



# CIBC Mellon's Accessibility for Ontarians with Disabilities Policy

CIBC MELLON

# TABLE OF CONTENTS

- Accessibility for Ontarians with Disabilities Policy ..... 3
- 1. Summary..... 3
- 2. Scope..... 3
- 3. Requirements..... 3
  - 3.1 Establishment of Multi-Year Accessibility Plan..... 3
  - 3.2 Training..... 4
  - 3.3 Accessibility Compliance Reports..... 4
- 4. Accessibility Standards for Customer Service ..... 4
  - 4.1 Assistive Devices..... 4
  - 4.2 Service Animals..... 4
  - 4.3 Support Person..... 4
  - 4.4 Notice of Temporary Disruptions in Service ..... 5
  - 4.5 Feedback..... 5
- 5. Integrated Accessibility Standards: Information and Communications Standards..... 5
  - 5.1 Accessible Formats and Communication Supports..... 5
  - 5.2 Accessible Website and Web Content..... 5
- 6. Integrated Accessibility Standards: Employment Standards ..... 6
  - 6.1 Recruitment and Selection..... 6
  - 6.2 Employee Supports ..... 6
  - 6.3 Accessible Formats and Communication Supports for Employees ..... 6
  - 6.4 Individualized Workplace Emergency Response Information..... 6
  - 6.5 Documented Individual Accommodation Plan ..... 7
  - 6.6 Return to Work Process..... 7
  - 6.7 Performance Management, Career Development and Redeployment..... 7
- 7. Policy Review..... 7
- 8. Links ..... 7

# Accessibility for Ontarians with Disabilities Policy

## 1. SUMMARY

CIBC Mellon is committed to providing an accessible workplace where all individuals have equal access to its premises and products and services in a manner that respects the dignity and independence of people with disabilities.

This Policy has been prepared in accordance with the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and its associated regulations, including the Accessibility Standards for Customer Service and the Integrated Accessibility Standards. It will govern CIBC Mellon's AODA Program, supporting the company's delivery of its products and services to people with disabilities and will outline how the company will comply with the requirements of the AODA and its regulations.

CIBC Mellon is committed to meeting the accessibility needs of people with disabilities in a timely manner. Our goal is to treat all individuals in a manner that allows them to maintain their dignity and independence. We will take reasonable efforts to ensure that the delivery of its products and services is consistent with the following guiding principles:

- Respecting the dignity and independence of people with disabilities
- Ensuring that the delivery of products and services to people with disabilities is integrated within CIBC Mellon's existing policies and procedures unless an alternative measure is necessary
- Ensuring that people with disabilities are provided with an equal opportunity to obtain, use and benefit from CIBC Mellon's workplace and its products and services

This Policy will be maintained on CIBC Mellon's website and provided, upon request, in an accessible format that takes a person's accessibility needs into account.

## 2. SCOPE

This Policy applies to all CIBC Mellon employees, including permanent employees, temporary staff and independent contractors, and all CIBC Mellon employees who are accountable for the proper treatment of and accessibility for individuals, including people with disabilities.

## 3. REQUIREMENTS

The AODA Program includes the following components:

### 3.1 Establishment of Multi-Year Accessibility Plan

CIBC Mellon will establish, implement and maintain a Multi-Year Accessibility Plan. The Multi-Year Accessibility Plan describes the specific short-term and long-term actions that CIBC Mellon will take to meet its obligations under the AODA and its regulations within the required timelines. CIBC Mellon will update the Multi-Year Accessibility Plan at least once every five years. The Multi-Year Accessibility Plan will be posted on CIBC Mellon's website.

## 3.2 Training

CIBC Mellon will ensure that timely training is provided to all employees, aligning with the requirements of the AODA and its regulations, and the Ontario Human Rights Code as it relates to people with disabilities.

Training content related to the AODA and its regulations as well as the Human Rights Code is included in several e-learning modules and addresses the following topics:

- How to interact and communicate with people with various types of disability
- How to interact with people with disabilities who use an assistive device or require the assistance of a guide dog, other service animal or support person
- How to use equipment or devices available on CIBC Mellon's workplace or otherwise provided by CIBC Mellon that may help a person with a disability
- What to do if a person with a disability is having difficulty accessing CIBC Mellon's products and services

All new hires complete training related to the AODA as part of the learning component of the onboarding process. Human Resources is responsible for updating the learning content and monitoring the completion of training as well as the retention of training records.

## 3.3 Accessibility Compliance Reports

CIBC Mellon Compliance will file an Accessibility Compliance Report electronically on December 31, 2014 and every three years thereafter, unless a different date is established.

# 4. ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE

## 4.1 Assistive Devices

CIBC Mellon will accommodate the use of assistive devices in order to ensure that people with disabilities are able to obtain, use or benefit from CIBC Mellon's workplace, and its products and services. Assistive devices include, but are not limited to, wheelchairs, canes, walkers, scooters, screen readers, listening devices and braille display boards.

## 4.2 Service Animals

CIBC Mellon will accommodate the use of guide dogs and other service animals. Guide dogs and other service animals will be permitted to enter CIBC Mellon's offices and to remain with the person with the disability unless the guide dog or other service animal is otherwise excluded by law. If the guide dog or other service animal is otherwise excluded by law, CIBC Mellon will ensure that other measures are available to allow the person with the disability to use, obtain or benefit from CIBC Mellon's offices, and its products and services.

## 4.3 Support Person

CIBC Mellon will accommodate a person with a disability's need for the assistance of a support person. If a person with a disability is accompanied by a support person, the company will ensure that both persons are permitted to enter the premises. The person with the disability will not be prevented from having access to the support person while on the premises.

