

ACCESSIBILITY ACT PLAN

Progress Report

May 2024

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1. Changes from Previous Version

- This is the first version of the progress report.

2. Executive Summary

The *Accessible Canada Act* is intended to make Canada barrier-free by January 1, 2040. This involves identifying, removing and preventing barriers in federal jurisdiction in the following priority areas:

- employment
- the built environment (buildings and public spaces)
- information and communication technologies
- communication, other than information and communication technologies
- the procurement of goods, services and facilities
- the design and delivery of programs and services, and
- transportation (airlines, as well as rail, road and marine transportation providers that cross provincial or international borders)

JPMorgan Chase's Multi-Year Accessibility Plan and Policies are developed in accordance with the *Accessible Canada Act* and the following depicts (and is not limited to) what has been Completed, Planned or in Progress as part of the firm's commitment to prevent/remove barriers and improve opportunities for both internal employees and the public with disabilities.

3. Accessibility Statement

JPMorgan Chase strives to meet the needs of its employees and customers with disabilities and is working hard to remove and prevent barriers to accessibility.

Our organization is committed to fulfilling requirements under the *Accessible Canada Act (ACA)*. This Accessibility Plan Progress Report outlines the steps JPMorgan Chase is taking to meet those requirements and to improve opportunities for people with disabilities.

Our plan shows how JPMorgan Chase will play its role in making Canada an accessible country for all Canadians.

4. General

Progress Report Summary

JPMorgan engaged in ongoing dialogue with employees on accessibility this year. Through consultation and education the firm sought out and responded to employee feedback through multiple modalities.

- Feedback through the annual Employee Opinion Survey reflected positive sentiment of the efforts from the firm to meet the needs of all employees as evidenced by 90% favourable response rating on the inclusion indices.
- Consultation with external consultants, individual employees and employee-led Business Resource Groups yielded enhancements to the benefits plans, policy review
- Partnership with the talent acquisition team resulted in a strategy to increase connections with community partners serving persons with disabilities
- Education and information sessions facilitated by global programs and initiatives brought relevant content on Autism, mental health issues, accommodations in the workplace, and inclusion to Canadian employees.

Completed

- ✓ Conducted ongoing consultations
- ✓ Completed a review of Workplace policies
- ✓ Accessibility internal resources available
 - Chase Accessibility Services
 - MyAccessibility Hub
 - Office of Disability Inclusion
 - DE&I Committee: Access Ability
 - Autism at Work
 - Captioning Services
 - Firmwide Work Environment Policy
 - Flexible Work Arrangement policy
 - Disability Inclusion Resource Guide
 - Web Content Accessibility Guidelines (WCAG) 2.1 AA compliant
- ✓ Review of Physical Barriers in all Public Spaces across Canada
- ✓ Healthier food and beverage selections in JPMorgan Chase facilities
- ✓ Benefit plan enhancements to provide greater access to referrals and support services

In Progress

- Refresh Accessibility Training Curriculums for employees and managers
- Extend mandatory training to all Canadian employees
- Access Ability Business Resource Group to host education sessions
- Identify local organizations to develop partnerships and support recruitment of persons with disabilities
- Consultation with Property Management teams across all sites on planned accessibility initiatives

Planned Activities

- Exploring the partnership with Rangan in Canada through the North American Autism at Work internship program
- Review of disability definitions for Canada employees
- Employee Opinion Survey to better understand perception of diversity and inclusion culture within the organization

Continued partnership with the property managers for JPMorgan sites to prioritize creating barrier-free spaces remains a focus for the firm. Targeted training content for Canadian managers and employees is also a core objective for the year ahead.

Feedback

JPMorgan welcomes feedback on matters related to accessibility including, but not limited to: requests for copies of the Accessibility plan, progress reports, and feedback process descriptions in certain alternate formats, feedback about barriers encountered when dealing with JPMorgan Chase, and feedback on JPMorgan Chase's implementation of its accessibility plan.

All inquiries, customer feedback and complaints may be submitted to:

Wade Cole Managing Director, Human Resources
In writing: 66 Wellington St W, Suite 4500
Toronto, Ontario, M5K 1E7 Canada
By email: canada.accommodations.feedback@chase.com
By phone: (416) 981 - 9228

Feedback on the ACA plan should be submitted via email or phone to Wade Cole. An email acknowledging receipt of the feedback will be sent to the contributor within 72 hours. A summary of feedback received will be reviewed quarterly with Human Resources, the Diversity Committee, and the Management Committee where relevant. Feedback contributors will receive a response to their submission including any action items subsequent to the review process. Requests to receive the feedback response in an alternate format can be made at the time the feedback is shared.

