



# Accessibility Standards Policy

December 2025



## Introduction/Purpose

The Integrated Accessibility Standards under the Accessibility for Ontarians with Disabilities Act (“AODA”), 2005 requires organizations to create written accessibility policies and make them publicly available. Accessibility policies are the formal rules an organization puts in place to achieve its accessibility goals.

## Applicability and Scope

Policy documents are applicable to all full and part-time employees including individuals on a contract or temporary basis, while working for or on behalf, of CIBC Mellon Trust Company.

## Policy Details/Discussion

### 1. Statement of Organizational Commitment

CIBC Mellon is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration and we are committed to meeting the needs of people with disabilities in a timely manner.

CIBC Mellon will undertake reasonable efforts, to facilitate and implement accessible solutions where required. Solutions may include temporary or permanent measures to remove Barriers which may prevent an individual from accessing information about CIBC Mellon, receiving services provided by CIBC Mellon or fulfilling the essential duties of a job within our workplaces.

As each situation is unique, the measures taken by CIBC Mellon may need to be customized to ensure an individual is reasonably accommodated. In these instances, CIBC Mellon will work with the individual requesting accommodation to identify and fulfill an appropriate solution.

### 2. Reporting Requirements

CIBC Mellon is required to file an accessibility compliance report on a 3 year cycle.

### 3. Accessibility Policies and a Multi-Year Plan

In accordance with the nature of their business roles, functions and responsibilities, Corporate Compliance, Corporate Communications, Human Resources, and other impacted stakeholders are required to maintain current and detailed written departmental policies and procedures, to address and support the core components of this policy.

A public multi-year accessibility plan (the “Plan”) must be prepared in accordance with the AODA and its associated regulations. This plan must outline the actions CIBC Mellon will take to remove accessibility Barriers and meet Ontario accessibility laws. The Plan should be publicly accessible and must be made available in accessible formats, upon request. At minimum, the Plan should be revisited on a 5 year cycle in accordance with regulatory guidance.

### 4. Training

Training will be provided to all employees that interact with the public or other third parties and to those that are involved in developing customer service policies, practices and procedures.

Employees that require training will be provided the Accessibility Standards training as soon as reasonably possible after the commencement of their employment, and on an ongoing basis as required.

Human Resources will retain the record of training, including the date on which training is provided, the number and details of individuals that completed the training.

Training will include the following:

- The purposes of AODA and the requirements of the customer service standard;
- How to interact and communicate with people with various types of disabilities;
- How to interact with people with disabilities who use an Assistive Device or require the assistance of a Service Animal or a Support Person;
- Communicating and/or providing support to individuals in a manner that is respectful of their Disability; and
- Policies, practices, and procedures relating to the customer service standard.

## **5. Assistive Devices**

Persons with a Disability are welcome to use their own Assistive Devices on CIBC Mellon premises. In cases where the Assistive Device presents a health or safety concern, CIBC Mellon will undertake reasonable efforts to provide an alternative accessible solution, as required, to ensure the persons with a Disability can access our products/services.

## **6. Communicating With A Person With A Disability**

CIBC Mellon employees will communicate with persons with Disabilities in a manner that considers their Disability.

## **7. Service Animals**

Persons with a Disability are permitted to be accompanied by a Service Animal on CIBC Mellon premises. A Service Animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

When CIBC Mellon cannot easily identify a Service Animal, our employees may request documentation from a Regulated Health Professional that confirms the person requires the Service Animal for reasons relating to a Disability.

## **8. Support Persons**

Persons with a Disability are permitted to be accompanied by a Support Person on CIBC Mellon premises.

## **9. Notice of Temporary Disruption**

In the event of a planned or unexpected disruption that has an impact on the accessibility of CIBC Mellon's services and/or premises, CIBC Mellon will provide notice of interruption on a best efforts basis. The notice will include information about the reasons for the disruption, its anticipated duration, and a description of alternative services, where available.

## **10. Feedback Process**

CIBC Mellon shall maintain channels on our website for providing feedback on how CIBC Mellon provides accessible service to employees, contractors and external clients.

Internal Employee feedback may be provided in the following ways:

- By Phone: (416) 643-5000
- By E-Mail: [HumanResources@cibcmellon.com](mailto:HumanResources@cibcmellon.com)

External Client feedback may be provided in the following ways:

- By Mail: Corporate Affairs 1 York Street, Suite 900 Toronto (Ontario) M5J 0B6
- By Phone: (416) 643-5000
- By E-Mail: [corporate\\_affairs@cibcmellon.com](mailto:corporate_affairs@cibcmellon.com)

## **11. Information and Communication**

CIBC Mellon has a process for receiving and responding to feedback and the process is accessible to persons with Disabilities upon request. Upon request, CIBC Mellon will provide information about the organization and its services, including public safety information, in accessible formats or with communication supports in a timely manner, considering the person's accessibility needs due to Disability.

CIBC Mellon will also consult with the person making the request in determining the suitability of an accessible format or communication support. If CIBC Mellon determines that information or communications are unconvertible, it shall provide the requestor with:

- An explanation as to why the information or communications are unconvertible; and
- A summary of the unconvertible information or communications.

CIBC Mellon will meet the internationally recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario's accessibility laws.

## **12. Employment**

CIBC Mellon will notify its employees and job applicants that accommodations can be made during recruitment and hiring.

CIBC Mellon will consult with employees requiring accommodation in a manner that considers their accessibility needs due to Disability. The consultation will include:

- Information that is needed to perform the employee's job; and
- Information that is generally available to employees in the workplace

Any changes to existing policies on the provision of job accommodation will be communicated to the impacted employees in a timely manner.

## **13. Emergency Response Accommodation**

Where needed, CIBC Mellon will provide customized emergency information to help an employee with a Disability during an emergency. With the employee's consent, CIBC Mellon will also provide workplace emergency information to a designated person who is providing assistance to that employee during an emergency.

CIBC Mellon will provide information as soon as practicable after becoming aware of the need for accommodation due to the employee's Disability. The organization will review the individualized workplace emergency response information when:

- The employee moves to a different location in the organization;
- The employee's overall accommodations, needs or plans are reviewed; and
- The employer reviews its general emergency response policies.

## **14. Design of Public Spaces**

CIBC Mellon will work with vendors to ensure compliance with accessibility laws when redesigning public space, as applicable.

# **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 the Policy in its sole discretion and make changes as it deems appropriate from time to time without the requirement of advance notice.

## Links

This Policy can be accessed externally on CIBC Mellon's website and internally on the Corporate Policies site. For inquiries or further information, contact Human Resources.