# RBC Accessibility Plan: 2023 Progress Report

On June 1, 2023, Royal Bank of Canada and certain of its subsidiaries¹ (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.² The Plan aligns with the requirements of the Accessible Canada Act (the ACA) and helps support inclusive and equitable participation for all.

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<sup>&</sup>lt;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). As the acquisition was completed outside of the reporting period, information regarding HSBC Canada is not included in the scope of this Report.

<sup>&</sup>lt;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 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.

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 Persons with Disabilities. We are also establishing 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 in the ACA that are applicable to our financial services business.<sup>4</sup>

This RBC Accessibility Plan: 2023 Progress Report

(the Report) reflects activities undertaken in respect of the Plan during the period from June 1, 2023, through December 31, 2023, unless otherwise noted. In some instances clearly identified as such, this Report refers to actions taken after December 31, 2023 but prior to the publication of this document in order to provide further insight into our process.

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

In this Report, we have set out our progress in implementing our Plan. This Report does not address those action items where progress has yet to be made. While we have made progress against certain action items in the Plan, we continue to work towards addressing all action items and will provide updates in those respective areas in future progress reports.

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 Diversity & Inclusion and Chief Accessibility Officer
- Email: accessibility@rbc.com
   Attachments can be included, and the maximum combined file size of all attachments cannot exceed 55MB. Accepted file formats include PNG, JPEG, MP4, DOC and 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

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**

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 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 <a href="mailto:rbc.com/accessibility">rbc.com/accessibility</a> website.

### 2023 Progress Update

### **Accessibility Office**

Since the Plan was published on June 1, 2023, we have been working on further establishing the Accessibility Office and strengthening collaboration across the organization.

We have identified key stakeholders to support the work effort needed and implemented processes to support our operating and governance model, including the sharing of feedback received on barriers experienced. We also began to engage senior executives and our Diversity Leadership Councils to support our ongoing commitments.

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

### **Employment**

### • Talent Acquisition

Action item	Progress update
Review online recruitment assessments to confirm they are accessible for Persons with Disabilities.	The Accessibility Office and our Inclusive Recruitment team conducted an accessibility review on all current candidate assessments used during the recruitment process in collaboration with our suppliers. No significant accessibility issues were found, and we confirmed alternate formats and options are available to accommodate specific needs.

#### • Inclusive Experiences, Talent Growth and Retention

Action item	Progress update
Brand, Marketing and Communications teams to participate in learning about accessibility.	In October 2023, to continue to raise awareness of communication barriers for Persons with Disabilities, the Accessibility Office presented an education session to the RBC Global Employee Communications Council <sup>5</sup> to share accessibility tips for communicators as well as insights on Universal and Inclusive Design. We are developing further education and awareness training resources.

<sup>&</sup>lt;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.

### • Inclusive Experiences, Talent Growth and Retention

Action item	Progress update
Provide relevant information and resources in a timely manner to individuals following the formal disclosure of a disability.	To help enable a more streamlined path to resources and information on workplace accommodations, we developed a system-automated notification in our primary human resources (HR) platform to send a summary of available resources to any employee who initiates a voluntary self-disclosure of a disability in their employee profile. We plan to activate this notification in 2024.
Improve leadership awareness and understanding of disability.	We built a prototype for an internal digital accessibility hub which will serve as a central source for the most up-to-date information, resources, and support for accessibility. We intend to launch this accessibility hub in 2024 and make it available to all employees globally.

### Workplace Accommodations

Action item	Progress update
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.	To deepen awareness of disability inclusion and some of the accessibility barriers faced by Persons with Disabilities, we hosted our annual global employee event virtually on December 1, 2023, in recognition of the United Nations International Day of Persons with Disabilities. This event was attended by more than 1,800 employees who benefitted from learning about the lived experiences of Persons with Disabilities, the access to workplace accommodations at RBC and ways to be a better ally. RBC made the recording of the event available to all employees globally on our internal diversity and inclusion site.

### **Benefits**

Action item	Progress update
During our annual review of the employee Benefits Program, we will assess opportunities for expansion of services and ways to increase awareness of the multitude of benefits available to employees.	In October 2023, in collaboration with the RBC REACH employee resource group and our Canadian benefits provider, we hosted an information session for employees based in Canada to raise awareness of available benefits relevant for Persons with Disabilities and caregivers, prior to the 2024 annual review of the employee Benefits Program. More than 400 employees attended the session. We intend to provide an update on the outcome of this annual review in our 2024 progress report.

