

BMO Financial Group

# Accessible Canada Act Progress Report

June 1, 2024

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# Message from leadership



Guided by our Purpose, to **Boldly Grow the Good in business and life**, we are making progress for a more inclusive business by removing barriers for our colleagues, customers, and the communities we serve.

As the Chief Sustainability Officer and head of the Enterprise Accessibility Office at BMO, I am proud to present the progress report for the first year of our Accessibility Plan. Our goal is to advance our Zero Barriers ambition to create a more accessible BMO, with a focus on improving our customer and employee experience. Zero Barriers is a multi-year strategy that supports equity, equality and inclusion through a variety of programs including investments, products, services, and partnerships.

In 2023, incorporating feedback from both internal and external consultations, we outlined our three-year Accessibility Plan to remove barriers for customers and colleagues. Since we published our Accessibility Plan, we have continued to advance actions to remove barriers to our services and workplace, fostering the goals of the *Accessible Canada Act*. This report sets out the progress we've made in the last year, and highlights areas of opportunity we've identified within each focus area of the Accessibility Plan.

As we move forward, we will continue to collaborate closely with our colleagues, customers, and the communities we serve, seeking to empower them to share feedback and ideas from their personal and professional experiences. This approach will enable us to understand their diverse needs and develop solutions that will help advance equitable access and Zero Barriers to inclusion.

Michael Torrance  
Chief Sustainability Officer  
**BMO Financial Group**



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# Contact information and feedback

## Overview of BMO's accessibility feedback process

We value all feedback received from our customers and employees and will continue to look for ways to improve and enhance accessibility and remove barriers to accessing our products, services, technologies and workplace environments.



### BMO's Progress Report

This Progress Report fulfills the *Accessible Canada Act* and *Accessibility for Ontarians with Disabilities Act*, and their regulations' requirements for federally and provincially regulated entities.

BMO customers and employees may contact us or provide feedback through any of the following channels:

#### Webform

[bmo.com/main/about-bmo/accessibility](https://bmo.com/main/about-bmo/accessibility)

#### Email

[accessibility.accessibilite@bmo.com](mailto:accessibility.accessibilite@bmo.com)

#### Telephone

1-877-225-5266

For clients who are deaf, deafened or hard of hearing, BMO supports calls (24/7) from third-party relay service providers trained to relay communications through message relays or video relays.

#### Mail

Enterprise Accessibility Office  
First Canadian Place – 9th floor,  
100 King St. W,  
Toronto, ON  
M5X 1A3

#### Branch

Share feedback with one of our branch staff.

Anonymous feedback can be provided through the webform, telephone, and mailing channels. Acknowledgement of receipt will be provided via the channel through which the feedback was received, unless feedback was provided anonymously. Personal contact information may be collected as part of the feedback processes for the sole purpose of responding to the feedback received.

### Alternative format request

To request a copy of BMO's Progress Report, Accessibility Plan and/or a description of the feedback process in an alternative format, please email us at [accessibility.accessibilite@bmo.com](mailto:accessibility.accessibilite@bmo.com)



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# Outcome of consultation process

## Internal employee consultation

### Participants

- 974 employees engaged (313 responses).
- Participants from across multiple functions and job grades.
- All provinces represented.

### Process

BMO undertook a survey to gather comprehensive feedback and suggestions from employees on their thoughts and experiences regarding accessibility in our workplace, specifically focusing on key areas outlined in the *Accessible Canada Act*. The survey was conducted in March 2024 and included aspects such as our physical spaces, information technologies, and communication practices.

We also gave participants the chance to provide additional feedback on areas not otherwise covered in the survey.

### Findings

#### Positives:

- Positive feedback was received on the work done to advance accessibility by BMO.
- Employee appreciation and support from management was highlighted as a positive.

#### Opportunity for improvement:

- Comments provided by participants highlighted that enhanced promotion of resources available would be a benefit to all.

## External customer consultation

### Participants

- 74% of participants were existing BMO customers.
- Participants reflected a balanced representation of individuals across various disability categories, including sensory, mobility, and cognitive impairments.
- Participants were recruited from across Canadian provinces.

