



# CIBC Mellon's Multi-Year Accessibility Plan

January 2020

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## Introduction and Statement of Commitment

CIBC Mellon is committed to providing an accessible workplace where all individuals have equal access to its premises and products and services in a timely manner that respects the dignity and independence of people with disabilities. CIBC Mellon 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 Multi-Year Accessibility Plan has been prepared in accordance with the Accessibility for Ontarians with Disabilities Act, 2005 (the "AODA") and its associated regulations, the Accessibility Standards for Customer Service and the Integrated Accessibility Standards. This Plan summarizes CIBC Mellon's commitment to accessibility and outlines the specific short-term and long-term actions that the company will take to foster an environment where all individuals including people with disabilities have equal access to its premises and products and services in a manner that respects their dignity and independence.

This Plan will be reviewed and updated at least once every five years, will be posted on CIBC Mellon's website and will be provided in an accessible format upon request.

## CIBC Mellon's Multi-Year Accessibility Plan

Objective	Action Plan	Completion Date
<p><b>Implemented Timeframe:</b> 2011 to 2012  <b>Required Legislative Compliance:</b> January 1, 2012</p>		
<p>Establish policies, practices and procedures governing the provision of CIBC Mellon's products and services to persons with disabilities</p>	<p>Develop, implement and maintain an Accessibility Standards for Customer Service Policy governing how CIBC Mellon will achieve accessibility through meeting the requirements set out in the AODA and its regulations.</p>	<p>An Accessibility Standards for Customer Service Policy was developed and added to CIBC Mellon's Management Policies and Procedures in December 2011.</p>
<p>Develop and implement training on the Accessibility for Ontarians with Disabilities Act and Accessibility Standards for Customer Service</p>	<p>Develop and implement training for CIBC Mellon's employees, volunteers, individuals or organizations who provide facilities, products and services on CIBC Mellon's behalf and any individual who is involved in the preparation of CIBC Mellon's policies and procedures regarding the requirements of the Accessibility for Ontarians with Disabilities Act and the Accessibility Standards for Customer Service.</p>	<p>Training is provided to all individuals who provide facilities, products and services on CIBC Mellon's behalf and any individual who is involved in the preparation of CIBC Mellon's policies and procedures regarding the requirements of the AODA and the Accessibility Standards for Customer Service. This training was launched at the beginning of December 2011.</p> <p>As of December 2011, training is assigned to all new employees as part of the on-boarding requirements.</p>

Objective	Action Plan	Completion Date
Accommodate use of assistive devices	Ensure that CIBC Mellon is able to accommodate the use of an assistive device by a person with a disability on CIBC Mellon's premises.	Accommodation was implemented under the Accessibility Standards for Customer Service Policy and came into effect December 2011.
Accommodate use of guide dogs, other service animals and support persons	Ensure that guide dogs, other service animals and support persons are able to enter CIBC Mellon's premises to accompany a person with a disability.	Accommodation was implemented under the Accessibility Standards for Customer Service Policy and came into effect December 2011.
Provide notice of temporary disruptions in CIBC Mellon's services and premises	Ensure that notices of temporary disruptions in the services or premises that people with disabilities use to access CIBC Mellon's goods or services are communicated and posted.	Accommodation was implemented under the Accessibility Standards for Customer Service Policy and came into effect December 2011.
Develop an accessible feedback process	Develop a process for receiving and responding (mail, email, phone and fax) to feedback about the manner in which CIBC Mellon provides products and services to people with disabilities. The process will also set out the actions the company will take when it receives a complaint. Process was posted on CIBC Mellon's website.	Accessible feedback process was developed as part of the Accessibility Standards for Customer Service Policy and came into effect December 2011.
Develop Workplace Emergency Response Information	<p>Ensure that employees with disabilities are provided with individualized workplace emergency response information.</p> <p>Develop a process to review and update when the employee moves to a different location within the company, when the employee's overall accommodation plans are reviewed, or when the company reviews its general emergency response policies.</p>	<p>Availability of Individualized Workplace Emergency Response Information was communicated through various channels including the company's intranet, employee communications and Accessibility for Ontarians with Disabilities Act and Accessibility Standards for Customer Service training that was launched in December 2011.</p> <p>Ongoing reviews (including annual review) and updates occur as appropriate.</p>
File an Accessibility Compliance Report	File an Accessibility Compliance Report by December 31, 2012.	Accessibility Compliance Report was filed on December 28, 2012.