### Learning and Development

Action item	Progress update
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.	We conducted a learning needs analysis in order to identify opportunities for developing learning programs and resources that can help improve accessibility and strengthen disability inclusion to support RBC colleagues. We identified the following opportunities: • Enhance learning offerings for all employees to raise awareness of accessibility and available programs at RBC • Provide additional resources for people managers and our client-facing roles These findings will be used to inform the future development of learning aids and programming for employees and people managers.

### **Built environment**

Action item	Progress update
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:  • Review physical accessibility, including washrooms, entrances/exits and ramps.  • Review seating demand to ensure adequate seating is available for Persons with Disabilities.	RBC engaged Universal Design Access to conduct accessibility assessments on a subset of office and retail branches. We intend to report on the findings of these assessments and actions planned or taken, if any, in our 2024 progress report.

### Information and communication technologies (ICT)

Information and communication technologies include everything we use to communicate and conduct business online, including web-based interfaces and non-web content such as PDFs and Word documents.

We intended to establish a governance model for digital accessibility by the end of 2023. However, to build an approach we can scale and execute, we require more consultation with key stakeholders. We have begun discussions about the governance model in 2023 and will continue this work in 2024.

Action item	Progress update
Conduct an inventory of existing technology to include accessibility wherever feasible and prioritize high traffic applications.	• While accessibility and Universal Design principles <sup>6</sup> are incorporated into our application development requirements, there is an opportunity to help teams more consistently implement our accessibility standards. In December 2023, our Digital Accessibility Enablement team conducted an initial baseline testing on over 170 related RBC websites, webpages and applications to measure the implementation of web accessibility standards and to help prioritize the necessary efforts to address any identified gaps. We are reviewing the findings of this testing, and we intend to report on them and actions planned or taken, if any, in our 2024 progress report.

<sup>&</sup>lt;sup>6</sup>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.

Action item	Progress update
Conduct an inventory of existing technology to include accessibility wherever feasible and prioritize high traffic applications.	<ul> <li>In early 2023, the RBC HR Technology team reviewed our primary HR platform against RBC's Digital Accessibility Requirements to begin identifying opportunities to improve accessibility in collaboration with the vendor. We are reviewing the findings and intend to report on any gaps identified and actions planned or taken, if any, in our 2024 progress report.</li> </ul>

### Communication, other than information and communication technologies

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. While work is advancing, we have no specific progress to report at this time. We anticipate sharing updates in the 2024 progress report.

### Design and delivery of programs and services

Action item	Progress update
Continue consultations with employees and clients with disabilities and update or enhance programs and services based on the feedback received.	<ul> <li>We continue to have ongoing discussions with key stakeholders to better understand the opportunity for accessibility principles to be embedded in the design and delivery of RBC's programs and services. In November 2023, we provided advice and guidance to the Retail Card Products team within Personal and Commercial Banking on the incorporation of accessibility features in our client cards.</li> </ul>

Action item	Progress update
Continue consultations with employees and clients with disabilities and update or enhance programs and services based on the feedback received.	We have established a cross- functional working team including Personal and Commercial Banking, HR and Technology teams which meets quarterly to discuss feedback from clients and employees about accessibility barriers and to explore ways we can improve accessibility.
Plan to enhance training programs for customer service and client-facing teams to improve interactions with customers with disabilities.	As outlined in the Employment section of this Report, we identified opportunities for additional learning resources for all employees, including client-facing employees, to help them identify, remove and prevent barriers to accessibility, when serving clients with disabilities. We anticipate offering resources through our accessibility hub in 2024.

### Procurement of goods, services and facilities

Our preliminary assessment of procurement practices revealed no specific barriers for Persons with Disabilities; however, we will assess and respond to opportunities to enhance accessibility if, and when identified.

