



RFA BANK OF CANADA ACCESSIBILITY PLAN

General

Introduction

At RFA Bank (“RFA” or the “Bank”) we embrace the culture of inclusion as one of core values. We believe in creating an environment that is accessible for all of our existing and future clients, including those with disabilities. We recognize that people with disabilities may have different needs and we work hard to provide the same level of customer service to all of our clients by providing barrier-free facilities and services.

Receiving feedback on accessibility is crucial for creating an inclusive and equitable environment for all individuals. This feedback allows us to identify opportunities to accommodate the needs of people with disabilities and make the necessary improvements to enhance their experience. It can also give us a better understanding of the diverse needs and perspectives of our clients and employees, which can ultimately lead to better service and experiences for everyone. Therefore, we actively seek feedback on accessibility and approach it with an open mind, a willingness to learn, and a commitment to take action.

You can use the contact information listed below to ask us for a copy of our Accessibility Plan and our feedback process description in these **alternate formats**: print, large print, Braille, audio or an electronic format that is compatible with adaptive technology that is intended to assist persons with disabilities. We will provide the format you ask for as soon as possible. Braille and audio formats may take up to 45 days. Print, large print and electronic formats may take up to 15 days.

Contact us:

The Vice President, Human Resources, Martin Flood

Email: martin.flood@rfabank.ca

Phone: 647.259.7873

Mail: Accessibility Feedback, RFA Bank of Canada, 2401, 1 Yonge Street, Toronto, ON, M5E 1E5

Personal privacy will be respected. All feedback will be reviewed, and we will take appropriate action to improve our processes and procedures.

Reporting and implementation

The Accessibility Canada Act (ACA) mandates that RFA Bank publish annual Progress Reports. These reports will share our progress against our commitments as described in this Accessibility Plan. RFA Bank will also publish an updated Accessibility Plan every three years as required by the ACA.

Persons with disabilities will always be involved in the creation of Progress Reports and future Accessibility Plans. At RFA, we will continue to identify barriers to accessibility and take action to remove them, in support of all persons with disabilities.

Consultations

A number of our employees from our IT, HR, Customer Service and Marketing/Communications team met with the Alliance for Equality of Blind Canadians.

- We consulted through (check all that apply):
 - Survey(s) (online / print)
 - ✓ Discussion groups (online / in-person)
 - Other (specify): _____
- Dates / time periods of consultations: July 5th, 2023
- Locations of our consultations (if in-person): Virtual
- We asked participants the following questions:
 1. The difference in types of communication devices, e.g Zoom and Teams and how it affects the user
 2. What challenges a person with an accessibility issue faces coming into an old building
 3. Have you any suggestions for building an accessibility website

We made our consultations accessible by:

Asking how they would like to meet and what was convenient for them.

We consulted:

- Individuals with disabilities

**To protect individuals' privacy, do not list the names of individuals who participated in your consultations unless they participated as "experts".*

- Disability organizations

List the names of the organizations: _Alliance for Equality of Blind Canadians

- Accessibility experts

List the names and fields of expertise (e.g., built environment) of the experts: _

- Disability experts

List the names of the experts: _____

- Total number of participants (not including members of our organization): 3
- Number of participants with disabilities: 2
- Types of disabilities represented: Vision.

RFA Bank is committed to taking more steps to initiate formal consultations by conducting surveys and focus groups within the next 24 months. While the Bank has not received any complaints regarding its handling of situations involving individuals with disabilities, we recognize the potential existence of barriers that require our attention and commitment to resolution. Moreover, the Bank will proactively conduct accessibility assessments, research best practices, and provide employee training on accessibility issues. As part of informal efforts, the Bank has encouraged employees with disabilities to come forward and let us know if they need support or assistance and accessibility will be at the forefront of our mind as we plan our office move.

Areas in Section 5 of the Accessible Canada Act

Employment

At RFA, we are committed to building a diverse and inclusive workplace where employees with disabilities are respected; provided the ability to access RFA's services in a manner that respects dignity and independence; enabled to reach their full potential and provided equal opportunity in the workplace.

We identified the following barrier:

Barrier 1: There is a need to expand our understanding of the range and variety of accommodation options available to persons with disabilities working or interested in working at RFA.

We will do the following to remove and prevent those barriers:

Barrier 1: Develop a framework that HR and Hiring managers understand their responsibilities in the accommodation process and guide them in supporting their employees and implementing suitable workplace adjustments. Management and Finance will determine and implement an accommodation budget to allow for assistive equipment. This will be part of the 2025 budget and HR plan.

The Built Environment

RFA is committed to providing accessible spaces for all employees, including those with disabilities.

We identified the following barriers:

Barrier 1: Some spaces within the office, workstations, technology and having a stairs may limit the mobility of employees and visitors with disabilities.

We will do the following to remove and prevent those barriers:

Barrier 1: The Bank is committed to moving to an accessibility friendly office by 2026. Our build team have agreed to consult with the Rick Hansen Foundation.

Information and Communication Technologies

RFA is committed to communicating with people with disabilities in ways that consider their disability.

We identified the following barriers:

Barrier 1: Access - Individuals with difficulty accessing websites.

Individuals with limited short-term memory, cognitive disabilities, or reading disabilities will benefit as they can identify content from the title. Individuals with severe mobility impairments often depend on audio navigation.

Barrier 2: Visibility – Shape & Location: Information presented using shapes or locations may not be understood by blind or low-vision individuals due to how their assistive technology functions.

Barrier 3: Visibility – Low Vision Individuals with low vision may have challenges reading text at certain sizes and contrast levels.

