# **BMO Accessibility Plan**

Transcribed 2023 into 18pt Reflowed Large Print

In 1 Volume
Large Print pages 1-41
Print pages 1-22

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# **BMO Accessibility Plan**



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### A. Introduction

#### A.1. About BMO<sup>1</sup>

- Established in 1817, BMO Financial Group is the eighth largest bank in North America by assets, with total assets of \$1.14 trillion. We are highly diversified, providing a broad range of personal and commercial banking, wealth management, global markets and investment banking products and services. We serve twelve million customers across Canada and the United States, and in select markets globally, through three integrated operating groups.
- BMO Financial Group is building a digitally enabled, future-ready bank with leading efficiency, profitability, and loyalty — all powered by a winning

<sup>&</sup>lt;sup>1</sup> In this Accessibility Plan, we, us, our, Bank and BMO mean Bank of Montreal and its Canadian operating subsidiaries.

culture and driven by our Purpose. Our strategy connects our growth to driving positive, lasting change in the world.

**1817** serving customers for 205 years and counting **\$1,251B** in total assets

8<sup>th</sup> largest bank in North America by assets We serve 13 million customers globally

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## A.2. BMO's Accessibility Plan

This Plan fulfills the Accessibility for Ontarians with Disabilities Act (AODA) and the Accessible Canada Act (ACA), and their regulations' requirements for provincially and federally regulated entities to prepare and publish their Accessibility Plans.

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# A.3. BMO's Commitment to Accessibility

#### A.3.1. Message from Leadership

BMO's Three-Year Accessibility Plan boldly builds on BMO's progress to remove barriers to accessibility for

our customers so that they can make real financial progress, and to continue to provide our team members with an inclusive and equitable work environment that allows them to showcase their talents and achieve their full potential. The feedback we've received and will continue to seek from the lived experiences of our employees and customers has informed and will continue to inform our actions to achieve a barrier-free Canada by 2040. We are committed to Boldly Grow the Good, in business and life, and to exceptional customer experiences.

Eld - Anhalore

We are committed to providing employees an inclusive and equitable work environment that allows them to showcase their talents and achieve their full potential.

#### **Ernie Johannson**

Group Head, North American
Personal and Business Banking

#### **Mona Malone**

Chief Human Resource Officer

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#### A.3.2. BMO's Commitment to Inclusion

BMO is committed to building a workplace that reflects the diversity of the customers and communities we serve and contributing to an inclusive society. Zero Barriers to Inclusion is our multi-year strategy to accelerate initiatives that increase equity, equality, and inclusion for all. We're focused on providing equitable access to opportunities and enabling progress for our colleagues, our customers, and the communities we serve. This includes identifying and removing barriers that impact employees and customers living with disabilities. We are dedicated to meeting the unique needs and addressing the varied expectations of employees and customers by creating inclusive and accessible work environments, products, services, and resources. BMO's Accessibility Plan represents our commitment to meaningful actions in support of creating a barrier-free Canada under the Accessible Canada Act and other provincial accessibility legislations.

# A.4. Alternative Formats of BMO's Accessibility Plan

To request a copy of BMO's Accessibility Plan in an alternative format, please email us at accessibility.accessibilite@bmo.com

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# **B. BMO's Feedback Process and Contact Information**

# **B.1.** Overview of BMO's Accessibility Feedback Process

BMO values the voices of our customers and employees and is committed to reviewing any feedback received to improve our products, services, channels, technologies, and working environments.

BMO's Accessibility Office is designated to receive feedback on behalf of BMO for both employee and customer accessibility related feedback. BMO welcomes feedback about:

 BMO's Accessibility Plan and the manner in which BMO is implementing our Accessibility Plan.  The barriers encountered by BMO's employees, customers, and any other persons that interact with BMO.

#### **B.2. How Customers Can Submit Feedback**

BMO customers may provide feedback through any of the following channels:

#### 1. Webform:

bmo.com/main/about-bmo/accessibility

#### 2. **Email:**

accessibility.accessibilite@bmo.com

#### 3. **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 (MRS) or video relays (VRS).

#### 4. **Mail:**

Accessibility Office BMO Place – 4<sup>th</sup> floor 33 Dundas St. West, Toronto, ON, Canada M5G 3C2 5. **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.

