

# HSBC Bank Canada Accessibility Plan (2023-2025)

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**Prepared by:** HSBC Bank Canada's Diversity & Inclusion Office



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# HSBC Bank Canada's Accessibility Plan

HSBC Bank Canada (the Bank), its subsidiaries, and HSBC Global Services (Canada) Limited (together, "HSBC Canada"), is pleased to share its Accessibility Plan – a three-year plan (2023-2025) that lays the foundation for creating a more inclusive and accessible workplace. This Accessibility Plan forms part of of HSBC Canada's compliance with the Accessible Canada Act (ACA) and the Accessible Canada Regulations. The Accessible Canada Act, which was passed in 2019, is a new law that will help make all of Canada more accessible for

people with disabilities. This plan was prepared to track the progress HSBC Canada is making towards our accessibility goals. It is considered a living document that will be reviewed and updated annually.

## **We welcome your feedback**

Our journey towards full accessibility is well underway and your feedback is a vital component of this process. We are always looking for ways to improve and we welcome

input from members of the public, clients, employees and community groups. If we're doing something right in making HSBC Canada more accessible, let us know so we can continue our actions. If we can do something better, let us know so we can adjust what we are doing as we work towards our goal to progress our efforts in accessibility and disability inclusion.

## **Share your accessibility insights and feedback**

HSBC Canada's Head of Diversity & Inclusion is designated to receive accessibility feedback and will co-ordinate with internal subject matter experts responsible for each of the priority areas to meet obligations described under the Accessible Canada Act as required.

- ◆ **Personal banking:**

Call us toll-free at 1-888-310-4722

Visit an [HSBC branch](#)

- ◆ **Business banking:**

Call us toll-free at 1-866-808-4722

- ◆ **Email address:**

[info@hsbc.ca](mailto:info@hsbc.ca)

- ◆ **Mailing address:**

HR, Diversity & Inclusion  
885 West Georgia Street  
Vancouver, British Columbia  
V6C 3E9

We will acknowledge that we have received feedback in the same manner as the feedback was received, unless you ask us to reply using a different channel or format. Feedback may be provided anonymously, in which case acknowledgement of receipt will not be issued.

## **Requesting HSBC Canada's accessibility plan, description of HSBC Canada's feedback process and alternate formats:**

By contacting HSBC Canada using any of the methods described above, HSBC Canada will provide its accessibility plan and a description of HSBC Canada's feedback process, in print, large print, Braille, audio format (French and English) or electronic format that is compatible with adaptive technology that assists people with disabilities. Requests for documentation in Braille or audio format will be fulfilled within 45 days of the request. All other requests will be fulfilled within 15 days.





# General

## About HSBC Canada

HSBC Holdings plc, the parent company of HSBC Canada, is headquartered in London, United Kingdom. HSBC serves customers worldwide from offices in 62 countries and territories in its geographical regions: Europe, Asia, North America, Latin America, and Middle East and North Africa. With assets of US\$2,967 billion at December 31, 2022, HSBC is one of the world's largest banking and financial services organizations.

## Statement of commitment

HSBC Canada is committed to fostering an inclusive, barrier-free workplace where all employees are treated with respect and dignity. We recognize that planning for accessibility helps us create a more inclusive workplace so that everyone can realize their full potential. HSBC is also committed to meeting the goals and requirements outlined in the Accessible Canada Act (ACA), the Accessibility for Ontarians with Disabilities Act (AODA) and other related provincial legislation, and to meet the accessibility needs of people with disabilities in a timely manner by implementing



the requirements of the ACA and its applicable regulations. We have made progress in creating an inclusive and accessible workplace, but there is more work to be done. We remain committed to uncovering and removing barriers that limit full participation.

## Definitions from the Accessible Canada Act

### **Barrier:**

“Means 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:**

“Means 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.”







# Introduction

This document identifies HSBC Canada's accessibility gaps in the priority areas identified by the ACA and outlines our plan to reduce these barriers to achieve or enhance accessibility and disability inclusion. This plan is a living document and will be updated regularly concurrent with new developments and feedback.

During the preparation of this document, HSBC Holdings Plc announced that subject to regulatory review and approval, it had reached

an agreement to sell its 100 per cent equity stake in HSBC Canada and its subsidiaries to Royal Bank of Canada (RBC). The following plan reflects HSBC Canada's aspirations for accessibility and disability inclusion as at June 2023 while still a member of HSBC Group. A more detailed list of everyday barriers has also been inventoried for HSBC Canada to address if it continues to remain with HSBC Group. If the sale of HSBC Canada to RBC is completed, this plan will be amended or integrated into RBC's overall accessibility plan.

## Inclusion, Diversity, Equity and Accessibility at HSBC Canada

HSBC Canada is committed to strengthening inclusion in our workplaces and communities. Our Diversity & Inclusion strategy is grounded in four strategic pillars:

- ◆ **Leadership and accountability:** We will build diversity, equity and inclusion confidence, behaviours and accountability in our leaders and people managers to help lead and inspire diverse teams as we navigate through constant change.
- ◆ **Workforce composition:** We will build and develop our workforce with an intentional approach to increase diversity representation aligned to labour market availability and HSBC's aspirational goals, with a specific focus on under-represented groups, especially Indigenous people and people with disabilities.
- ◆ **Cultural competence:** We will build an inclusive, supportive and safe-to-speak-up culture that enables each of us to thrive and bring our whole self to work.
- ◆ **Marketplace presence:** We will amplify, promote and sustain HSBC Canada's diversity and inclusion brand of trust and familiarity in our target communities.

