Canadian Tire Bank
Accessibility Plan 2023-2026

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Canadian Tire Bank Accessibility Plan 2023-2026

1.0 Message from the President and Chief Executive Officer

As the financial services arm of Canadian Tire Corporation, Limited (CTC), Canadian Tire Bank (CTB) has made it our goal to build lifelong relationships with Canadians by providing financial products and services they truly value. A key part of developing these lifelong relationships is fully understanding the needs of our customers and ensuring that we operate in a way that is inclusive of everyone.

CTB has a long and proud history of drawing strength from the diversity of our employees and the communities where we work, live and play. We pride ourselves on our strong connections to our customers and employees. CTB's underlying values of inclusivity align closely with the intent of the Accessible Canada Act (ACA). We are excited to be publishing this action plan to ensure accessibility is considered as a core aspect of our efforts to promote Diversity, Inclusion and Belonging (DIB) at CTB.

As an organization we are committed to fostering an inclusive and barrier-free environment. To fully achieve this, we recognize that we have work to do. We understand that this action plan is the first step of many needed to remove barriers for customers, employees and other stakeholders. We are committed to enacting meaningful change to support the needs of all Canadians and the actions put forward in this plan are an important step towards that.

Our success is earned through the diversity of our teams, and we believe that our business will continue to grow stronger through the inclusion of talent from a variety of backgrounds and capabilities. This accessibility plan has been developed by looking at our current level of accessibility and incorporating feedback from persons with disabilities and their allies. We consider the input from individuals with lived experience as the most important element in guiding us towards a more accessible future and are committed to continuing consultations with persons with disabilities throughout the implementation of this plan.

Aayaz A. Pira

President and Chief Executive Officer, Canadian Tire Bank

2.0 General

2.1 Introduction

Established in 2003, CTB is the financial services subsidiary of CTC and employs approximately 1,300 individuals. CTB is primarily engaged in the marketing and issuing of consumer credit cards but also offers high-interest savings accounts, guaranteed investment certificates and tax-free savings accounts. This Accessibility Plan applies to accessibility within all areas of CTB. With support from CTC, CTB is committed to supporting the intent of the ACA. This Accessibility Plan outlines accessibility barriers we have identified and the steps we will take to address them.

2.2 Organization contact information

To receive this document in an accessible format that works better for you, please contact:

Address:
Attention: Chief Compliance Officer / Accessibility Champion
Canadian Tire Bank
3475 Superior Court, Oakville, Ontario, L6L 0C6

Telephone number: 1-833-642-2185

Email address: accessibility@ctfs.com

2.3 Definitions/ key terminology

Accessibility

Accessibility refers to how services, technology, locations, devices, environments and products are designed with persons with disabilities in mind. Accessibility means giving people of all abilities equal opportunities to take part in life activities. The term implies conscious planning and effort to make sure something is barrier-free for persons with disabilities. Accessibility benefits everyone.

Barrier

According to the ACA, a barrier is "anything - including anything physical, architectural, technological, or attitudinal, anything that is based on information or communications or anything that is the result of a policy or a practice - that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation."

Disability

According to the ACA, disability is defined as "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."

Persons with Disabilities

Anyone can identify as a person with a disability if they experience one or more impairments or functional limitations that, in interaction with a barrier, hinders their full and equal participation in society.

"Nothing Without Us" Principle

The "Nothing Without Us" principle means that persons with disabilities should be consulted when developing laws, policies and programs that impact them.

Planned Action

The planned actions presented under section 3 of this Accessibility Plan are the steps that CTB intends to take to address the barriers. Some of these planned actions may have already begun and others may not yet have started.

Promising Practices

The promising practices presented under section 3 of this Accessibility Plan are a short summary of the actions that CTB is already taking to improve accessibility in the priority areas of the ACA. Some of these actions may be completed and others may be in the process of being implemented.

2.4 Consultations

CTB is committed to creating accessible environments, services and experiences where everyone can participate and feel valued and included. Our Accessibility Plan has been shaped by consultations with employees, including persons with disabilities and their allies, with the goal to identify, remove and prevent accessibility barriers. As we better understand the issues and conditions within the workplace that create barriers for persons with disabilities, we will consult with customers who use our financial products and services to inform future iterations of the plan.

