

## **PNC Bank Canada Branch Initial Accessibility Plan**

### **General**

PNC Bank Canada Branch (“PNC Canada”) has prepared this initial accessibility plan to meet its obligations under the Accessible Canada Act (“ACA”) and the Accessible Canada Regulations (“ACR”). PNC Canada is committed to accessibility for its employees and clients, particularly those with disabilities.

Questions or other feedback may be directed to the Accessibility Office of PNC Bank, National Association (“PNC Bank”), using the contact information listed below or as set forth in PNC Canada’s feedback process description.

Copies of PNC Canada’s accessibility plan and feedback process description are available upon request in these alternate formats: print, large print, Braille, audio, or an electronic format that is compatible with adaptive technology intended to assist persons with disabilities. Requested copies will be provided as soon as possible. Braille and audio formats may take up to 45 days. Print, large print and electronic formats may take up to 20 days.

### **Contact Us**

By email:

[AccessibilityTeam@pnc.com](mailto:AccessibilityTeam@pnc.com)

By telephone:

412-762-8068

By mail:

The PNC Financial Services Group – Accessibility Office  
One PNC Plaza (P1-POPP-23-B)  
249 Fifth Ave.  
Pittsburgh, PA 15222

### **About PNC Canada Branch**

PNC Canada is a foreign bank branch of PNC Bank, with its primary office in Toronto, Ontario in The Exchange Tower at 130 King Street West. PNC Canada’s clients are corporate and institutional banking clients—it does not have retail banking clients or retail branches. PNC Canada also conducts treasury management operations at an office location in Mississauga, Ontario and has employees who live in Canada and work remotely.

## Areas of Focus for Accessibility Barriers

PNC Bank has long demonstrated its commitment to accessibility, and has extensive experience with compliance with the Americans with Disabilities Act (“ADA”). PNC Bank has an ADA Policy that focuses on PNC Bank’s accessibility-related obligations to its customers. PNC Bank also maintains an internal “Accommodation of Disabilities” procedure and associated processes for candidates and employees to follow when in need of an accessibility-related accommodation. The ADA Policy and aforementioned procedure also are applicable to PNC Canada, and more information about PNC’s accessibility efforts is provided below.

PNC Canada is committed to meeting the requirements of the ACA, including when these requirements may exceed those under the ADA. As well, as we consider next steps and consistent with Accessibility Standards Canada’s principle of “nothing done without us,” we will continue to consult persons with disabilities.

PNC Canada is committed to the identification, removal, and prevention of accessibility barriers in the following areas identified in the ACA: Employment, Built Environment, Information and Communication Technologies (“ICT”), Communication other than ICT, Procurement of Goods, Services and Facilities, and Design and Delivery of Programs and Services.

### More about PNC Bank’s accessibility efforts:

Consistent with its overall commitment to accessibility, PNC Bank has taken the actions summarized below. The list below is not exhaustive; rather, it’s meant to provide examples of PNC Bank’s accessibility efforts, which extend to PNC Canada where applicable.

- Created an “Accessible Banking” page (<https://www.pnc.com/en/customer-service/accessible-banking.html>) on our public website that provides customers with, among other things, information about PNC Bank’s accessible offerings and the ability to provide accessibility feedback and make accommodation requests
- Created an “Accessibility Hub” on the intranet that provides PNC Bank employees with, among other things, resources regarding accommodations and accessibility tools for employees and customers and for creating accessible content and meetings
- Committed to enhancing our public website (www.pnc.com) to be compliant with the Web Content Accessibility Guidelines (“WCAG”) 2.0 AA standard
- Enacted an ADA Policy outlining the requirements for customer accessibility regarding, among other things, (a) public facilities, (b) effective communication (including the provision of auxiliary aids, the acceptance of telecommunications relay service calls, the provision of translation services, and digital communications standards), and (c) reasonable modifications to Policies, practices, and procedures for individuals with disabilities

## 1. Employment

PNC Canada prohibits discrimination based on an individual's disability, and is committed to providing employment opportunities to all candidates and employees, including those with disabilities or who may need an accommodation. PNC Canada employees have full access to PNC Bank's Accessibility Hub on the intranet. The Accessibility Hub provides employees with resources for, among other things, requesting accommodations, creating accessible documents and meetings, completing accessibility trainings, reaching the Accessibility Service Desk for help with assistive technology, providing voluntary self-identification as an individual with a disability, and accessing mental health support.

PNC Canada has a robust process in place for candidates and employees to request accommodations that may be needed during the application process and to enable employees to perform their essential job functions, including assistive technology.

Further, PNC Canada regularly provides training to all employees on topics relating to the creation of an accessible workplace. The training seeks to eliminate biases and promote awareness about accommodations.

PNC Canada also is committed to employee wellness and work/life balance. To that end, PNC Canada provides resources to help employees manage their health, including an Employee Assistance Program, through which employees may access free health coaching and mental health counseling.

PNC Canada has identified the following barrier(s):

- New hires are not provided with information regarding PNC's accessibility resources as part of the individual onboarding process
- The website used by internal candidates to search and apply for jobs at PNC is not compliant with WCAG

PNC Canada will do the following to remove and prevent those barrier(s):

- Consult with the Accessibility Office and Human Resources about incorporating accessibility resources into the individual onboarding experience for new hires
- The website used by internal candidates will be sunset in 2024 and, to the extent that the new platform is not WCAG compliant, we will consult with our Digital Partners and Human Resources about creating a timeline for WCAG compliance

## 2. Built Environment

PNC Canada has its primary office in Toronto on the 21<sup>st</sup> floor in The Exchange Tower at 130 King Street West. PNC Canada also maintains an office in Mississauga. PNC Canada does not own either property; rather, it leases these locations. As a result, PNC Canada has limited

control in changing the built environment, but does and will work with its landlords as necessary to the extent issues arise and modifications are necessary relating to accessibility.

