our organization.

### **Enterprise Accessibility Office**

Established in 2023, TD's Enterprise Accessibility Office aims to promote accessibility and inclusion throughout the organization. The Accessibility Office is responsible for *TD's Accessibility Policy (Canada)*, Accessibility Plan, and annual progress reports. The Enterprise Accessibility Office strives to advance the adoption of accessibility standards and tools and scale sustainable best practices. They also provide oversight and support to our accessibility executive advisory leaders and working committees, who work together to identify remove, and look for ways to prevent barriers to accessibility and inclusion at TD.



# Focus Areas

## Employment

At TD, we believe a great colleague experience is built on a culture of care. We share a vision that encourages everyone to bring their best, and authentic, selves to work. This includes our ongoing commitment to providing accessible workplaces and effective accommodations.

### **Hiring and Retaining Talent**

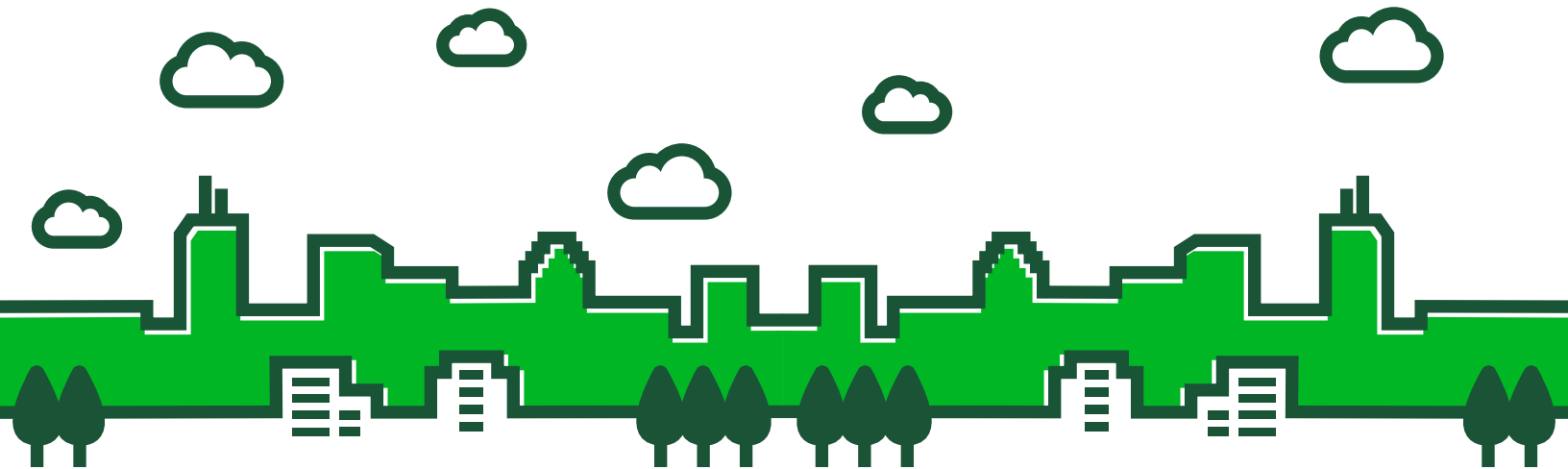
This section includes information on recruitment and onboarding of TD colleagues as well as colleague experience in the workplace as it pertains to programs, benefits, and accommodations.

#### **Progress:**

We are committed to incorporating inclusive hiring practices to attract, grow, and retain diverse talent that is representative of Canada's labour market availability. Since June 2023, we have made progress in the following areas:

- Created and updated information for candidates about disability-inclusive recruitment in our job postings, invitations to interview, and support available upon acceptance of a job offer. We also launched an interview guide for our talent partners confirming our commitment to accommodating candidates during the interview process. Additionally, we enhanced our People Manager supports by refreshing resources related to accommodations in recruitment and launching a new onboarding toolkit to support accessibility and accommodations during onboarding of new TD colleagues.
- Piloted live and interactive training on disability-inclusive recruitment to multiple Talent Acquisition teams and hiring managers. Plans are in place to continue roll out of this training and identify a sustainable approach.