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Feedback received through BMO's other existing channels will also be provided to our Accessibility Office on a regular basis for review as part of our overall accessibility feedback process:

- Complaints: Accessibility related complaints
  received across all levels of the complaints
  process. For more details, please see our Customer
  Complaint Handling Process:
  www.bmo.com/main/about-bmo/complainthandling-process
- 2. **Net Promoter Score:** Accessibility feedback received through Net Promoter Score surveys sent to our customers.

- 3. **Corporate Secretary's Office:** Accessibility feedback received through shareholder communications shared with the Corporate Secretary through email or mail.
- 4. **Social media:** Accessibility related feedback shared by customers on any of BMO's social media channels (e.g., Twitter, Instagram, Facebook, LinkedIn).

## **B.3. How Employees Can Submit Feedback**

BMO employees may also provide feedback/anonymous feedback through the below listed internal channels. For more details on these internal resources, employees are encouraged to visit BMO's internal accessibility hub.

- Speak Up!: A confidential, anonymous, and thirdparty resource to receive employee feedback and concerns safely and securely.
- 2. **Human Resources Centre:** Accessibility feedback can also be sent to our Human Resource Centre, through the following channels:
  - a) Web chat
  - b) eService Request
  - c) Phone

- d) Fax
- e) Mail
- f) Alternate Accessible Format

#### **B.4. How Feedback Will Be Used**

All feedback received through the channels listed above will be reviewed and addressed according to our established process including any requests that require a response or remediation. Additionally, the feedback will be shared with the Accessibility Office, and centrally reviewed to inform future iterations to our Accessibility Plan, upcoming progress reports, and our work efforts to help BMO achieve zero barriers to inclusion. Written acknowledgement will be provided to all non-anonymous complaints via the channel through which the feedback was received.

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# C. Consultations with People with Disabilities

In line with the principle of "Nothing without Us", as outlined by the **Accessible Canada Act**, we consulted with our customers and employees with disabilities in

the development of our Accessibility Plan, to understand the barriers they face and how we can best address them. All survey results were aggregated anonymously and shared with the Accessibility Office and internal working groups, so that tangible action plans could be developed to address the barriers identified and prevent future barriers.

### C.1. Internal Employee Consultations

We conducted a series of internal employee consultations to capture the lived experiences of our employees with disabilities. The consultations were through:

- Surveys: Completely anonymous and confidential short surveys consisting of questions covering the different action areas under the Accessible Canada Act, and barriers faced by employees with different types of disabilities.
- 2. **Focus groups:** Focus groups led by independent facilitators from BMO's Institute for Learning. Focus groups were held virtually with participants from across Canadian branches and offices. Focus group sessions were offered in both English and French, and accommodations such as American Sign Language (ASL) interpreting were provided

upon request.

All questions asked as part of the focus groups and surveys were developed in partnership with disability consulting experts from D(if) Labs, BMO's Internal Diversity, Equity and Inclusion Team, and the BMO Without Barriers Employee Resource Group.

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#### C.2. External Customer Consultations

To capture the lived experiences of persons with disabilities as they interact with financial services institutions and the products and services we offer, we partnered with industry experts from D(if) Labs. D(if) Labs is an offering of the Return on Disability Group, which is an insights and design firm helping private and public sector clients better support customers and employees with disabilities. The focus groups were attended by more than 80+ persons with disabilities, who are part of D(if) Lab's membership.

8 focus groups were held, each covering one of the following topics:

- Personal banking
- 2. Business banking

- 3. Mortgages
- 4. Insurance (home and auto)
- 5. Mobile banking apps
- 6. Investments
- 7. Loans
- 8. In-Person banking

For barriers identified, D(if) Labs provided BMO with recommendations based on industry trends and best practices.

# C.3. Employee Resource Group – BMO Without Barriers (BWB)

BMO Without Barriers offers an opportunity for employees with visible and non-visible disabilities to get involved, and help the enterprise foster a culture that values diversity and maximizes the potential of all individuals. The group represents BMO's commitment to creating an inclusive work environment by helping its employees recognize and share their diversity.

BWB and its members were actively engaged as part of the development of BMO's Accessibility Plan. 10

# C.4. Engagement with Advocacy Groups and Industry Experts

BMO is always open to feedback and suggestions from our community. During the development of our Accessibility Plan, we took into consideration feedback received from the following community groups:

- Alliance for Equality of Blind Canadians
- Canadian Association of the Deaf

We also reviewed research reports from the following organizations:

- Regroupement des aveugles et amblyopes du Québec (RAAQ)
- Canadian Association of the Deaf
- D(if) Labs as part of the Return on Disability Group
  - BMO participates in quarterly forums facilitated by D(if) Labs and closely reviews the industry research provided through these forums for opportunities to improve our Accessibility programs and offerings.