Internal Consultation:

In February 2023, we developed an accessibility working group with representation from Human Resources, Facilities Management, Digital Services, Customer Service, Procurement, Product and Compliance groups. We held working sessions with subject matter experts to conduct a preliminary assessment of our accessibility strengths and opportunities across six of the seven ACA priority areas. Discussions focused on CTB policies, programs, practices and services that promote or hinder accessibility for our employees and customers. In March 2023, as a follow-up to CTC's annual DIB survey, we reached out to all CTB employees via email to solicit participation in a voluntary accessibility advisory group. Employees with disabilities and their allies shared their lived experiences, which helped inform our inaugural Accessibility Plan.

External Consultation:

In March 2023, CTB partnered with an external firm specializing in accessibility to assist in developing our Accessibility Plan. An in-depth external review was conducted from March to May 2023, including a document review, employee consultations and a focus group.

In April 2023, the external firm led an employee consultation session with participants from the accessibility advisory group respecting the "Nothing Without Us" principle. The focus group, followed by a few individual one-on-one conversations, helped identify accessibility strengths at CTB as well as barriers that employees experienced.

A formal accessibility assessment report was provided in April 2023, which helped define CTB's current state on accessibility across six of the ACA priority areas and informed the action plans published in our Accessibility Plan. Additional support on accessibility best practices and employee consultation sessions will be used to influence action plans for future Progress Reports and updated plans.

3.0 Areas described under the Act

There are seven priority areas described under Section 5 of the ACA. These areas include:

- Employment
- The built environment
- Information and communication technologies (ICT)
- Communication, other than ICT
- The procurement of goods, services and facilities
- The design and delivery of programs and services
- Transportation

The following sections are divided into these areas. Each section will include promising practices, barriers and actions we plan to take to address each barrier.

3.1 Employment

The employment priority area covers an employee's entire experience at CTB. It starts from the recruitment and onboarding process, and it ends when the individual leaves the organization. It also includes accommodation and short and long-term absences from work.

Promising Practices

Accommodations

- CTB's accommodation policy reinforces a commitment to inclusiveness. It includes offering workplace accommodations so persons with disabilities can perform meaningful work. This is related to protecting human rights under the Canadian Human Rights Act.
- CTB has documented policies on accommodations, short-term disability, and long-term disability. These are available to employees through CTC's Human Resources information system.
- Human Resources have partnered with a third-party service provider to support accommodation and leave requests. This protects employee privacy and helps to remove bias.

Culture

- CTB established a management level Accessibility Steering Committee. The Accessibility Steering Committee oversees the development of CTB's Accessibility Plan and corresponding Progress Reports.
- CTC launched an accessibility-specific Employee Resource Group (ERG) called EN-ABLE. This ERG works to support a more inclusive and accessible environment for persons with disabilities. It does this by offering education and support. EN-ABLE also focuses on initiatives to support the hiring of persons with disabilities across CTC, including CTB.
- DIB is a key focus area within CTC's multi-year strategy, with a vision to be an organization where belonging thrives and diversity, inclusion and equity are infused into everything CTC/CTB does. It identifies a commitment to creating an equitable and inclusive culture that represents all of CTC's people, customers and communities it serves.
- CTC informs employees about DIB-related programs, training opportunities and progress through monthly e-newsletters (Belonging Bulletin) and annual DIB reports. Recent Belonging Bulletins focused on equitable return-to-office support for people leaders and inclusive event planning.
- CTC conducts an annual DIB survey that allows collection of information on the diversity of employees, including persons with disabilities. This survey also offers an avenue for employees to provide qualitative feedback on accessibility.
- CTC's DIB team is prioritizing intersectional accessibility in 2023 and is developing a workplan on this topic.
- CTB employees have access to mental health resources through CTC's benefits program, including Not Myself Today, LifeWorks, Inkblot and Be Well Program. The annual maximum for mental health benefits is $5,000. Mental health support through Lumino Health Virtual Care is also available to employees who opt out of the health benefit plan. CTC's DIB team has also partnered with the Centre for Addiction and Mental Health (CAMH) to co-design an organizational mental health strategy.

Recruitment, Hiring and Onboarding

- Improvements were made to the talent acquisition process in 2022. Improvements included reducing the number of mandatory skills listed on a job posting to encourage applicants from more diverse backgrounds.
- CTB's commitment to DIB is highlighted on job postings. All job postings specify that accommodations are available for applicants with disabilities.
- Job interviews use standardized questions and scorecards. The scorecards are designed to reduce bias. Interview questions are also provided to candidates both verbally and in written form.
- CTB encourages candidates to identify if they require an accommodation during the hiring process. A requested accommodation will stay with the candidate for the remainder of the process.
- All job offers contain a statement highlighting CTB's commitment to fair and accessible employment practices.
- During the onboarding process, new employees are made aware of the policies in place to support employees with disabilities.
- Human Resources has partnerships with organizations to recruit neurodiverse individuals and a partnership with the Canadian National Institute for the Blind (CNIB). CTB has successfully recruited employees through these partnerships.

