

# **RBC Accessibility Plan: 2024 Progress Report**

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# General

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On June 1, 2023, Royal Bank of Canada and certain of its subsidiaries<sup>1</sup> (referred to as RBC, we, us or our) launched the RBC Accessibility Plan (the “Plan”), outlining our commitment to identify, remove and prevent accessibility barriers for Persons with Disabilities (PwDs).<sup>2</sup> The Plan aligns with the

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<sup>1</sup> The **Accessible Canada Act** applies to Canadian operations of RBC’s federally regulated entities. RBC legal entities that are provincially regulated may be subject to provincial accessibility requirements. However, RBC will strive towards the higher accessibility standards. On March 28, 2024, RBC closed the acquisition of HSBC Bank Canada (HSBC Canada). We have accounted for any impact to RBC’s Accessibility Plan as a result of the acquisition of HSBC Canada by RBC in this Report. The HSBC Canada acquisition did not have a significant impact on the Plan, with the exception of its affect on the Built Environment priority area. As the result of the acquisition, RBC acquired a number of HSBC Canada branches, fifty of which remained open as of October 31, 2024. (Refer to page 16 of the 2024 Public Accountability Statement)

<sup>2</sup> According to the ACA, any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment – or a functional limitation – whether permanent, temporary or episodic

requirements of the Accessible Canada Act (the “ACA”) and helps us strive for greater inclusion and enhance our culture of accessibility.

Our approach to accessibility includes learning about the evolving needs of our employees,<sup>3</sup> clients and communities, and is informed by feedback and consultation with PwDs. We are also continuing to establish processes to help advance the actions planned.

The Plan outlines the actions we intend to take between 2023 and 2026 in respect of the six priority areas (“Priority Areas”) as defined by the ACA that are applicable to our financial services business.<sup>4</sup>

This RBC Accessibility Plan: 2024 Progress Report (the “Report”) reflects activities undertaken in respect of the Plan during the period from January 1, 2024, through December 31, 2024, unless otherwise noted.

In this report, we have set out our progress in implementing the Plan. This report builds on the

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in nature, or evident or not, that, in interaction with a barrier, hinders a person’s full and equal participation in society. Refer to the Plan for further information.

<sup>3</sup> For the purposes of this Report, employees refer to individuals employed on a full-time or part time basis, as well as contract workers.

<sup>4</sup> Transportation is not within the scope of services offered by RBC and is not included in the Plan.

progress noted in the 2023 Progress Report . While we have made progress against many action items in the Plan, we continue to work towards addressing them all.

We value your feedback on this report and our ongoing accessibility journey. Please contact our Accessibility Office with any comments:

- **Position Title:** Vice President, Global Inclusion and Chief Accessibility Officer
- **Email:** [accessibility@rbc.com](mailto:accessibility@rbc.com)
- **Online webform:**  
<https://www.rbc.com/accessibility/feedback.html>
- **Phone:** 416-216-1206 or toll-free 1-888-994-9004. We also accept calls through IP or video relay services.
- **Mail:** Accessibility Office 181 Bay St, 11<sup>th</sup> Floor, Toronto, ON M5J 2T3

We will acknowledge receipt of any non-anonymous feedback as soon as possible in the same format it was received and retain copies of the feedback received. This feedback will be used to shape the continuous improvement of our accessibility commitments, programs, processes and initiatives.

## **Anonymous Feedback**

You can provide anonymous feedback through our online webform or by calling 416-216-1206 (or toll-free 1-888-994-9004) and leave a message. Our Accessibility Office will review these messages weekly.

Voice messages will be transcribed and saved electronically.

## **Alternative Formats**

For anyone needing alternative formats (e.g. print, large print, Braille, audio format or an electronic format that is compatible with adaptive technology), contact our Accessibility Office at any of the contacts identified or refer to the [rbc.com/accessibility](https://rbc.com/accessibility) website.

## **2024 Progress Update**

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### **Accessibility Office**

Our Accessibility Office collaborates closely with key stakeholders to support the work effort required for our operating and governance model to execute on [RBC's Accessibility Plan](#), including the sharing of feedback received on barriers experienced. We have formalized our Executive Steering Committee, comprised of senior executives across various areas of the organization who meet regularly to provide key updates and discuss ongoing efforts. We also continue to engage our Diversity Leadership Councils to support our Accessibility Plan commitments.

## **Progress Against Action Items in Priority Areas**

The following sections outline RBC's action plans across the applicable priority areas in 2024. The status of the progress of our actions against our Plan since 2023 is detailed in the Appendix. The following tables provide detailed information on the status of the actions and progress made in 2024 only. As noted previously, progress made in 2023 can be found in the 2023 Progress Report.