Objective	Action Plan	Completion Date
<p><b>Implemented Timeframe:</b> 2013 to 2014  <b>Required Legislative Compliance:</b> January 1, 2014 and July 1, 2014</p>		
<p>Develop and Review Accessibility Policies</p>	<p>Develop, implement and maintain policies governing how CIBC Mellon will achieve accessibility through meeting the requirements set out in the Accessibility for Ontarians with Disabilities Act and its regulations, including the Integrated Accessibility Standards, and include a statement of commitment to meeting the accessibility needs of people with disabilities in a timely manner in those policies.</p>	<p>Developed an Accessibility Policy (since renamed to Accessibility for Ontarians with Disabilities Policy) in 2013, which included the requirements of the Integrated Accessibility Standards. Reviewed and updated the Accessibility Standards for Customer Service Policy as part of this work effort.</p> <p>The Discrimination and Harassment in the Workplace Policy is reviewed and updated annually.</p> <p>The Health and Safety Policy in reviewed and updated annually.</p> <p>The Workplace Accommodation Policy is reviewed and updated biannually.</p>
<p>Develop, implement and maintain CIBC Mellon's Multi-Year Accessibility Plan</p>	<p>Develop, implement and maintain a multi-year accessibility plan outlining CIBC Mellon's strategy to prevent and remove barriers to accessibility and to meet the requirements set out in the Accessibility for Ontarians with Disabilities Act and its regulations.</p>	<p>The Plan was implemented and posted on CIBC Mellon's website in December 2013.</p>
<p>Develop an accessible website</p>	<p>Begin work effort to ensure CIBC Mellon's corporate website is in compliance with Accessibility for Ontarians with Disabilities Act and its regulations.</p>	<p>Work effort including a review of the requirements began in 2013. Target full compliance by January 1, 2021.</p>
<p>Develop and implement Health and Safety training</p>	<p>Develop and implement Health and Safety learning with training modules specific to people managers and employees.</p>	<p>Training was launched to all people managers and employees prior to July 1, 2014. Starting July 2014, training has been assigned to all new hires as part of the on-boarding requirements.</p>

Objective	Action Plan	Completion Date
<p><b>Implemented Timeframe:</b> 2014 to 2015  <b>Required Legislative Compliance:</b> January 1, 2015</p>		
<p>Develop and implement training on the requirements of the AODA, the Integrated Accessibility Standards, the Human Rights Code and CIBC Mellon's accessibility policies</p>	<p>Develop and implement training on the requirements of the AODA, the Integrated Accessibility Standards, the Human Rights Code and CIBC Mellon's accessibility policies. Training to be provided to all employees, individuals and organizations who provide facilities, goods or services on the company's behalf and to any individual who is involved in the preparation of CIBC Mellon's policies and plans regarding the requirements of the AODA and its regulations.</p>	<p>Launched was training to all employees in December 2014.</p> <p>As of December 2014, training has been assigned to all new employees as part of the onboarding requirements.</p> <p>In 2016, training was updated and launched to all employees.</p> <p>In December 2017, the training was launched to all employees. The training continues to be mandatory for all new hires as part of the onboarding requirements.</p>
<p>Accessible Feedback Process</p>	<p>Ensure that CIBC Mellon's feedback process is accessible to people with disabilities by providing or arranging for the provision of accessible formats and communication supports upon request.</p>	<p>Completed in December 2011 as part of the feedback process.</p>
<p>File an Accessibility Compliance Report</p>	<p>File an Accessibility Compliance Report by December 31, 2014.</p>	<p>Accessibility Compliance Report was filed on December 30, 2014.</p>

Objective	Action Plan	Completion Date
<p><b>Implemented Timeframe:</b> 2015 to 2016  <b>Required Legislative Compliance:</b> January 1, 2016</p>		
<p>Notify job applicants of the availability of accommodations for people with disabilities throughout the recruitment process and in relation to any materials or processes used to assess or select job applicants.</p>	<p>Update internal and external job posting and interview invitation templates to notify all applicants of the availability of accommodations for people with disabilities.</p>	<p>Completed in December 2015.</p>
<p>Notify all successful job applicants of the availability of accommodations for people with disabilities.</p>	<p>Revise offer package including updating new hire information and forms to notify all successful applicants of the availability of accommodations for people with disabilities.</p> <p>Update Employee Orientation to notify new hires of the availability of accommodations for people with disabilities.</p>	<p>Completed in December 2015.</p>
<p>Notify all employees of the availability of accommodations for people with disabilities</p>	<p>Notify all employees of the availability of accommodations for people with disabilities by:</p> <ul style="list-style-type: none"> <li>• Re-training all employees on the requirements of the Accessibility for Ontarians with Disabilities Act, its regulations and Accessibility Policies.</li> <li>• Review and update of internal communications (including intranet and posted policies).</li> </ul>	<p>Completed in 2014 as part of the training provided to all employees on the AODA, the Integrated Accessibility Standards, the Human Rights Code and CIBC Mellon's accessibility policies including the Workplace Accommodation Policy.</p> <p>Re-training of all employees was completed in December 2015 as part of the learning curriculum.</p> <p>Internal communications was revised and updated in December 2015.</p>