- Established a plan to hire twenty additional colleagues with a disability in 2024, with support of a disability not-for-profit organization focused on people who identify as neurodivergent, including autistic, where the traditional hiring process is replaced by an inclusive assessment tailor-made for candidates. To date, we have hired 12 colleagues through this program, 60% of this year's plan.
- Hired three students through an early talent internship program in TD Wealth in the fall of 2023, where the opportunities were posted in select universities seeking candidates with disabilities.
- Conducted annual benchmarking of TD's health and well-being benefits with the support of an external consultant. In July 2023, the annual exercise included a review of TD's diversity, equity, and inclusion areas of focus, including disability. As a result of this benchmarking exercise TD enhanced hospital coverage and other medical supports (e.g., medically necessary wig coverage), provided additional eligible expenses for the Wellness account (e.g., added Financial Advisor services), and expanded the list of eligible practitioners available for mental health support.

## Learning & Development

At TD, we view Learning and Development as more than just formal training. This section pertains to our learning offerings, resources to support inclusive learning, and our efforts to educate our colleagues about accessibility and a disability inclusive workplace.

### Progress:

Since June 2023, we have focused on providing education on a variety of accessibility-focused topics and in a variety of engaging ways. Here are a few examples:

- As part of mandatory training curriculum to improve knowledge and understanding of accessibility and inclusion, all Canadian colleagues completed two accessibility-related courses in early 2024. One of the courses focuses on our customers accessibility needs and the second on our colleagues. Additionally, the training courses highlight the Accessibility at TD Resource Hub, a colleague-facing website that contains additional resources and support. Further updates to the accessibility training are planned in 2024 and 2025, including People Manager specific training.
- Hosted a series of events, across our businesses aimed to provide accessibility education and facilitate conversation, including:

- In September 2023, TD hosted Jenny Lay-Flurrie, Chief Accessibility Officer at Microsoft for "Straight UP Inclusive Design & Innovation" a conversation on the challenges, strategies, and latest technological developments to advance accessibility inclusion in a digital world.
- In October 2023, to celebrate National Disability Employment Awareness Month (NDEAM), which promotes inclusion of people with disabilities in our workplaces and communities, TD hosted a kick-off event with guest speaker Jeff Adams, Paralympian World Champion, and Human Rights Lawyer.
- In December 2023, TD hosted a week of events to celebrate International Day of Persons with Disabilities, taking the opportunity to facilitate colleague learning on a variety of topics:
  - A fireside chat with our President and CEO, and our Inclusion & Diversity Leadership Council People with Disabilities Chair to celebrate disability inclusion, accessibility achievements (including the Accessibility Adaptor), and the positive impacts of self-disclosure.
  - A focused conversation with our VP, TD Accessibility Office, and Stephanie Cadieux, Chief Accessibility Officer of Canada, on the importance of the ACA and the actions TD is taking to be more accessible.
  - A discussion about ADHD was led by Springboard Clinic founder, Laura MacNiven.
- Launched the Disability Inclusion at TD Network, an internal community open to all colleagues, which shares blogs, colleague stories, articles, and events about disability, accessibility, career success, and disability-confident workplaces. In February 2024, this network launched TD's first Empowering Postcards campaign to welcome colleagues to share their connection to a particular disability, whether personal, family member, at work, how TD has supported them, and what the disability means to them.
- Updated many internal sites to provide our colleagues, including People Managers, with readily available support such as:
  - Centralized accessibility resources on a new intranet platform, the Accessibility at TD Resource Hub, for easier and more direct access (e.g., best practice guidelines for meetings, documents, and emails, the TD accommodation program, etc.).
  - Enhanced the Wealth Accessibility Resource Centre on the TD Wealth intranet to include accessibility related processes, procedures, and resources to support our colleague's interaction with clients including procedures for obtaining alternate format documents.
  - Launched a Diversity, Equity, and Inclusion Event Planning Toolkit to plan and execute inclusive and accessible events.
  - Established a generic inbox for TD's Enterprise Accessibility Office for feedback, support, and questions.
  - Added a quick link titled "What is TD's Workplace Accommodation Strategy?" to the Enterprise Real Estate TD Campus intranet page to provide easier access to information on workplace accommodation standards, strategies, and solutions.
- Established a Reverse Mentorship program led in TD Wealth and moderated by three colleague mentors, who identify as having a disability. The mentors shared their lived experiences and provided a deeper understanding of their successes and challenges, in group sessions with twenty leaders (mentees). With positive feedback received, opportunities to expand the program are being explored.