Training

- CTB employees have access to training toolkits including Bias in a Box. This is training on diversity, inclusion, equity and accessibility. CTB employees also have access to Courageous Conversation Training. This training provides information on inequity. These toolkits include presentations, resources and facilitation guides.
- CTB employees are required to complete the recently updated accessibility awareness training.

Barriers and Actions

Barriers to accessibility observed at CTB related to employment include:

- **Barrier 1**
  - The accommodation process has not been recently reviewed to ensure that it fits the ever-changing needs of employees and that employees are familiar with the process.
- **Planned Action to Address Barrier 1**
  - CTB will conduct a thorough review of the accommodation process to find opportunities to better address the needs of employees.

- **Barrier 2**
  - There have been large improvements in DIB communications and programming throughout CTC. However, the messaging has been focused mostly on Indigenous identity, race/ethnicity, gender identity, sexual orientation and family status. A deeper focus on accessibility is required to fully embed an intersectional approach.
- **Planned Action to Address Barrier 2**
  - CTB will look to ensure accessibility is appropriately represented in DIB messaging and programming moving forward. CTB will work to ensure that communications from the DIB team consider intersectionality as it relates to supporting persons with disabilities.

- **Barrier 3**
  - CTB collects metrics and feedback on employee diversity, including disability and engagement. However, this data is not fully leveraged to explore opportunities to improve accessibility within CTB.
- **Planned Action to Address Barrier 3**
  - CTB will intentionally leverage the data from employee feedback to identify patterns and trends. This data will inform annual plans and cultivate greater belonging for persons with disabilities.

- **Barrier 4**
  - There are opportunities to ensure that CTB employees receive regular accessibility training relevant to their role and responsibilities.
- **Planned Action to Address Barrier 4**
  - CTB will assess best practices for accessibility training. CTB will also work to provide training to employees to increase knowledge and awareness of relevant accessibility considerations.

- **Barrier 5**
  - CTB has an opportunity to improve the recruitment process in support of hiring of persons with disabilities.
- **Planned Action to Address Barrier 5**
  - CTB will work towards the intentional recruitment of persons with disabilities to ensure that its workforce is aligned to the Canadian labour market's availability of persons with disabilities. Related metrics will be tracked and monitored.
  - CTB will seek feedback from job candidates about how to improve accessibility within the recruitment and hiring process. CTB will work to make these improvements.
  - Partnerships with organizations that support the hiring of persons with disabilities will continue to be expanded. These partnerships support increasing the number of candidates with disabilities that CTB recruits.
  - CTB will work to support hiring managers in fostering an inclusive hiring process. This will be done by providing training and resources that deepen knowledge of accessible hiring practices.

3.2 Built environment

The built environment priority area refers to all CTB physical spaces. This includes considering accessibility features, such as automatic door openers, accessible washrooms, lighting, signage and noise. It also includes work from home spaces.

Promising Practices

- CTB has a Fire Prevention & Evacuation plan that takes into consideration persons with disabilities. The plan includes the additional supports that persons with disabilities may require in the case of an emergency. The plan includes a Persons Requiring Assistance (PRA) procedure. This procedure documents the process for notifying the Occupational Health & Safety team of an assistance request.
- In 2016, the Rick Hansen Foundation conducted a built environment accessibility assessment of all CTB physical locations.
- The facilities team is highly supportive of employee needs and makes changes, where possible, when accessibility issues are flagged.
- Select CTB offices are equipped with sit/stand desks. Employees are provided with documentation that demonstrates how a workstation should be set up to support ergonomic considerations.
- Interior wayfinding signage at select CTB office locations was designed with high-contrast and Braille.

Barriers and Actions

Barriers to accessibility observed at CTB related to the built environment include:

- **Barrier 6**
  - CTB has known accessibility barriers within the built environment. There has not been a comprehensive accessibility review of CTB facilities since 2016.
- **Planned Action to Address Barrier 6**
  - CTB will initiate an accessibility audit of the CTB locations. The audit will be completed with the support of third-party experts such as the Rick Hansen Foundation. CTB will use the findings of this audit to prioritize and address accessibility concerns.

