

Accessible Canada Act Progress Report 2025

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BMO Financial Group

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Message from leadership

As we enter the third year of our Accessibility Plan, BMO remains committed to playing our role for zero barriers to inclusion in our business, as part of our purpose to Boldly Grow the Good **in business and in life.**

In 2023, we published our first accessibility plan in alignment with the **Accessible Canada Act**. Last year, we shared our first progress update and this year we are pleased to provide another update on our progress and next steps.

A key milestone this year was enhancing our internal governance of accessibility. We are continuing to work with our internal and external partners to maintain an accessibility-minded culture and to develop the expertise needed to reach our goals.

Looking ahead, we are continuing to prioritize our compliance goals while improving the employee and customer experience to advance our zero barriers to inclusion purpose commitment. We will continue to seek ways to embed accessibility in how we do

business. Our goal is to make accessibility a part of how we attract and retain talent and how we serve our customers and communities, every day.



Michael Torrance

Chief Sustainability Officer

BMO Financial Group

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

Webform

bmo.com/main/about-bmo/accessibility

Email

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 providers trained to relay communications through text relay services or video relay services.

Mail

Enterprise Accessibility Office

First Canadian Place – 9th floor,

100 King St. West, 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.

Complaint Handling Process Customers looking to file a formal complaint can refer to BMO's Customer Complaint Handling Process for more information.

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.

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

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

Outcome of consultation process

Internal employee consultation

Participants

- 283 employees participated in the internal accessibility survey.

- Participants from across multiple functions and job grades.
- Participants represented all provinces across Canada. The majority were from Ontario (65%), Western Canada (21%), Quebec (9%) and Nova Scotia (3%).

Process

BMO conducted a survey in early 2025 to gather feedback from employees about their experiences related to accessibility in the workplace. The survey focused on areas aligned within the **Accessible Canada Act**, such as physical spaces, information technologies, communications and employment. Participants were also asked to provide feedback on accessibility-related concerns or suggestions for improvement beyond what was listed in the survey questions.

Findings

Positives:

- Employees responded favourably to BMO's ongoing efforts to advance accessibility in the workplace.
- Awareness and effectiveness of BMO's Accessibility Hub improved, and employees continued to find key resources and supports helpful in their day-to-day

work.

Opportunity for improvement:

- Interest in expanded scope of accessibility topics covered in employee communications that enhance the employee experience.

External customer consultation

Participants

- 75% of participants were existing BMO customers.
- Participants represented a wide range of individuals with disabilities, including those with cognitive, physical, vision and hearing-related disabilities.
- Participants came from various provinces across Canada, including Ontario (51%), Western Canada (37%), Quebec (7%) and Nova Scotia (5%).
- Ages ranged from 26 to 65+ with the highest concentration between 45 and 54 years old (27%).

Process

BMO engaged the Return on Disability Group to conduct BMO customer experience consultations to assess the banking experiences of people with disabilities. The consultations, which included BMO clients and non-clients, were held in early 2025 and

looked at different ways people interacted across multiple channels, including digital banking, mobile app use, website navigation, mortgage pre-approvals and Tax Free Savings Account (TFSA) investment journeys.

Participants were assigned tasks and asked to complete specific journeys, followed by guided discussions to gather detailed feedback and opportunities for improvement.

Findings

Positives:

- Participants rated the mobile app highly for ease of use with tasks such as balance checks and transfers. The app's friendly tone and cheque deposit feature were also viewed positively by most.
- Participants found the website effective for completing more complex banking tasks. Improvements to the structure and contrast of fonts were noted as enhancing overall usability and accessibility.
- The mortgage pre-approval process was found to be easy to navigate for most participants.

Opportunities for improvement:

- Screen-reader users reported challenges and

provided suggestions for improving menu customization and enhancing search to support easier navigation and clearer guidance for certain products and services.

Our goal

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

Action areas at-a-glance

BMO's ongoing focus on accessibility continues to drive progress in creating barrier-free experiences for employees and customers. In alignment with the **Accessible Canada Act**, we remain committed to advancing key initiatives while exploring new opportunities for improvement through feedback and consultations.