Our Diversity & Inclusion Office is responsible for ensuring all activities, investments and focus from our leaders, senior stakeholders and employees are aligned with these four strategic pillars. Our Diversity & Inclusion Council, made up of our Executive Committee members, oversees our Diversity & Inclusion strategy and is a quarterly forum to strategically discuss, debate and action diversity, equity, accessibility and inclusion issues of impact. The Council also ensures our workforce is representative of changing demographics and that we maintain an inclusive work environment. Members of the Council also act as executive sponsors to our Employee Resource Groups (ERGs), and representatives of our ERGs are regularly invited to attend our Diversity & Inclusion Council meetings to ensure we listen to the voices of our employees.





# Executive summary

The seven sections of the HSBC Canada Accessibility Plan (2023-2025) align with the seven priority areas identified in the ACA. Each section of this plan summarizes the issues in each priority area and includes HSBC's goal, the current status, identified barriers, three-year action plan and the teams responsible for implementing the actions.

In partnership with the Business Disability Forum, HSBC Group's global Disability Confidence Program (launched in 2020) is committed to improving disability inclusion and confidence across the bank and increasing awareness of the challenges faced by people with disabilities and how we can address them. In Canada, following a review of our practices, policies and processes across ACA's priority areas, we have identified the following goals:

- ◆ **Goal 1 – Employment:** Employees and job seekers with disabilities regard HSBC Canada as an employer of choice where they have access to employment, development and advancement opportunities to realize their full career potential.
- ◆ **Goal 2 – Built environment:** All of HSBC Canada’s physical locations and exterior areas are accessible and barrier free for employees, clients, visitors and the general public.
- ◆ **Goal 3 – Information and communication technologies (ICT):** All public websites, mobile applications and internal systems are accessible and usable by all customers and staff.
- ◆ **Goal 4 – Communications, other than ICT:** All our internal and external communications are as accessible and inclusive as possible.
- ◆ **Goal 5 – Procurement of goods, services and facilities:** Accessibility criteria are included and implemented in procedures for buying and acquiring goods, services and facilities.
- ◆ **Goal 6 – Design and delivery of programs and services:** Needs of employees and clients with disabilities are addressed effectively when developing and delivering HSBC products and services.
- ◆ **Goal 7 – Training:** Our leaders and employees are equipped with the knowledge and tools they need to feel confident interacting and providing support to colleagues and customers with disabilities and how to do it.
- ◆ **Goal 8 – Transportation:** N/A

Achieving the above goals will require a co-ordinated approach to address the main accessibility barriers uncovered in our review and ensure our organizational culture embeds accessibility in everyday principles, processes, communications and operations. Our review identified the need to:

- ◆ increase consideration of accessibility in organizational planning and resource allocation,
- ◆ increase awareness and understanding of how work-related practices impact people with disabilities and the role everyone plays in accessibility and disability inclusion,
- ◆ increase awareness, training and accommodation by managers so they can better support employees with disabilities to thrive in the workplace and
- ◆ increase training and awareness of the need to make communications accessible and for accessible communication standards to be embedded throughout the organization.

## Consultations

This Accessibility Plan was developed in collaboration with HSBC’s global and local subject matter experts, leaders and stakeholders - a multidisciplinary team covering all ACA priority areas, and, in consultation with HSBC Canada’s Ability ERG, comprised of employees with disabilities and allies.

Our Ability ERG is dedicated to leveraging the diverse skills and abilities of employees with visible and non-visible disabilities as well as those who are caregivers of individuals with disabilities. Members of the group are



committed to creating a more equitable bank for colleagues and customers with disabilities, and empowering employees with a disability to achieve their potential at HSBC. The Ability ERG continues to be a valuable source of leadership, consultation and partnership in bringing awareness to and support for HSBC's accessibility efforts for customers and employees. Together with the Ability ERG, HSBC Canada takes time to support and recognize the contributions of individuals with disabilities, including on the International Day of Persons with Disabilities. The day is an opportunity to reflect on our commitment every single day of the year to promote the rights and well-being of people with disabilities, and to celebrate and recognize their contributions in the workforce and wider community.

Within HSBC, employees are also regularly invited to complete Snapshot, our engagement survey, and to participate in focus groups and exchange sessions to identify gaps to inclusion. This Accessibility Plan has been informed by the following sources of feedback:

- ◆ **Snapshot:** Our global employee engagement survey is deployed annually to all employees.

At each reporting period, results are broken out so that we can obtain a deeper understanding of employee sentiment along diversity dimensions, including for people with disabilities.

- ◆ **Global WPB survey and consultation:** In 2019, an in-depth global survey was conducted by our Wealth and Personal Banking (WPB) group in partnership with the Building Disability Forum to better understand

the experiences of WPB colleagues and customers with disabilities. Almost 2,000 employees were surveyed (including many from Canada) and 38 interviews were conducted involving global functions and leads from 14 markets. Group policies and procedures were also reviewed at the same time, and a research report was produced in April 2020 that identified barriers. Specific action plans were developed for each of the report's relevant areas.

- ◆ **Employee engagement:** HSBC Canada's recruitment team reached out to branch managers in 2019 and early 2020 to see if we could make improvements to better accommodate job candidates with disabilities. Four branches (out of over 130) were identified as requiring modifications and improvements were made to these buildings.
- ◆ **Exchange sessions:** Leaders at all levels of the organization regularly conduct exchange sessions to hear directly from employees about our diversity and inclusion progress. A number of sessions, including ones led by our executive team, actively encouraged feedback from employees with disabilities on the topic of disability inclusion to better understand how we can support them to thrive within the organization.
- ◆ **Focus groups:** A series of focus groups, including with Ability ERG members and employees with disabilities, was conducted to help identify the barriers outlined in this plan.
- ◆ **Working groups:** Working groups have been established during the planning stages of various projects and initiatives to identify and address accessibility barriers before

plans were developed or implemented. Identified barriers and corresponding action plans are reflected throughout the different priority areas of this Accessibility Plan.