# Employment

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## Talent Acquisition

Action item	2024 Progress update
Enhance learning resources available to recruiters and hiring managers on inclusive hiring practices.  Status: In progress	<ul style="list-style-type: none"><li>• Our Inclusive Recruitment team hosted an information session for our broader Recruitment team in June 2024, which covered topics including an overview of the Accessibility Office and the Workplace Accommodation process in North America. We plan to host similar presentations annually to continue to raise awareness amongst the Recruitment team.</li><li>• Initiated the planning phase to update recruiter and hiring manager resources to enhance guidance related to inclusive recruitment practices, including considerations for</li></ul>

<b>Action item</b>	<b>2024 Progress update</b>
	candidates with disabilities.
<p>Review all RBC job application sites and strive to ensure they meet current accessibility standards.</p> <p>Status: In progress</p>	<p>Our HR Digital Solutions and Employer Brand and Recruitment Marketing Teams collaborated to implement the following:</p> <ul style="list-style-type: none"> <li>• In 2023, Ernst &amp; Young Neurodiversity Centres of Excellence conducted a Web Accessibility Report of a subset of RBC Careers site pages to identify gaps in accessibility. In September 2024, the Employer Brand and Recruitment Marketing team leveraged findings from this report to develop and implement an Accessibility Quality Assurance Checklist, for manual use, which outlines accessibility requirements and best practices to enhance accessibility for users.</li> </ul>



Action item	2024 Progress update
	<p>This checklist is leveraged by all individuals who create content for the RBC Careers site pages.</p> <ul style="list-style-type: none"> <li>• Enabled an automatic Accessibility Checker feature in the RBC Careers site Content Management System. In addition to manual testing, the Accessibility Checker conducts an automatic accessibility review. If required, the team then engages the vendor who supports our RBC Careers site pages, to remediate any accessibility findings prior to publishing.</li> <li>• Added the link to the <u>Accessibility at RBC</u> - RBC page to the universal footer available on all pages of RBC's Careers site to enhance communication to candidates on our ongoing</li> </ul>

<b>Action item</b>	<b>2024 Progress update</b>
	<p>commitment to accessibility.</p> <ul style="list-style-type: none"> <li>• Completed testing of RBC's Careers pages and obtained initial data on WCAG (Web Content Accessibility Guidelines) compliance in March 2024. We will continue to test and monitor compliance to identify potential areas of improvement.</li> <li>• In 2024, we began the planning process with our external vendor to conduct a thorough accessibility review of RBC's Careers site which is planned in 2025.</li> </ul>

## Inclusive Experiences, Talent Growth and Retention

Action item	2024 Progress update
<p>Brand, Marketing and Communications teams to participate in learning about accessibility.</p> <p>Status: In progress</p>	<ul style="list-style-type: none"> <li>The Accessibility Office continued to collaborate and meet with RBC's Global Employee Communications Council<sup>5</sup>. The purpose of this collaboration is to raise awareness of communication barriers for PwDs and to share accessibility practices,</li> </ul>

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<sup>5</sup> RBC Global Employee Communications Council is an international, cross-RBC community of practice that comprises more than 200 individuals who have responsibility for internal communications activities. This council holds regular meetings to share plans, best practices, tools and resources for communicating with employees.

Action item	2024 Progress update
	<p>including Universal and Inclusive Design, which we can leverage to enhance communications.</p> <ul style="list-style-type: none"> <li>• Piloted an accessible communications training solution for communicators.</li> </ul>
<p>Provide relevant information and resources in a timely manner to individuals following the formal disclosure of a disability.</p> <p>Status: Complete</p>	<ul style="list-style-type: none"> <li>• The system-generated notification that was developed in 2023 was implemented in May 2024 (Refer to the 2023 Progress Report). Launched a new process to automatically send this email to employees who update their employee profile in our HR system, self-identifying that they are a PwD. The notification raises awareness about key resources and programs that are available, such as accommodations, Employee Resource Groups (ERGs) and benefits.</li> </ul>

<b>Action item</b>	<b>2024 Progress update</b>
<p>Improve leadership awareness and understanding of disability.</p> <p>Status: In progress</p>	<ul style="list-style-type: none"> <li>• Incorporated disability awareness content into existing training programs and resources for people managers and employees. We continue to evolve our training and resources to educate people managers in supporting their teams and strengthening an inclusive culture.</li> <li>• Launched the internal Accessibility at RBC Hub in May 2024. This central space is available to all employees globally, including leaders. It was built in collaboration with employees with disabilities and will evolve over time. The site contains employee and people-manager resources to help managers support employees. It includes information on topics such as, Workplace Accommodations, resources to increase digital accessibility, and employee stories to help increase awareness and understanding of the experiences of PwDs. The space</li> </ul>

<b>Action item</b>	<b>2024 Progress update</b>
	<p>is designed to be a source of knowledge and inspiration, to support the involvement of the global RBC workforce and help promote disability inclusion.</p>
<p>Actively review representation of PwDs in our priority talent and leadership development programs.</p> <p>Status: In progress</p>	<ul style="list-style-type: none"> <li>• Collaborated with employee development team program managers to further identify opportunities to remove potential barriers that could make it more difficult for employees to access programming and resources, including providing closed captioning for events and seeking accessible venues and vendors.</li> <li>• Reviewed feedback on leadership program accessibility for PwDs based on their experiences before, during and after program delivery.</li> </ul>