This feedback process was established in June 2024. Wade Cole, JPMorgan Canada's HR Country Head is the member of the Management Committee designated to receive feedback on JPMC's accessibility program. As of the filing of this progress report no feedback has been received.

5. Employment

JPMorgan Chase is committed to fair and accessible employment practices and to encourage the full inclusion of persons with disabilities. Current processes in place:

- Notify the public and staff that, when requested, JPMorgan Chase will accommodate people with disabilities during the recruitment and assessment processes and when candidates are hired
- Advise of the availability of accommodations for applicants with disabilities in the recruitment and assessment processes, and in the notification to successful applicants
- Process for developing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability
- Ensure the accessibility needs of employees with disabilities are considered in performance management, career development and redeployment processes
- Consult with disability management provider to meet accommodation requirements
- Prevent and remove other accessibility barriers identified and review any complaints relating to accessibility barriers and address them as they arise by escalating through internal stakeholders
- Provide workplace information and communications in accessible formats and with communication supports for persons with disabilities, upon request, in a timely manner that considers the person's accessibility needs due to disability. The disability management team consult with the individual requesting such services to determine a suitable format or support
- Encourage self-identification of employees with disabilities to provide accurate aggregated reporting of employee demographics and create opportunities to engage in supportive dialogue while maintaining employee privacy and confidentiality
- Posting job vacancies through Ontario Disability Employment Network (ODEN) to encourage applicants with disabilities to apply for positions at JPMorgan

6. The Built Environment

JPMorgan Chase must provide Person(s) with Disabilities full and equal access to, and the opportunity for full and equal enjoyment of, Products, Services, and Facilities.

JPMorgan Chase will continue to meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces. JP Morgan will address barriers to accessibility in some locations identified during the consultation. The firm made renovations to one site this year and added height adjustable desks for increased flexibility.

JPMorgan Chase will have procedures in place to notify the public of any service disruptions and alternatives available in the event of a service disruption to accessible parts of its public spaces.

7. Information & Communication Technologies

JPMorgan Chase provides equal access to information communicated in writing, orally, digitally or in person. We will continue to consult with people with disabilities to determine their information and communication needs to meet the requirements of ACA. Consultations in 2024 did not identify information and communication technology barriers for persons with disabilities.

Accessible Formats and Communication Supports

- JP Morgan Chase will upon request arrange for the timely provision of accessible communication formats of publicly available information and communication supports for persons with disabilities that considers each person's particular accessibility needs.
- We will work with the person with a disability and determine the appropriate method of communication or accessible communication format for documents, based on their needs.

JPMorgan Chase provides accommodations in the form of Auxiliary Aids and Services, reasonable modifications to policies and procedures, and other services, for the purpose of effective communication, equal access to and opportunity for full and equal enjoyment of Products and Services and Facilities.

8. Communication, other than ICT

JPMorgan Chase provides equal access to information communicated in writing, orally, digitally or in person. We will continue to consult with people with disabilities to determine their information and communication needs to meet the requirements of ACA. Consultations in 2024 did not identify communication barriers for persons with disabilities.

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9. The Procurement of Goods, Services & Facilities

New Business, Initiatives, Eliminations or Changes to Products or Processes must follow the JPMorgan Chase established process in adherence with New Business Initiative Approval Policy - Firmwide framework. JPMorgan Chase must have program framework including but not limited to: Procedures, Risk and Controls, Issue Management, Training, Complaint Monitoring, Quality Assurance, Reporting and Analysis, and when applicable, Supplier Oversight.

10. The Design & Delivery of Programs and Services

New Business, Initiatives, Eliminations or Changes to Products or Processes must follow the JPMorgan Chase established process in adherence with New Business Initiative Approval Policy - Firmwide framework. JPMorgan Chase must have program framework including but not limited to: Procedures, Risk and Controls, Issue Management, Training, Complaint Monitoring, Quality Assurance, Reporting and Analysis, and when applicable, Supplier Oversight.

JPMorgan Chase provides accommodations in the form of Auxiliary Aids and Services, reasonable modifications to policies and procedures, and other services, for the purpose of effective communication, equal access to and opportunity for full and equal enjoyment of Products and Services.

11. Transportation

Not Applicable

12. Consultations

12.1 Who was consulted

JPMorgan consulted with employees who self-identified as persons with disabilities, members of the Diversity and Inclusion Committee, and members of AccessAbility, an internal Business Resource Group that serves as a resource on disability issues, a voice for employees with disabilities, and a partner in the success of all JPMorgan Chase colleagues. The mission of AccessAbility is to complement JPMorgan Chase's global diversity efforts by maximizing the contributions of employees affected by disabilities, long-term illness or caregiving responsibilities.