#### C.5. Additional Sources Consulted

We also collected and reviewed customer feedback received across other BMO channels as part of the development of our Accessibility Plan. These include feedback received over the past 1-2 years from the following BMO channels:

- Complaints channels (as part of the complaints process developed under the guidance of the Financial Consumer Protection Framework)
- Net Promoter Score Surveys
- Social media channels

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### **D. Action Areas**

#### **D.1 Introduction**

BMO's Accessibility Plan outlines our plans to build towards a barrier-free Canada and aligns with the focus areas of the **Accessible Canada Act**. Each focus area indicates the initiatives, programs, and services we currently have in place, the opportunities for improvement through feedback and consultations, and finally our path forward/commitment to removing and

preventing new barriers impacting our customers and employees.

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## **D.2 Employment**

#### What We Have In Place Today

BMO is committed to having a diverse workforce and an inclusive, supportive workplace where everyone is treated with respect across each stage of their career at BMO. As of 2022, persons with disabilities represent 5.6% of our workforce across Canada and the United States.

Talent attraction/Recruitment: BMO is committed to attracting diverse talent.
 Accommodations are available for applicants and referenced in job postings. Additionally, we're committed to providing reasonable accommodations for applicants with disabilities throughout the entire recruiting process. We work with community partners to broaden our reach within disabled communities, better match job seekers with disabilities to open roles, and to understand applicant needs. In Canada, we are in

- the process of launching our partnership with a third party, which will help us generate a recruitment channel of diverse candidates and connect with diversity and inclusion employment programs that focus on Persons with Disabilities, Visible Minorities, and Women.
- 2. Hiring: At BMO, we believe in the importance of providing equitable employment opportunities. Additionally, we are committed to providing accommodations for job candidates and employees with disabilities throughout the entire recruiting process, in accordance with governing laws. Our recruiters are trained on where to go for workplace accommodation support.
- 3. **Employment:** We aim to provide a barrier-free work environment for all our employees. Accommodating employees with disabilities is an important part of our commitment to an inclusive, supportive, and accessible workplace. We have a dedicated team within our Human Resources department that manages the assessment, coordination, and fulfilment of our accommodations policy. Our Workplace Accommodation Advisor works with employees and managers to respond to workplace accommodation needs quickly and efficiently. Managers and

support team members work proactively to prevent and remove accessibility barriers to performance, career development or redeployment.

People managers, BMO's Disability Recovery Support team, and the employee's medical practitioner also develop individual accommodation and return-to-work plans for employees returning to work from a disability leave.

Employees with disabilities are also able to leverage the support of BMO Without Barriers (BWB), our Employee Resource Group that celebrates and supports people living with visible and non-visible disabilities, and their allies. BWB provides community building activities such as training, networking and career networking opportunities for its members and the broader employee community.

Initiatives like Mental Health Awareness Month campaigns are facilitated at BMO to collectively focus on mental health, and raise awareness of issues related to mental health, provide support, educate others, and encourage people to learn, talk, and reflect on the topic.

Finally, we require accessibility training to be completed by all BMO employees, volunteers, and third

parties who deal directly with our customers. The training provides tips on building an inclusive, accessible, and barrier-free environment, education on various types of visible and non-visible disabilities, and information on how to request accommodations and support.

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#### **Opportunities for Improvement**

Findings from our consultations and internal assessment review identified the following barriers to accessibility as they relate to employment, including:

- Not all employees and people managers are aware of the accessibility policies and/or the types of accommodations offered.
- Employees and people managers sometimes find the process to request accommodations to be confusing or complex.
- Employees with disabilities are sometimes uncomfortable disclosing their disabilities to recruiters, managers, or colleagues, and want to feel comfortable asking for help and having more transparent conversations, including those relating to career development.

 More focus can be placed on non-visible disabilities, decreasing associated stigma (including real or perceived), and sharing more resources/support tools.