### Process

BMO engaged the Return on Disability Group to undertake a series of BMO customer experience consultations to assess the banking experiences of people living with disabilities.

The series of consultations was conducted throughout February and March 2024. Existing BMO customers participated in consultations focusing on evaluating services for current clients, while non-BMO customers were selected to assess the account opening process.

Participants in each group were given specific tasks to complete and were asked to document their experiences. Additionally, guided discussions provided a platform for participants to share their insights and feedback.

### Findings

#### Positives:

- Participants expressed positive feedback on the accessibility of personal account opening procedures.
- BMO's mobile app garnered praise for its user-friendly interface, though some challenges were reported by screen reader users following a recent software update.
- Several examples were cited of BMO staff exceeding expectations to ensure that people with disabilities enjoyed consistently positive banking experiences.

#### Opportunities for improvement:

- A common challenge for banking customers is the complexity of banking terminology. Plain language and clarity were encouraged to improve the customer experience.
- Challenges with telephone banking, including the need for more cues to guide users.
- Challenges for screen reading users with the BMO banking app in certain circumstances.



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# Our goal

We aim to remove barriers to accessibility to improve the customer experience and to provide our employees with an accessible work environment where they can achieve their full potential.



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# Action areas at-a-glance

BMO's 2023 Accessibility Plan outlines our approach to advancing a barrier-free customer and employee experience. In line with the goals of the *Accessible Canada Act*, each focus area indicates the initiatives, programs, and services we currently have in place, the opportunities for improvement we have identified through feedback and consultations, and our path forward.

 <h3>Employment</h3> <p>We continue to create a more accessible and inclusive workplace where everyone is treated with respect and supported to achieve their full potential.</p>	 <h3>Information and communication technologies</h3> <p>We seek to make our digital content accessible for both employees and customers, enabling equal access to important information and ways of communicating.</p>		 <h3>Design and delivery of programs and services</h3> <p>All customers living with disabilities should receive our products and services with dignity and respect.</p>
 <h3>Built environment</h3> <p>We seek to design and build spaces that are accessible to everyone.</p>	 <h3>Communication, other than information and communication technologies</h3> <p>We aim to enhance communication with all our employees and customers by seeking to make important information readily accessible to everyone.</p>	 <h3>Procurement of goods, services, and facilities</h3> <p>We aim to eliminate barriers to accessibility throughout our range of products, services, and technologies.</p>	 <h3>Transportation</h3> <p>BMO recognizes that there are barriers related to transportation for persons with disabilities and will continue to review and assess this issue for barriers.</p>

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# Employment

We continue to create a more accessible and inclusive workplace where everyone is treated with respect and supported to achieve their full potential.



## Areas identified for improvement

Within our organization, there exists a range of awareness levels among employees and people managers regarding accessibility policies and available accommodations. Some individuals may find the process for requesting accommodations confusing or complex. Moreover, there is a need to elevate attention towards non-visible disabilities to mitigate associated stigma and expand available resources and support. Employees may also feel hesitant to disclose their disabilities to recruiters, managers, or colleagues, highlighting the concern around stigma and the need for creating a safe space to foster transparency in discussions, particularly concerning career development.

### Opportunities

- Increase awareness of the accessibility policies and/or the types of accommodations offered for employees at BMO.
- Increase awareness of non-visible disabilities through education and support tools.
- Continue to facilitate an environment where all employees feel they can be comfortable and confident to ask for help and discuss their needs.