- **Barrier 7**
  - The process for employees to provide accessibility-related feedback for the built environment is not currently well documented within CTB.
- **Planned Action to Address Barrier 7**
  - CTB will work to better define and document the feedback process that currently exists for built environment feedback. CTB will also continue to ensure that accessibility related feedback is addressed in a way that meets employee needs.

3.3 Information and communication technologies (ICT)

The ICT priority area relates to the technologies that employees and customers use. This includes hardware, software, assistive devices and all other aspects of technology.

Promising Practices

- CTB uses a reputable third-party digital accessibility service provider to conduct ongoing auditing and testing of its website. The third-party service provider is supporting CTB in meeting Web Content Accessibility Guidelines (WCAG).
- The Digital Experience team takes mandatory accessibility-related training. The training focuses on WCAG and accessible user experience design.
- There are two surveys on CTB's website that capture customer experience feedback. Both surveys have been evaluated for accessibility by the digital accessibility service provider. Updates were recently made to improve the level of accessibility of the surveys.
- CTB uses the Microsoft Office Suite of products. The built-in accessibility features are enabled for employees.

Barriers and Actions

Barriers to accessibility observed at CTB related to ICT include:

- **Barrier 8**
  - CTB's website does not fully meet the most current WCAG standards.
- **Planned Actions to Address Barrier 8**
  - CTB will continue working with its digital accessibility service provider to ensure that its website meets WCAG standards.
  - CTB will work to evolve its digital asset delivery model to align with advancing WCAG standards.
  - CTB will continue to build internal knowledge of WCAG standards. This will be done with the support of the digital accessibility service provider.

- **Barrier 9**
  - There is limited knowledge amongst CTB employees on how to use the built-in accessibility features of software, such as the Microsoft Office Suite (i.e., the "Accessibility Checker" in Microsoft Word and the closed captions in Microsoft Teams).
- **Planned Action to Address Barrier 9**
  - CTB will work to develop resources for employees. These resources will aim to better support knowledge of existing accessibility features and accessibility best practices. CTB will ensure these resources are promoted and available to all employees.

3.4 Communications other than information and communication technologies

The communications priority area relates to communication with employees and customers. This includes print materials and publications. It also includes digital communications such as websites, digital materials and e-newsletters. Presentations and other methods of communication are also covered.

Promising Practices

- CTB offers a variety of services that support accessibility. Offered services includes telephone relay services and alternative document formats. Alternative document formats that are offered include electronic statements and Braille or large print credit card statements.
- CTB content creators are responsible for providing clear and well-structured messages to all customers. This includes considerations for readability and the use of concise phrasing in content.
- Select Marketing staff have taken the following training sessions: Creative Accessibility Fundamentals, Writing Accessible Copy for Content Designers and Writing Basics for Content Designers.
- CTB's website includes information about its partnership with a digital accessibility service provider that provides free assistive technology for persons with disabilities.

Barriers and Actions

Barriers to accessibility observed at CTB related to communications include:

- **Barrier 10**
  - There is inconsistent use of accessible communication offerings in townhalls or large group meetings. Closed captioning and sign language are being used intermittently at townhalls. However, there is a lack of standardization and understanding as to what is needed and expected.
- **Planned Action to Address Barrier 10**
  - A review will be conducted to understand the needs of employees. CTB will then evaluate what accessible communication offerings could be used. CTB will also work to understand accessibility best practices and implement a consistent approach to these communications.

- **Barrier 11**
  - PowerPoint slide decks and informational videos are common forms of communication within CTB. There is currently no training provided to employees on how to ensure slides and videos are presented in an accessible format.
- **Planned Action to Address Barrier 11**
  - CTB will work to offer resources to all employees on how to develop documents, presentations and videos in accessible formats.

- **Barrier 12**
  - Departments with communication related responsibilities are supportive of accessibility. However, they lack the training and education required to promote best practices for accessible communications.
- **Planned Action to Address Barrier 12**
  - CTB will explore opportunities to enhance accessibility related training provided to roles supporting communications.

3.5 Procurement of goods, services and facilities

The procurement priority area relates to how goods, services, and facilities are purchased by CTB. This includes the evaluation process leading up to making purchases. It also includes ensuring that all documents related to procurement are accessible and have accessibility considerations in mind.

