

# RBC Accessibility Plan

2023-2026



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# General

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Royal Bank of Canada (RBC®, we, us or our) is a global financial institution with a purpose-driven, principles-led approach to delivering leading performance. Our success is driven by our 97,000+ employees, who leverage their imaginations and insights to bring our Vision, Values and strategy to life so we can help our clients thrive and communities prosper. As Canada’s largest bank and one of the largest in the world, based on market capitalization, we have a diversified business model with a focus on innovation and providing exceptional experiences to our 17 million clients in Canada, the U.S. and 27 other countries.

Diversity & Inclusion is core to RBC’s Purpose of helping clients thrive and communities prosper. That’s why we’re committed to removing barriers to support the full and equal participation of all. To continue delivering on our commitment, we are improving our overarching governance of accessibility for Persons with Disabilities. By establishing a centralized Accessibility Office (Office) and an accountable senior leader, we will strive to promote accessibility culture and coordinate accessibility improvements across RBC.

We have established a cross-enterprise steering group to oversee and direct RBC’s accessibility efforts, including receiving feedback from our clients, community partners and employees, and to inform whether we are on track to meet our goals, as presented in this document. This executive-led team is organized as follows:

<b>Executive of Global Diversity and Inclusion and Chief Accessibility Officer</b> Overall responsibility for cross-functional leadership and employee commitments	
<b>Executive of Regulatory Strategy &amp; Delivery</b> Clients	<b>Executive of Corporate Citizenship and ESG</b> Communities

For more information on our governance of accessibility, please refer to the Accessibility Office section.

If you have feedback, please reach out to our Accessibility Office at:

**Position Title:** Vice President, Global Diversity & Inclusion and Chief Accessibility Officer

**Email:** [accessibility@rbc.com](mailto:accessibility@rbc.com)

**Phone:** 416-216-1206 or toll-free 1-888-994-9004

We also accept calls through IP or video relay services.

**Mail:**

Accessibility Office  
200 Bay St, 11th Floor  
North Tower, Toronto, ON  
M5J 2T6

**Anonymous Feedback:** If you would like to provide anonymous feedback, you may dial 416-216-1206 (or toll-free 1-888-994-9004) and leave a message. Our Accessibility Office will review these messages/forms weekly. Voice messages will be transcribed and saved electronically.

# Executive Summary

The **Accessible Canada Act (ACA)** was enacted in 2019 with the aim of realizing a barrier-free Canada by 2040 by identifying, removing and preventing accessibility barriers within the federal government’s jurisdiction. One of RBC’s requirements under the ACA is to publish this RBC Accessibility Plan (the “Plan”) by June 1, 2023.

The ACA identifies the priority areas to pursue barrier-free accessibility; this Plan aligns with the ACA priority areas that are applicable to our financial services business<sup>1</sup>:

- Employment
- Built environment
- Information and communication technologies
- Communication other than information and communication technologies
- Design and delivery of programs and services
- Procurement of goods, services and facilities

RBC has built this Plan in consultation with Persons with Disabilities to help ensure we understand and reflect the needs of our clients and employees who have visible or invisible disabilities. RBC’s Plan has been informed by and developed with:

- Accessibility Standards Canada’s “nothing without us” principle in mind
- Consultations and feedback from our employees, clients and members of the public who identified as having a disability and
- Conversations with accessibility experts to identify barriers and opportunities for improvement

This Plan outlines the progress to date and the actions we plan to take between 2023 and 2026. We will publish an updated Plan in 2026 and progress reports in the interim, which will incorporate any feedback we receive.



<sup>1</sup> Transportation is not within the scope of services offered by RBC and is not included in this Plan.

# Accelerating Diversity & Inclusion at RBC

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## Improving Accessibility and an Inclusive Design

At RBC, Diversity & Inclusion (D&I) is more than a Value; it is core to our Purpose and a fundamental strength of our organization. Our D&I vision is to be among the most inclusive workplaces and successful companies, putting diversity into action to help employees, clients and communities thrive. It's also a critical component of our overarching focus on Environmental, Social and Governance (ESG) priorities, which are integrated throughout our strategy and operations to create meaningful value and harness the power of our Purpose.

In practice, bringing RBC's D&I vision to life involves setting bold commitments – informed by meaningful consultation – measuring and disclosing our progress and ensuring we remain accountable to our stakeholders.

RBC's Accessibility Plan is another demonstration of progress on our D&I journey and our commitment to being a catalyst for change. **At RBC, we are dedicated to supporting full and equal participation of all persons, and we commit to consulting with our employees and clients with disabilities to identify, prevent and remove accessibility barriers.**

Our culture of inclusivity is what enables us to attract top talent, drive innovation and growth, and provide meaningful, differentiated value for the clients and communities we serve. We also believe that diversity and inclusion is an engine for innovation and economic prosperity, and as Canada's biggest bank, and a top global financial institution, we are committed to playing a leadership role in accelerating a more inclusive, sustainable and prosperous future.

[Learn more about RBC's Diversity & Inclusion Strategic Priorities](#)



***“ At some point in our lives, almost everyone will experience or be touched by disability in some form, whether that’s temporary or permanent, visible or invisible.***

***Across RBC, we will continue to celebrate the many contributions of persons with disabilities in every aspect of our society and economy and are committed to sustained, meaningful action and progress in order to remove barriers to accessibility and inclusion.***

***A truly inclusive society is one where everyone has the opportunity to achieve their full potential. A greater understanding of the barriers and gaps we need to address is how we’ll inspire action and create change.”***

**Dave McKay  
President & Chief Executive Officer**

# Consultations




For this Plan, consultations include feedback from clients and other members of the public, employees and external subject matter experts.