The insightful feedback we gathered through the mechanisms described above enabled us to identify the following accessibility barriers, challenges and opportunities:

- ◆ HSBC systems can be complex and some processes are not intuitive or easy to navigate.
- ◆ Increased education and training would help managers have more consistent awareness of disability inclusion and the steps to take to provide support, including when, where and how to put accommodations in place.
- ◆ More can be done to destigmatize disability and address the hidden and unconscious biases that we hold of employees/customers with disabilities.
- ◆ We have the opportunity to build an organizational culture where people feel safe to self-disclose their disability, including to their managers.
- ◆ Employees with disabilities would like to see more representation from their demographic in senior roles/leadership.
- ◆ More work can be done to provide consistent development support or sponsorship for employees with disabilities.
- ◆ Although career development is the responsibility of the individual, it's important for managers to be supportive at all levels.
- ◆ Accommodation plans are in place for ergonomic and workplace adjustments, but those who require assistive technologies or have other complex needs also need to have documented accommodation plans in place.
- ◆ Although there are clear processes to accommodate employees with physical disabilities, a clear accommodations process is also needed for employees with invisible disabilities (e.g., those who are neurodiverse, experience mental health issues, have chronic disabilities).
- ◆ In our 2022 Snapshot engagement survey, employees with disabilities continue to respond less favourably to the following statements compared to employees without disabilities:
  - I feel able to achieve my career objectives at this company
  - I would recommend this company as a great place to work
  - I feel valued at the company
  - I generally look forward to going to work
  - My work gives me a feeling of personal accomplishment

As we take steps to advance our Accessibility Plan, we will continue to encourage and leverage the feedback shared by employees and members of disability communities. They continue to play an instrumental role in identifying our priorities and measuring our progress.

Our sincere thanks and appreciation to everyone involved in the creation of this plan, especially to our Ability ERG members for their passion, commitment and ongoing support to make HSBC more accessible for everyone of all abilities.



## **Identification and Removal of Barriers and Prevention of New Barriers – Areas Described under Section 5 of the Accessible Canada Act (ACA)**



# Employment

## Goal

Employees and job seekers with disabilities regard HSBC Canada as an employer of choice where they have access to employment, development and advancement opportunities to realize their full career potential.

## Current status

HSBC Canada remains committed to identifying, hiring, retaining and promoting people with disabilities. We are a member of the Presidents Group, a network of change-driven British

Columbia business leaders whose mission is to model and champion inclusive employment practices to make accessibility a hallmark of how British Columbia does business. Any best practice learnings are leveraged across the bank, both in Canada and globally.

HSBC Canada's overall representation of people with disabilities has been decreasing slightly year over year. As we continue to fall short of labour market availability, we plan to enhance our hiring goals and build disability confidence across our employee base while attracting and retaining this population.



Representation	HSBC 2018	HSBC 2019	HSBC 2020	HSBC 2021	HSBC 2022	Labour market availability*
Overall	3.81%	3.67%	3.50%	3.15%	<b>2.8%</b>	9.10%
Professional	3.68%	3.62%	3.28%	3.03%	<b>2.6%</b>	8.90%

\*Overall labour market availability as per Employment and Social Development Canada's 2016 Employment Equity Data Report.

## Inclusive recruitment

Removing barriers and improving the candidate application process is extremely important as we continue to embed a fair and inclusive recruitment process. We have expanded diversity self-identification options upon application to now include disability, sexual orientation, gender identity and more visible minority and Indigenous categories. These options are all in line with our workplace employee self-identification survey. Persons with disabilities are now able to request accommodations during their application, prompting our recruiters to offer accommodations assistance earlier.

Our Values-Based Assessments for external candidates are regularly evaluated. Our assessment vendor confirmed that our current assessments are not adversely affecting under-represented candidates, including people with disabilities. We previously invested in a platform that identifies and removes unconscious bias in job postings and communications. We have been welcoming constructive feedback and suggestions from our Ability ERG members to ensure that our writing and job postings are inclusive and free of bias. We have also featured members in recruitment campaigns, highlighting their career experience and involvement in the

ERG. Our dedicated diversity recruiter meets regularly with Ability ERG members to solicit feedback with respect to inclusive recruitment practices and/or marketing.

Education goes hand in hand with our inclusive recruitment efforts. Before opening a posting, managers are required to complete training called "Hiring and Selection: Getting it Right" to help them make decisions in line with our inclusive hiring principles. Our recruitment team complements this training by ensuring hiring leaders are mindful of our commitment to increase overall representation from diverse communities and providing a Diversity Interviewing Best Practice Guide as a resource. Our recruitment team has also completed additional upskilling on select topics such as unconscious bias, neurodiversity and COVID-19 impacts.

## Inclusive talent and performance management

Our talent management practices ensure we have the capabilities and culture required for HSBC to meet its immediate and future goals. Our goal is to identify and develop leaders who are diverse and adaptable, who enable change and who foster a culture of performance, feedback and learning where everyone can thrive.

Over the years we have standardized our processes for identifying and developing potential talent to uncover bias and remove barriers:

- ◆ We define what we mean by talent based on learning agility and objective criteria to identify that agility. We apply these criteria through talent reviews.
- ◆ We assess talent to provide more objective evaluation of the identified talent pipeline through a range of tools, including the actual talent identification and program selection processes and formal assessments.
- ◆ We develop talent by creating succession and development plans.

Our global performance management policy was also recently reviewed and explicitly states that planned absence due to a disability leave will not impact any performance reviews. As we continue to gain feedback on and learn from the impact of our talent programs and processes, we will review and enhance them to ensure they are as diverse and inclusive as possible.

## **Workplace accommodations**

HSBC Canada currently employs more than 4,600 employees, many of whom work at office-based jobs in Toronto and Vancouver as well as branch locations across the country. During the COVID-19 pandemic, most employees started working remotely, and we took steps to minimize new accessibility barriers that resulted from this shift. For example:

- ◆ Our Human Resources (HR) team partnered with Procurement in 2021 to bring on a new vendor that could provide ergonomic

assessment services in both office and home environments to identify and mitigate barriers as well as minimize potential exposure to physical workstation hazards. Our ergonomic assessment process was streamlined and improved to promote employee health, safety and accessibility, thus empowering employees and managers to work together to minimize barriers.