## Built Environment & Procurement of Facilities

TD occupies a variety of premises that reflect its long history as a place of business in Canada. Locations that have been built or undergone major renovations will meet the needs of our colleagues and customers in addition to aligning to, or exceeding, current regulations.

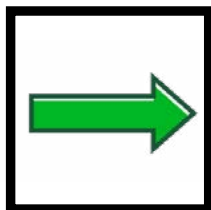
### **Progress:**

At TD we strive to provide premises that are accessible and inclusive, enabling our colleagues and customers to feel welcomed, safe, and supported. Since June 2023, we have completed the following:

- As part of our Enterprise Real Estate (ERE) business as usual process, TD has reinforced our design standards with accessibility features that exceed building code requirements for developing new and renovated corporate workplaces, including:
  - Fully accessible wellness rooms, lactation rooms, and prayer rooms with ablution stations.
  - Universally accessible washrooms.
  - Designated quiet zones.
  - Barrier-free phone rooms.
  - Accessible counters and millwork at staff café/kitchen areas, including providing roll-in knee space below all beverage equipment and microwave ovens.
  - Coffee machines equipped with mobile-app remote-control capability if requested by occupant line of business.



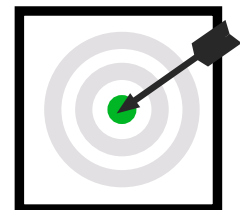
- A campus experience digital support app for mobile and desktop that includes accessibility patterns that colleagues can toggle to, with colours and contrast that meet accessibility guidelines, and a wayfinding feature with an accessible route option that never suggests taking the stairs. It also provides an avenue for feedback, including reporting on accessibility concerns within the campus environment.
- From May to November 2024, TD will move approximately 15,000 colleagues into 895,500 square feet of space in our newly constructed office tower, TD Terrace, at 160 Front Street in Toronto. The TD Terrace design exceeds minimum requirements established by the Accessibility for Ontarians with Disabilities Act (AODA), integrating a holistic strategy focused on inclusive, universal design. Across 33 floors of new, state-of-the-art corporate workspace, 100% of all workstations will be fully accessible. This will provide 3,752 adjustable-height workstations with ergonomic task chairs (previously only provided for workplace accommodations), 32 universally accessible washrooms, 4 accessible lactation rooms, 2 accessible group prayer rooms, 30 accessible wellness rooms, 30 quiet zones (8-12 workstations per zone), and an outdoor Sky Garden. Main corridors within the workplace floors will accommodate a 1700mm turning radius, exceeding building code requirements. The standards applied to TD Terrace will become the new standards for all newly designed and built TD office spaces.
- Many Architecture and Design colleagues and external architects and consultants maintain memberships in Association of Registered Interior Designers of Ontario (ARIDO) and/or Interior Designers of Canada (IDC) and some are WELL-accredited, a commitment to advancing human health and wellness in buildings. These organizations require ongoing education credits that include training in accessibility.
- The process for developing or building new and renovated workplaces is informed by hosting Workplace Experience Journey Sessions. These sessions, which are in-person collaborations between TD ERE design teams, including TD Architecture and Design Managers, third-party architects, and end-users, including individuals who identify as having a disability.
- We rely on valuable feedback from our colleagues, customers, and the public gathered through our ERE design teams who continue to regularly conduct branch tours as part of our business-as-usual design process and through the Accessibility at TD Feedback process.



