

MAY 2026

Accessibility Canada Act Plan

Progress Report

May 2026

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1. Changes from Previous Version

- This is the 3rd version of this progress report.

2. Executive Summary

The **Accessible Canada Act (ACA)** establishes a national objective of achieving a barrier-free Canada by January 1, 2040. In support of this objective, federally regulated organizations are expected to take a proactive, ongoing approach to identify, remove, and prevent barriers to accessibility across the following priority areas:

- Employment
- The built environment (buildings and public spaces)
- Information and communication technologies (ICT)
- Communication, other than ICT
- Procurement of goods, services, and facilities
- Design and delivery of programs and services
- Transportation (including air, rail, road, and marine providers that cross provincial or international borders)

JPMorganChase's Multi-Year Accessibility Plan and related policies are developed to align with the ACA and are intended to embed accessibility into how the firm operates; through inclusive practices, accessible communications and technologies, and thoughtful design of workplaces, services, and client experiences. This includes strengthening internal capabilities (such as guidance, training, and standards), promoting consistent execution across relevant business and corporate functions, and integrating accessibility considerations into planning, delivery, and continuous improvement.

This progress report provides an overview of initiatives that are completed, in progress, or planned. It is designed to transparently communicate actions taken, outcomes achieved where available, and areas of continued focus. Collectively, these efforts reflect the firm's ongoing commitment to reducing barriers, improving access, and supporting equitable participation and opportunities for employees and members of the public with disabilities.

3. Accessibility Statement

JPMorganChase is committed to supporting the needs of employees and customers with disabilities by fostering an inclusive environment and taking active steps to identify, remove, and prevent barriers to accessibility across our operations, services, and workplace practices.

We are also committed to meeting our obligations under the Accessible Canada Act (ACA). This Accessibility Plan Progress Report describes the measures JPMorganChase has implemented to advance accessibility, as well as actions that are currently underway or planned, to strengthen equitable access and participation for people with disabilities.

Through this work, JPMorganChase aims to contribute to the ACA's broader objective of a barrier-free Canada, helping to ensure that individuals can access our workplaces, programs, services, and communications in a manner that respects dignity, promotes independence, and supports full and meaningful inclusion.

4. General - Progress Report Summary

Over the past year, JPMorganChase continued to engage employees in ongoing dialogue on accessibility. Through consultation, active listening, and education, the firm strengthened its feedback loops and has seen more consistent, actionable input overall, helping inform improvements across the employee experience, policies, and practices. The firm also continued its partnership with property managers across JPMorganChase sites to prioritize barrier-free spaces, which remains an ongoing focus.

- **Consultation and continuous improvement:** Input from external accessibility consultants, individual employees, and employee-led Business Resource Groups informed targeted enhancements, including refinements to benefits offerings and a broader review of relevant policies and practices to help reduce barriers and improve clarity and consistency.
- **Inclusive talent acquisition:** In partnership with the Talent Acquisition team, the firm advanced a strategy to strengthen connections with community partners that support people with disabilities, with the goal of expanding outreach, improving candidate access to opportunities, and reinforcing inclusive hiring practices.
- **Education and awareness:** The firm delivered education and information sessions through local and global programs and initiatives, providing Canadian employees with practical, relevant content on topics including autism, mental health, workplace accommodations, environmental and physical health considerations, and inclusion. These sessions were designed to build awareness, strengthen leader and employee capability, and support a culture where accessibility is understood as a shared responsibility.

Completed

- ✓ Conducted ongoing consultations
- ✓ Completed a review of Workplace policies
- ✓ Accessibility internal resources available
 - Chase Accessibility Services
 - MyAccessibility Hub
 - Office of Disability Affairs
 - Global Disability Advisory
 - Canada Community Engagement Forum
 - Access Ability
 - Autism at Work
 - Captioning Services
 - Firmwide Work Environment Policy
 - Flexible Work Arrangement policy
 - Disability Inclusion Guidelines
 - Mental Health Awareness Resource Page
 - Employee Assistance Program (EAP)
 - Web Content Accessibility Guidelines (WCAG) 2.1 AA compliant

- ✓ Review of Physical Barriers in all Public Spaces across Canada
- ✓ Healthier food and beverage selections in JPMorgan Chase facilities
- ✓ Benefit plan enhancements to provide greater access to referrals and support services
- ✓ Refresh Accessibility Training Curriculums for employees and managers
- ✓ Extend mandatory training to all Canadian employees
- ✓ Hosted Global Disability Advisory Process Intensive 2 Day Workshop to develop short and long term action plans
- ✓ Partnered with Global Disability Advisory to inform Real Estate plans for universal design aspects of new office space
- ✓ Attended ODEN's Rethinking Disability Conference (RDC25) and expanded network
- ✓ Access Ability Business Resource Group hosted education awareness sessions on Autism Awareness and a Meet the Author session on lived experience and inclusion.
- ✓ Global Disability Advisory hosted coffee chat on the Accommodation process
- ✓ Launched New Hire Orientation for consistent onboarding experience and inclusion messaging
- ✓ Added SelfID slide in New Hire Orientation Deck, and shared at Town Hall