## Workplace Accommodations

Action item	2024 Progress update
<p>Review of the accommodation process to identify opportunities to improve the employee accommodations experience with a focus on:</p> <ul style="list-style-type: none"> <li>• more clearly defined roles and responsibilities of the various parties involved in the accommodation process.</li> <li>• increasing manager and employee awareness of the process through participation in partner accessibility information</li> </ul>	<ul style="list-style-type: none"> <li>• In June 2024, we updated our Workplace Accommodations &amp; Ergonomic Assessment intranet page to more clearly define processes, roles and responsibilities.</li> <li>• To increase awareness and enhance promotion of our workplace accommodations process, we: <ul style="list-style-type: none"> <li>○ Hosted an information session in July 2024 in collaboration with RBC REACH, our ERG for employees with disabilities and caregivers.</li> <li>○ Added information to our central Accessibility at RBC Hub in May 2024.</li> <li>○ Featured employee storytelling during our global International Day of PwDs event held in December 2024 with more than 2,100 employees attending.</li> </ul> </li> </ul>

<b>Action item</b>	<b>2024 Progress update</b>
<p>events and collaborating with partners to enhance training and technology opportunities throughout the accommodation process.</p> <p>Status: Complete</p>	<ul style="list-style-type: none"> <li>○ Created an automated system-generated notification for employees who self-identify as having a disability (i.e., as referenced in the Inclusive Experiences, Talent Growth and Retention section).</li> <li>● In May 2024, we introduced a new technology software solution to all employees. This software offers a set of reading and writing tools to support anyone who may struggle with digital text, including neurodivergent employees.</li> </ul>



## Benefits

Action item	2024 Progress update
<p>During our annual review, we will assess opportunities for expansion of services and ways to increase awareness of the multitude of benefits available to employees.</p> <p>Status: Complete</p>	<ul style="list-style-type: none"> <li>• Following a positive response from our RBC REACH members in 2023, we established an annual Benefits Information session for employees based in Canada to raise awareness of available benefits relevant for PwDs and caregivers. The 2024 session was hosted in October and had close to 400 people in attendance.</li> <li>• As part of our internal annual review process, RBC made the following enhancements to coverage within the Canadian Benefits plan: <ul style="list-style-type: none"> <li>○ Increased coverage maximums for Speech and Visual Therapy. This is an important benefit for children where early intervention is critical.</li> </ul> </li> </ul>

Action item	2024 Progress update
	<ul style="list-style-type: none"> <li>○ Increased the maximums for Critical Illness Insurance coverage to provide employees with the opportunity to purchase higher coverage.</li> <li>• Continued to offer employee information sessions during the annual enrollment period, covering topics such as a high-level overview of benefits available, coordination of benefits, and different types of coverage and how employees can pick the one that is right for them.</li> <li>• Introduced accessibility and usability enhancements to our benefits selection and support chatbot in May 2024</li> <li>• Launched a new always-on digital wellness platform to support</li> </ul>

<b>Action item</b>	<b>2024 Progress update</b>
	<p>employees to improve their health and wellbeing by tracking their wellness activities and earning incentives.</p> <ul style="list-style-type: none"> <li>• Introduced a fully digitized claims process and expanded the list of eligible expenses for the Personal Spending Account.</li> <li>• Published an internal online page highlighting the benefits available for employees in Canada experiencing any symptoms of menopause leading to functional limitations (episodic, mental and physical), including educational resources from the Menopause Foundation of Canada.</li> </ul>

## Learning and Development

Action item	2024 Progress update
<p>Assess opportunities to improve training for all employees (including client-facing employees, managers, leaders and recruiters) to increase knowledge and skills, and to effectively support clients and colleagues with disabilities.</p> <p>Status: In progress</p>	<ul style="list-style-type: none"><li>• Following the learning needs analysis in 2023 to identify opportunities for developing learning programs and resources that can help improve accessibility and strengthen inclusion (Refer to the 2023 Progress Report), in 2024 we began development of a new foundational learning solution on accessibility and disability inclusion.</li><li>• Integrated new topics on disability inclusion into our new and aspiring leaders' skills development program.</li><li>• Conducted an information session with the Recruitment team on our accommodations program (Refer to the Talent Acquisition section).</li></ul>

Action item	2024 Progress update
	<ul style="list-style-type: none"> <li>• Launched the Accessibility at RBC Hub that offers resources and learning for accessibility-related topics for all employees (Refer to the Inclusive Experiences, Talent Growth and Retention section).</li> <li>• Identified clear contacts for accessibility accommodation needs for all instructor-led training and webinars in our learning management system.</li> </ul>

## Accessible Learning Experiences

Action item	2024 Progress update
<p>Review all Learning &amp; Performance roles to identify accessibility/Universal Design design skill gaps based on responsibilities and accountabilities.</p> <p>Status: In progress</p>	<ul style="list-style-type: none"><li>• Completed a skills assessment for key accessibility/Universal Design skills required for various Learning &amp; Performance roles. We are reviewing the results and defining a plan to address gaps in 2025.</li></ul>