- ◆ In response to feedback from Ability ERG members, we worked with our colleagues from the deaf and hard-of-hearing communities to identify and onboard a new vendor that would better meet their interpretation services needs.

These enhancements made over the past 24 months to our workplace accommodations policy and process coincided with the adoption of our new ways of working and redesigned office spaces. All individuals who had office accommodations before the pandemic were contacted by HR and Corporate Services as part of the return-to work project. We ensured all accommodation requests were honoured in our new office spaces in alignment with various workstyles. Today, many HSBC Canada employees have adopted a hybrid workstyle, with the majority coming into our offices a few days a week.

We have updated our workplace accommodations policy and process to comply with standards set out in the AODA and to better improve workplace accessibility for employees with disabilities. A new Accessibility resource page is now available as a one-stop shop for employees and managers to access information about our commitment to accessibility and the accessibility supports available.



## Three-year action plan

We continue to review our processes and hold consultations with people with disabilities to uncover any barriers to employment. The following action plan was developed in response to employee feedback on how to increase the hiring, retention and promotion of employees with disabilities over the next three years:

Action	Steps	Responsibility	Timeline
Continue to assess ways to deliver workplace accommodations more effectively	<ul style="list-style-type: none"> <li>♦ Review ways to make the accommodation process more centralized</li> <li>♦ Explore ways to centralize funding for accommodations</li> <li>♦ Deliver session to HR and those involved in the accommodation process to clarify roles and responsibilities and raise understanding of the reasons for accommodation and our legal duty to accommodate</li> </ul>	Canada HR	Q1-Q4 2023
Ensure plans are in place and documented for all employees requiring accommodations	<ul style="list-style-type: none"> <li>♦ Assess onboarding practices to ensure they are accessible and that employees feel supported, including reviewing and updating the orientation program and checklist for new employees as appropriate</li> <li>♦ Ensure individual accommodation plans have been developed and documented for both new joiners and existing employees in partnership between the employee, their manager and a third-party accommodations vendor</li> </ul>	Canada HR	Q1-Q4 2023

Action	Steps	Responsibility	Timeline
Increase awareness of HSBC's commitment to accessibility, disability inclusion and workplace accommodations process	<ul style="list-style-type: none"> <li>◆ Develop a strategy on how managers can better support employees with disabilities</li> <li>◆ Deliver session on disability inclusion and the workplace accommodations process tailored to people managers</li> <li>◆ Deliver session on disability inclusion and workplace accommodations to all employees</li> </ul>	Canada HR	Q1 2024
Continue to identify barriers and areas of bias in our employment and talent management process	<ul style="list-style-type: none"> <li>◆ Continue to conduct Exchange Sessions, consultations and other feedback mechanisms to identify barriers</li> </ul>	Canada HR/ Ability ERG	Q1 2024
Increase representation of people with disabilities overall and at all levels of the organization	<ul style="list-style-type: none"> <li>◆ Continually review workforce data to update hiring and promotion goals for people with disabilities as part of a three-year diversity hiring strategy</li> <li>◆ Continue to assess opportunities to build community partnerships that will help us reach and attract candidates of all abilities</li> <li>◆ Continue to intentionally promote talent and learning programs to encourage the participation of employees with disabilities</li> </ul>	Canada HR	Ongoing 2023-2025





# Built environment

## Goal

All of HSBC Canada's physical locations and exterior areas are accessible and barrier free for employees, clients, visitors and the general public.

## Current status

In 2021, we embarked on an accessibility review of our physical locations, starting with our head office buildings in Ontario, to ensure we were complying with the standards outlined

in the AODA. Our early findings indicated a need to conduct a complete inventory of accessibility barriers in the built environment at each of our sites. HSBC occupies 139 sites across Canada and the date range for when each site was constructed spans decades. Most of our branches are legacy locations originally constructed in compliance with older iterations of local building codes that do not meet today's accessibility standards. With accessibility considerations varying from site to site, an important next step would be to ascertain

each site's state of accessibility through physical assessments leveraging a tiered ranking system utilizing existing accessibility design standards established provincially and through independent consortiums (i.e., the Rick Hansen Foundation). We also consulted with our internal Ability ERG and a wider employee audience for their feedback on the accessibility barriers they face in the workplace.

## **Challenges**

HSBC-occupied buildings in Canada are leased, which means we do not have direct control over the exterior and common areas of these properties. Exterior entrances, walk paths, lighting and parking stalls are directly controlled by the building's private owners. This means we must rely on the accessibility commitment of private companies to achieve a holistically accessible experience for our employees, clients and visitors to our buildings.

Despite the above challenges and limitations, we continue to make progress to enhance the accessibility of our built environment. Working with colleagues in Corporate Services, we also reviewed our internal processes against the federal government's return to work accessibility guidelines for COVID-19 and other health emergencies and made appropriate improvements to meet established standards.

As part of the redesign of our main office locations in Vancouver and Toronto we invited Ability ERG members to participate in a working group advising on how to facilitate a smooth transition back to the office. As a result, we were able to make adjustable ergonomic equipment available to all employees, including

groupings of height-adjustable desks, fully adjustable ergonomic chairs and adjustable monitor arms. In addition, lockers are now available in our office buildings for employees to store IT peripherals (such as specialized ergonomic keyboards/mice) and any additional workstation equipment such as footrests. Our workplace ergonomic accommodations process has also been streamlined for faster delivery of professional assessments and procurement of specialized equipment or furniture. The end-to-end accommodation process is now far more transparent requiring more engagement between the employee and line management.