In Progress

- Developing Relationship with University Career Services and Office of Disability Support Services to partner on projects with mutual benefit
- Partnering with ODEN on JobsAbility postings and hosting Biz Connect session
- Working to implement action items coming from Global Disability Advisory Process Intensive

Planned Activities

- Build relationship with ODEN 's affiliated services to increase connectivity to network of candidates with disabilities
- Offer "Who's in the Room" Autism Awareness training to all Managers
- Employee Opinion Survey analysis to better understand perception of diversity and inclusion culture within the organization
- Launch of Employee Assistant for ease of information access across all topics, including Accommodations, Leaves of Absence

5. Feedback

JPMorgan welcomes feedback on matters related to accessibility, including but not limited to: requests for copies of the Accessibility plan, progress reports, and feedback process descriptions in certain alternate formats, feedback about barriers encountered when dealing with JPMorgan Chase, and feedback on JPMorgan Chase's implementation of its accessibility plan.

All inquiries, customer feedback and complaints may be submitted to:

Shannon Zunn, Executive Director, Human Resources

In writing: 66 Wellington St W, Suite 4500
Toronto, Ontario, M5K 1E7 Canada

By email: canada.accommodations.feedback@chase.com

By phone: (416) 981 - 9223

Feedback on the Accessibility plan should be submitted via email or phone to Shannon Zunn. An email acknowledging receipt of the feedback will be sent to the contributor within 72 hours. A summary of feedback received will be reviewed quarterly with Human Resources, the Diversity Committee, and the Management Committee where relevant. Feedback contributors will receive a response to their submission including any action items subsequent to the review process. Requests to receive the feedback response in an alternate format can be made at the time the feedback is shared.

This feedback process was established in June 2024. Shannon Zunn, JPMorgan Canada's HR Country Head is the member of the Management Committee designated to receive feedback on JPMC's accessibility program. As of the filing of this progress report no feedback has been received.

6. Employment

JPMorgan Chase is committed to fair and accessible employment practices and to encourage the full inclusion of persons with disabilities. The following current processes are in place:

- Notify the public and staff that, when requested, JPMorgan Chase will accommodate people with disabilities during the recruitment and assessment processes and when candidates are hired
- Advise of the availability of accommodations for applicants with disabilities in the recruitment and assessment processes, and in the notification to successful applicants
- Implement a process for developing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability
- Ensure the accessibility needs of employees with disabilities are considered in performance management, career development and redeployment processes
- Consult with disability management provider to meet accommodation requirements
- Prevent and remove other accessibility barriers identified and review any complaints relating to accessibility barriers and address them as they arise by escalating through internal stakeholders
- Provide workplace information and communications in accessible formats and with communication supports for persons with disabilities, upon request, in a timely manner that considers the person's accessibility needs due to disability. The disability management team consults with the individual requesting such services to determine a suitable format or support
- Encourage self-identification of employees with disabilities to provide accurate aggregated reporting of employee demographics and create opportunities to engage in supportive dialogue while maintaining employee privacy and confidentiality

6. The Built Environment

JPMorgan Chase must provide Person(s) with Disabilities full and equal access to, and the opportunity for full and equal enjoyment of, Products, Services, and Facilities.

JPMorgan Chase will continue to meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces. JP Morgan will address barriers to accessibility in some locations identified during the consultation. The firm made renovations to one site this year and added height adjustable desks for increased flexibility. In 2027, our Canada headquarters is moving to new space and we are consulting with Accessibility at front of mind across all features of the new build space. All work stations will have adjustable desks, each floor will have a barrier free all gender restroom, and each floor will have a designated quiet room designed with neurodiversity in mind.

JPMorgan Chase will have procedures in place to notify the public of any service disruptions and alternatives available in the event of a service disruption to accessible parts of its public spaces.

7. Information & Communication Technologies

JPMorgan Chase provides equal access to information communicated in writing, orally, digitally or in person. We will continue to consult with people with disabilities to determine their information and communication needs to meet the requirements of ACA. Consultations in 2025 did not identify information and communication technology barriers for persons with disabilities.