## Built environment

Action item	2024 Progress update
<p>Establish a process to review RBC's built environment to confirm accessibility for PwDs is consistent with our standards, considering the branches recommended by the accessibility review:</p> <ul style="list-style-type: none"> <li>• Review physical accessibility, including washrooms, entrances/exits and ramps.</li> <li>• Review seating demand to ensure adequate seating is available for PwDs.</li> </ul>	<ul style="list-style-type: none"> <li>• A third-party firm, certified through the Rick Hansen Foundation Accessibility Certification, completed the accessibility assessments of a group of retail branches and office buildings across Canada. RBC is currently reviewing the assessment reports and conducting a gap analysis to create recommendations for review in early 2025.</li> <li>• Two employees within our Corporate Real Estate group have obtained the <u>Rick Hansen Foundation Accessibility Certification</u>, expanding our internal capabilities and expertise to assess RBC properties and enhance accessibility within our built environment.</li> </ul>

<b>Action item</b>	<b>2024 Progress update</b>
Status: In progress	
Perform a gap analysis of emergency procedures to identify opportunities to enhance safety and explore	<ul style="list-style-type: none"> <li>• Began conversations with a cross-functional team tasked with identifying emergency procedures best practices and working with landlords of RBC-occupied properties to incorporate best practices into their emergency procedures. We plan to seek external</li> </ul>



<b>Action item</b>	<b>2024 Progress update</b>
remediating actions.  Status: In progress	guidance to inform a plan moving forward.
Study ways to improve wayfinding (e.g. enhanced signage with braille) in branches and at RBC ATMs.  Status: In progress	<ul style="list-style-type: none"> <li>• Accessibility reports from the third-party firm referenced above in the first Built Environment action item included a review of wayfinding. The accessibility report findings and recommendations are currently being reviewed internally.</li> <li>• The Physical Networks Strategy team continued conversations with the Canadian National Institute for the Blind and BlindSquare, a software vendor, to identify additional wayfinding technology solutions.</li> </ul>

## Information and communication technologies (ICT)

Action item	2024 Progress update
<p>Establish a governance model structure.</p> <p>Status: Initiated</p>	<ul style="list-style-type: none"> <li>• The Enterprise Digital Accessibility Enablement team, in collaboration with business and functional teams, conducted a pilot study in the summer of 2024 to test a subset of existing public-facing web pages using both automated and manual testing procedures. The pilot results helped us better understand the work effort involved for testing. We are working with our senior leaders on next steps to achieve long-term success, including developing a governance model structure.</li> </ul>
<p>Mandate new technology to include accessibility principles:</p>	<ul style="list-style-type: none"> <li>• Continued to increase awareness on digital accessibility gaps by raising items identified through client and</li> </ul>

<b>Action item</b>	<b>2024 Progress update</b>
<ul style="list-style-type: none"> <li>• Establish a strategic working group to evaluate our current build and buy practices against current industry standards.</li> <li>• Define any one-time project work and ongoing maintenance necessary to close the accessibility gaps identified.</li> </ul> <p>Status: Initiated</p>	<p>employee feedback with relevant groups so that they may address the work needed to remediate. For example:</p> <ul style="list-style-type: none"> <li>○ Enhancements to our Personal Banking pages are currently underway by product owners.</li> <li>○ Leveraging feedback from adaptive technology users, product owners tested and enhanced the accessibility of Year-end Performance forms.</li> <li>○ Semi-annual Workday Release Updates include a focus on accessibility updates.</li> </ul>
<p>Conduct an inventory of existing technology to include accessibility wherever feasible and prioritize high traffic applications:</p>	<ul style="list-style-type: none"> <li>• Refer to the recent pilot study referenced in the first ICT action item.</li> <li>• Personal Banking and Commercial Banking Digital Design teams kicked off a working</li> </ul>

<b>Action item</b>	<b>2024 Progress update</b>
<ul style="list-style-type: none"> <li>• Establish a tactical working group to perform a current-state analysis of application-level accessibility support.</li> <li>• Define technology roadmaps to identify and close accessibility gaps.</li> </ul> <p>Status: In progress</p>	<p>group to actively identify issues and develop remediation plans for client-facing websites and mobile applications; the team will source educational resources and create an accessibility checklist for team members to use design activities.</p> <ul style="list-style-type: none"> <li>• Created an internal reference library of accessible user interface (UI) components for RBC designers, RBC developers and creators to help standardize the behaviours of UI components.</li> </ul>
<p>Centralize and automate processes that involve accessibility testing to reduce barriers:</p> <ul style="list-style-type: none"> <li>• Expand Accessibility Centres of Excellence to increase</li> </ul>	<ul style="list-style-type: none"> <li>• Refer to the recent pilot study referenced in the first ICT action item</li> <li>• Conducted a pilot study during the summer of 2024 to determine the feasibility of integrating a source code testing</li> </ul>

<b>Action item</b>	<b>2024 Progress update</b>
<p>accessibility adoption across the enterprise.</p> <ul style="list-style-type: none"> <li>• Define our ideal end-state level of automated and manual testing efficiency goals.</li> <li>• Establish manual testing procedures to thoroughly measure the gap between current-state and current-industry standards.</li> </ul> <p>Status: Initiated</p>	<p>solution for accessibility into the software pipeline.</p>