The employees who participated in the consultations identified as persons with chronic medical and mental health conditions, physical disabilities, neurodivergent conditions, learning disabilities, and allies.

12.2 Consultation topics

The purpose of the consultations was to better understand the experience of employees with disabilities and where they may encounter barriers to a fulsome employee experience at JPMorgan Chase. Employees who had previously participated in consultation were asked to opine on any changes they had noticed since the prior consultation period. Questions were asked about experiences pertaining to the employment cycle (recruiting, onboarding, training and development, promotion, retention) employee resources (i.e. communication and accommodation), barriers to inclusion and success at JPMorgan, and opportunities for improvements.

The responses provided generated dialogue, greater awareness about systemic and physical barriers, and suggestions on ways to address these barriers. The feedback is summarized in this review and will be used to inform future enhancements to our policies, procedures, communication, training and physical environment.

12.3 Consultation timing

JPMorgan consulted with the Access Ability Business Resource Group and individual employees who self-identified as persons with disabilities in Q2 of 2024 during the process of creating the Accessibility Review.

12.4 Consultation methods

JPMorgan met with employees virtually to conduct the consultations. The virtual consultations via Zoom technology were most used to include employees across the country and those working remotely. The consultation consisted of small group discussions with the AccessAbility Business Resource Group, and individual discussions with the employees who self-identified as persons with disabilities to ensure confidentiality.

12.5 Consultation results

The results from the consultations yielded feedback in the following areas:

12.5.1 Physical barriers

JPMorgan identified some barriers to accessibility for persons with disabilities in the physical spaces of the sites. The access doors and doors to the washrooms are not barrier-free at some sites. As part of the Accessibility Plan, JPMorgan will work with the facilities team and the property management of each site to identify how entrances and washroom doors can be updated to be more accessible. Consultation with the property managers at each of the 6 sites across Canada confirmed that access to washrooms do meet the accessibility code guidelines, however only 1 site would be considered barrier free. At this time the property managers do not have plans to update the washroom doors at the other 5 sites. JPMorgan conducted renovations at 1 site this year, adding sit/stand workstations to increase flexibility for employees, and will continue discussions with the property managers and consider the need for barrier free upgrades when sourcing new sites or renovating the current sites.

12.5.2 Accommodation barriers

Employees appreciate the hybrid work structure and for some roles fully remote working arrangements. They advised that navigating the self-service tools to request accommodation is straightforward. Having access to technical support resources when onboarding to facilitate a smooth integration process was noted as desirable.

How managers interact with employees with disabilities continues to be an opportunity. Employees expressed their intent to disclose their disability was highly dependent on the relationship with their manager, and some had not done so due to concerns on how the information would impact perception. Additional training for managers was suggested as an approach to provide a more consistent and supportive response to employees.

12.5.3 Manager and employee Training

Employees expressed the benefits that could be derived from manager and employee training, particularly in the area of invisible disabilities. They were encouraged hear that mandatory training on disabilities in the workplace would be rolled out to all employees in Canada in 2024.

12.5.4 Communication

Employees consulted who had accessed internal resources (i.e. benefits, disability leave, accommodation) were aware of the supports available for persons with disabilities at JPMorgan. JPMorgan included content on benefits, employee assistance, accommodation and inclusion during town hall meetings and in written communications in 2023 and 2024 to increase awareness and promote support programs.

JPMorgan conducted a campaign encouraging employees to self-identify though the internal human resource information system this year. The results of the campaign were not as fulsome as hoped; this is a continued area of opportunity. Through consultation some employees indicated the conditions

included in the definition of disability on the Canada portal were not as robust as on the U.S. portal; JPMorgan will investigate this further.

12.5.5 Recruiting

None of the employees consulted had been through recruiting for a new position with recent experience so did not have feedback in this area. The AccessAbility BRG did recommend partnering with community organizations to attract persons with disabilities. JPMorgan will work with the Access Ability and the New Joiner Experience team to identify local organizations to develop partnerships and support recruitment of persons with disabilities. JPMorgan will also explore opportunities to expand the partnership with Rangan in Canada through the North American Autism at Work internship program. Lastly, JPMorgan will share the work done internally in support of persons with disabilities through social media to create greater awareness of the firm's commitment to being an inclusive employer of choice.

13. Training

JPMorgan Chase aims provides training to all employees and volunteers on providing accessible customer service and how to interact with people with various types of disabilities.

- In addition to training on the Accessibility for Ontarians with Disabilities Act (AODA) provided to provincially regulated employees, JPMorgan has developed Disability at Work training that will be mandatory for federally regulated employees by the end of 2024
- JP Morgan Chase will continue to maintain a record of the training provided