Promising Practices

- CTB takes proactive steps to provide a fair and unbiased procurement process.
- CNIB provided CTB with a list of software offerings that can support employees with visual impairment.

Barriers and Actions

Barriers to accessibility observed at CTB related to procurement include:

- **Barrier 13**
  - Accessibility considerations are not formally embedded in CTB's procurement processes.
- **Planned Action to Address Barrier 13**
  - CTB will modify its processes to include consideration of accessibility when procuring new products and services.

- **Barrier 14**
  - CTB employees that are currently involved in the procurement process do not receive training that is tailored towards understanding accessible procurement practices.
- **Planned Action to Address Barrier 14**
  - CTB will work to offer training to its employees involved in the procurement process. This training will highlight best practices in supporting accessible procurement.

3.6 Design and delivery of programs and services

This priority area focuses on making all programs and services at CTB accessible to all. It involves thinking about persons with disabilities when programs and services are being created. It also requires continuous improvement of the programs and services for persons with disabilities.

Promising Practices

- CTB offers alternative identity verification options for customer account openings.
- CTB offers a Signature Preferred Card. This card only requires the cardholder's signature for purchasing. This product can be requested by customers who have physical limitations that prohibit them from entering a PIN.
- CTB offers a program to support customers facing long-term financial hardship, including persons with disabilities.
- CTB's online application for customers is simple and uses clear language.
- CTB collects data on accessibility-related concerns and complaints from customers and aims to resolve where possible.
- CTB receives customer experience data that includes information about accessibility from a variety of external organizations including J.D. Power, Forrester and Ipsos. CTB reviews the data and information from these organizations and addresses it when possible.
- CTB follows the Financial Consumer Agency of Canada's clear language and presentation principles.
- CTB's Contact Centre employees have taken training focused on accessible customer service and ensuring a barrier free and accessible workplace.

Barriers and Actions

Barriers to accessibility observed at CTB related to the design and delivery of programs and services include:

- **Barrier 15**
  - Accessibility considerations are not formally embedded in CTB's design and delivery of financial products and services.
- **Planned Action to Address Barrier 15**
  - CTB will establish processes to consider accessibility in the design and delivery of financial products and services.

- **Barrier 16**
  - CTB collects accessibility feedback from customers in various formats. This feedback is not currently being actioned in a way that fully enhances the design and delivery of programs and services.
- **Planned Action to Address Barrier 16**
  - CTB will evaluate and assess accessibility feedback received from customers. The feedback will be used to enhance the design and delivery of financial products and services for persons with disabilities.

- **Barrier 17**
  - Customer service accessibility training for CTB's Contact Centre is focused on accessibility in a retail store setting. Training on the available accessibility tools for CTB customers is limited.
- **Planned Action to Address Barrier 17**
  - Accessibility related training provided to CTB's Contact Centre will be enhanced to better support customers with disabilities.

3.7 Transportation

Due to CTB's limited involvement with transportation, barriers have not been identified under this priority area. CTB commits to ensuring that all aspects of accessibility are being considered. Should CTB become more involved with any form of transportation, an accessibility review will be conducted.

4.0 Reporting and implementation

The ACA mandates that CTB publish annual Progress Reports. These reports will share our progress against our commitments as described in this Accessibility Plan. CTB 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 CTB. We will continue to identify barriers to accessibility at CTB and take action to remove them, in support of all persons with disabilities.

5.0 Feedback

Feedback Process

CTB welcomes feedback from its customers, employees and the public on this Accessibility Plan and any barriers to accessibility you have experienced when dealing with us. The Accessibility Champion is designated to receive feedback on accessibility at CTB and will coordinate with internal groups to address any barriers identified.

How to Submit Feedback

When submitting feedback, please describe your experiences, how they impacted you and any recommendations you may have for how barriers can be removed at CTB. We will use your feedback to inform upcoming Accessibility Plans and Progress Reports.

You can contact us using any of the ways shown below:

Mail:
Attention: Chief Compliance Officer / Accessibility Champion
Canadian Tire Bank
3475 Superior Court, Oakville, Ontario, L6L 0C6

Telephone:
1-833-642-2185

Email:
accessibility@ctfs.com

You may also choose to provide feedback anonymously by mail or by phone.

We will acknowledge feedback on accessibility in the same method it was shared. While we will not acknowledge receipt of feedback that was sent anonymously, we will process the feedback appropriately.

CTB supports operator assisted calls with telephone relay services such as Bell Relay.