RBC engaged Return on Disability Group (RoDG) to assist in conducting consultations with Persons with Disabilities. With deep expertise in this area, RoDG provides insights and guidance on data, strategy, process and offerings to enable companies to enhance accessibility and add value.







## External Consultations: Client Focus Groups

In November 2022, RoDG conducted eight research focus groups across Canada with 10 participating members in each group.

- Study participants were recruited to provide perspectives from a diverse set of disabilities including:

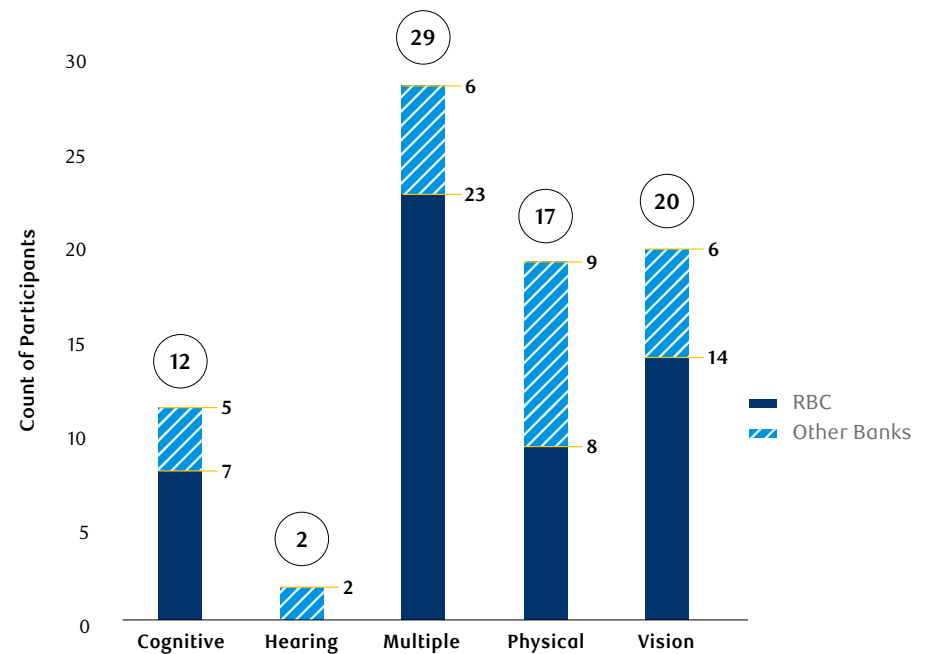
-  Physical (including mobility and dexterity)
-  Cognitive (including neurodiversity, mental health and learning disabilities)
-  Sensory (vision, hearing and speech)

- Six of the eight studies focused on a particular RBC service or offering:

-  Mortgage pre-approval process
-  Opening a personal bank account
-  In-branch account switch
-  Signing up for the Registered Disability Savings Plan (RDSP)
-  Using the RBC Mobile app
-  Personal banking at RBC


- Two studies focused on personal banking experiences across other Canadian financial institutions and the contents of their accessibility pages.
- In each study, 10 participants were asked to use a specific RBC service or offering and anonymously share their user experience.
- For studies that included a comparison of product/service offerings and a purchase, participants were given one to two weeks to complete their activities and were asked to take notes about their experience.
- For studies intended to track user experience over time, such as the RBC Mobile app study, participants were given three weeks to use the app. Participants were asked to keep a diary about their experiences throughout this period, as well as attend a three-hour focus group to provide their feedback.


Distribution of client focus group participants by disability type and banking relationship





# Consultations

■ The following accommodations were made available to study participants:

 ASL interpreters

 Auto-captioning

 Typing of all questions in chat boxes and management of chat for comments

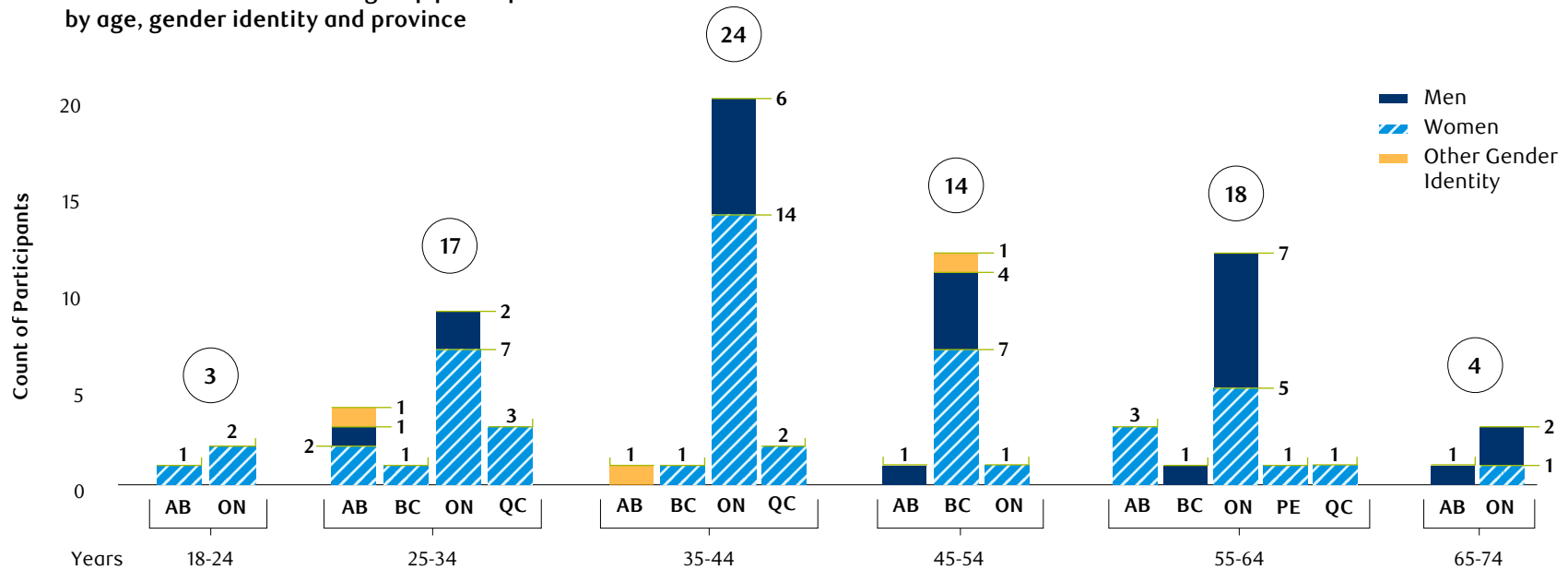
 One-on-one interviews for those who preferred non-group settings

■ General barriers identified on RBC’s public-facing websites include:

- Screen reader compatibility
- Information overload (challenging for those with cognitive disabilities)
- Lack of accessible card features (challenging for those with visual impairment)
- Perceived attitudes of some customer service advisors
- Some physical accessibility challenges at retail branches

■ Notably, participants had a favourable view of RBC’s Registered Disability Savings Plan (RDSP) product offering, mobile banking app, website and opening an account process.

**Distribution of client focus group participants by age, gender identity and province**



# Consultations

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## Employee Consultations

- In alignment with the principle “nothing without us”, and to have a clear understanding of the potential barriers employees with disabilities are experiencing, we held employee consultations in 2022 and into 2023.
- We conducted a survey that was open to all employees, and received over 1,600 responses, which provided insights into how to identify, prevent and remove potential barriers in employment.
- Two virtual consultation sessions held in March and April 2023 helped us better understand the barriers raised and explore potential solutions.

## Internal Subject Matter Experts

- Members and partners of the Accessibility Office held conversations with (i) internal subject matter experts in various functional groups; (ii) employee resource groups (ERGs); and (iii) Corporate Citizenship teams on the key priority areas, which helped us assess our current practices and how we can continue to remove barriers for Persons with Disabilities.



# Accessibility Plan

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The purpose of this Plan<sup>1</sup> is to outline how RBC will identify, remove and prevent barriers for Persons with Disabilities and meet relevant ACA requirements. This Plan was informed by internal and external consultations with Persons with Disabilities, including employees, clients and members of the public. We've developed action plans to remove these barriers and prevent new ones from occurring in the priority areas applicable to RBC. In some instances, a more thorough assessment is required to identify an effective long-term solution and implementation. We will provide more detail in future progress updates to this Plan. This Plan will continue to evolve as we progress toward our accessibility goals and with the release of future accessibility standards/requirements.

## Accessibility Office

Leveraging the D&I Governance and Accountability model, RBC will enable accountability for accessibility within the bank by incorporating the commitments detailed in this Plan into the management activities of our Global Diversity Leadership Council (DLC), Global D&I Centre of Excellence (CoE), Group Executive and business units, functions and their DLCs. The CoE is supported by teams across the organization who drive accountability for inclusion and accessibility efforts, programs, initiatives; and track progress against our commitments. These teams include but are not limited to:

- Human Resources
- ERGs
- Corporate Real Estate
- Corporate Citizenship
- Global Procurement
- Technology & Operations
- Brand, Marketing and Communications
- Regulatory Strategy & Delivery
- Group Risk Management
- Global Compliance
- Digital Accessibility

To enhance our culture of accessibility, RBC will establish a central Accessibility Office within our CoE, supported by co-executive champions. This Office will enable RBC to lead and support our ongoing accessibility journey by setting accessibility goals, acting on feedback and consistently evaluating opportunities to improve accessibility at RBC.

The following sections outline RBC's action plans across the applicable priority areas.

<sup>1</sup> The ACA 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.

# Accessibility Plan

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## Employment

At RBC, we are committed to building a diverse and inclusive workplace where every individual is enabled to reach their full potential and provided equal opportunity in the workplace.

RBC's Diversity & Inclusion strategy is focused on three key priorities:

- **Advancing diversity and representation**
- **Strengthening inclusion**
- **Enabling economic inclusion**

We are also more clearly defining our Disability Inclusion strategy to continue to bring accessibility to the forefront.

Enterprise-wide policies and practices focused on creating an inclusive environment for all employees include the Code of Conduct, Respectful Workplace Policy, Accommodation Policy for Employees and Job Applicants, and Workplace Accessibility Guidelines.

## Accommodations

RBC is committed to providing employees and job applicants with reasonable accommodations that value diversity in our culture and business practices, focus on individual needs and provide working conditions inclusive of the needs of a diverse workforce.