## **Communication, other than information and communication technologies**

<b>Action item</b>	<b>2024 Progress update</b>
Review and identify documents not currently available in alternative formats (such as large print/braille).  Status: Initiated	<ul style="list-style-type: none"><li>• Conducted education sessions and discussions with internal marketing teams who create marketing and operational documents to increase awareness of accessibility guidelines and regulatory requirements for PDF remediation.</li></ul>

## **Design and delivery of programs and services**

<b>Action item</b>	<b>2024 Progress update</b>
Continue consultations with employees and clients with disabilities and update or enhance programs and services based on the feedback received.  Status: Complete (and ongoing)	<ul style="list-style-type: none"><li>• The Accessibility Office initiated work on a new Employee Accessibility Advisory Group, to enable our business and functional teams to consult with employees with disabilities during the discovery and design phases of programs, products and services.</li></ul>

<b>Action item</b>	<b>2024 Progress update</b>
	<p>Employees with disabilities will have the opportunity to inform decision-making by sharing their lived experiences and raising awareness of potential accessibility barriers early on. We plan to formally launch the program early in 2025.</p> <ul style="list-style-type: none"> <li>• The RBC Retail Cards team identified opportunities to enhance accessibility features on our retail cards to improve the experience for clients who are blind or have low vision. Conducted planning phases for a pilot which RBC REACH members were invited to participate in to test these accessibility features. Testing is expected to launch in early 2025. Once complete, we plan to assess the outcomes</li> </ul>

<b>Action item</b>	<b>2024 Progress update</b>
	<p>and determine possible adoption.</p> <ul style="list-style-type: none"> <li>• Launched asynchronous messaging for Personal Banking clients on both RBC Online Banking and the RBC Mobile app (with the exception of the <u>RBC Mobile Student Edition</u>). Clients can leverage this service to contact RBC for support with certain core banking needs.</li> </ul>
<p>Plan to enhance training programs for customer service and client-facing teams to improve interactions with customers with disabilities.</p> <p>Status: In progress</p>	<ul style="list-style-type: none"> <li>• Refer to the Learning and Development section for additional information on the web-based learning solution for all employees which includes specific client-facing training and is planned to be launched in Spring 2025.</li> </ul>



## Procurement of goods, services and facilities

Our preliminary assessment of procurement practices revealed no specific barriers for PwDs; however, we will assess and respond to opportunities to enhance accessibility if, and when identified. The following activities were completed in 2024 to enhance accessibility:

Action item	2024 Progress update
Increase awareness of accessibility and the Universal Design Principles by providing access to training and learning resources for all Procurement employees.  Status: In progress	<ul style="list-style-type: none"><li>• The Accessibility Office conducted a presentation for the Procurement Strategy Team to raise awareness around disability inclusion concepts, Universal Design, and the importance of incorporating accessibility in their practices. Discussions took place in 2024, to conduct a similar presentation to the broader Procurement team, planned for 2025.</li></ul>
Develop Requests for Proposal (RFP) criteria	<ul style="list-style-type: none"><li>• Reviewed and validated the digital accessibility</li></ul>

<b>Action item</b>	<b>2024 Progress update</b>
<p>that reflect RBC’s evolving accessibility requirements, as applicable.</p> <p>Status: Complete</p>	<p>questions included in standard RFP criteria. The review found that the questions were current, relevant and accurate, with no changes required at this time. We will continue to monitor as part of our regular process.</p>
<p>Review RBC’s Third-Party Risk Management Policy and Standards to ensure expectations regarding accessibility are clearly articulated.</p> <p>Status: In progress</p>	<ul style="list-style-type: none"> <li>• Initiated a review of Third-Party Risk Management policies and standards to identify opportunities to incorporate and/or enhance accessibility considerations.</li> </ul>

## Transportation

RBC does not operate or provide transportation services and, therefore, transportation is not within the purview of our Plan.

## Consultations

We actively seek the insights and perspectives of PwDs, their caregivers and allies through a range of

consultation methods with employees and clients to strengthen our culture of accessibility and foster an environment where everyone can participate fully. This involves reaching out to our employees and our clients through surveys and focus groups, which enable us to hear direct feedback, uncover trends and understand where we have improved – and where we could do better. Some of our key findings are noted in the following pages.

## **Employees**

- Our Accessibility Survey and focus group discussions are key levers we use to gather feedback on accessible experiences related to work, digital solutions and disability inclusion culture at RBC. In 2024, we invited over 2,000 members of RBC REACH to complete two anonymous surveys. Between these two surveys, we received 900 responses and 486 of those respondents identified as PwDs. We also conducted 10 focus group discussions to gather feedback and had over 120 employees register to participate. The following insights were gathered from these consultations:
  - Since 2023, employees expressed an increase in awareness of how to request accommodations, however there is still more we can do to enhance and simplify the process for employees.
  - There is an ongoing opportunity for our people managers to better understand the varied needs

of their teams and find ways to further support them.