#### **Our Way Forward**

Work is well underway and/or planned to remediate the identified barriers. Progress against each will be reported over the next 3 years, including:

- Continue to conduct regular reviews of our accommodations program, in consultation with employees with disabilities, to identify opportunities to improve our support (on-going).
- Creation of and continuous updates to an employee Accessibility Hub that will act as a centralized source of accessibility related resources, including training, policies, key contacts, and guidance on how to request accommodations and provide feedback (short term).
- More proactive communication about accessibility policies and offerings (medium term).
- Update 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 (medium term).
- Formalize mentorship programs to support employees with disabilities with career development (long term).

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#### **D.3. Built Environment**

#### What We Have In Place Today

It's important that our branches and offices are accessible to everyone. For all new builds we follow provincial regulations such as the Accessibility for Ontarians with Disabilities Act, 2005 and the Integrated Accessibility Standards Regulation (collectively "AODA") for Design of Public Spaces Standards. We also follow National and Provincial Building Codes.

To obtain construction permits, all new builds and renovations must meet or exceed local accessibility standards. Our Corporate Real Estate department works closely with Legal & Regulatory Compliance, Human Resources, and our building partners to ensure our spaces are fully accessible.

Feedback from employees and customers with disabilities is taken into consideration when developing our accessible design standards.

#### **Opportunities for Improvement**

Findings from our consultations and internal assessment review identified the following barriers to accessibility, as they relate to built environment, including:

- The interior design, layout, and amenities of our built environments are not always optimized for accessibility.
- The exterior environments of certain branches (e.g., parking spots, ramps, and entrances) can be further optimized to reduce mobility related barriers.
   However, oftentimes leased properties are subject to external factors that limit opportunities to optimize for accessibility.
- Ergonomic furniture and devices are not available at all locations.
- Some older branches and offices require renovations to provide our employees and customers with greater accessibility.

#### **Our Way Forward**

Work is well underway and/or planned to remediate the identified barriers. Progress against each will be reported over the next 3 years, including:

- 1. Continuing to have new locations be assessed by persons with disabilities for opportunities to increase accessibility (short term).
- Continuing to engage our external design consultant to assess the latest industry standards and best practices against our current standards, and determine next steps (medium term).
- 3. Investing in design solutions and technologies that improve accessibility and remove physical barriers (medium/long term).
- 4. In alignment with our Corporate Real Estate strategies, continuing to refresh and renovate older branches and offices to have our updated accessibility standards be met across the majority of our locations (long term).
- 5. Continuing to work with landlords and government authorities where we lease space, to find opportunities to remediate any potential accessibility barriers (long term).

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# D.4. Information and Communication Technologies

#### What We Have In Place Today

BMO is committed to making our digital content and technologies accessible for both employees and customers to enable equal access to important information and communication technologies.

Employees at BMO have access to adaptive technologies as part of our accommodation program, as we are committed to providing an equitable and supportive workplace unimpeded by barriers. We also maintain various technology standards, including accessibility related guidance managed by different teams across BMO, that govern our digital technology programs, products, and applications.

We aim to make our websites and mobile apps accessible to every customer. Since January 1, 2014, BMO has been working towards developing all new webpages and web content on our websites in conformance with Web Content Accessibility Guidelines (WCAG) 2.0, Level A.

Since the introduction of WCAG 2.1, we have been testing new websites, mobile apps, and customer

applications to WCAG 2.1 Level AA, and continue to update as needed when defects are identified. We also take steps to make sure all publicly available information is made accessible upon request.

### **Opportunities for Improvement**

Findings from our consultations and internal assessment review identified the following barriers to accessibility as they relate to Information and Communication Technology, including:

- Decentralized approach and oversight of the accessibility technology standard have led to inconsistent adoption and practices across technology and business teams managing employee or customer facing platforms, tools, and systems.
- Not all managers or employees are aware of the process to request adaptive technologies and where to go to receive technology support when required.

#### **Our Way Forward**

Work is well underway and/or planned to remediate the identified barriers. Progress against each will be reported over the next 3 years, including:

1. 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 new Accessibility Hub Intranet page (short-term).
- 2. Refresh the Technology Accessibility Standard to be adapted enterprise wide and governed centrally for all technology, business, and vendor managed applications (short-term).
- 3. A full review of employee platforms, tools, and systems to assess potential gaps against the new standards and remediate where needed (medium/long-term).

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### **D.5.** Communication, other than ICT

#### What We Have In Place Today

We believe everyone should have equal access to important information. We're always striving to do better – we continually consult with people with disabilities to get insights about their specific needs to help us better communicate with all our employees and customers.