## Employee Well-Being

RBC understands the importance and impact of supporting employee well-being, and we believe employers need to play an active role in fostering healthy workplaces that support physical, mental and financial well-being. Our Wellness+ program aims to educate employees about well-being through interactive wellness activities, including educational content and engagement opportunities. We offer comprehensive mental health support and psychological benefits for employees and eligible family members. Raising awareness and eliminating stigma around speaking openly about mental health continues to be a key focus.

## Employee Resource Groups

RBC's employee resource group (ERG) network for Persons with Disabilities brings together employees who share a common group identity and set of interests. The RBC REACH ERG's mission is to eliminate stereotypes and stigma associated with Persons with Disabilities and drive engagement and performance through awareness, education, coaching and accommodation. This group is open to employees who identify as Persons with Disabilities, caregivers as well as allies.

For more on programs, policies and practices, please see our [About Value for Employees Backgrounder](#).

The following section outlines the goals and actions RBC will take to address barriers and other opportunities for improvements related to employment practices as identified through consultations.

# Accessibility Plan

## Talent Acquisition

RBC currently supports Persons with Disabilities throughout the talent lifecycle by striving to ensure job descriptions are clear, specific and skills-based and by offering accommodations to all candidates during the application and interview processes.

RBC also offers flexible working arrangements as appropriate and uses skills-based assessments and structured interviews when applicable.

To drive accountability for advancing diversity and representation, we review our representation, hires, promotions and departures for Persons with Disabilities on a quarterly basis to better understand and determine how best to continue to foster equitable opportunities.

RBC actively uses the Career Edge Internship program to recruit and onboard Persons with Disabilities, and actively monitors and manages progress against representation goals for Persons with Disabilities on a quarterly basis.



<p><b>Barrier Identified</b></p>	<ul style="list-style-type: none"> <li>• There is an opportunity to improve accessibility on RBC’s job application site to meet web content accessibility guidelines.</li> </ul>
<p><b>Opportunities to Improve Accessibility</b></p>	<ul style="list-style-type: none"> <li>• Strive to ensure RBC job application sites comply with current accessibility standards, which are based on the World Wide Web Consortium (W3C) Web Content Accessibility Guidelines.</li> <li>• Update and refresh RBC’s Inclusive Recruitment strategy to improve the candidate experience.</li> </ul>
<p><b>Next Actions</b></p>	<ul style="list-style-type: none"> <li>• Review all RBC job application sites and strive to ensure they meet current accessibility standards.</li> <li>• Enhance learning resources available to recruiters and hiring managers on inclusive hiring practices.</li> <li>• Review online recruitment assessments to confirm they are accessible for Persons with Disabilities.</li> </ul>

# Accessibility Plan

## Inclusive Experiences, Talent Growth and Retention

RBC regularly highlights employee stories to raise awareness, demonstrate active sponsorship and share views of representation across all position levels. RBC also hosts annual enterprise-wide virtual events for World Mental Health Day and International Day of Persons with Disabilities (IDPD) to deepen awareness and drive conversations about disability inclusion.

To strengthen inclusion through community, RBC's REACH ERG provides its members (over 1,800 employees) with access to resources and peer support and hosts regular events to increase awareness, eliminate stigma and drive inclusion.

RBC's enterprise virtual events include closed captioning, ASL (if requested), post event transcripts and accessible technology. Enterprise in-person events provide accommodations where requested, and invitations ask for accommodation requirements.

<b>Barrier Identified</b>	<ul style="list-style-type: none"> <li>• There is an opportunity to make our digital content, communications and events more accessible.</li> </ul>
<b>Opportunity to Improve Accessibility</b>	<ul style="list-style-type: none"> <li>• Increase organizational awareness of RBC's Accessibility Policies for digital content, communications, events and marketing.</li> </ul>
<b>Next Actions</b>	<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> <li>• Brand, Marketing and Communications teams to participate in learning about accessibility.</li> </ul>

<b>Barrier Identified</b>	<ul style="list-style-type: none"> <li>• There is a perceived stigma around disability disclosure resulting in some employees not self-identifying or requesting accommodations or feeling that disclosure will limit their career growth.</li> </ul>
<b>Opportunities to Improve Accessibility</b>	<ul style="list-style-type: none"> <li>• Reduce the stigma around disclosing a disability and any negative perception of its impact on career growth to strengthen inclusion and foster a sense of belonging.</li> <li>• Continue to enable people managers to support employees with disabilities to reach their full potential.</li> </ul>
<b>Next Actions</b>	<ul style="list-style-type: none"> <li>• Provide relevant information and resources in a timely manner to individuals following the formal disclosure of a disability.</li> <li>• Improve leadership awareness and understanding of disability.</li> <li>• Include a plan to attract, retain and grow neurodiverse talent in our Disability Inclusion strategy.</li> <li>• Actively review representation of Persons with Disabilities in our priority talent and leadership development programs.</li> </ul>

# Accessibility Plan

## Workplace Accommodations

Reasonable accommodations are made available to RBC employees and candidates. The Workplace Accommodation team responds to all accommodation inquiries and provides guidance to support the accommodations process. Workplace accommodations information and guidance is available to all employees through RBC’s internal site.