Employment

We continue to create a more accessible and inclusive workplace where everyone is treated with respect and supported in reaching their career development goals.

Built environment

We seek to design and build spaces that are accessible to everyone.

Information and communication technologies

We seek to make our digital content accessible for both employees and customers, enabling equal access to important information and ways of communicating.

Communication, other than information and communication technologies

We aim to enhance communication with all our employees and customers by seeking to make important information readily accessible to everyone and easy to understand.

Procurement of goods, services and facilities

We aim to eliminate barriers by including accessibility as a key consideration in the procurement of products, services and technologies.

Design and delivery of programs and services

We seek to offer accessible products and services that all customers can access with ease and dignity.

Transportation

BMO recognizes that there are barriers related to transportation for persons with disabilities and will continue to review and assess accessibility needs as part of our ongoing review process.

Employment

We continue to prioritize fostering an accessible and inclusive workplace where employees are treated with respect and supported in reaching their career development goals.

Areas identified for improvement

Within the organization, awareness of accessibility policies and available accommodations varies among employees and people managers. To address this, steps are being taken to clarify processes and enhance access to relevant information.

Efforts are also being focused on strengthening support for non-apparent disabilities by expanding available resources and broadening organizational awareness.

Some employees may be reluctant to share disability-related information with recruiters, managers or colleagues. The organization continues to focus on fostering open, informed conversations particularly in the context of recruitment and career development.

Opportunities:

- Increase awareness of the accessibility policies and/or the types of accommodations offered for employees at BMO.
- Increase awareness of non-apparent 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.

Our way forward: Short term

- Continuously update BMO's employee Accessibility Hub – a centralized source of accessibility-related resources for employees, including training, policies, key contacts and guidance on how to request accommodations and provide feedback.

Progress:

- The Accessibility Hub continues to serve as a key internal resource, providing employees with tools and materials to support accessibility. Plans are underway for further enhancements as part of our ongoing commitment to continuous improvement.

Our way forward: Medium term

- Provide more proactive communication about accessibility policies and offerings.
- 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.

Progress:

- We launched a project to review and refresh recruitment content, including a redesign of core documents to better align with emerging accessibility

standards, under the Accessible Canada Act.

- We refreshed our annual recruitment training to include more detailed information on BMO's accommodation process so that recruiters can better support candidates who have accommodation needs.
- We adjusted existing accommodation processes to make it easier for recruiters to apply on behalf of both internal and external candidates, enhancing our ability to support this type of accommodation request.
- All BMO employees, including contract and contingent staff, are required to complete the Ethics, Legal and Compliance Training (ELCT) upon hire and annually. The training includes a module on accessibility to educate employees on BMO's obligations under the Accessible Canada Act and drive awareness of accessibility-related scenarios they may come across in their roles.
- We collaborated with our ELCT vendor to identify and implement accessibility improvements within BMO's learning platform. Enhancements focused on audio and visual accommodations to support employees with diverse learning needs.
- We expanded accessibility features in Microsoft and Adobe products to create a more inclusive and consistent learning experience. As part of this effort,

we enhanced text-only versions of courses to better support employees who benefit from alternative formats.

- We engaged course owners and learning partners to assess and address accessibility barriers in existing training programs. Updates included enhancements to audio, video and closed captioning features to support a wider range of learners.
- We engaged BMO Without Barriers Employee Resource group to gather insights on how to enhance the accessibility and inclusivity of enterprise courses. This collaboration helps identify opportunities to refine course content and delivery methods.

Our way forward: Long term

- Formalize mentorship programs to support employees with disabilities with career development.

Progress:

- We refined our approach to sourcing partnerships to strengthen talent outreach with partners and attract a wider range of candidates.
- We completed our first engagement with Specialisterne, a global organization that focuses on harnessing the talents of people on the autism spectrum and other neurodivergent people.
- We continue our commitment to attending Mayfest,

an annual deaf expo and culture celebration, and will be delivering Recruitment Sourcing team training for BMO participants leading up to the event.