Ways that we are making communication more

accessible for our customers and employees include:

- 1. **Sign language interpreting:** We can arrange for our Deaf, deafened and hard of hearing customers to get assistance from a professional sign language interpreter (ASL for English or LSQ for French) in branch, free of charge, with 3 days advanced notice. We also support alternative ways of communicating at our branches, including:
  - Note and/or message writing
  - SMS (text) message
  - Using a customer's family member or friend as an interpreter
  - Engaging a customer's preferred sign language interpreter

Sign language accommodations are also available for all employees.

- 2. **Alternative format documents:** We offer important customer information in alternate formats to make it more accessible. On request, we can provide customer documents in alternate formats (in English and French). Available alternative formats include:
  - Large print: Our large print documents use
     Arial 16-point font. They also use extra spacing

- and improved contrast.
- Braille: We offer Braille Grade 1 or Grade 2 documents.
- Audio: Audio formats are recorded on a CD or USB stick with a professional narrator reading the text.
- E-text: E-text converts text to electronic files for customers who don't have access to web or email. All graphics, including photos, charts and illustrations, are explained using text and stored electronically.
- Accessible pdf: Formatted for use of accessibility features to allow assistive technology (an application that helps with reading information on screen) to interact effectively with the document.

For documents where alternative format documents are not available, we can help our customers with disabilities review documents/information by:

- Offering to read documents/information over the phone or in person.
- Helping to guide them through online banking.
   By using an online solution, customers can magnify information using their computer or use screen reading technology (such as JAWS).

Enlarging documents/information using a photocopier.

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- 3. **Emergency Response Information:** BMO is committed to providing our customers with publicly available emergency information in accessible formats when requested. We also provide individualized emergency response information to employees with disabilities when needed.
- 4. **Accessible Cheques:** Two cheque products are available for customers with disabilities:
  - Large print format cheques: The customer's name, address and the cheque line will appear in a large font.
  - Perforate cheques: cheques that feature oversized print, black line work on a white background for maximum contrast, and perforated lines to provide tactile guides to assist with writing. Accessories including transaction register books, vinyl covers, deposit slips, and withdrawal slips are also available.

### 5. Telecommunications Relay Services: At BMO

we allow people who are Deaf, deafened, or hard of hearing to communicate with us by having specially trained operators who act as an intermediary.

All employees are also trained on best practices for interacting and communicating with colleagues and customers with various types of disabilities, as part of our annual accessibility training. We also give written accessibility training materials to third parties who deal directly with our customers and take steps to ensure they complete the training.

#### **Opportunities for Improvement**

Findings from our consultations and internal assessment review identified the following barriers to accessibility as they relate to communications, including:

#### For our employees:

- Our Deaf, deafened, or hard of hearing employees sometimes find it challenging to participate in meetings, company events and townhalls where an ASL interpreter has not been pre-arranged.
- Opportunities to make visual or written communications more accessible, including using

plain language.

#### For our customers:

- While alternative format statements are available for most products, alternative formats are not available for all customer documents.
- Information complexity is a frequent barrier for customers when provided communications heavy with financial jargon.

#### **Our Way Forward**

Work is well underway and/or planned to remediate the identified barriers. Progress against each will be reported over the next 3 years, including:

- Formalizing process to fulfill ad hoc requests for alternative formats of all customer documents provided by BMO (short-term).
- Developing standards on providing sign language interpreting, closed captioning, and/or transcriptions at all large BMO events and townhalls, and sharing materials in advance where possible so that employees can review at their own pace and leverage adaptive technologies where needed (medium term).
- Updating internal design standards to add

considerations around increased contrast, font size, etc., to support our colleagues with visual disabilities (long-term).

 Continuing to enforce the application of plain language principles as part of verbal and written information (ongoing). 18

# D.6. The Procurement of Goods, Services and Facilities

#### What We Have In Place Today

BMO is committed to meeting the needs of people with disabilities, and preventing and removing barriers across our products, services, channels, and technologies, including those procured from third party vendors.

Accessibility considerations are embedded across BMO's procurement processes, for example we provide vendors with our technology accessibility related expectations, as part of our sourcing process.

#### **Opportunities for Improvement**

Findings from our consultations and internal assessment review identified the following barriers to accessibility as they relate to procurement of goods and services, including:

 There are potential process enhancement opportunities to facilitate an even earlier identification of accessibility requirements by

- stakeholders, and the evaluation of the vendor products and services by the Lines of Business.
- There may be a need for additional efforts to ensure that the products, services, channels, and technologies we procure from third party vendors are fully accessible and we will continue to enhance our procurement processes.
- We have limited resources with specialized knowledge to determine accessibility requirements are met across products and services.