### **Transportation**

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

### **Consultations**

To help enhance our culture of accessibility and further enable the participation of all, we continue to seek the input of Persons with Disabilities, caregivers and allies. While some of the actions highlighted took place after December 31, 2023, the work to create the feedback and consultation mechanisms began during the reporting period. Since June 1, 2023, we initiated the following consultations:

#### **Employees**

- A survey was sent to members of REACH, RBC's employee resource group for Persons with Disabilities and allies on January 15, 2024. The survey was open for four weeks and was conducted to gather sentiment on our progress since the last survey in 2022. It included questions on accessible experiences related to work, digital and disability inclusion culture at RBC. We received 712 anonymous responses. We intend to report on the findings of the survey and any actions taken, if any, in our 2024 progress report.
- The 2023 Inclusive Experiences Composite Score<sup>7</sup> for Persons with Disabilities indicates 77% of employees 'strongly agree' and

<sup>&</sup>lt;sup>7</sup>The Inclusive Experiences Composite Score is our measure for understanding the experiences of our employees across three core pillars of inclusion: Psychological Safety, Respect/Trust and Sense of Belonging. It is based on extensive research of the drivers of inclusion and is a composite of eight questions in our annual Employee Engagement Survey.

### Consultations

'agree' on the measures of inclusion, representing no change in reported results since our 2022 survey was completed. We continue to monitor the score through our existing annual Employee Engagement Survey to determine how the work we are doing against our commitments are making an impact for our employees.

#### Clients

We sought feedback from clients through an IPSOS survey conducted between November 1, 2023 and January 31, 2024. We asked questions to gauge possible barriers and accessible experiences in their interactions with RBC, including experiences related to navigating RBC branches, accessing information online and the ability to receive the support/advice needed. We received over 1,700 responses. We intend to report on the findings of the survey and any actions taken, if any, in our 2024 progress report.

### Feedback

With the launch of the Plan, we established multiple global channels for employees, contract workers, suppliers, and clients to provide feedback to the Accessibility Office on the manner in which RBC is implementing the Plan and on the barriers encountered by employees and by other persons that deal with RBC.

During the reporting period, we received 66 accessibility-related inquiries. A summary of key categories is included in Figure 1. We have initiated a cross-functional working team including Personal and Commercial Banking, HR and Technology teams to share feedback received across these teams and further explore opportunities to identify, remove and prevent barriers for Persons with Disabilities.

We received positive feedback with regard to the establishment of the Accessibility Office and the approach RBC is taking to address barriers to improve accessibility. The feedback that we received in relation to the various priority areas of the Plan has reinforced that there is more work to be done and validates that our Next Actions continue to reflect the needs of our employees and clients.

### Feedback

Figure 1: Summary of Accessibility Related Feedback		
Design and delivery of products and services	48%	
Information and communication technologies (ICT)	36%	
Employment	11%	
Built environment barriers	3%	
RBC Accessibility Plan	2%	

The following statements include insights drawn from the feedback received in the areas of design and delivery of products and services, information and communication technologies, and employment:

• We received the most feedback with respect to the design and delivery of products and services (48%) as described in Figure 1 above. The majority of the feedback we received related to issues in relation to our client-facing roles. As outlined above, in the Employment section of this Report, we identified opportunities for additional learning resources for all employees, including client-facing employees, to help them identify, remove and prevent barriers to accessibility, when serving clients with disabilities.

### Feedback

- With respect to information and communication technologies, we received the most feedback on the digital accessibility of our technology platforms and its compatibility with adaptive technologies. We are currently reviewing the findings of our initial baseline testing of our websites, webpages and applications.
- In the area of employment, the feedback indicates we should continue to strengthen our accessibility and disability inclusion training. Ongoing reviews of benefits coverage and accommodations processes will also help support the needs of our employees.

### Caution Regarding Forward-looking Statements

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 social and governance-related 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 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", "suggest", "seek", "foresee", "forecast", "schedule", "anticipate", "intend", "estimate", "commit", "goal", "plan", "strive", "objective", "target", "outlook", "timeline" and "project" and similar expressions of

### Caution Regarding Forward-looking Statements

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 social and governance-related 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, feasibility of incorporating accessibility into our information and communication technologies, the legal and regulatory environment, and regulatory compliance (which

### Caution Regarding Forward-looking Statements

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 social and governance-related 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.

All references to websites are for your information only. The content of any websites referred to in this Progress Report, 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 Progress Report.