Our way forward: Ongoing

- Continue to conduct regular reviews of our accommodations program, in consultation with employees with disabilities, to identify opportunities to improve our support.

Progress:

- We updated our annual employee survey to gather more targeted feedback from employees who have used the Workplace Accommodations Program. The revised format and questions made the survey more user-friendly and reflective of employee experiences.

Built environment

Designing branches and offices that are accessible to all remains a priority. Our Corporate Real Estate team continues to improve accessibility in our physical spaces. We value employee and customer feedback and use it to refine 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 are expected to 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 the 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.

Our way forward: Short term

- Continue to have new locations assessed by persons with disabilities for opportunities to increase accessibility.

Progress:

- When planning renovations of leased and owned locations, spaces are designed to meet current accessibility standards, codes and specific jurisdictional requirements.
- When completing significant renovations of existing properties, we address accessibility gaps in customer-facing and employee spaces within reasonable limits.
- Areas of particular importance include entrances, and access to services such as ATMs, service counters, offices, washrooms and supporting staff spaces.

Our way forward: Medium term

- Continue to engage our external design consultant to assess the latest industry standards and best practices against our current standards and determine next steps.
- Invest in design solutions and technologies that improve accessibility and remove physical barriers.

Progress:

- We conducted a gap analysis of our current internal accessibility guidelines to identify new recommendations for future updates to BMO's accessibility standards.

- We continued to review the Canadian Standards Association recommendations as well as updates issued for the National Building Code and provincial building codes, including the Ontario Building Code, to identify accessibility improvements relevant to our retail and corporate spaces.
- Updated building codes that require immediate adoption are incorporated into our current design standards on an ongoing basis. Recommendations that are not mandated by building codes are currently being assessed for feasibility of adoption.
- Our accessibility standards for new projects have evolved to provide more barrier-free visitor and employee spaces that are accessible and inclusive for all individuals.
- Adopted updates include, but are not limited to, the following:
 - Wave-open or dual door operators at all main entry points and barrier-free washrooms
 - Sit-stand stations for offices and work-stations including select retail customer-facing services
 - Accessible lighting levels with dimming
 - features for select applications
 - Wayfinding signage with tactile and braille design
 - Larger door openings for meeting and office spaces
- We continue to engage in reviews of spaces with

partners such as our BMO Without Barriers Employee Resource Group to help inform and evolve the application of accessible design standards within our built environment and technology offerings.

- We aim to implement user feedback by working with key partners – such as landlords, employees, customers and consultants – as needed to address and eliminate accessibility gaps within our corporate and retail spaces.

Our way forward: Long term

- 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.
- Continue to work with landlords and government authorities where we lease space, to find opportunities to remediate potential accessibility barriers.

Progress:

- Since 2019, we have been updating our corporate offices in Canada to align with BMO's accessible design guidelines, incorporating relevant building code requirements and practices that meet or exceed minimum accessibility standards. These

improvements are made when locations are being renovated as part of the Real Estate strategy for corporate offices.

- We continue to update our branch portfolio each year, addressing opportunities through renovations ranging from minor upgrades to major construction. Where the scope of renovation allows, spaces are updated to current accessible design standards.
- The remaining office and retail branch portfolio will continue to be assessed for accessibility improvements in alignment with real estate strategies for the Corporate Real Estate and Physical Retail Channels Network.
- We will continue to work with landlords to meet building code requirements and/or remediate accessibility barriers such as incorporating new tactile and colour-contrasting elements to improve visibility and access into our retail and corporate spaces.

Information and communication technologies

We continue to prioritize digital accessibility to support access to information and communication tools for all employees and customers.

Through our workplace accommodation program, employees can access adaptive technologies to support their needs, reinforcing our commitment to an inclusive and barrier-free workplace.

Our technology accessibility standards guide the development of digital products, programs and applications, helping to embed accessibility across BMO's digital landscape.

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 and employees are familiar with the process to request adaptive technologies, and 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.

Our way forward: Short term

- Update existing training and resources for managers and employees to promote awareness of the process to request adaptive technology and obtain technical support, including on the Accessibility Hub intranet page.
- Refresh the Technology Accessibility Standard to be adopted enterprise-wide and governed centrally for all technology, business and vendor managed applications.