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<p>Provide employees, upon request, with information that is needed to perform a job and information that is generally available in the workplace in an accessible format or with the appropriate communication support.</p>	<p>CIBC Mellon will facilitate and implement accommodation solutions to support employees in removing barriers which may prevent an otherwise qualified employee from performing or fulfilling the essential duties of a job or participating effectively within the workplace.</p>	<p>Availability of information is part of CIBC Mellon's Workplace Accommodation Policy.</p>
<p>Review and enhance CIBC Mellon's policies under the Accessibility for Ontarians with Disabilities Act and its related regulations, and the company's Accommodation Programs.</p>	<p>Review and enhance CIBC Mellon's policies under the Accessibility for Ontarians with Disabilities Act and its related regulations and the company's Accommodation Programs including policies, procedures, training and communications as part of CIBC Mellon's ongoing commitment to fostering an accessible environment.</p>	<p>Work effort began in July 2015 and updates and enhancements were completed in 2016.</p>
<p>Prepare documented individual accommodation plan for employees with disabilities</p>	<p>Review accessibility policies and procedures to ensure the process outlines how the employee will be accommodated and ensure any individual accommodation plans are documented.</p> <p>Prepare tools and templates to support a documented individual accommodation plan.</p>	<p>Completed in December 2015.</p>
<p>Ensure that a return to work process for employees with disabilities is in place.</p>	<p>Review CIBC Mellon's Short-Term Disability and Leave of Absence Policies to ensure that the current return to work process for employees with disabilities is updated and complies with the Accessibility for Ontarians with Disabilities Act and its related regulations</p>	<p>Reviewed and updated in December 2015.</p>

Objective	Action Plan	Completion Date
<p>Ensure that performance management processes and career development and redeployment opportunities take an employee's accessibility needs due to disability into account.</p>	<p>Review and update various policies as well as the company's intranet including Workplace Accommodation, Recruitment and Performance Management to formally document this practice.</p>	<p>Completed in December 2015.  Reviewed in January 2020.</p>
<p>Ensure all employees are trained on the updated learning related to Accessibility for Ontarians with Disabilities Act, its regulations and Accessibility Policies.</p>	<p>Review all training to ensure the requirements of the Accessibility for Ontarians with Disabilities Act, its regulations and Accessibility Policies are included.</p> <p>Re-train all employees on updated training.</p> <p>Add updated training to new hire onboarding requirements.</p> <p>Develop a recurring training schedule for all employees.</p>	<p>Review of all training and schedules and launch all training was completed in 2016.</p>

Objective	Action Plan	Completion Date
Implemented Timeframe: 2016 onwards		
File an Accessibility Compliance Report	File an Accessibility Compliance Report as directed.	An Accessibility Compliance Report was filed on December 19, 2017 and will be completed every three years thereafter.
Perform a review of CIBC Mellon's Accessibility Program including the policies under the Accessibility for Ontarians with Disabilities Act and its regulations.	Prepare a status report on the progress of measures taken to implement the multi-year accessibility plan.	Completed December 2016 and every two years thereafter.  Reviewed in January 2018.
Embed review on all training on the Accessibility Standards for Customer Service and the Integrated Accessibility Standards as part of the company's review schedule to ensure learning is up-to-date.	Ensure that all employees are trained on the requirements set out in both the Accessibility Standards for Customer Service and the Integrated Accessibility Standards.	Completed December 2016 and every year thereafter.
Provide an accessible website	Ensure that CIBC Mellon's website and web content complies with the World Wide Web Consortium Web Content Accessibilities Guidelines as required by the AODA.	Full compliance by January 1, 2021.
Develop future plans as part of CIBC Mellon's ongoing commitment to accessibility	Ensure that the multi-year accessibility plan is reviewed and updated at least once every five years.	To be completed as necessary, but at least once every five years.



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