<b>Barrier Identified</b>	<ul style="list-style-type: none"> <li>• There is an opportunity to improve the workplace accommodations process and increase awareness of roles and responsibilities.</li> </ul>
<b>Opportunity to Improve Accessibility</b>	<ul style="list-style-type: none"> <li>• Review the accommodation process for ease of use and communicate clear roles and responsibilities of all employees involved throughout the process.</li> </ul>
<b>Next Actions</b>	<p>Complete a 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 events and collaborating with partners to enhance training and technology opportunities throughout the accommodation process</li> </ul>

## Benefits

RBC conducts an annual review of its employee Benefits Program and offerings to confirm it provides valuable coverage, flexibility and choice to meet its employees’ diverse needs.

<b>Barrier Identified</b>	<ul style="list-style-type: none"> <li>• There is an opportunity to review employee health benefits and improve awareness of coverage.</li> </ul>
<b>Opportunity to Improve Accessibility</b>	<ul style="list-style-type: none"> <li>• Review the employee Benefits Program to ensure benefits for Persons with Disabilities are meaningful and competitive.</li> </ul>
<b>Next Actions</b>	<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>



# Accessibility Plan

## Learning and Development

RBC offers enterprise-wide learning programs focused on creating an inclusive workplace, including training on anti-bias and anti-discrimination, as well as inclusion and belonging webinars. In April 2023, we refreshed our D&I Essentials program, including enhancements of the content on disability, neurodiversity, empathy and compassion. We also offer a quarterly webinar on the topic of Creating an Inclusive Workplace for Employees with Disabilities. This program helps deepen awareness of disability and opportunities to strengthen inclusion.

<b>Barriers Identified</b>	<ul style="list-style-type: none"> <li>• There is an opportunity to increase employee training on:               <ul style="list-style-type: none"> <li>– Disability awareness</li> <li>– Supporting clients with disabilities</li> <li>– Workplace accommodation process</li> </ul> </li> </ul>
<b>Opportunity to Improve Accessibility</b>	<ul style="list-style-type: none"> <li>• Review training offered to employees to ensure they have the knowledge, tools and resources to effectively support clients and colleagues with disabilities.</li> </ul>
<b>Next Actions</b>	<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 clients and colleagues with disabilities.</li> </ul>

## Accessible Learning Experiences

RBC’s Learning & Performance team works to ensure that RBC’s enterprise-wide learning offerings are accessible, or accessible formats are made available, and that content meets RBC’s Accessibility Policies by providing guidance and follow-up testing when required. The team also responds to concerns about accessibility raised to them on a case-by-case basis, updating content to meet web accessibility standards when applicable.

RBC’s Learning Design team has documented RBC’s Accessibility Policies, provides learning/information sessions and is committed to design with the World Wide Web Consortium (W3C)’s concept of POUR (Perceivable, Operable, Understandable and Robust), as outlined in the Web Content Accessibility Guidelines (WCAG 2.0).

<b>Barrier Identified</b>	<ul style="list-style-type: none"> <li>• There is an opportunity for learning experiences provided by RBC Learning &amp; Performance to be consistently accessible.</li> </ul>
<b>Opportunity to Improve Accessibility</b>	<ul style="list-style-type: none"> <li>• Strive to ensure that learning experiences provided by RBC Learning &amp; Performance are fully accessible.</li> </ul>
<b>Next Actions</b>	<ul style="list-style-type: none"> <li>• Promote awareness of RBC’s Accessibility Policies.</li> <li>• Review all Learning &amp; Performance roles to identify accessibility/Universal Design design skill gaps based on responsibilities and accountabilities.</li> <li>• Promote the feedback mechanism for content-related or other learning accessibility concerns.</li> </ul>

# Accessibility Plan

## Built Environment

We continue to make ongoing accessibility improvements, involving employees, customers, industry specialists and other stakeholders in the process. RBC's workspaces and retail branches are designed by our expert team of corporate real estate professionals and third-party licensed architects, who provide knowledge and guidance on design guidelines, including accessibility.

Accessibility of RBC's workspaces and retail branches is governed by RBC's design standards, which are informed by regional/municipal building codes and standards (including the Canadian Standards Association B651 Accessible Design for the Built Environment and B651.2 Accessible Design for Automated Banking Machines). In addition, RBC has been an active supporter of the Rick Hansen Foundation Accessibility Certification<sup>‡</sup> (RHFAC) program since 2021, which helps to inform our accessibility efforts in the built environment.

In early 2023, the design team engaged external consultants to conduct an accessibility review of a subset of offices and retail branches, which includes physical site visits and an assessment of our workplace and retail design guidelines and other related accessibility initiatives (e.g. assistive technologies). The review is expected to be completed by the end of 2023 and will enable us to understand and develop action plans to address any gaps in our built environment and update our current accessibility guidelines in both RBC's workplace and retail branch network.

<b>Barriers Identified</b>	<p>The barriers identified through consultations include:</p> <ul style="list-style-type: none"><li>• Lack of adequate seating/waiting space for Persons with Disabilities due to extended wait times</li><li>• Bank branches that did not have accessible entrances or wheelchair ramps</li></ul>
<b>Opportunity to Improve Accessibility</b>	<ul style="list-style-type: none"><li>• Strive towards equal access to RBC office spaces and branches.</li></ul>
<b>Next Actions</b>	<p>The following action plans address barriers and other opportunities for improvements identified through consultations:</p> <ul style="list-style-type: none"><li>• 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:<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 Persons with Disabilities.</li></ul></li><li>• Perform a gap analysis of emergency procedures to identify opportunities to enhance safety and explore remediating actions.</li><li>• Study ways to improve wayfinding (e.g. enhanced signage with braille) in branches and at RBC ATMs.</li></ul>

# Accessibility Plan

## Information and Communication Technologies (ICT)

ICT<sup>1</sup> includes everything we use to communicate and do business online, including web-based interfaces and non-web content such as PDFs and Word documents.