## Three-year action plan

HSBC Canada's Corporate Services team created a road map to show how we are planning to meet the ACA 2040 barrier-free requirements for the built environment. The road map outlines yearly actions and targets for renovating and/or relocating HSBC Canada sites. Actions for 2023-2025 include:

Action	Steps	Responsibility	Timeline
Ensure all shared spaces are accessible to employees, visitors and clients of all abilities	<ul style="list-style-type: none"> <li>◆ Survey employees to obtain their feedback on barriers to inform building assessment standards</li> <li>◆ Finalize accessible design standards</li> <li>◆ Pre-program site level accessibility assessments to identify barriers and gaps</li> </ul>	Corporate Services	Q2/Q3 2023
Conduct building accessibility assessments	<ul style="list-style-type: none"> <li>◆ Roll-out accessible design standards to workplace health &amp; safety representatives as a self-survey mechanism to assess the level of accessibility of HSBC locations</li> </ul>	Corporate Services	Q3/Q4 2023
Integrate accessibility	<ul style="list-style-type: none"> <li>◆ Establish accessibility design standards for new construction and renovations</li> <li>◆ Introduce enhanced accessibility lease clauses for all new leases that reflect AODA and ACA standards</li> <li>◆ Continue to review and identify areas in need of improvement for accessibility</li> </ul>	Corporate Services	2023/2024
Ensure legacy branch locations are brought up to current accessibility standards	<ul style="list-style-type: none"> <li>◆ Conduct thorough site-by-site accessibility evaluations leveraging a tiered ranking system based on established accessibility design standards</li> <li>◆ Upgrade sites where practically feasible</li> <li>◆ Document and communicate identified barriers to employees in the workplace</li> </ul>	Corporate Services	2023/2024



# Information and communication technologies (ICT)

## Goal

All public websites, mobile applications and internal systems are accessible and usable by all customers and staff.

## Current status – Digital accessibility

HSBC Group launched a bold ambition to become the most digitally accessible financial

services provider in the world. We measure digital accessibility by the extent to which a digital experience is easily used by everyone, regardless of ability.

Our accessibility guidelines outline our global policy and process for ensuring HSBC digital experiences can be used by the widest range of customers and staff. They apply to all HSBC digital projects, as every HSBC digital experience must be accessible and used or accessed in the way it was intended according



to this global policy. The following standards are included within our global accessibility policy:

- ♦ digital experiences must always be planned and built with accessibility in mind and
- ♦ HSBC websites and apps must comply with all Web Content Accessibility Guidelines (WCAG) 2.1 AA level of conformance.

Within Canada, we partnered with our businesses, functions and information technology teams in 2021 to ensure our external websites, including web-based applications, were accessible and complied with WCAG 2.0 level AA, as per guidelines under the AODA. After filing our AODA report in 2022, the Ontario government confirmed we met the WCAG 2.0 level AA standards. The WCAG guidelines are a continual work in progress and will be refined over time in response to ever-advancing technologies and ever-changing ways that people of all abilities access content online, and our digital experiences and applications will evolve to meet these guidelines.

In tandem with our global accessibility policy, global procedures have also been developed for HSBC employees and any third party that produces internal and external-facing HSBC digital experiences or applications, or reviews and approves our digital experiences and applications. Every internal and external-facing digital experience or application must now comply with HSBC Global Accessibility Standards to ensure people with disabilities or including neurodiverse users are able to use it effectively.

Moving forward, before any team launches a new digital experience or application, it must

first be reviewed by Group Brand Digital and a third-party auditor during its creation and before launch for final certification and compliance with HSBC Group Accessibility Standards.

Globally, and in Canada, we have increased awareness and focus on neurodiversity and launched new neurodiversity guidelines to complement our existing accessibility standards. These guidelines provide HSBC employees, including the digital teams, with guidance on how to design, code and create digital content to support customers or employees who are neurodiverse. Members of our Ability ERG contribute regularly to building these evolving guidelines.

## **Current status – Assistive technology**

Assistive technology is any item, piece of equipment, software program or product system used to increase, maintain or improve the independence or functional capabilities of people with disabilities. HSBC Group has a portal that employees use to request assistive technology, including hearing communication aids, memory aids, dyslexia software, ergonomic mice and keyboards, handheld magnifiers, screen readers, screen magnification and colour overlays.

In Canada, some employees, including line managers, are still not widely aware of assistive technology, and it is a priority for us to raise awareness of our offerings and how they can be accessed to support people with disabilities at HSBC. Our existing assistive technology products seek to support the following disability groups:



- ◆ **Auditory:** Hearing-related impairment.
- ◆ **Motor:** Any form of physical disability relating to movement or mobility.
- ◆ **Visual:** Sight-related impairment.
- ◆ **Cognitive:** Relating to cognitive processing ability.
- ◆ **Neurodiverse:** Refers to variation in the human brain regarding sociability, learning, attention, mood and other mental functions.

## Three-year action plan

While a global accessibility policy is now in place across HSBC Group, we need to embed accessibility within our core procedures and standards in Canada to ensure that the lived experiences of employees and customers with disabilities inform our plans.

Actions/Barriers	Steps	Responsibility	Timeline
Embed HSBC's global accessibility policy and processes within Canadian procedures and operations	<ul style="list-style-type: none"> <li>◆ Create and implement a process to embed the new global accessibility policy and procedures in everyday operations and decision-making</li> <li>◆ Ensure project owners or sponsors embed accessibility planning in new digital experiences</li> <li>◆ Put process in place for project owners/ sponsors to confirm and document that their new applications are certified and comply with HSBC Global Accessibility Policy and Standards</li> </ul>	Canada HR	Q4 2023
Raise employee awareness of assistive technology processes	<ul style="list-style-type: none"> <li>◆ Raise employee awareness of how to access assistive technology (e.g., text-to-speech, dictation, closed captioning, high contrast and alternate input devices)</li> </ul>	Canada HR	Q1 2024
Educate employees about the new global accessibility policy	<ul style="list-style-type: none"> <li>◆ Provide training on the new HSBC Global Accessibility Standards and Policy to relevant stakeholders, especially project owners, for creating digital experiences or applications</li> </ul>	Canada HR	Q2 2024



# Communication, other than ICT

## Goal

All our internal and external communications are as accessible and inclusive as possible.