**We rely on valuable feedback**  
from our colleagues, customers, and the public



**The process includes**  
in-person collaborations between TD ERE design teams



**New standards for building workplaces** integrating a holistic strategy focused on inclusive, universal design



# Information & Communication Technologies (ICT)

TD's digital platforms deliver information and services to customers. Every day, colleagues use thousands of desktop applications, mobile apps, and electronic documents to complete their work. TD recognizes the importance of removing barriers and creating accessible digital experiences for customers and colleagues so they can bank and work effectively.

## Digital Accessibility

### Progress:

Our goal is to deliver best-in-class technology to help enable our colleagues and deliver legendary experiences for our customers. Accessibility is a key component of that technology journey. Since June 2023 we have made the following progress:

- Launched the TD Accessibility Adaptor, a new innovative accessibility tool to create more inclusive and accessible user experiences and offered free to both customers and colleagues. Launched in 2023, the tool was widely tested by colleagues and the public with the help of Disability:IN, a leading non-profit resource for business disability inclusion worldwide.
- Acquired a new suite of tools that will facilitate consistent and accurate accessibility assessments of our internal and external websites, helping to identify gaps and improve customer and colleague experiences.
- Increased text size and made other formatting changes on EasyWeb, our online banking website, to address customer feedback about design changes.
- Updated our Systems Development Life Cycle process in 2023 to improve our ability to monitor accessibility capabilities across our digital assets. Our internal consulting team completed over 900 consulting engagements in 2023 and 350 in 2024, year to date.
- Improved our process to track colleague-facing platforms that do not meet accessibility requirements to allow the business to track ownership and identify mitigation and remediation plans.
- Updated the TD Project Methodology to incorporate accessibility considerations such as the inclusion of accessibility in the requirements, testing, and review of any high severity accessibility gaps before production.
- Delivered lunch and learn training programs related to digital accessibility to various businesses throughout 2023 and 2024. In 2024, we continue to find opportunities to formalize the presentations and create sustainability.

## Tools and Resources

### Progress:

We have numerous resources to support both colleagues with disabilities and those that are designing assets and communications to be accessible. New this year:

- ICT-related accessibility resources have been centralized on the Accessibility at TD Resource Hub for easier and more direct access (e.g., information on assistive technologies, TD Accessibility Standards, Accessibility Code Toolbox, etc.).
- TD's Assistive Technology and Digital Accessibility teams are members of the International Association of Accessibility Professionals (IAAP). Membership allows us access to IAAP network communities and access to online and in-person training to increase their knowledge about accessibility.
- Introduced the Disability Answer Desk to support our colleagues with any accessibility-related questions. The site also includes a feedback mechanism for colleagues to share accessibility-related comments. Since inception in October 2023, we have received 82 accessibility related questions.

## Communication

TD interacts with customers, colleagues, and communities in which it operates in many ways, including in-person, print, online, and by phone. Given our scope of ongoing communication, we remain committed to providing communications that are accessible and inclusive to all.

In 2023, we made several commitments to address accessible and inclusive communication barriers, specifically related to accessibility guidelines, the use of plain language, and our approach to using and soliciting the feedback of our colleagues to further improve accessibility at TD.

This Progress Report was written and designed to reflect our commitment to plain language, focusing on the reduction of text and complexity.

### Accessibility & Plain Language Guidelines

#### Progress:

- Internally, guidelines on accessible communications are available on the Accessibility at TD Resource Hub, including best practices related to the Microsoft Office Suite including guidelines for documents, presentations and spreadsheets. Detailed guidelines for email, Word documents, PowerPoint presentations, and Excel spreadsheets are also provided.
- Several business lines have reviewed their internal sites for pre-existing PDF content, made it accessible, and implemented a proactive and systemic process to be sure that all new material published is accessible, preventing new barriers from being created. The model followed, will be scaled, and applied to other business sites.
- Created accessibility policies and plans to satisfy requirements in provincial legislation for our provincially regulated businesses. These businesses continue to address accessibility needs across the entire Canadian footprint.