Accessible Formats and Communication Supports

- JP Morgan Chase will upon request arrange for the timely provision of accessible communication formats of publicly available information and communication supports for persons with disabilities that considers each person's particular accessibility needs.
- We will work with the person with a disability and determine the appropriate method of communication or accessible communication format for documents, based on their needs.

JPMorgan Chase provides accommodations in the form of Auxiliary Aids and Services, reasonable modifications to policies and procedures, and other services, for the purpose of effective communication, equal access to and opportunity for full and equal enjoyment of Products and Services and Facilities.

8. Communication, other than ICT

JPMorgan Chase provides equal access to information communicated in writing, orally, digitally or in person. We will continue to consult with people with disabilities to determine their information and communication needs to meet the requirements of ACA. Consultations in 2025 did not identify communication barriers for persons with disabilities.

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JPMorgan Chase provides accommodations in the form of Auxiliary Aids and Services, reasonable modifications to policies and procedures, and other services, for the purpose of effective communication, equal access to and opportunity for full and equal enjoyment of Products and Services and Facilities.

9. The Procurement of Goods, Services & Facilities

New Business, Initiatives, Eliminations or Changes to Products or Processes must follow the JPMorgan Chase established process in adherence with New Business Initiative Approval Policy - Firmwide framework To remain competitive, JPMorgan Chase must be timely with new to market, expanded or modified products and services. Introducing new or modifying existing products or services introduces risk to the firm. Making sure the relevant risks are understood and appropriate controls are in place to help launch the New Business Initiative (NBI) in a controlled manner. The Office of the Comptroller of the Currency (OCC) expects bank management and the board to oversee all new, expanded, or modified products and services through an effective risk management process.. JPMorgan Chase must have a program framework including but not limited to: Procedures, Risk and Controls, Issue Management, Training, Complaint Monitoring, Quality Assurance, Reporting and Analysis, and when applicable, Supplier Oversight.

10. The Design & Delivery of Programs and Services

New Business, Initiatives, Eliminations or Changes to Products or Processes must follow the JPMorgan Chase established process in adherence with New Business Initiative Approval Policy - Firmwide framework. JPMorgan Chase must have program framework including but not limited to: Procedures, Risk and Controls, Issue Management, Training, Complaint Monitoring, Quality Assurance, Reporting and Analysis, and when applicable, Supplier Oversight.

JPMorgan Chase provides accommodations in the form of Auxiliary Aids and Services, reasonable modifications to policies and procedures, and other services, for the purpose of effective communication, equal access to and opportunity for full and equal enjoyment of Products and Services.

11. Transportation

Not Applicable

12. Consultations

12.1 Who was consulted

JPMorgan consulted with employees who self-identified as persons with disabilities, members of the Canada Community Engagement Forum, and members of AccessAbility, an internal Business Resource Group that serves as a resource on disability issues, a voice for employees with disabilities, and a partner in the success of all JPMorgan Chase colleagues. The mission of AccessAbility is to complement JPMorgan Chase's global diversity and opportunity efforts by maximizing the contributions of employees affected by disabilities, long-term illness or caregiving responsibilities. The Canada Management Committee was also consulted in the finalizing of this Plan.

The employees who participated in the consultations identified as persons with chronic medical and mental health conditions, physical disabilities, neurodivergent conditions, learning disabilities, and allies.

12.2 Consultation topics

The purpose of the consultations was to better understand the experience of employees with disabilities and where they may encounter barriers to a fulsome employee experience at JPMorgan Chase. Employees who had previously participated in consultation were asked to opine on any changes they had noticed since the prior consultation period. Questions were asked about experiences pertaining to the employment cycle (recruiting, onboarding, training and development, promotion, retention) employee resources (i.e. communication and accommodation), barriers to inclusion and success at JPMorgan, and opportunities for improvements.

The responses provided generated dialogue, greater awareness about systemic and physical barriers, and suggestions on ways to address these barriers. The feedback is summarized in this review and will be used to inform future enhancements to our policies, procedures, communication, training and physical environment. Manager support came through strongly and repeatedly as a key enabler.

12.3 Consultation timing

JPMorgan consulted with the Access Ability Business Resource Group and individual employees who self identified as persons with disabilities during the 2025-2026 progress report period.

12.4 Consultation methods

JPMorgan met with employees virtually to conduct the consultations. The virtual consultations via Zoom technology were most used to include employees across the country and those working remotely. The consultation was completed virtually due to the meeting cadence with the AccessAbility Business Resource Group, and individual discussions with the employees who self-identified as persons with disabilities to ensure confidentiality.