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## Our way forward

## Progress

<p><b>Short term</b></p> <ul style="list-style-type: none"> <li>Continuously update BMO’s employee Accessibility Hub that will act as a centralized source of accessibility-related resources for employees, including training, policies, key contacts, and guidance on how to request accommodations and provide feedback.</li> </ul>	<ul style="list-style-type: none"> <li>We communicated the publication of BMO’s Accessibility Plan to all of our employees.</li> <li>We launched our Accessibility Hub, which serves as an internal resource offering supportive tools and materials for issues relating to accessibility.</li> <li>BMO Without Barriers, an employee resource group focused on employees with disabilities, has been actively raising awareness and promoting the BMO Accessibility Hub.</li> <li>We added a direct link to the Accessibility Hub from our human resources intranet. This provides hiring managers with ready access to BMO’s Workplace Accommodation Policy, enabling them to effectively inquire about candidates’ accommodation needs.</li> <li>We updated our Workplace Accommodation Policy to include a new section covering BMO’s Accessibility Plan, reiterating our commitment to a barrier-free environment. A direct link to BMO’s Accessible Customer Service Policy was also added.</li> </ul>
<p><b>Medium term</b></p> <ul style="list-style-type: none"> <li>Provide more proactive communication about accessibility policies and offerings.</li> <li>Update our accessibility training for managers to promote transparent conversations with employees about their disabilities, the accommodations they need, and how to better support them in the workplace.</li> </ul>	<ul style="list-style-type: none"> <li>We promoted the Accessibility Hub to our recruitment teams to deepen their familiarity with the available resources and tools for candidates with disabilities, facilitating consistent application of best practices throughout the recruitment process.</li> <li>We expanded our employee benefits program to provide greater financial and social assistance for individuals with visible and non-visible disabilities. Access to medical professionals for mental health support for employees and their families is available 24/7 through a virtual care app at no cost to them.</li> </ul>
<p><b>Long term</b></p> <ul style="list-style-type: none"> <li>Formalize mentorship programs to support employees with disabilities with career development.</li> </ul>	<ul style="list-style-type: none"> <li>We continue to explore partnerships and opportunities with advocacy groups focused on disabilities. The goal is to promote career opportunities in formats and forums that are accessible to all. As part of this effort, we have updated our human resource policy and internal resources. We have also established feedback channels to enable employees to provide input, suggest revisions, and identify new opportunities.</li> </ul>
<p><b>Ongoing</b></p> <ul style="list-style-type: none"> <li>Continue to conduct regular reviews of our accommodations program, in consultation with employees with disabilities, to identify opportunities to improve our support.</li> </ul>	<ul style="list-style-type: none"> <li>BMO is conducting annual employee consultations with employees with disabilities to understand their experiences in our workplaces, identify opportunities for improvement, and assess awareness of our efforts to create an accessible workplace. The most recent employee consultation was carried out in 2024.</li> </ul>

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# Built environment

It's important that our branches and offices are accessible to everyone. Our Corporate Real Estate department actively works to promote accessibility of our physical spaces. We value input from our employees and customers with disabilities, incorporating their feedback into the development of our accessible design standards.

## Areas identified for improvement

Our existing built environments sometimes lack efficient accessibility in terms of interior design, layout, and amenities, particularly older branches and offices that will undergo renovations as part of facility improvement plans. Additionally, certain branches and offices face challenges in optimizing exterior environments such as parking spots, ramps, and entrances, due to external factors associated with leased properties.

### Opportunities

- Optimize interior and exterior environments of branches and offices for accessibility and reduce mobility related barriers through landlord negotiations and implementation of interior accessibility standards.
- Continue to make ergonomic furniture, floor plan revisions and devices available as needed.
- Enhance accessibility as part of facility improvements for older built environments.