- Employee consultations also revealed that there's an opportunity to broadly raise awareness on disabilities, especially invisible disabilities. While a high number of employees reported feeling included in their team, employees also indicated they did not feel comfortable self-identifying as a PwD.
- In select surveys, including in our annual Employee Engagement Survey, we include a series of questions related to employees' experiences with inclusion and belonging. The composite of responses is referred to as our Inclusive Experiences Composite Score, which is our measure for understanding the experiences of our employees across experiential pillars that include, but are not limited to, a sense of connection and belonging, respect, trust, and career opportunities. The 2024 score for PwDs was 77 which remain unchanged from 2023<sup>6</sup> and 2022<sup>6</sup>. We continue to monitor the score to measure the impact of our work.

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<sup>6</sup> This excludes City National Bank and RBC Brewin Dolphin as these subsidiaries have not been integrated onto our primary HR platform. The 2022 and 2023 comparative figures exclude BlueBay Asset Management.

## Clients

- We gathered client feedback through surveys conducted by a third-party firm in Q1 and Q3 2024, receiving over 2,000 responses on each survey respectively<sup>7</sup>. In Q3, 80% of RBC customers with disabilities or caregivers reported not facing barriers preventing them from having a good experience at RBC, a 3% increase from Q1.
- Survey respondents also felt they were able to easily navigate the branch, access information online, and complete transactions with ease, as well as receive support, service and advice needed.

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<sup>7</sup> 12% of respondents in Q1 and 14% in Q3 identified as having a visible or invisible disability or a caregiver of a person with a disability.

## **Feedback**

In 2023, we established multiple global channels for employees, contract workers, suppliers, and clients to provide the Accessibility Office with feedback on the process to implement the Plan and on the barriers they may encounter when interacting with RBC. We implemented a new online form in June 2024 to enable an additional channel to provide anonymous feedback.

During the reporting period, we received 184 accessibility-related inquiries. A summary of the key categories of the subject of this feedback is included in Table 1.

<b>Table 1: Summary of Accessibility Related Feedback<sup>8</sup></b>	<b>Number of Inquiries</b>	<b>Percentage</b>
<b>Design and Delivery of Programs and Services</b>	70	38.0%
<b>Information and Communication Technologies</b>	52	28.3%
<b>Employment</b>	26	14.1%
<b>General Inquiries</b>	20	10.9%
<b>Communications other than ICT</b>	9	4.9%
<b>Built Environment</b>	7	3.8%

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<sup>8</sup> Procurement of goods, services and facilities is not referenced as no accessibility related feedback was received in 2024 for this ACA priority area.

The following feedback offers additional commentary and context drawn from the feedback mechanisms.

- We received the most accessibility-related inquiries related to design and delivery of programs and services (38%). Feedback from clients with disabilities included difficulties faced when using the Virtual Assistant and Video Relay Services to speak with a Customer Service Advisor.
- Information and communication technologies received 23.8% of accessibility-related inquiries. Feedback from clients with disabilities included challenges when navigating and completing banking transactions through our online and mobile banking platforms and faced barriers when completing 2-step verification methods.
- In the area of employment, among the inquiries from employees, feedback included topics relating to available workplace accommodations and benefit coverage, and a desire for the organization to raise awareness on accessibility and disability inclusion, the accommodations process, and ways to support employees and clients with disabilities.



# Appendix

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The following is a summary of the status of the progress of our actions against our Plan since 2023. For additional information on barriers identified and opportunities to improve accessibility for each priority area please reference the [Plan](#).

Priority Area	Status	Commitments / Next Actions
<b>Employment</b> Talent acquisition	In progress	<ul style="list-style-type: none"><li>• Review all RBC job application sites and strive to ensure they meet current accessibility standards.</li></ul>
	In progress	<ul style="list-style-type: none"><li>• Enhance learning resources available to recruiters and hiring managers on inclusive hiring practices.</li></ul>
	Complete	<ul style="list-style-type: none"><li>• Review online recruitment</li></ul>

Priority Area	Status	Commitments / Next Actions
		assessments to confirm they are accessible for PwDs.
<b>Employment</b>  Inclusive experiences, Talent Growth and Retention	Complete	<ul style="list-style-type: none"> <li>Promote RBC's Accessibility Policies to reinforce the adoption of Universal Design and provide regular reminders/training to relevant stakeholders.</li> </ul>
	In progress	<ul style="list-style-type: none"> <li>Brand, Marketing and Communications teams to participate in learning about accessibility.</li> </ul>
	Complete	<ul style="list-style-type: none"> <li>Provide relevant information and resources in a timely manner to individuals following the formal</li> </ul>

<b>Priority Area</b>	<b>Status</b>	<b>Commitments / Next Actions</b>
		disclosure of a disability.
	In progress	<ul style="list-style-type: none"> <li>• Improve leadership awareness and understanding of disability.</li> </ul>
	Not started	<ul style="list-style-type: none"> <li>• Include a plan to attract, retain and grow neurodiverse talent in our Disability Inclusion strategy.</li> </ul>
	In progress	<ul style="list-style-type: none"> <li>• Actively review representation of Persons with Disabilities in our priority talent and leadership development programs.</li> </ul>
<b>Employment</b>	Complete	Complete a review of the accommodation process