## Current status

HSBC Group introduced Diversity and Inclusion guidelines that outline our principles and

commitment to fair representation, diversity and inclusion in all of our marketing activities from creative and production through to research and partnerships. All HSBC's partners and agencies must commit to the global guidelines covering eight key areas:

- ◆ **Creative development:** All creative work should be a fair representation of all customers and audiences, and reflect the diverse world we live in.

- ◆ **Research and testing:** The research that feeds our ideas and decision-making should be representative and avoid any systemic bias.
- ◆ **Production:** Ensure representation in the production process captures all the nuance from different cultures and backgrounds.
- ◆ **Media:** Ensure media buys reach all audiences from diverse backgrounds and does not support systemic biases, hate or exclusion.
- ◆ **Partnerships:** Ensure investments are with strong partners that share HSBC's vision and commitment to inclusion.
- ◆ **Inclusive design:** Global digital accessibility policy integrated to ensure digital experience is easily used by everyone, regardless of ability, and that the majority of HSBC customers and staff can experience a product or use a feature in the way it was intended.
- ◆ **Inclusive tone of voice:** Guidance on how to use language respectfully and inclusively when talking with, or referring to people with different cultural backgrounds, religions, sexual orientations, learning preferences or disabilities, neurodiverse brains and native languages.
- ◆ **Inclusive imagery:** Principle in place to ensure we choose imagery that is inclusive and representative of our audiences' diversity.

Throughout the pandemic and as part of our transition back to the office, we have also worked with our Ability ERG members to identify barriers and areas for improvement in everyday communication, including:

- ◆ Ordering clear face masks for our branch staff to assist in communicating with deaf customers when public health requirements during the COVID-19 pandemic required people to wear masks in public settings.
- ◆ Making live transcription/closed captioning available for internal Zoom meetings in response to feedback from deaf and hard-of-hearing employees, and exploring technical requirements are currently being explored to enable the same for external meetings.
- ◆ Sourcing and onboarding a new vendor for providing interpretation services in response to Ability ERG feedback to better meet the needs of deaf and hard-of-hearing employees.

As the above global guidelines were introduced recently, we are now working to embed them in our communications protocols and processes locally in Canada.



## Three-year plan

Our Ability ERG members in Canada continue to review corporate communications such as job postings and our global guidebook on Inclusive Communications to ensure we are inclusive of people with disabilities and that the terms we use are appropriate and respectful. As we continue to embed accessibility in our communications and hybrid workplace culture, we will continue to collaborate with the Ability ERG to ensure we progress on our commitments to meet the needs of both employees and clients with disabilities effectively:

<b>Actions/Barriers</b>	<b>Steps</b>	<b>Responsibility</b>	<b>Timeline</b>
Ensure all information we provide is accessible to people of all abilities	♦ Create and implement a process for requesting and receiving documents and materials in alternate formats	Canada HR and WPB	Q4 2023
Ensure global D&I marketing guidelines are embedded in Canadian processes	♦ Establish a process to ensure relevant teams meet D&I guidelines for marketing	Marketing	2023
Ensure everyday employee communications are accessible and inclusive	♦ Explore whether it is possible to include American Sign Language as an alternate language option in HSBC videos	Group D&I	Q4 2023
Improve accessibility in communicating with deaf and hard-of-hearing employees and customers	♦ Explore feasibility of implementing video relay interpretation services	Canada HR/ WPB/ IT	2023/24

Actions/Barriers	Steps	Responsibility	Timeline
Establish and implement a plan to ensure internal and external hybrid meetings are accessible	<ul style="list-style-type: none"> <li>◆ Provide communication/education on technology to support accessible meetings, including assistive listening devices, live captioning or designating a facilitator to reduce barriers from unclear audio IT/events</li> </ul>	Canada HR Marketing	Q2 2024
Establish and implement a plan to ensure any HSBC-sponsored events are accessible	<ul style="list-style-type: none"> <li>◆ Develop a process to ensure events are accessible, offer sign language interpretation and that relevant accessible formats and tools are used</li> </ul>	Canada HR	Q2 2024
Ensure we provide accessible services to deaf and hard-of-hearing customers	<ul style="list-style-type: none"> <li>◆ Employee video in development that shows how deaf customers use the Contact Centre and the tools that can be leveraged to enhance their experience.</li> </ul>	WPB/Ability ERG	2025



# Procurement of goods, services and facilities

## Goal

Accessibility criteria are included and implemented in procedures for buying and acquiring goods, services and facilities.

## Current status: Procurement of goods and services

Across HSBC globally we want to ensure our suppliers represent our employees, customers and the communities we serve. We believe that creating a diverse supply chain drives innovation and increases our agility and adaptability, and we work with our suppliers



to ensure their commitment and practices for disability inclusion are reflective of ours.

HSBC's Supplier Code of Conduct sets out our commitments and priorities for a sustainable supply chain and our expectations of what is required from suppliers to support these priorities. We are committed to ensuring that diversity and inclusion are prioritized in the goods and services we purchase by:

- ◆ increasing procurement opportunities for diverse-owned businesses, and small-to-medium sized enterprises. A diverse-owned business is one that is at least 51 per cent owned, managed and controlled by an individual or group that is part of a traditionally underrepresented or underserved group (i.e., people with disabilities),
- ◆ ensuring that neither HSBC nor our suppliers discriminate against any individuals or groups on any grounds, including disability, mental or physical health conditions,
- ◆ ensuring that contractors and suppliers providing services to HSBC promote diversity and inclusion within their organizations and
- ◆ making the goods and services suppliers deliver equally accessible to everyone (i.e., by considering and complying with international accessibility standards when creating and/or maintaining any deliverables for HSBC).