Accessibility of digital technology solutions at RBC is governed by an enterprise level policy that references digital accessibility requirements consisting of WCAG (Web Content Accessibility Guidelines) 2.1 Level AA and RBC's digital accommodation requirements.

### Barriers Identified

The barriers identified through consultations include the following:

- Some content (including web and non-web) such as images, visual instructions and guides, forms, monthly statements, and in-app user agreements and contracts are not fully accessible for Persons with Disabilities.
- Barriers that affect persons with the following disabilities were also identified:
  - Cognitive (difficult language):
    - Some areas of the website use long sentences or difficult financial terms that are not always easy to understand.
  - Mobility (excessive or automatic scrolling):
    - Some labels are not close to the form field and require additional horizontal scrolling.
    - Some tables require additional vertical scrolling to see the table header.
    - Some carousel widgets cannot be paused.
  - Vision (contrast and font sizes):
    - Some colours are too faint or blend into the background image.
    - Some fonts are too small by default.
  - Auditory (captions):
    - Video captioning is inconsistent: Some videos contain captions while other videos only contain a transcript.
  - Seizure disorder (ability to pause animations):
    - There is no ability to pause or stop some animations (e.g. GIFs).

### Opportunity to Improve Accessibility

- Strive to design, develop and test our technology solutions so they conform with the digital accessibility standard (currently WCAG 2.1 Level AA).

<sup>1</sup> Some examples of ICT include:

- Websites
- Web applications such as web-based email, web-based online banking
- Non-web documents like PDF and MS Word files, presentations such as PowerPoint
- Software such as Windows, iOS, Skype and QuickBooks
- Mobile hardware such as smartphones and tablets
- Stationary hardware such as ATMs and self-service kiosks for parking payment
- Other hardware, including computers, mice, keyboards, scanners and printers
- Assistive technology like screen readers and braille displays
- Virtual meeting platforms like Webex, Microsoft Teams and Zoom

# Accessibility Plan

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## Next Actions

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 priorities. The multi-year approach will focus on the following:

- Mandate new technology to include accessibility principles:
  - Establish a strategic working group to evaluate our current build and buy practices against current industry standards.
  - Define any one-time project work and ongoing maintenance necessary to close the accessibility gaps identified.
- Conduct an inventory of existing technology to include accessibility wherever feasible and prioritize high traffic applications:
  - Establish a tactical working group to perform a current-state analysis of application-level accessibility support.
  - Define technology roadmaps to identify and close accessibility gaps.
- Centralize and automate processes that involve accessibility testing to reduce barriers:
  - Expand Accessibility Centres of Excellence to increase accessibility adoption across the enterprise.
  - Define our ideal end-state level of automated and manual testing efficiency goals.
  - Establish manual testing procedures to thoroughly measure the gap between current-state and current-industry standards.

# Accessibility Plan

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## Communications other than ICT

RBC recognizes that people receive and provide communication in many different ways and formats. RBC will continue to communicate in a manner that maintains flexibility and includes different communication modes to suit a broad range of needs. This will be an ongoing effort to update the way we interact with our clients and prioritize simplicity across their journey.

<b>Barriers Identified</b>	<ul style="list-style-type: none"><li>• Clients expressed a need to simplify often complex banking language across RBC. Use of financial jargon/acronyms across various forms of communication led to confusion for Persons with Disabilities managing cognitive issues related to anxiety or absorption of knowledge.</li><li>• Documentation such as product brochures were not consistently available in alternate formats such as large print/braille.</li></ul>
<b>Opportunity to Improve Accessibility</b>	<ul style="list-style-type: none"><li>• Consider ways to enhance how communication can be more accessible for clients and employees.</li></ul>
<b>Next Actions</b>	<ul style="list-style-type: none"><li>• Conduct assessment of internal and external communication standards and practices to confirm any language used is simple, concise and accessible to everyone regardless of cognitive ability.</li><li>• Review and identify documents not currently available in alternative formats (such as large print/braille).</li></ul>

# Accessibility Plan

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## Design and Delivery of Programs and Services

RBC offers an RDSP, which is a registered savings plan that helps Persons with Disabilities who are eligible for the Disability Tax Credit (DTC) and their families save for long-term financial needs.

RBC will strive to update and enhance its programs and services based on the input received through ongoing consultations with Persons with Disabilities and to align with industry best practices and future ACA regulations.

<b>Barriers Identified</b>	<ul style="list-style-type: none"><li>• The enterprise level policy for accessible technology does not currently provide overarching guidance in establishing accessibility standards. Therefore, accessibility may not be consistently considered in designing programs, products and services across businesses and platforms.</li><li>• Some of the barriers identified through consultations were broadly related to in-branch experience, accessibility of certain electronic documents, frustration with some product onboarding processes and client service interactions. Specifically:<ul style="list-style-type: none"><li>– Some Persons with Disabilities with vision challenges perceived a lack of recognition of their condition from in-branch staff.</li><li>– Navigating through the mobile banking application, especially during initial setup/login and moving between pages, sessions timing out without advance notice and inflexibility around two-factor authentication caused frustration and anxiety for some users.</li></ul></li></ul>
<b>Opportunities to Improve Accessibility</b>	<ul style="list-style-type: none"><li>• Strive to ensure RBC’s user-facing programs and services are barrier-free and a consistent experience is provided to all persons.</li><li>• Provide both our employees and clients with reasonable accommodations and services that meet their diverse needs.</li></ul>
<b>Next Actions</b>	<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 delivery of our programs and services.</li><li>• Continue consultations with employees and clients with disabilities and update or enhance programs and services based on the feedback received.</li><li>• Enhance and update the accessibility policy to confirm that accessibility is considered in the design and delivery of all programs and services across business units and platforms.</li><li>• Plan to enhance training programs for customer service and client-facing teams to improve interactions with customers with disabilities.</li></ul>