Priority Area	Status	Commitments / Next Actions
Workplace accommodations		<p>to identify opportunities to improve the employee accommodations experience, with a focus on:</p> <ul style="list-style-type: none"> <li>• more clearly defined roles and responsibilities of the various parties involved in the accommodation process</li> <li>• increasing manager and employee awareness of the process through participation in partner accessibility information events and collaborating with partners to enhance training and technology opportunities</li> </ul>

Priority Area	Status	Commitments / Next Actions
		throughout the accommodation process.
<b>Employment</b> Benefits	Complete	<ul style="list-style-type: none"> <li>During our annual review, we will assess opportunities for expansion of services and ways to increase awareness of the multitude of benefits available to employees.</li> </ul>
<b>Employment</b> Learning and development	In progress	<ul style="list-style-type: none"> <li>Assess opportunities to improve training for all employees (including client-facing employees, managers, leaders and recruiters) to increase knowledge and skills, and to effectively support</li> </ul>

Priority Area	Status	Commitments / Next Actions
		clients and colleagues with disabilities.
<b>Employment</b> Accessible learning experiences	In progress	<ul style="list-style-type: none"> <li>Promote awareness of RBC's Accessibility Policies.</li> </ul>
	In progress	<ul style="list-style-type: none"> <li>Review all Learning &amp; Performance roles to identify accessibility/Universal Design design skill gaps based on responsibilities and accountabilities.</li> </ul>
	In progress	<ul style="list-style-type: none"> <li>Promote the feedback mechanism for content-related or other learning accessibility concerns.</li> </ul>
<b>Built environment</b>		The following action plans address barriers and other

Priority Area	Status	Commitments / Next Actions
	In progress	<p data-bbox="927 331 1354 569">opportunities for improvements identified through consultations:</p> <ul style="list-style-type: none"> <li data-bbox="976 604 1451 1528">• Establish a process to review RBC's built environment to confirm accessibility for Persons with Disabilities is consistent with our standards, considering the branches recommended by the accessibility review:</li> <li data-bbox="1024 1564 1451 1801">○ Review physical accessibility, including washrooms,</li> </ul>

Priority Area	Status	Commitments / Next Actions
		<p>entrances/exits and ramps.</p> <ul style="list-style-type: none"> <li>○ Review seating demand to ensure adequate seating is available for Persons with Disabilities.</li> </ul>
	In progress	<ul style="list-style-type: none"> <li>• Perform a gap analysis of emergency procedures to identify opportunities to enhance safety and explore remediating actions.</li> </ul>
	In progress	<ul style="list-style-type: none"> <li>• Study ways to improve wayfinding (e.g.</li> </ul>



Priority Area	Status	Commitments / Next Actions
<b>Information and communication technologies (ICT)</b>	Initiated	<p>enhanced signage with braille) in branches and at RBC ATMs.</p> <p>Commencing by the end of 2023, RBC will take a consultative approach to assessing current gaps and identifying areas of remediation. First point of action will be to establish a governance model structure to confirm appropriate stakeholders are included to cover all areas of ICT. Establishing a strong governance model will help enable RBC to address both strategic and tactical</p>

Priority Area	Status	Commitments / Next Actions
		<p>priorities. The multi-year approach will focus on the following:</p>
	Initiated	<ul style="list-style-type: none"> <li>• Mandate new technology to include accessibility principles:               <ul style="list-style-type: none"> <li>○ Establish a strategic working group to evaluate our current build and buy practices against current industry standards.</li> <li>○ Define any one-time project work and ongoing maintenance</li> </ul> </li> </ul>

Priority Area	Status	Commitments / Next Actions
		necessary to close the accessibility gaps identified.
	In progress	<ul style="list-style-type: none"> <li>• Conduct an inventory of existing technology to include accessibility wherever feasible and prioritize high traffic applications:               <ul style="list-style-type: none"> <li>○ Establish a tactical working group to perform a current-state analysis of application-level</li> </ul> </li> </ul>

Priority Area	Status	Commitments / Next Actions
		<p>accessibility support.</p> <ul style="list-style-type: none"> <li>○ Define technology roadmaps to identify and close accessibility gaps</li> </ul>
	Initiated	<ul style="list-style-type: none"> <li>• Centralize and automate processes that involve accessibility testing to reduce barriers:             <ul style="list-style-type: none"> <li>○ Expand Accessibility Centres of Excellence to increase accessibility adoption across the enterprise.</li> </ul> </li> </ul>

Priority Area	Status	Commitments / Next Actions
		<ul style="list-style-type: none"> <li>○ Define our ideal end-state level of automated and manual testing efficiency goals.</li> <li>○ Establish manual testing procedures to thoroughly measure the gap between current-state and current-industry standards.</li> </ul>
<b>Communications, other than ICT</b>	Initiated	<ul style="list-style-type: none"> <li>• Conduct assessment of internal and external communication standards and practices to confirm any</li> </ul>