Progress:

- We launched a SharePoint site dedicated to providing adaptive and assistive technology support to users, managers, developers and project teams. The site provides resources on standards, processes and key contacts. Learning resources are regularly updated to enhance technical support.
- We drafted a technology accessibility standard to align applications, websites and documents with the Web Content Accessibility Guidelines under the Accessible Canada Act's evolving information communication and technologies regulatory requirements. The standard is currently undergoing internal reviews and approvals.

Our way forward: Medium and long term

- Conduct a full review of employee platforms, tools and systems to assess potential gaps against the new standards and enhance where needed.

Progress:

- Work is ongoing to advance the technology accessibility standard to establish centralized ownership and easy access, while aligning with evolving industry standards and practices.
- We continue to evaluate vendors for their expertise in digital accessibility assessment and enhancement. Planning is underway to identify partners to support our ongoing accessibility improvements.

Communication, other than information and communication technologies

We continue to gather insights through consultations with people with disabilities to help us improve communication and better meet the diverse needs of our employees and customers.

Areas identified for improvement

While we have implemented interpretive services for individuals who are Deaf, deafened or hard of hearing, there is an opportunity to drive greater awareness and improve across the organization.

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.

Customers can encounter information barriers with communications heavy in financial jargon.

Opportunities:

- Sign language interpreters are available for individuals who use sign language. There is an opportunity to further drive awareness and ensure individuals know how to access this service as well as text relay services and video relay services.
- Make visual or written communications for employees and customers more accessible, including by using plain language.
- Expand the availability of alternative formats for all customer documents.

Our way forward: Short term

- Formalize process to fulfill ad hoc requests for alternative formats of all customer documents provided by BMO.

Progress:

- The intake process for requesting alternative format statements and brochures remains in place and provides customers with accessible options to access various documents.
- As part of our ongoing efforts to enhance accessibility, any requests for online PDFs submitted through the BMO Design intake portal are made accessible in compliance with the Web Content Accessibility Guidelines.

Our way forward: Medium term

- Develop standards on providing sign language interpreting, closed captioning and/or transcriptions at all large BMO events and town halls. Share materials in advance where possible so that employees can review at their own pace and leverage adaptive technologies where needed.

Progress:

- Employees can submit requests for sign language interpreter services through a standardized intake

process.

- We are exploring a pilot and potential enhancements for instant access to interpretative services with a select group of employees.

Our way forward: Long term

- Update internal design standards to add considerations around increased contrast, font size, etc., to support our colleagues with visual disabilities.

Progress:

We have made the following changes to internal design standards to support accessibility improvements for projects managed by our in-house creative team:

- Developed a mandatory accessibility checklist and attestation as part of accessible PDF design deliverables.
- Created comprehensive documentation to guide teams in producing accessible PDF documents.
- Delivered presentations on digital accessibility to the Marketing Leadership team and at a Business to Business (B2B) Marketing, Events and Design Town Hall.
- Implemented automated accessibility scanning software as part of quality assurance for website development.

- Established a partnership with a third-party vendor to support manual accessibility audits and remediation.
- Developed Brand Guidelines documentation to communicate the importance of readability and accessibility in supporting colleagues and customers with visual disabilities.
- Collaborated with teams across the enterprise to incorporate brand readability and accessibility considerations in their collateral.

Our way forward: Ongoing

- Continue to enforce the application of plain language principles as part of verbal and written information.

Progress:

- We continue to implement an Editorial Accessibility Guideline that advises communicators on how to improve accessibility of communications for employees and/or customers. All communications across internal and external enterprise channels are reviewed through this lens before being published.
- We socialize best practices to make communications more accessible. Our Editorial Accessibility Guideline is hosted on the Accessibility Hub, which is regularly updated and highlighted in communications, and houses employee resources including tips to make

communications more accessible.