#### 4.4 Notice of Temporary Disruptions in Service

Temporary service disruptions may occur due to reasons that may or may not be within the control and knowledge of CIBC Mellon. In the event of any temporary service disruptions to the workplace or to the company's products and services that people with disabilities rely on to access or use, reasonable efforts will be made to provide advance notice. In some circumstances, including unplanned temporary disruptions, advance notice may not be possible.

Notice of temporary disruptions in service shall include the reason for the disruption, the anticipated duration of the disruption and a description of available alternative facilities, if any.

#### 4.5 Feedback

CIBC Mellon will receive and respond to feedback regarding the manner in which it provides information about the company and its products and services to people with disabilities. People with disabilities will be able to provide feedback and receive responses to feedback in a manner that takes into account a person's accessibility needs due to disability. Individuals can provide feedback in various formats including mail, phone, email or fax.

By Mail:

CIBC Mellon Corporate Affairs  
P.O. Box 1  
320 Bay Street  
Toronto, Ontario  
M5H 4A6

By Phone: (416) 643-5000

By E-Mail: [corporate\\_affairs@cibcmellon.com](mailto:corporate_affairs@cibcmellon.com)

Information regarding how a person with a disability can provide feedback is also posted on CIBC Mellon's website and various policies and procedures.

## 5. INTEGRATED ACCESSIBILITY STANDARDS: INFORMATION AND COMMUNICATIONS STANDARDS

### 5.1 Accessible Formats and Communication Supports

CIBC Mellon will communicate with people with disabilities in a manner that takes into account a person's disability.

Except as otherwise provided by the AODA and its regulations, CIBC Mellon will, upon request and in consultation with the person making the request, provide or make arrangements to provide accessible formats and communication supports for people with disabilities. Accessible formats may include alternatives to standard print, such as braille or large font, and communication supports include methods to assist non-verbal communication.

### 5.2 Accessible Website and Web Content

CIBC Mellon will ensure that it complies with the World Wide Web Consortium Web Content Accessibilities Guidelines as required by the AODA.

## **6. INTEGRATED ACCESSIBILITY STANDARDS: EMPLOYMENT STANDARDS**

### **6.1 Recruitment and Selection**

CIBC Mellon is committed to ensuring that reasonable accommodations, upon request, are made available to people with disabilities during the recruitment and selection process.

In particular, CIBC Mellon will:

- Notify job applicants about the availability of accommodations during the recruitment and selection process. Notification will be provided on CIBC Mellon's website, job postings and invitation for interviews;
- Consult with job applicants to ensure reasonable accommodations are provided, taking into account individual accessibility needs; and
- Notify new hires about the availability of accommodations by providing them with AODA related policies and workplace accommodation for people with disabilities.

### **6.2 Employee Supports**

CIBC Mellon will inform new and existing employees of its policies for accommodating employees with disabilities, including policies on the provision of employment-related accommodations that take into account an employee's accessibility needs due to disability. When there are changes to CIBC Mellon policies for accommodating employees with disabilities, CIBC Mellon will provide an update regarding the changes.

### **6.3 Accessible Formats and Communication Supports for Employees**

Upon the request of an employee with a disability, CIBC Mellon will provide the employee with, or arrange for the delivery of, information that is necessary in order for the employee to perform a job and information that is generally available in the workplace. CIBC Mellon may consult with the employee to determine the suitability of an accessible format or communication support.

### **6.4 Individualized Workplace Emergency Response Information**

CIBC Mellon will provide individualized workplace emergency response information as soon as practicable to employees who have disabilities when the company is aware of the need for accommodation due to the person's disability. The company will communicate the individualized workplace emergency response information process through various channels and will ensure that information regarding individualized workplace emergency response information is communicated only with the consent of the employee with the disability.

The employee's individualized workplace emergency response information will be reviewed and updated when new information is received by the employee or when there is a change in the employee's circumstances and at least on an annual basis.

## **6.5 Documented Individual Accommodation Plan**

CIBC Mellon will develop a procedure for the creation and review of documented individual accommodation plans for employees with disabilities.

CIBC Mellon will develop individualized accommodation plans for its employees with disabilities, as the company is made aware. CIBC Mellon will implement and maintain measures to the extent possible to maintain the privacy of its employees with disabilities. Upon the consent of the employee with the disability, CIBC Mellon Human Resources will partner with other departments who are designated to provide assistance to develop a documented individual accommodation plan to address the accommodations needs of the individual.

## **6.6 Return to Work Process**

CIBC Mellon will have in place a documented return to work process for employees who have been absent from work due to disability and require disability-related accommodations in order to return to work. The return to work process will outline the steps that CIBC Mellon will take to facilitate the return to work of employees with disabilities and consider the accommodations under the documented individual accommodation plan, if applicable.

## **6.7 Performance Management, Career Development and Redeployment**

CIBC Mellon will take into account the accessibility needs of employees with disabilities and the documented individual accommodation plans of employees with disabilities, if applicable, when carrying out performance management processes and when assessing career development and redeployment opportunities.

# **7. POLICY REVIEW**

This Policy will be reviewed as often as necessary but no less than every two years. CIBC Mellon reserves the right to interpret this Policy in its sole discretion and make changes as it deems appropriate from time to time without the requirement of advance notice.

# **8. LINKS**

This Policy can be accessed externally on the CIBC Mellon website and internally in the Human Resources policy section.

**CIBC MELLON**

➤ A BNY MELLON AND CIBC JOINT VENTURE COMPANY<sup>SM</sup>

**[www.cibcmellon.com](http://www.cibcmellon.com)**

©2015 CIBC Mellon is a licensed user of the CIBC trade-mark and certain BNY Mellon trade-marks. CIBC Mellon is the corporate brand of CIBC Mellon Trust Company and CIBC Mellon Global Securities Services Company and may be used as a generic term to reference either company or both companies collectively.