Priority Area	Status	Commitments / Next Actions
<b>Design and delivery of programs and services</b>	Initiated	<p>language used is simple, concise and accessible to everyone regardless of cognitive ability.</p> <ul style="list-style-type: none"> <li>• Review and identify documents not currently available in alternative formats (such as large print/braille).</li> </ul>
	Initiated	<ul style="list-style-type: none"> <li>• Establish a cross-functional team to explore and assess how accessibility principles can be better embedded in the design and</li> </ul>

Priority Area	Status	Commitments / Next Actions
		delivery of our programs and services.
	Complete (and ongoing)	<ul style="list-style-type: none"> <li>• Continue consultations with employees and clients with disabilities and update or enhance programs and services based on the feedback received.</li> </ul>
	Not started	<ul style="list-style-type: none"> <li>• Enhance and update the accessibility policy to confirm that accessibility is considered in the design and delivery of all programs and</li> </ul>

Priority Area	Status	Commitments / Next Actions
	In progress	<p>services across business units and platforms.</p> <ul style="list-style-type: none"> <li>• Plan to enhance training programs for customer service and client-facing teams to improve interactions with customers with disabilities.</li> </ul>
<b>Procurement of goods, services and facilities<sup>9</sup></b>	In progress	<ul style="list-style-type: none"> <li>• Increase awareness of accessibility and the Universal Design Principles by providing access to training and learning</li> </ul>

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<sup>9</sup> As noted in the Accessibility Plan, no specific barriers for PwDs were identified. The above reflects actions we took to continue to enhance accessibility.



Priority Area	Status	Commitments / Next Actions
		resources for all Procurement employees.
	Complete	<ul style="list-style-type: none"> <li>• Develop Requests for Proposal (RFP) criteria that reflect RBC's evolving accessibility requirements, as applicable.</li> </ul>
	In progress	<ul style="list-style-type: none"> <li>• Review RBC's Third-Party Risk Management Policy and Standards to ensure expectations regarding accessibility are clearly articulated.</li> </ul>

# Caution Regarding Forward-looking Statements

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This Progress Report contains forward-looking statements within the meaning of certain securities laws, including the “safe harbour” provisions of the United States Private Securities Litigation Reform Act of 1995 and any applicable Canadian securities legislation. Forward-looking statements in this Progress Report may include, but are not limited to, statements related to certain objectives, vision, commitments and goals of Royal Bank of Canada (RBC, we, us or our) and its affiliates, including our objectives, vision, commitments and goals related to the identification, prevention and removal of accessibility barriers for persons with disabilities in relevant areas identified in the Accessible Canada Act (ACA), as set out in our Plan. The forward-looking information contained in this Progress Report is presented for the purpose of assisting our stakeholders in understanding the ways we intend to address accessibility barriers and pursue opportunities to enhance accessibility for persons with disabilities and to meet relevant ACA requirements in accordance with our Plan, as well as our related objectives, visions, commitments and goals, and may not be appropriate for other purposes.

Forward-looking statements are typically identified by words such as “believe”, “expect”, “expectation”, “aim”,

“achieve”, “suggest”, “seek”, “foresee”, “forecast”, “schedule”, “anticipate”, “intend”, “estimate”, “commit”, “goal”, “plan”, “strive”, “objective”, “target”, “outlook”, “timeline” and “project” and similar expressions of future or conditional verbs such as “will”, “may”, “might”, “should”, “could”, “can” or “would” or negative or grammatical variations thereof.

By their very nature, forward-looking statements require us to make assumptions and are subject to inherent risks and uncertainties, both general and specific in nature, which give rise to the possibility that our predictions, forecasts, projections, expectations or conclusions will not prove to be accurate, that our assumptions may not be correct, and that our visions, ambitions, commitments, goals and objectives will not be achieved.

We caution readers not to place undue reliance on our forward-looking statements as a number of risk factors could cause our actual results to differ materially from the expectations expressed in such forward-looking statements. These factors – many of which are beyond our control and the effects of which can be difficult to predict – include but are not limited to: our ability to successfully implement various initiatives throughout the company under expected time frames, the risk that initiatives will not be completed within a specified period or at all or with the results or outcomes as originally expected or anticipated by RBC, our ability to enhance accessibility in RBC’s business operations,

including RBC's workspaces and retail branches, the feasibility of incorporating accessibility into our information and communication technologies, the legal and regulatory environment, and regulatory compliance (which could lead to us being subject to various legal and regulatory proceedings, the potential outcome of which could include regulatory restrictions, penalties and fines), technological advancements, the evolution of consumer behaviour, evolving social views on certain topics, strategic, reputation, competitive, and systemic risks and other risks. We caution that the foregoing list of risk factors is not exhaustive and other factors could also adversely affect our results.

Additional factors that could cause actual results to differ materially from the expectations in such forward-looking statements can be found in the risk sections of our latest Annual Report and the Risk management section of our latest Quarterly Report. When relying on our forward-looking statements to make decisions with respect to us, investors and others should carefully consider the foregoing factors and other uncertainties and potential events, as well as the inherent uncertainty of forward-looking statements.

Except as required by law, none of RBC nor its affiliates undertake to update any forward-looking statement, whether written or oral, that may be made from time to time by us or on our behalf.

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