## **Current status: Digital accessibility in procurement**

HSBC Global Procurement partnered with the Digital Standards team to meet the growing challenge of digital accessibility within our supply chain. In 2022, HSBC Canada leveraged HSBC Group's digital standards to embed digital accessibility in our procurement practices. Our Global Procurement team in Canada have been briefed on these new standards and a briefing pack was created to inform suppliers of this new requirement. To ensure the adoption of our digital accessibility standard we have:

- ◆ created digital accessibility criteria in the source-to-contract procurement process,
- ◆ embedded accessibility criteria for RFx questions as well as the contract management software used by buyers in the procurement process,
- ◆ provided training and tools to our sourcing teams who procure IT goods or services to embed accessibility in the procurement process and
- ◆ started working with HSBC Legal to embed a clause on digital accessibility into standard supplier contracts.

## Three-year action plan

Currently, while accessibility is sometimes considered when we procure external goods and services in Canada, it is not standardized in our procurement processes. We plan to change the way we ask for goods and services to improve the accessibility of the products and services we buy.

Actions/Barriers	Steps	Responsibility	Timeline
Ensure digital accessibility standards are embedded within the procurement process	<ul style="list-style-type: none"> <li>◆ Ensure accessibility criteria are embedded in procurement documents. This includes directives, policies, checklists, requirement templates and template contracts</li> <li>◆ Finalize a digital accessibility clause to be included in standard contracts</li> <li>◆ Ensure IT buyers are updated on standard contract changes</li> </ul>	Global Procurement	2023
Evaluate the employee procurement journey to better understand accessibility barriers	<ul style="list-style-type: none"> <li>◆ Gather feedback from employees to understand any gaps or barriers in digital accessibility that have not been captured through the Web Content Accessibility Guidelines (WCAG) 2.1 level AA standards implementation</li> </ul>	Canada Procurement, Canada HR and Ability ERG	2024
Embed accessibility considerations or prompts in the purchase requisition process	<ul style="list-style-type: none"> <li>◆ Create category-specific accessibility prompts for internal business stakeholders to reference during the purchase requisition process.</li> </ul>	Canada Procurement	2024
Effectively embed accessibility criteria in processes	<ul style="list-style-type: none"> <li>◆ Ensure system owners review feedback and take recommended actions to address any material accessibility barriers</li> <li>◆ Provide training on how to support employees to incorporate accessibility into procurement</li> </ul>	Canada Procurement	2025



# Design and delivery of programs and services

## Goal

We value our customers and employees with disabilities and address their needs when developing and delivering HSBC products and services.

## Current status

In 2020, HSBC launched the Global Disability Confidence Program. The program is committed to improving disability inclusion and confidence

across the bank globally while increasing awareness of the challenges faced by people with disabilities and the opportunities to address these challenges.

In 2019-2020, HSBC Canada conducted a thorough assessment of our Wealth and Personal Banking and InvestDirect groups to ensure we were meeting the customer service standards outlined in the AODA. This included identifying and addressing any barriers that may prevent customers with disabilities from accessing the services they need, especially



in the areas of physical obstacles, technology, information and communication, organizational practices and procedures, and employee attitudes. Findings have since been addressed in actions outlined throughout this Accessibility Plan against the relevant heading.

The same year, HSBC partnered with the Business Disability Forum to better understand the experiences of Wealth and Personal Banking's colleagues and customers with disabilities globally. Close to 2,000 employees were surveyed and 38 interviews were conducted in 14 markets, including Canada, to assess our policies, procedures and areas where we can improve our progress in accessibility and disability confidence. Since then, we have been working to address and implement solutions based on the feedback we received in addition to the findings from our comprehensive AODA review, including:

- ◆ **Embedding accessibility and disability inclusion within core procedures/ standards and to have the lived experience of employees and customers with disabilities inform improvement plans and the delivery of products and services in all global functions/ channels and markets.** As a start, we have been conducting diverse user testing of our external customer facing systems and product delivery with both neurodiverse users and users with disabilities to ensure that the end-user experience is informed by lived experience. Internally, a panel of 70 employees with disabilities has been established to provide feedback on staff-facing systems.

- ◆ **Developing disability confidence through training for customer-facing employees so they can better understand and meet the needs of our customers when delivering services.**

Video relay service is available at all HSBC call centres and new employees receive training on how to use the service to enhance communication. In 2022, HSBC Canada branches used staff huddles as an opportunity to raise employee awareness of the audio and visual assistive devices available in branches to support clients with auditory or visual disabilities. Branches are also equipped with a range of assistive technologies to support clients' accessibility needs including:

- Optelec: An optical magnifier and reading aid for people with a visual impairment that magnifies text and photos to make reading easier
  - Advanced Listening System: Technology that supports customers with a hearing impairment by filtering out background noise and transmitting clear sound through their personally adjusted hearing aid
  - Voice Guidance on ATMs: Text-to-speech technology delivers a human like, engaging and personalized audio-guided user experience when doing transactions at Automated Teller Machines (ATMs). Supported languages include English, French, Mandarin and Cantonese.
- ◆ **Ensuring virtual learning modules meet Group Accessibility Standards.** To address this Learning Accessibility Standards were developed and launched at the beginning of 2022 and global mandatory training modules were reviewed to ensure that they were

made accessible for all employees. However, these standards only cover global programs and vendors. In Canada, our Learning team is working with the global vendor to ensure that Canadian-specific training/learning modules are accessible.

- ◆ **Improving accessibility for customers**  
(e.g., their ability to source information about,

and request adjustments, in all markets and channels). Currently, the process and ability to request accommodations or adjustments is not consistent in all markets and channels, and is therefore an area for improvement. As a result, the branch team has been working with third party vendors to explore how best to provide documents in an accessible format in the different ways customers may require it.