#### **Our Way Forward**

Work is well underway and/or planned to remediate the identified barriers. Progress against each will be reported over the next 3 years, including:

- Enhanced governance processes and controls will be implemented throughout BMO's procurement process for early identification of accessibility requirements and evaluation of the products, services, channels, and technologies against accessibility requirements (short term).
- We will 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 (short term).

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# D.7. Design and Delivery of Programs and Services

#### What We Have In Place Today

BMO is committed to creating a great banking experience for customers who live with disabilities. This means providing our products and services to these customers with dignity and respect. We have a dedicated policy on accessible customer service and require all customer facing roles to complete annual accessibility training that also includes how to best service customers with disabilities.

At BMO we also believe all our customers should be able to access and receive our products and services. To do this, we are committed to accessibility across the channels in which our customers bank with us and the products and services we offer.

Our customers have access to accessible options through our different banking channels including in branch, telephone banking, ATMs, and online banking/mobile app.

#### **Branch Services**

We aim to provide barrier free access to our branches across the country. To learn more about our Built Environment refer to section D3. We also offer sign language assistance to customers—refer to Communications section D5 to learn more on this service.

#### **Telephone Banking Services**

Access a range of banking services by phone, 24 hours a day, 7 days a week. For clients who are Deaf, deafened or hard of hearing, BMO supports calls from third party relay service providers trained to relay communications through message relays (MRS) or video relays (VRS). We also offer a call-back option for those that prefer not to wait on the line.

#### **ATMs**

Our ATMs are designed with accessibility in mind. We recently lowered the height of our ATMs to make them more accessible for customers using wheelchairs. To help customers with vision loss, our ATM screens use contrasting bright colours, making instructions easier

to read. Our ATMs use large pulsing light bars to direct customers to the card and deposit slots and they have large-character keypads. All our ATMs are audio enabled in English and French, to help customers with vision loss manage their banking. You can use headphones with our audio ATMs to get private voice instructions. ATMs support most standard headphones.

#### **Online Banking and Mobile App Services**

Customers can also sign up for digital channels including online banking and our mobile app. We strive to make our online and mobile content accessible to people who:

- Use assistive technology, including screen readers and magnifiers.
- Have cognitive or physical disabilities, or cannot use a mouse.

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## **Virtual/Remote Capability Services**

BMO also has virtual and remote capabilities for select services in addition to the core banking channels listed above. This includes remote signature capabilities, secure document upload services, virtual appointment meetings and telephone/fax message agreements.

BMO also offers a registered disability savings plan (RDSP) to help provide financial security and peace of mind for people with disabilities. This includes benefits like tax-sheltered earning, access to your money and eligibility for other government programs to earn additional income.

BMO is also committed to improving financial literacy for consumers and we measure this progress through our Real Financial Progress Index. Through the programs and services we deliver, we continue to strive to enhance financial literacy for all, which includes using plain language to make it easier for everyone to understand.

#### **Opportunities for Improvement**

Findings from our consultations and internal assessment review identified the following barriers to accessibility as they relate to the design and delivery of programs and services, including:

- Select premium credit cards are currently flat printed making it difficult for people with vision loss or impairment to easily distinguish between other cards.
- 2. No formal process to collect accessibility feedback

- as part of the product lifecycle.
- 3. Opportunities to further enhance product offering and services to better meet the needs of people with disabilities.

#### **Our Way Forward**

Work is well underway and/or planned to remediate the identified barriers. Progress against each will be reported over the next 3 years, including:

- Embed accessibility considerations and feedback in the product development lifecycle keeping it top of mind as we build new products and services (medium term).
- 2. Work is underway to assess options for more accessible premium credit cards (long term).
- 3. Continue to use plain language wherever possible to help customers easily understand the information related to the products and services they select (ongoing).
- 4. Identify further opportunities across BMO to create more barrier-free products, services and channels for customers with disabilities (ongoing).

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### **D.8. Transportation**

BMO recognizes that there are barriers as they relate to transportation for persons with disabilities. These have been identified and addressed in the above sections. Further information, including the accessibility of our mobile branches and parking, can be found in the Built Environment section.