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## Our way forward

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<p><b>Short term</b></p> <ul style="list-style-type: none"> <li>› Continue to have new locations be assessed by persons with disabilities for opportunities to increase accessibility.</li> </ul>	<ul style="list-style-type: none"> <li>› We undertake reviews to identify potential accessibility barriers in both leased and owned spaces. Future reviews will be scheduled with the evolution of our accessibility standards, and where unique properties do not allow for the proper application of our standards.</li> <li>› We assessed our customer-facing spaces in 2022 and made certain appropriate retrofits.</li> </ul>
<p><b>Medium term</b></p> <ul style="list-style-type: none"> <li>› Continue to engage our external design consultant to assess the latest industry standards and best practices against our current standards and determine next steps.</li> <li>› Invest in design solutions and technologies that improve accessibility and remove physical barriers.</li> </ul>	<ul style="list-style-type: none"> <li>› A review and update of our accessibility standards is currently underway.</li> <li>› We are currently working with Accessibility Simplified to evaluate our current accessibility standards across our office and retail spaces. The vendor submitted technical accessibility design standards for the built environment in May 2024, which are currently under review for potential incorporation into our design standards.</li> <li>› We continue to leverage ad-hoc feedback from employee groups such as BMO Without Barriers and others, to help inform and evolve our application of standards within our built environment and technology offerings.</li> </ul>
<p><b>Long term</b></p> <ul style="list-style-type: none"> <li>› In alignment with our Corporate Real Estate strategies, continue to refresh and renovate older branches and offices to have our updated accessibility standards be met across the majority of our locations.</li> <li>› Continue to work with landlords and government authorities where we lease space, to find opportunities to remediate potential accessibility barriers.</li> </ul>	<ul style="list-style-type: none"> <li>› Newly renovated and built spaces since 2020 have considered the feasibility of accessibility beyond building code. This includes aspects such as turning radiuses, barrier-free access to equipment, height adjustable desks, colour contrast, furniture heights, ramps, wellness rooms, etc.</li> <li>› Within our office portfolio, this includes major occupancy locations such as BMO Place, Chicago Tower, First Canadian Place, and Station Square.</li> <li>› Within our Retail portfolio approximately 120 branches were newly built and/or renovated between 2020 and 2023.</li> </ul>

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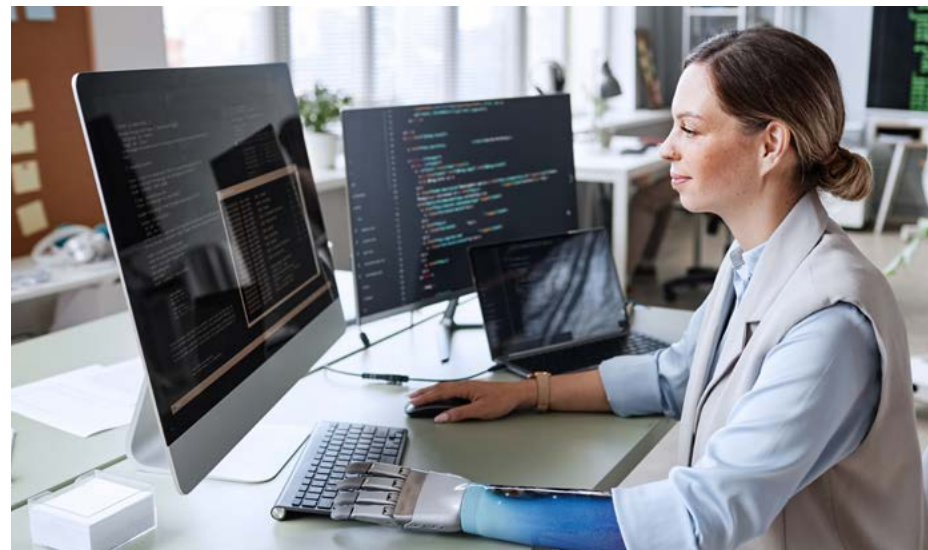


# Information and communication technologies

We seek to make our digital content and technologies accessible to all employees and customers, enabling equal access to important information and communications.

As part of our accommodation program, employees at BMO have access to adaptive technologies to support their needs, furthering our efforts to foster an equitable and barrier-free workplace.

We have adopted technology accessibility standards that govern our digital technology programs, products, and applications across BMO.



## Areas identified for improvement

Adoption and practices of accessible technology standards should be implemented consistently across technology and business teams managing our employee or customer facing platforms, tools, and systems. Training and education should be enhanced to ensure all managers or employees are familiar with the process to request adaptive technologies or where to seek technology support when needed.

### Opportunities

- Promote consistent adoption and practices across our technology and business teams.
- Facilitate awareness of the process to request adaptive technologies.