## Three-year action plan

There are some key opportunities to improve the design and delivery of our programs and services:

Actions/Barriers	Steps	Responsibility	Timeline
Improve accessibility for employees and customers, including their ability to source information about, and request adjustments, in all markets and channels	<ul style="list-style-type: none"> <li>◆ Create a public website page that summarizes the resources available for customers with disabilities in each market and channel</li> <li>◆ Actively promote the resources HSBC offers employees and customers with disabilities.</li> </ul>	All global functions, channels markets, with Canada HR support	2024
Draw on the lived experience of employees and customers to inform improvement plans and the development/ deployment of programs, products and services in all global functions/ channels and markets.	<ul style="list-style-type: none"> <li>◆ Ensure our procedures embed a requirement that the annual disability improvement plans required by each function/market have been informed by employees and customers with disabilities</li> <li>◆ Ensure that the development, deployment and delivery of programs, products and services are informed by employees and customers with disabilities</li> </ul>	All global functions, channels and markets, with Canada HR support	2024

Actions/Barriers	Steps	Responsibility	Timeline
Develop/build disability confidence by providing training to customer-facing employees so they can better understand and meet the needs of our customers	<ul style="list-style-type: none"> <li>◆ Engage customer-facing employees with disabilities to help shape and improve know-how of other customer facing employees</li> <li>◆ Provide training and guidance about serving customers with disabilities in all markets.</li> </ul>	All global functions, channels and markets, with Canada HR support	2024/ Ongoing





# Training

## Goal

Our leaders and employees are equipped with the knowledge and tools they need to feel confident interacting and providing support to colleagues and customers with disabilities and how to do it.

## Current status

Feedback received from consultations with our employees with disabilities identified a need for managers and employees to be upskilled on disability confidence and for increased awareness and training to support colleagues with disabilities to thrive in the workplace.

In 2020, HSBC launched the Global Disability Confidence Program. The program is committed to improving disability inclusion and confidence

across the bank globally while increasing awareness of the challenges faced by people with disabilities and the opportunities to address these challenges.

We currently have many training opportunities on offer to encourage and deepen disability inclusion, such as:

- ◆ At the global level, HSBC in partnership with the Business Disability Forum, has developed 17 guides to improve disability confidence. These guides are suitable for all colleagues and line managers. They cover many aspects of recruitment and retention, as well as workplace adjustments. These guides provide practical advice to help HSBC recruit and retain people with disabilities and serve customers with disabilities.
- ◆ An Inclusive Leadership course was introduced globally in 2020 to all people managers to further embed an inclusive culture. This training explores biases, what leaders can do to be more inclusive and how leaders can embed psychological safety within their teams. In Canada, training for people managers was further enhanced with the roll-out of a Diversity & Inclusion Leadership Intensive training module, providing tools to de-bias processes and decision-making to ensure an inclusive career journey for our employees. Our Canadian recruitment team also participated in unconscious bias training to ensure that they are supporting hiring managers well throughout the recruitment process.
- ◆ New joiners to HSBC in Canada must complete the “Welcoming Persons with Disabilities” online training module. The modules are intended to make people with

disabilities feel welcome at HSBC, whether they are clients or colleagues. A people manager toolkit on the same topic was developed for ongoing support. To address the challenges of finding accessibility and disability inclusion-related tools and resources in one centralized location, a dedicated page was created on HSBC Canada’s D&I intranet SharePoint site as a one-stop shop for accessibility resources. A new HSBC Group-wide intranet hub on disability inclusion was also developed by the Global Diversity & Inclusion team.

- ◆ To ensure we consistently deliver accessible digital products, our Global Digital Accessibility team is currently upskilling HSBC digital staff to create inclusive digital products and services. The team trains approximately 2,000 people annually, including key digital partners. In 2021, nearly 15,000 staff and suppliers participated in over 50 digital accessibility days. They also launched a new Group-wide Digital Accessibility Hub as well as three courses for developers and digital designers, including Q&As on the HSBC University learning platform.

Learning and training opportunities are also organized and made available throughout the year by our global and local Ability ERG. Employees have been able to participate in learning sessions and panel discussions on various topics, including neurodiversity, different disabilities (including sensory disabilities and autism), and to collaborate and engage with our community partners to help inform and bring awareness to employees about lived experiences with disabilities.

While HSBC has many disability inclusion and accessibility learning tools and resources, more can be done to promote these resources and training opportunities. This will help our

employees feel better equipped with the knowledge and skills to confidently interact with people with disabilities, especially in applying these learnings and practices in the everyday.

## Three-year action plan

Over the next three years we will continue to focus on building accessibility and disability confidence across the bank by promoting and sharing our tools and resources, as well as increasing the opportunities for learning, so that our employees feel comfortable interacting and providing support to colleagues and customers with disabilities.

Actions/Barriers	Steps	Responsibility	Timeline
Promote “disability confidence” tools, resources and training opportunities	<ul style="list-style-type: none"> <li>◆ Provide continued learning and training opportunities for managers and customer-facing employees to create consistent awareness of disability inclusion and how to provide support</li> <li>◆ Deliver training to people managers and employees on workplace accommodations to increase awareness of the process and how/what support is available</li> <li>◆ Actively promote disability confidence tools and resources with managers and employees</li> </ul>	Group and Canada HR (D&I, Learning)	2023/ Ongoing
Provide training, guidance and targeted support to all people managers to give them the knowledge and insight to successfully manage and support employees with disabilities	<ul style="list-style-type: none"> <li>◆ Provide people managers with more guidance, resources and training to improve their confidence when managing people with disabilities</li> </ul>	Group and Canada HR (D&I, Learning)	2023/ Ongoing



# Transportation

HSBC Canada does not currently run any transportation services; therefore, this priority area is not relevant to HSBC.