12.5 Consultation results

The results from the consultations yielded feedback in the following areas:

12.5.1 Physical barriers

Barriers to accessibility for persons with disabilities in the physical spaces of the sites was raised. The access doors and doors to the washrooms are not barrier-free at some sites. Consultation with the property managers at each of the 6 sites across Canada confirmed that access to washrooms do meet the accessibility code guidelines, however only 2 sites would be considered barrier free. With pending office moves in Montreal and Toronto, 2 additional sites will have barrier free restrooms available within the next 12 months. At this time the property managers do not have plans to update the washroom doors at the other 2 sites, but as renovations and office moves occur, JPMorgan will continue discussions with the property managers and consider the need for barrier free upgrades when sourcing new sites or renovating the current sites.

12.5.2 Accommodation barriers

JPMorgan transitioned from a hybrid work model to full-time in office attendance effective January 2025.

- **Communication-related accommodations** : a specific idea raised was adding optional indicators (e.g., neurodiversity/speech/communication preferences) in Zoom and the internal phonebook similar to preferred pronouns.
- **Flexibility accommodations** (shift flexibility and WFH) to attend physiotherapy were implemented quickly and supported by managers.
- **Episodic accommodations** may be needed (e.g., upcoming shoulder surgery not tied to disability), Manager approval for up to 5 weeks implemented Firmwide.
- **On-site support needs** include access to quiet/private rooms (e.g., for medical injections for Type 1 diabetes, or for dizziness episodes), but availability differs by location. New office will also include this space
- **Environment-based accommodations** were noted (office temperature being too cold causing muscle issues); Requesting an Accommodation can provide heating pads.

How managers engage with employees with disabilities remains a key opportunity area. Employees shared that their willingness to disclose a disability is strongly influenced by the level of trust, psychological safety, and demonstrated support in their relationship with their manager. Some employees have chosen not to disclose because they are concerned that the information could change how they are perceived. Employees also noted that disclosure feels more achievable when managers communicate confidentiality, respond without judgment, and proactively normalize accommodations as a standard part of inclusive people practices.

12.5.3 Manager and employee Training

- **Accessibility/ACA training** was described as well done, easy to understand, and effective in language/wording; it helps reduce stigma.
- **“Who’s in the Room”** / invisible disability awareness was viewed as a strong start that helps break down walls and increase understanding.

Employees had positive feedback about the web-based accessibility training that was introduced in 2024 and refreshed recently. They also shared a desire for more manager and employee training, particularly in the

areas of invisible disabilities and neurodivergent conditions. We have run one session of “Who’s in the Room” Autism Awareness and are planning to offer to all managers.

12.5.4 Communication

- **Assistive features in meetings** are working: headsets and Zoom closed captioning are highly accurate and helpful.

Employees consulted who had accessed internal resources (i.e. benefits, disability leave, accommodation) were aware of the supports available for persons with disabilities at JPMorgan. Assistive technology supports (i.e. headsets, close captioning for Zoom calls) were appreciated by employees, allowing greater access to content and ability to participate in online forums.

JPMorgan included content on benefits, employee assistance, accommodation and inclusion during town hall meetings and in written communications to increase awareness and promote support programs. For 2025-2026 increased coverage for mental health practitioners was noted and appreciated by employees consulted. Vaccination coverage and paramedical services were also viewed favourably.

12.5.5 Ongoing Challenges

- **Role and career implications:** employees in revenue-producing/client-facing roles worry that taking time off or changing roles impacts pipeline and client relationships; one employee is reskilling (PM/Sigma) due to medical guidance away from frontline sales and anticipates questions about accommodations.
- **Coverage language/limits:** “reasonable and customary” wording and reimbursement percentages create uncertainty;
- **Space constraints and privacy:** not enough quiet rooms in some locations; room availability and enforcement are issues (people entering booked rooms; discomfort confronting). This will be addressed with new office for downtown Toronto location.

12.5.6 Other Feedback

- Interest in joining the AccessAbility BRG exists, but capacity/time is a limiter for some; others may join later.
- Suggestion for new hires: a buddy system that is not limited to one LOB to improve inclusion and navigation.
- Some employees report “things going well” and don’t have much additional feedback, indicating parts of the experience are functioning smoothly.

- Employees appreciated that the firm consults and invests in accommodations and employee experience.

13. Training

JPMorgan Chase aims provides training to all employees and volunteers on providing accessible customer service and how to interact with people with various types of disabilities.

- In addition to training on the Accessibility for Ontarians with Disabilities Act (AODA) provided to provincially regulated employees, JPMorgan refreshed and improved the user experience for mandatory Accessibility training for all employees in Canada and non-Canadian employees and managers who support employees in Canada.
- JP Morgan Chase will continue to maintain a record of the training provided