- We leverage notable dates, such as Global Accessibility Awareness Day and Disability Employment Awareness Month, as opportunities to showcase accessibility at BMO, including highlighting resources available to employees, such as the Accessibility Hub.
- We continue to explore communications opportunities with Corporate Communications teams and Employee Resource Groups, such as BMO Without Barriers, to promote the tools and resources that are available to employees and customers.
- BMO's Marketing team hosted a training session on accessible marketing practices, with actionable tips on how marketers at BMO can improve accessibility of marketing assets. There were 125 attendees and meeting materials were shared with 500 marketing employees.
- As part of our ongoing focus on accessibility in marketing, we are exploring team-specific training opportunities to further improve our practices.

Procurement of goods, services and facilities

We aim to integrate accessibility into our procurement processes, by embedding accessibility considerations into sourcing activities for products, services and technologies. Vendors are provided with our expectations regarding accessibility standards, as part of our commitment to removing barriers in our sourcing process.

Areas identified for improvement

Potential opportunities exist to enhance our processes for earlier identification of accessibility requirements, and for evaluating vendor products and services by the lines of business.

Additional efforts may be needed to verify that products, services, channels and technologies procured from third-party vendors are 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.

Our way forward: Short term

- 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 lines 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.

Progress:

- Ongoing assessments continue to support the optimization of controls and decision-making processes, so that accessibility considerations remain a key priority and align with industry standards.
- Accessibility continues to be embedded in procurement practices, with resources such as a list of accessibility experts available on the Accessibility Hub, to support sourcing and procurement decisions. Efforts to promote and build awareness of these resources are ongoing.

- Accessibility language has been integrated into our new contract template and is also available in our sourcing contract lifecycle management tool to support procurement processes.

Design and delivery of programs and services

We continue to enhance accessibility across our products and services so that all customers can bank with dignity and ease. Over the past year we have reinforced our commitment to providing equal access across all service channels.

Our Accessible Customer Service Policy remains in place, and we continue to provide annual accessibility training for employees in customer-facing roles to equip them with the skills to better serve customers with disabilities. Customers have multiple accessible options, including in-branch services, telephone banking, ATMs, and our online and mobile banking platforms.

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 could be in place to collect accessibility feedback as part of the product lifecycle.

Opportunities:

- Consider 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.

Our way forward: Medium term

- Embed accessibility considerations and feedback in the product development lifecycle, keeping it top of mind as we build new products and services.

Progress:

- We continue to make accessibility improvements to our Online Banking for Business digital platforms to align with digital accessibility standards. Efforts are underway to meet evolving industry standards and practices.
- Our Design and Development teams for Online Banking for Business integrate accessibility checklists

and reference materials early in the development process to align with digital accessibility standards. This approach helps identify and address potential accessibility issues before deployment, reducing defects and improving digital accessibility.

- Testing teams in key areas of the business follow a three-pronged approach to accessibility testing, including manual testing, automated testing and testing with assistive technologies such as Job Access With Speech (JAWS).
- These methods help align digital banking experiences with requirements under the Accessible Canada Act.
- We initiated a project to remediate accessibility issues identified for the Online Banking for Business digital experience. Most identified defects have been resolved, with remaining remediations scheduled for completion in the next fiscal year.
- Accessibility is a key factor considered in our technology release gating processes.

Our way forward: Long term

- Continue to assess options for more accessible premium credit cards.

Progress:

- We continue to explore opportunities to enhance our premium credit cards as part of our ongoing effort to

identify and remove barriers to accessibility.

Our way forward: Ongoing

- Continue to use plain language wherever possible to help customers easily understand information related to the products and services they select.
- Identify further opportunities across BMO to create more barrier-free products, services and channels for customers with disabilities.

Progress:

- We continue to prioritize using plain language wherever feasible to enhance accessibility and improve clarity in communications. Efforts continue to make content clear, inclusive and easy to understand.
- We provide ongoing education for designers and developers to keep them informed about updates to accessible design practices. These efforts keep teams up to date on evolving standards.
- We enhanced our Accessible Customer Service Policy to reinforce our commitment to welcoming service animals in our branches. As part of this update, we installed new signage across Canadian branches to indicate that service animals are welcome and to promote awareness across our branches.

Glossary

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.

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.”

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.”

The End