- TD Insurance (TDI) updated its *Accessibility Policy* in 2023. The policy addresses accessibility of internal and external communications and documents. TDI also embedded a feedback procedure for capturing and actioning feedback received in a timely manner. Also, a business-specific communication detailing assistive technologies and resources was sent to all colleagues; this communication approach will be scaled and leveraged by other TD businesses going forward.
- Wealth and TDAM created their respective accessibility policies and multi-year plans.
- To further our progress and understanding of plain language best practices, with accessibility in mind, we are currently working with third parties and community experts to identify and procure training. Once standards are developed, an action plan will be developed to update our documents and webpages accordingly.

## **Availability of Information**

### **Progress:**

- Leveraging the platform of National AccessAbility Week (May 26 to June 1, 2024), an enterprise-wide communication strategy is planned to amplify awareness to the importance of accessibility and inclusion, and the resources to support.
- Introduced an interaction model with Inclusion & Diversity Leadership Councils across the organization to raise awareness of accessibility resources and TD's Accessibility Office, creating partnership between two key accessibility-focused stakeholders and exposure to a larger colleague audience.
- Leveraging the updated accessibility governance structure, key stakeholders from businesses across the organization are working together to identify, remove, and prevent new barriers. This collaborative approach to ongoing progress enables speed, sustainability of solutions, and innovation given the breadth, diversity of thought, and experiences of those involved.

## **Colleague Feedback & Consultation**

### **Progress:**

In addition to the Disability Answer Desk (see ICT on page 16), colleagues can share feedback through:

- The TD Accessibility Feedback process which provides colleagues, and customers, the ability to provide anonymous feedback by mail or phone.
- Our HR Advice Channel, where feedback is aggregated anonymously and shared with key partners to address and execute change.
- iD8, a shortform for 'ideate', a colleague-facing crowd-sourcing feedback tool.
- Available disability and inclusion community sites (e.g., the Disability Inclusion Network at TD, etc.)
- Monthly meetings and a mailing list designated for Job Access with Speech (JAWS) users (screen reader that provides speech output) to share experiences, concerns, and collaborate.
- The Employee Consulting Group, where colleagues with disabilities, their caregivers, and allies are invited to participate, on a voluntary basis, in research activities supporting the launch, development, and design of new products and services.



# Procurement of Goods & Services

TD is committed to providing products and services that are accessible for people with disabilities. By embedding accessibility requirements in our best practices, we can avoid creating new barriers. The procurement commitments require partnership with third parties and other key stakeholders.