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<p><b>Short term</b></p> <ul style="list-style-type: none"> <li>Update existing training and resources for managers and employees to promote awareness on the process to request adaptive technology and obtain technical support, including on the Accessibility Hub intranet page.</li> <li>Refresh the Technology Accessibility Standard to be adopted enterprise-wide and governed centrally for all technology, business, and vendor managed applications.</li> </ul>	<ul style="list-style-type: none"> <li>We have revised our technology risk directive to include guidance around meeting the standards outlined in regulations.</li> </ul>
<p><b>Medium term</b></p> <ul style="list-style-type: none"> <li>Conduct a full review of employee platforms, tools, and systems to assess potential gaps against the new standards and remediate where needed.</li> </ul>	<ul style="list-style-type: none"> <li>We continue to solicit feedback and review our accessibility management standard to formalize central ownership and promote ease of access to the standard.</li> <li>We are reviewing vendor applications for adherence to the enterprise accessibility technology standards.</li> </ul>

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# Communication, other than information and communication technologies

We believe everyone should have equal access to important information. We consult with people with disabilities to get insights about their specific needs to help us better communicate with all our employees and customers.



## Areas identified for improvement

Consistent arrangement of interpreters for our deaf, deafened, or hard of hearing employees when participating in meetings, company events, and town halls. There are opportunities to enhance accessibility in our visual or written communications, including through the use of plain language. For our customers, alternative format statements are accessible for most products and this process should extend to all customer documents to the extent possible. Customers can encounter information barriers with communications heavy in financial jargon.

### Opportunities

- Provide sign language interpreters for employees who are deaf, deafened, or hard of hearing to allow them to participate fully in meetings, company events and townhalls.
- Make visual or written communications for employees and customers more accessible, including using plain language.
- Expand the availability of alternative formats for all customer documents.

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<p><b>Short term</b></p> <ul style="list-style-type: none"> <li>› Formalize process to fulfill ad hoc requests for alternative formats of all customer documents provided by BMO.</li> </ul>	<ul style="list-style-type: none"> <li>› We created a new intake process that allows customers to request alternative format statements and brochures. This process was implemented with the goal of enhancing accessibility by accommodating diverse customer needs.</li> </ul>
<p><b>Medium term</b></p> <ul style="list-style-type: none"> <li>› Develop standards on providing sign language interpreting, closed captioning, and/or transcriptions at all large BMO events and townhalls. Share materials in advance where possible so that employees can review at their own pace and leverage adaptive technologies where needed.</li> </ul>	<ul style="list-style-type: none"> <li>› We implemented a standardized intake process for requesting sign language interpreter services. This process facilitates easy submission of requests for sign language interpreter services within the organization.</li> </ul>
<p><b>Long term</b></p> <ul style="list-style-type: none"> <li>› Update internal design standards to add considerations around increased contrast, font size, etc., to support our colleagues with visual disabilities.</li> </ul>	<ul style="list-style-type: none"> <li>› We are making ongoing progress as we continue to assess and create employee resources and guides.</li> </ul>
<p><b>Ongoing</b></p> <ul style="list-style-type: none"> <li>› Continue to enforce the application of plain language principles as part of verbal and written information.</li> </ul>	<ul style="list-style-type: none"> <li>› We have developed editorial guidelines advising communicators to employ clear and concise language. All communications across enterprise channels are reviewed through this lens.</li> <li>› We published an accessibility communications guide which is hosted on the Accessibility Hub. We continue to socialize this guide across our internal communication channels.</li> <li>› We have introduced a financial tips and tricks series on our enterprise channel BMO Central that gives employees real-life information about how BMO products and services can help make real financial progress. These stories are some of our most viewed on BMO Central.</li> <li>› We continue to explore communications opportunities with corporate communications groups to promote the tools and resources that are available to employees and customers.</li> </ul>

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# Procurement of goods, services, and facilities

We aim to eliminate barriers to accessibility throughout our range of products, services, and technologies. Accessibility considerations are embedded across BMO’s procurement processes and we provide vendors with our technology accessibility-related expectations, as part of our sourcing process.

## Areas identified for improvement

Potential opportunities exist to enhance our processes for even earlier identification of accessibility requirements, and for evaluating vendor products and services by the lines of business. Additional efforts may be needed to ensure that products, services, channels, and technologies procured from third-party vendors are fully accessible, and we will continue to improve our procurement processes.