Barrier 4: Audio Interference - Audio that presents itself automatically can negatively impact individuals using screen reading technology. Individuals with visual impairments or colour blindness may find content inaccessible if the colours are not visually optimized.

Barrier 5: Visual Interference - Content with repetitive flashes can negatively impact those who experience seizures.

Barrier 6: Site Errors: Individuals are unaware of errors, or the icons associated with them due to language, cognitive, and learning disabilities.

We will do the following to remove and prevent those barriers:

Barrier 1:

- All non-text content will have a text alternative.
- Presentation neutral text that can be adjusted to match the necessity of the individual (i.e., braille, speech, symbols, large print, lists, or simpler language)
- Introduction of an audio format as a text alternative.
- Information presented through non-text content becomes accessible with electronic text.
- Any non-text “control” content has a name that describes its purpose.
- All decorative non-text content used only for visual formatting is implemented in a way that will be ignored by assistive technology.
- Introduce predictive content on the website so that individuals can locate content in a way that best matches their needs.
- Consistent navigation repeated across the website.
- Continue to ensure the website contains descriptive titles and links that clearly explain the topic or purpose. The site <title> tag is included to aid with SEO.
- Include descriptive links to ensure users understand what each link’s purpose is.
- All content is written in plain English.

Barrier 2:

All content relying on understanding sensory characteristics will have additional information provided to assist in clarification.

Barrier 3:

- Provide users with the ability to increase font sizes by 200% while maintaining readability and avoiding overlapping content. Larger font sizes between 16-20pt, or larger is ideal.
- Meet WCAG AAA level of colour contrast for all text elements on a page. Body text must follow a ratio of at least 4.5:1, while large-scale text will have a contrast ratio of at least 3:1.
- All text will be in hierarchical order to aid with screen readers (i.e., <h4> does not follow <h2>)
- Ensure line lengths are between 45-90 characters and that line breaks are

included between paragraphs.

Barrier 4:

- Continue to provide this experience for any future updates.

Barrier 5:

Continue to provide this experience for any future updates. Any flashes contained on the website would be below the flash thresholds.

Barrier 6:

Continue to provide this experience for any future updates.

Communication, other than Information and Communication technologies

The way we share information has an important impact on whether our work environment is inclusive for persons with disabilities. RFA Bank employees and clients must be able to engage and communicate with all departments at the bank in a method that best suits their individual needs, in a language and format they can easily use and understand.

We identified the following barriers:

Barrier 1: Visibility – Shape, Location, Colour & Format: Information presented using shapes, locations, colour, or formatting such as underlined text may not be understood by blind or low-vision individuals due to how their assistive technology functions.

Barrier 2: Visibility – Low Vision: Individuals with low vision may have challenges reading text at certain sizes, spacing and contrast levels.

Barrier 3: Accessible Language – Clear, Simple & Concise: A number of disabilities can affect a person's ability to perceive, understand or retain written information. Some disabilities have an impact on the reader's ability to focus long enough to absorb information. The general population's literacy levels and knowledge of official languages can also vary widely.

We will do the following to remove and prevent those barriers:

Barrier 1:

- Continue to implement text elements that best work for those with visual impairment.
- Continue to print on matte and silk paper stock where appropriate.
- Provide users an option to request alternate formats: large print, braille, MP3 (audio), e-text & DAISY formats.
- Prepare standard resources and commonly issued company communication in alternative formats so that they are ready to be distributed upon request.
- Take into consideration that text should fall within size 12- 18 pt and should be vertically spaced accordingly. This is font/typeface dependant as this will vary based on the font/typefaces x-height. Heavier typefaces require slightly more leading.
- Avoid complicated or decorative fonts.
- Where possible, include upper and lower-case characters to ease readability.

Barrier 2:

- Continue to work towards implementing high contrast colours for text and background.
- Provide users an option to request alternate formats: large print, braille, MP3 (audio), e-text & DAISY formats.
- Prepare standard resources and commonly issued company communication in alternative formats so that they are ready to be distributed upon request.

Barrier 3:

Publish a writing style guide with clear language guidelines for employees to reference and follow.

The Procurement of Goods, Services and Facilities

RFA Bank procures goods and services for our operations from Third parties. We will work to ensure that Accessibility considerations are taken into account in our procurement practices, including ensuring that all documents related to procurement

are accessible.

We identified the following barriers:

Barrier 1: Lack of awareness around our vendors and their processes or policies around accessibility.

We will do the following to remove and prevent those barriers:

Barrier 1: Enhance our Vendor Questionnaire to assist in determining if our vendor is ACA or AODA compliant.

The Design and Delivery of Programs and Services

The Bank is aware that people with disabilities have unique requirements when it comes to their user experience and will continue to focus on designing, developing, and delivering our products and services with this in mind.

We identified the following barriers:

Barrier 1: We do not have a procedure on providing accessible customer service.

We will do the following to remove and prevent those barriers:

Barrier 1: Within one year, we will develop a procedure on accessible customer service. We will seek input from persons with disabilities when developing this policy to make sure it reflects their needs. Our procedure will cover topics such as communication supports, service animals and alternate formats. We will provide training on this procedure for all front-line staff and managers.

- **Transportation**

This is not applicable to the Bank as we do not operate or provide transportation services.

Conclusion

- RFA will monitor and measure our progress to make sure we are meeting our accessibility goals and removing the barriers that have been identified.
- RFA accountability measures will be included in senior managers' and executives' performance objectives.
- RFA will encourage feedback using our feedback process and the feedback will be used to help us implement our accessibility plan.
- RFA will publish progress reports on the implementation of our accessibility plan.
- RFA will consult with experts and groups with any feedback we receive and deal with it on a case-by-case basis.