## Sourcing of Goods & Services

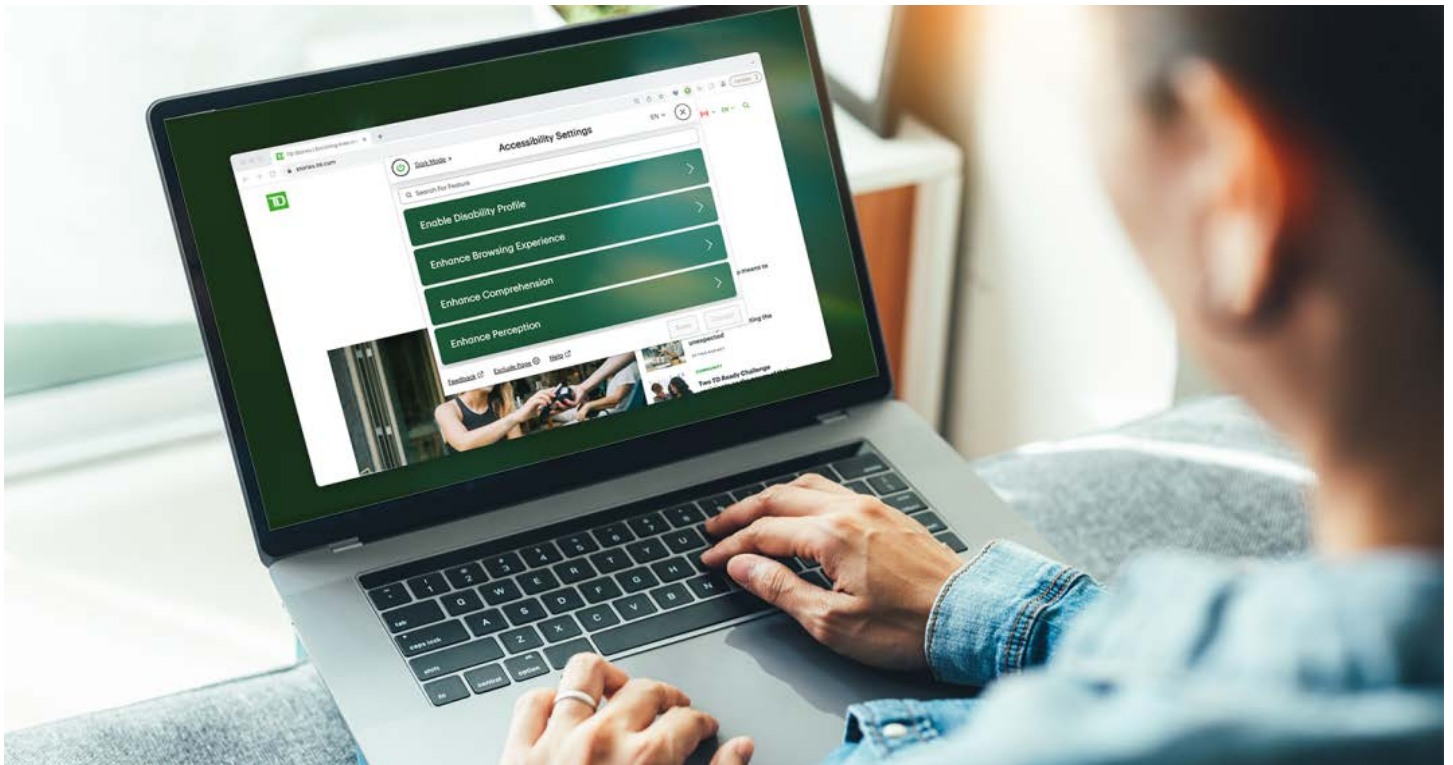
### Progress:

- The *Enterprise Procurement Policy* is updated annually documenting the requirements of our vendors to adhere to the *Supplier Code of Conduct* which requires our vendors to be committed to providing products and services that are accessible. The last annual policy review was completed, and the policy was published on November 1, 2023.
- The Responsible Sourcing and Supplier Diversity team regularly liaises with Inclusive Workplace and Supply Council of Canada (IWSCC) and Disability:IN in the U.S., that certifies businesses that are owned and operated by people with disabilities. Through our corporate memberships with these organizations, we can meet with, and mentor businesses owned and operated by people with disabilities to help identify opportunities and understand barriers.

## Managing Accessibility in our Vendor Relationships

### Progress:

TD's Enterprise Vendor Management Office (EVMO) is developing a process to build and monitor a list of vendor assets and their accessibility capabilities and incorporate vendor reviews of accessibility capabilities. This will include a review of the current vendor assessment process. This updated process is expected to be in place by October 2024.



# Design and Delivery of Goods & Services

TD is committed to conducting its affairs with fairness and equity and fostering a unique and inclusive culture by providing an accessible, safe, and respectful work environment that is free from harassment, discrimination, and violence. Every employee, potential employee, and director, as well as every customer, vendor, or other person in a business relationship with TD must be treated with dignity and respect.

## **Progress:**

As TD designs new initiatives and updates existing products, services, and programs, accessibility is taken into consideration as a key principle so that programs and services are accessible. Since June 2023, the following initiatives have been designed and enhanced with accessibility in mind:

- A program is being established for Canadian Personal Banking (CPB) Executives, Special Assistants, and Executive Assistants to educate and build awareness on accessibility requirements and the document support service. The objective of this program is to make sure that communications and events hosted by CPB Executives are inclusive and accessible for all colleagues. This program will be shared with other TD businesses upon completion.
- The Branch Ambassador Program continues to update resources and will provide specialized training to a dedicated professional in every branch about servicing our customers with disabilities. The role of the ambassador is to share the learned information and their expertise with all branch staff. The program's successes will be shared with other customer facing businesses.
- Implemented a full re-design of our Branch Banking 'Assisting Customers with Disabilities' resource page with links to key support materials, information, and the feedback process. Amplified the location of the resource on the intranet home page to drive awareness of content and support processes. This approach will be shared with other business to be considered for other intranet sites.
- Established an Accessibility Challenge through our iD8 program, an internal crowd-sourcing tool, which will be introduced to all businesses in 2024. This program allows colleagues to share interactions they have observed and potential solutions where TD could improve the experiences of customers with disabilities related to physical, communications, and technology.
- Implemented braille/large print card sleeves for customers who are visually impaired so that they can have their card number, expiry date, and CVV2 printed in either braille or large font to make it more accessible.
- Reviewed all components in our Design System, used to build TD websites, and made enhancements to improve accessibility. To enable fully compliant future components, proactive consideration is made before the components are added to the Design System.



## Consultations

At TD we recognize the importance of engaging with and listening to people with disabilities to learn about accessibility needs and to help remove barriers. While we continue to progress along our accessibility journey, we collaborate with people with disabilities to support an inclusive environment. We recognize how important capturing and actioning feedback from our customers and colleagues is and embrace that consultation will be an ongoing effort.

While we action the feedback that we have received from our current consultation initiatives to build a more accessible TD, we continue to look for opportunities to hear from our colleagues, customers, and the public.

Since June 2023, we have continued our internal and external consultations while monitoring progress. These activities included:

- Establishing an Employee Consulting Group, where colleagues with disabilities, caregivers, and allies are invited to participate, on a voluntary basis, in research activities supporting the launch, development, and design of new products and services.
- Using iD8, our internal crowd-sourcing feedback program, established an accessibility focused challenge to provide ideas about potential improvements to remove obstacles and barriers. Initially rolled out in one business in December 2023, a staggered roll out across all businesses is planned for 2024.
- During the design and launch of the TD Accessibility Adaptor, the tool was widely tested by both colleagues and the public with the help of Disability: IN.
- Commissioned a third party, specialized in accessibility, to conduct an internal and external study as part of TD's ACA consultation process. The initial phase of this study took place in Spring 2024. The objective of the study is to:
  - Identify pain points and design opportunities in call centre interactions.
  - Complete a design workshop to develop a plan to integrate research findings, observations, and recommendations, improving colleague and customer experiences.



# TD Consultation Study with People with Disabilities



- A total of 66 secret shopping events and 4 online focus groups, at 120 minutes in length each.



- 22 consumers participated



## Consumer participant profile:

- Canadian residents who disclosed a range of disabilities, inclusive of cognitive, physical, and sensory
- Represented five provinces across Canada, urban and rural (AB, BC, ON, MB, and PE)



- 20 colleagues participated



**Study identified areas in which design changes could remove barriers for both customers and colleagues, making TD more accessible for all**

## Accessibility Feedback

At TD we believe that customer, colleague, and public feedback is important. As such, all feedback received that will enable the organization to be more accessible is carefully recognized, considered, and appropriately acted on.

In addition to our existing sources to capture and respond to customer comments and feedback related to accessibility (e.g., customer experience surveys, social media sentiment, etc.), TD developed a centralized accessibility feedback process for customers, non-customers, and colleagues. This accessibility feedback process captures feedback on the Bank's published Accessibility Plan as well as any accessibility related matters. Feedback can be submitted externally or internally by telephone, email, and by mail (as outlined in Contact Us on page 3).

Through the centralized accessibility feedback submission process outlined above, since June 2023, we have received 119 submissions specific to accessibility.