PNC Canada has identified the following barrier(s):

- Multiple challenges to someone in a wheelchair or with a similar impairment have been identified regarding the Toronto office. In particular, the doors to enter the office and the office's boardroom are manual (there is no automatic or push-button functionality), the microwave in the office kitchen sits too high for someone in a wheelchair to have access, and the hooks on the back of the office doors are too high for someone in a wheelchair to have access

PNC Canada will do the following to remove and prevent those barrier(s):

- Consult the owner of property where the Toronto office is located about the possibility of adding automatic or push-button functionality to the doors used to enter the office
- Identify whether any employees are in a wheelchair or have a similar impairment and discuss potential accommodations related to the microwave, the hooks on the back of that employee's office door (if they have an office), and any other challenges

### **3. Information and Communication Technologies**

PNC Canada is committed to meeting the technology needs of its employees and clients. PNC Bank's website has a target date for WCAG 2.0 AA compliance of January 1, 2025, and the pages specific to PNC Canada have a target date of June 1, 2024. Further, PNC Canada is committed to working with its corporate and institutional banking clients in meeting the accessibility needs of their employees when those employees are using PNC-provided ICT. PNC Canada also is committed to meeting the needs of its own employees regarding ICT.

PNC Canada has identified the following barrier(s):

- SharePoint sites utilized by employees may not be accessible with a screen reader
- The boardroom in the Toronto office is not equipped with instructions for utilizing technology that would assist individuals with disabilities

PNC Canada will do the following to remove and prevent those barrier(s):

- Consult with our Digital partners about the possibility of either (1) making SharePoint sites more accessible or (2) creating an accommodation to make select SharePoint sites accessible for those who need it
- Send a reminder communication to all PNC Canada employees about the various technology resources that could assist individuals with disabilities

#### **4. Communication other than Information and Communication Technologies**

PNC Canada is committed to meeting the communication needs of its employees and clients when it comes to in-person meetings and physical documents sent internally and externally. PNC Canada is prepared to provide interpreters for employees and clients, documents in an alternative format, and PNC Canada also accepts all forms of telephone relay services used by clients.

PNC Canada has identified the following barrier(s):

- Showing the cost of assistive technologies to the individuals requesting the technology could deter the individual from making the request

PNC Canada will do the following to remove and prevent those barrier(s):

- Discuss with the appropriate parties the possibility of removing the cost of assistive technologies from the view of the requesting individuals

#### **5. Procurement of Goods, Services, and Facilities**

PNC Canada is committed to the procurement of goods, services, and facilities in a way that removes barriers to accessibility. Specifically, PNC Canada requires that third-party vendors comply with PNC Bank's ADA Policy. Further, PNC Canada is prepared to be responsive if an accessibility challenge were to arise during the request-for-proposal ("RFP") process.

PNC Canada did not identify any barriers.

#### **6. Design and Delivery of Programs and Services**

PNC Canada is committed to providing its products and services, internal training programs, and external presentations in a way that is free of accessibility barriers. PNC Bank's ADA Policy strives to ensure that those with disabilities have full and equal access to PNC goods and services. Additionally, PNC Canada employees conducting internal training programs and external presentations have access to technology that is equipped with auxiliary aids such as closed captioning.

PNC Canada has identified the following barrier(s):

- Although enterprise-wide required trainings must and do have closed captions, some non-required trainings do not have closed captions
- Employees may be unaware of the ability to request alternative versions of trainings that are accessible with a screen reader as an accommodation

PNC Canada will do the following to remove and prevent those barrier(s):

- Discuss with the Learning and Development Director and our Digital partners the possibility of making available alternative versions of non-required trainings with closed captions as an accommodation
- Increase awareness among employees accessing trainings of the ability to request alternative versions of trainings that are accessible with a screen reader and of any other accessibility accommodations related to training

## 7. Transportation

PNC Canada does not coordinate a transportation system or a fleet of transportation vehicles; therefore, this area of focus is inapplicable to PNC Canada.

## Statement Regarding PNC Canada's Plans to Remove and Prevent Barriers

PNC Canada's initial accessibility plan commits to taking various actions toward removing and preventing identified barriers to accessibility. Such actions require PNC Canada to make assumptions and are subject to inherent risks and uncertainties, which give rise to the possibility that these assumptions may not be correct. Examples of the risks and uncertainties that could cause PNC Canada not to successfully implement its plans to remove and prevent barriers include, but are not limited to, the following: the ability to successfully implement various initiatives using appropriate corporate channels and processes; the risk that initiatives will not be completed within a specified period or exactly as described in the accessibility plan due to competing legal and regulatory priorities, technological or personnel limitations, or other reasons; and other systemic risks. Nonetheless, PNC Canada remains steadfast in its commitment to comply with the ACA.

## Consultations

PNC Canada consulted with persons with disabilities when preparing its accessibility plan and feedback process. Specifically, PNC Canada sent a survey to all current PNC Canada employees and numerous PNC Bank employees who identify as having a disability regarding the above-discussed areas of focus for accessibility barriers. PNC Canada also built on the extensive consultations that were done as part of compliance with the ADA.