# Accessibility Plan



## Procurement of Goods, Services and Facilities

Through our preliminary assessment, no specific barriers for Persons with Disabilities were identified in our Procurement practice. However, in the spirit of continuing to enhance accessibility, we will:

- Increase awareness of accessibility and the Universal Design Principles by providing access to training and learning resources for all Procurement employees
- Develop Requests for Proposal (RFP) criteria that reflect RBC's evolving accessibility requirements, as applicable
- Review RBC's Third-Party Risk Management Policy and Standards to ensure expectations regarding accessibility are clearly articulated.

## Transportation

While transportation is the seventh pillar of accessibility importance in the Accessible Canada Act, RBC does not operate or provide transportation services and, therefore, is not within the purview of this plan.

# Feedback

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We believe collaboration results in better outcomes and clear, consistent, transparent communication is essential to continue to strengthen RBC's inclusive culture. We communicate regularly about our diversity, inclusion and accessibility progress, sharing experiences and best practices. For more information, visit [rbc.com/diversity-inclusion](https://www.rbc.com/diversity-inclusion).

Your feedback and input on this Plan is welcome as we work towards a barrier-free Canada by 2040. If you have feedback, please reach out to our Accessibility Office at:

**Email:** [accessibility@rbc.com](mailto:accessibility@rbc.com)

Attachments can be included, and the maximum combined file size of all attachments cannot exceed 55MB. Examples of accepted file formats are PNG, JPEG, MP4, DOC, PDF.

**Phone:** 416-216-1206 or toll-free 1-888-994-9004

We also accept calls through IP or video relay services.

**Mail:**

Accessibility Office  
200 Bay St, 11th Floor  
North Tower, Toronto, ON  
M5J 2T6

**Anonymous Feedback:** If you would like to provide anonymous feedback, please call 416-216-1206 (or toll-free 1-888-994-9004) and leave a message. Our Accessibility Office will review these messages/forms weekly. Voice messages will be transcribed and saved electronically.

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.

**Alternative Formats:** If you require alternative formats (e.g. large print, braille), please reach out to our Accessibility Office at any of the contacts identified.

RBC routinely engages with stakeholders, as appropriate, to understand their perspectives on environmental and social issues. We also have in place and will continue to develop mechanisms by which anyone, including our employees, contractors, suppliers and clients, can raise their concerns with us, including those related to human rights. [Human rights-related concerns can be submitted here](#)

For more information on accessible customer service, visit [Accessibility at RBC](#).

## Training

RBC will continue to support and train employees to help them deepen their awareness of accessibility and leading with disability inclusion in mind.

For specific action plans on training, please refer to the [Employment section](#).

# Glossary

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**ABM:** Automated banking machine

**ACA:** Accessible Canada Act

**ASL:** American Sign Language

**ATM:** Automated teller machine

**Barrier:** According to the ACA, anything physical, architectural, technological or attitudinal based on information or communications that is the result of a policy or a practice that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation.

**Disability:** 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 in nature, or evident or not, that, in interaction with a barrier, hinders a person’s full and equal participation in society.

Types of disabilities include, but are not limited to:

- Seeing or vision
- Mobility
- Speech
- Hearing
- Flexibility
- Dexterity
- Pain-related
- Learning
- Cognitive
- Developmental
- Mental-health related
- Memory

**ESG:** Environmental, Social and Governance is a framework designed to be embedded in an organization’s strategy that considers the needs and ways in which to generate value for all organizational stakeholders.

**RDSP:** Registered Disability Savings Plan is a plan registered with the Canada Revenue Agency (CRA) that is designed to help individuals with disabilities and their families save for their long-term financial needs.

**RoDG:** Return on Disability Group

**Universal Design:** Universal Design is the design and composition of an environment so that it can be accessed, understood and used to the greatest extent possible by all people regardless of their age, size, ability or disability. An environment (or any building, product or service in that environment) should be designed to meet the needs of all people who wish to use it.