Summary of the trends and themes identified in the feedback received:

Focus Area	Number Received	Feedback Summary
Built Environment & Procurement of Facilities	11	<p><b>Accessibility features in branches including:</b></p> <ul style="list-style-type: none"> <li>• Sit down teller wickets not available or at the other end of the branch.</li> <li>• Inaccessible washrooms for customers and colleagues.</li> <li>• Poorly signed accessible parking spaces.</li> </ul>
Information & Communication Technologies	20	<ul style="list-style-type: none"> <li>• PIN Pad authentication device not accessible.</li> <li>• iPad for Language Line not available for customer.</li> <li>• e-Sign is inaccessible to user that does not use a mouse.</li> <li>• Difficulty using TD online applications.</li> </ul>
Communication	10	<p><b>Various customer accommodation requests including:</b></p> <ul style="list-style-type: none"> <li>• Authentication not available through rotary phone, IP Relay, or computer.</li> <li>• Branch has bright flashing lights, vibrations, TV ads.</li> </ul>
Design & Delivery	70	<ul style="list-style-type: none"> <li>• Dark Mode not available on TD online applications.</li> <li>• Negative feedback to online application changes.</li> <li>• Many positive comments about online cheque deposit option and online application features.</li> </ul>
Other	8	<ul style="list-style-type: none"> <li>• Specific Customer Experience and Account concerns</li> </ul>

## How Accessibility Feedback is Addressed

With the centralized accessibility feedback process, it was important that a clear and simple process was established to review, consider, and appropriately action, all feedback by the appropriate TD business.

- Colleague feedback, if received through our Human Resources channel, is managed, and triaged with the impacted TD business to consider, and as appropriate, address, and resolve.
- Customer feedback is received by our Senior Customer Complaints Office (SCCO), assessed, and then triaged to the appropriate business accessibility designate to action and track. Each feedback item is tracked until a solution has been identified and addressed, at which point it will be closed.

Since June 2023, we have been actively monitoring, responding to and reporting on the accessibility feedback process. We continue to leverage the trends and themes identified through the feedback received to inform next steps and business decisions with a goal to identify opportunities in our business processes and services and improve customer and colleague experiences.

# Progress Summary & Conclusion

At TD, we are committed to our vision and purpose to be the better bank, dedicated to enriching the lives of our customers, communities, and colleagues. We understand that there continue to be opportunities to improve accessibility in our organization. The accessibility plan will continue to guide us as we strive to provide a barrier-free environment for our customers and colleagues.

Over the last year, we have made significant progress in socializing our approach to accessibility as an organization, an approach where we work together, leveraging our size and scale, to create accessible and inclusive experiences, products, and services. As an organization we have created opportunities for our colleagues to share their experiences and feedback and participate in research and consultation activities to help us design and deliver better customer experiences. We have centralized our accessibility-related resources, making it easier to access the information needed to serve our customers, and do our jobs well. We are proud of the proactive approach to building and designing our newest office tower in Toronto and updating accessibility standards for all new and renovated corporate offices, benefiting our colleagues. And we have incorporated accessibility into our design tools for digital development, making it easier to build and design with accessibility in mind.

In the years ahead, we will focus on enhancing our accessibility-related training which includes, identifying where targeted training is required to support distinct and unique business models. We will continue to work with our third-party vendors, continuing to make accessibility requirements a priority in all sourcing requests to improve our procurement processes. And we are committed to prioritizing action on the learnings from our external consulting engagements, customer and colleague feedback received, and output received from our Employee Consulting Group activities.

While we are proud of the progress we have made, we remain committed to making accessibility and inclusion a priority at TD and building more inclusive and accessible experiences for our colleagues and customers.



# Glossary of Terms

**Accessibility** is the design of products, devices, services, environments, technologies, policies, and rules that makes their 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 eliminating disadvantages and barriers to colleagues, prospective colleagues or customers resulting from policy or practice that has more have an adverse impact 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 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 ACA as anything that hinders the full and equal participation of people with a disability in society. The disability 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.

**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.

**Deaf** with a capital “D” refers to individuals who are deaf or hard of hearing and who identify with and participate in the language, culture, and community of Deaf people, using sign language as the first choice of communication. Deaf culture does not perceive hearing loss and deafness as a disability, but as the basis of a distinct cultural group. Culturally, Deaf people may use speech reading, gesturing, spoken language and written English to communicate with people who do not sign.



**Disability** is defined by the ACA 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 disabilities 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 disabilities 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.