### Opportunities

- Identify accessibility needs early and integrate them into product design.
- Enhance accessibility in our procurement processes through ongoing improvement efforts.



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- > Implement enhanced governance processes and controls throughout BMO’s procurement process for early identification of accessibility requirements and evaluation of the products, services, channels, and technologies against accessibility requirements by the line of business.
- > Review and consider adding additional standard contractual language to ensure vendors are compliant with any accessibility laws under which BMO is regulated, and that the products, services, channels, or technologies they are providing to BMO are accessible.

- > To continuously enhance our procurement process and align with industry standards, we conduct ongoing assessments to optimize controls and implement improvements.
- > We have started to implement measures to include contractual language pertaining to accessibility requirements in our procurement process. We will continue to enforce and enhance these requirements in our procurement practices.
- > To promote accessibility in our procurement process, we socialized and published a list of subject matter experts in our Accessibility Hub. The list will be used as a resource to assist with procurement and sourcing decisions.



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# Design and delivery of programs and services

We believe customers living with disabilities should be able to access our products and services with dignity and respect. This involves providing equal access across channels in which customers bank with us and the products and services we offer.

To support this goal, we have established a dedicated policy on accessible customer service, and team members in customer-facing roles undergo annual accessibility training, equipping them with the skills to best serve customers with disabilities.

Our customers have accessible options across our different banking channels, including in-branch services, telephone banking, ATMs, and our online banking platform and mobile app.



## Areas identified for improvement

Certain premium credit cards are currently flat printed, posing difficulties for individuals with vision loss or impairment in distinguishing them from other cards. More formal processes should be in place to collect accessibility feedback as part of the product lifecycle.

### Opportunities

- Considering options to enhance the design of premium credit cards to facilitate easier identification for customers experiencing vision loss or impairment.
- Develop additional processes to collect accessibility feedback.
- Augment product offerings and services to better meet the needs of people with disabilities and improve customer experience.

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**Our way forward**

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<p><b>Medium term</b></p> <ul style="list-style-type: none"> <li>› Embed accessibility considerations and feedback in the product development lifecycle keeping it top of mind as we build new products and services.</li> </ul>	<ul style="list-style-type: none"> <li>› We are actively exploring the establishment of a governance framework and process to integrate accessibility throughout the entire product lifecycle. Our goal is to incorporate accessibility requirements into every stage of product development.</li> </ul>
<p><b>Long term</b></p> <ul style="list-style-type: none"> <li>› Continue to assess options for more accessible premium credit cards.</li> </ul>	<ul style="list-style-type: none"> <li>› We are currently conducting a comprehensive review and remediation plan to identify and address areas for improvement regarding our premium credit cards, with a focus on promptly resolving accessibility-related issues and concerns.</li> </ul>
<p><b>Ongoing</b></p> <ul style="list-style-type: none"> <li>› Continue to use plain language wherever possible to help customers easily understand the information related to the products and services they select.</li> <li>› Identify further opportunities across BMO to create more barrier-free products, services and channels for customers with disabilities.</li> </ul>	<ul style="list-style-type: none"> <li>› We continue to prioritize plain language use wherever feasible.</li> <li>› We are actively pursuing opportunities throughout BMO to enhance the accessibility of our products, services, and channels.</li> </ul>

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# Glossary

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**Accessible Canada Act** – is legislation that was enacted with the goal of removing barriers and achieving accessibility within areas of federal jurisdiction on or before January 1, 2040. It came into force on July 11, 2019.

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**Barrier** – under the *Accessible Canada Act*, “barrier means anything – including anything physical, architectural, technological or attitudinal, anything that is based on information or communications or anything that is the result of a policy or a practice – that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation.”

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**Disability** – under the *Accessible Canada Act*, “disability means any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment – or a functional limitation – whether permanent, temporary or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person’s full and equal participation in society.”

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**BMO Financial Group**  
Accessible Canada Act Progress Report  
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