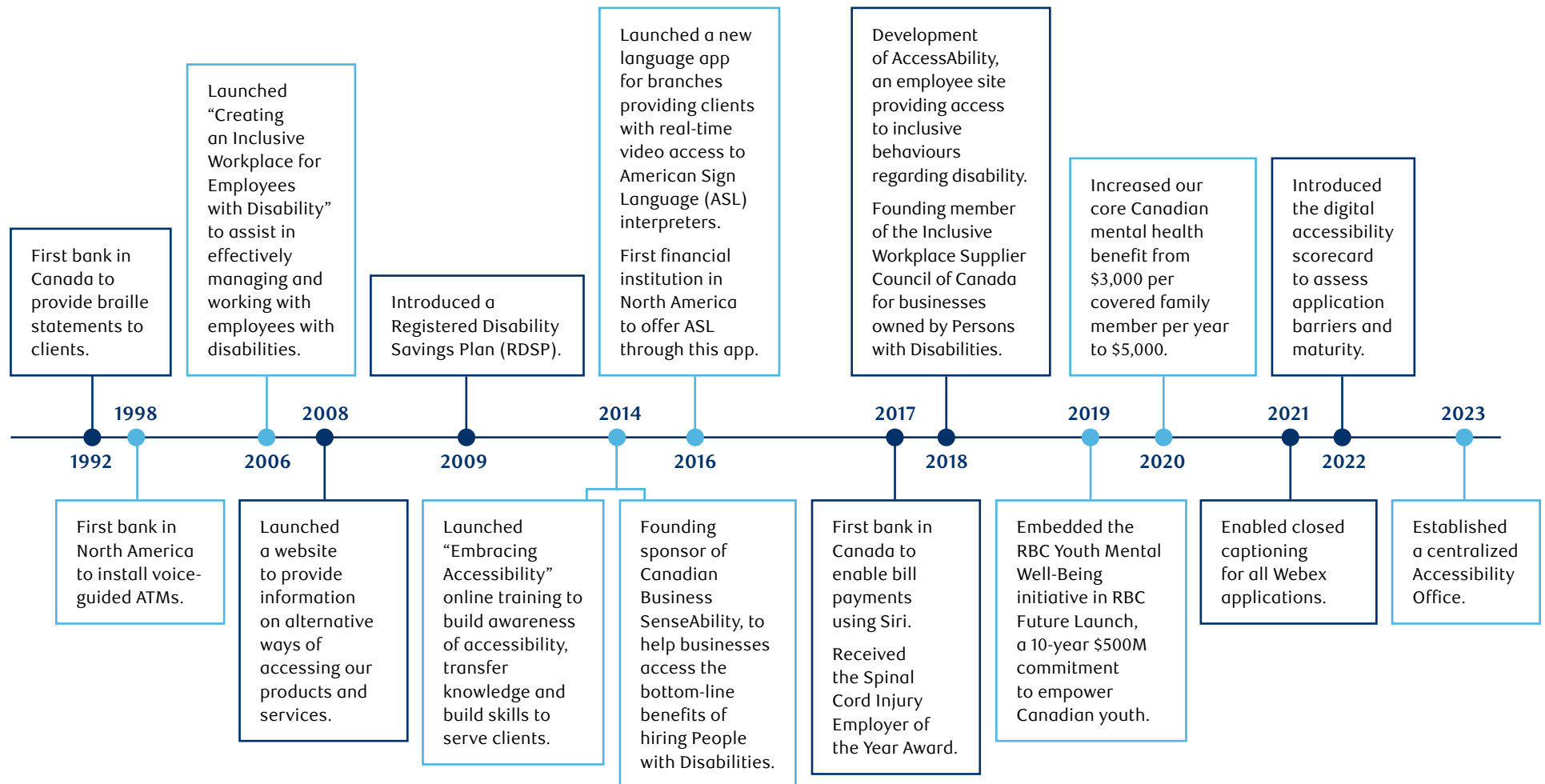
**W3C:** The World Wide Web Consortium is the main international standards organization for the World Wide Web.

**WCAG 2.0/2.1:** Web Content Accessibility Guidelines (WCAG) covers a wide range of recommendations for making web content more accessible. Following these guidelines will make content more accessible to a wider range of Persons with Disabilities, including accommodations for blindness and low vision, deafness and hearing loss, limited movement, speech disabilities, photosensitivity, and combinations of these; and some accommodation for learning disabilities and cognitive limitations.

**Workplace accommodation:** Refers to an adjustment in a standard or practice, or the removal of a barrier, that enables employees to successfully achieve the goals and expectations of their roles. Examples include, but are not limited to, physical modifications to a workstation or premises, providing adaptive technology, flexibility of scheduling to meet personal needs or accommodation for religious and cultural observances.

# Appendix – RBC’s Accessibility Journey

RBC has a long history of addressing barriers potentially impacting our clients, colleagues and communities from equitable access to products, services or opportunities. The following timeline illustrates some of the key milestones on our accessibility journey.



# Caution Regarding Forward-looking Statements

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This RBC Accessibility Plan (Plan) may contain 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 Plan may include, but are not limited to, statements related to certain social and governance-related objectives, vision, commitments and goals of Royal Bank of Canada (RBC, we, us or our), 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). The forward-looking information contained in this Plan 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, as well as our related social and governance-related objectives, vision, 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”, “intend”, “commit”, “goal”, “plan”, “strive” and “objective”, and similar expressions of future or conditional verbs such as “will”, “may”, “might”, “should”, “could” or “would”.

By their very nature, forward-looking statements require us to make assumptions and are subject to inherent risks and uncertainties, which give rise to the possibility that our expectations or conclusions will not prove to be accurate, that our assumptions may not be correct, and that our social and governance-related visions, commitments, goals and objectives will not be achieved. We caution readers not to place undue reliance on these 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, 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), 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 Annual Report for the year ended October 31, 2022 (2022 Annual Report) and the Risk management section of our Quarterly Report for the three-month period ended April 30, 2023 (Q2 2023 Report to Shareholders). 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.

Except as required by law, RBC does not 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.

All references to websites are for your information only. The content of any websites referred to in this Plan, including via a website link, and any other websites they refer to are not incorporated by reference in, and do not form part of, this Plan.



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