



July 25, 2023

Accessible Canada Act

Canada Branch Accessibility Plan

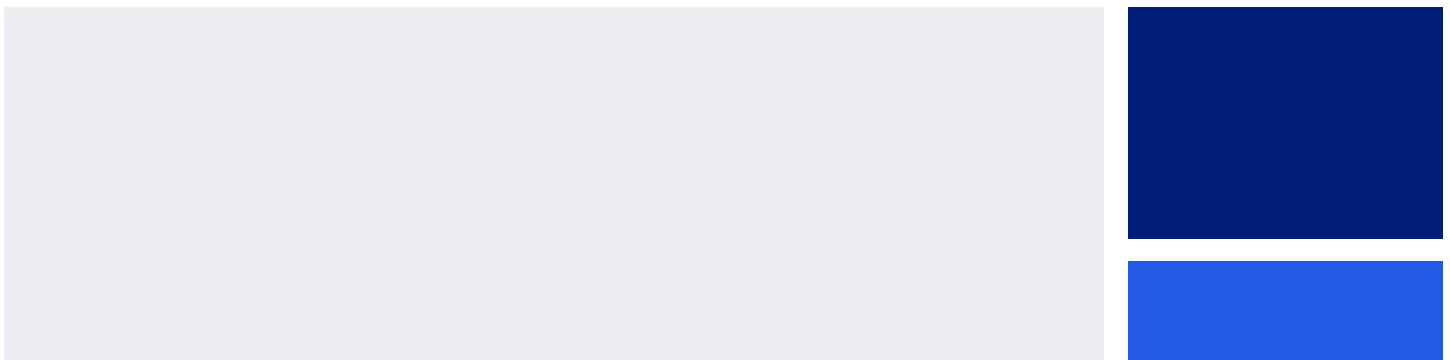


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U.S. Bank National Association, Canada Branch accessibility plan under the Accessible Canada Act (ACA) and the Accessible Canada Regulations

The following policy, practices and procedures have been established by the Canada Branch, a division of U.S. Bank National Association (USBNA), to govern the provision of its services in accordance with the Accessible Canada Act (ACA) and the Accessible Canada Regulations (regulations).

General

U.S. Bank National Association, Canada Branch (Canada Branch) is a Schedule 3 bank in Canada regulated by the Office of the Superintendent of Financial Institutions (OSFI). Operating since 2000, Canada Branch sales, relationship, technical and customer service staff are dedicated to servicing our payments business in Canada. Innovative technology solutions are developed for Canada Branch in both official languages, English and French. Canada Branch serves business customers in various industries; it does not provide products or services directly to individual consumers.

Accessibility statement

Canada Branch is committed to treating all individuals in a way that allows them to maintain their dignity and independence and provides for integration and equal opportunity. Canada Branch is committed to meeting the needs of individuals with disabilities in a timely manner, preventing and removing barriers to accessibility, and meeting accessibility requirements under the Accessible Canada Act and its regulations.

Accommodation requests and accessibility feedback

A person with a disability may request an accommodation with respect to access to Canada Branch services, and Canada Branch will make best efforts to respond to the request effectively and in accordance with the principles established under the ACA.

Accommodation requests and feedback regarding the delivery of services to people with disabilities may be given by telephone, by text, by email or other electronic format, as well as in person, in writing, or by using the Canada Branch website at usbankcanada.com/en/index.html.

Feedback is welcomed, as it may identify areas that require change and encourages continuous customer service improvements. Canada Branch is committed to responding to any inquiries within 10 business days.

All accommodation requests and feedback should be directed to intouchwithus@usbank.com or 866-274-5898. Individuals may also contact Kelly Risser, U.S. Bank Accessibility Banking director, at kelly.risser1@usbank.com, or speak with our 24-hour banking team at 800-USBANKS (872-2657).

Information about this plan, accommodation requests, our feedback process and how we respond to feedback and address complaints, is available by contacting intouchwithus@usbank.com or 866-274-5898.

Written requests and feedback can be sent to:

U.S. Bank National Association – Canada Branch
120 Adelaide Street West
Suite 2300
Toronto, Ontario
Canada M5H 1T1

Executive summary

Canada Branch is committed to making our products and services accessible to people with disabilities. We are also committed to creating a diverse and inclusive workplace where employees of all abilities can bring their authentic selves to work and find success and fulfillment in their careers.

Canada Branch takes the necessary steps to ensure that no individual with a disability is excluded, denied services, segregated or otherwise treated differently than other individuals. We have an accessibility banking policy, available upon request, which defines requirements to ensure Canada Branch products and services are accessible. The policy describes

core processes for digital accessibility, reasonable accommodations, key roles and responsibilities, oversight and governance. We also have an accommodations policy and employee accessibility guidelines to ensure the same precautions are in place for employees.

Areas described under section 5 of the ACA

Employment

At Canada Branch, diversity, equity and inclusion means seeking out and promoting diverse talent, and it means making every employee feel empowered to bring their unique perspective to work. It is through these commitments that we will reach our potential and make sure that every employee and customer can reach theirs too. We are committed to making the application and interviewing process easy for people with disabilities by providing accommodations, and by promoting accessibility throughout the interview process.

Our recruiting staff are trained on how to make virtual and in-person meetings accessible, including knowing what accessibility features are available through our various systems and platforms, for example, Microsoft Teams. Our centralized accommodation request process allows recruiters to expedite any accommodation requests throughout the application and interview process.

In 2022 we published digital accessibility standards for employees. Digital technology is a central part of the work that we do each day. All digital properties purchased, built or used by Canada Branch employees should be accessible so that employees with disabilities have an equal opportunity to independently and easily access the technology that powers Canada Branch. These standards are actively being communicated and socialized throughout the company.

Built environment

Canada Branch maintains a barrier-free banking facility that welcomes service animals and provides employees and clients with physical access to our products and services. The office in Canada is located at:

U.S. Bank National Association – Canada Branch
120 Adelaide Street West
Suite 2300
Toronto, Ontario
Canada M5H 1T1

Information and communication technologies (ICT)

We follow Web Content Accessibility Guidelines (WCAG 2.1) Level AA to design and develop in an electronic format that is accessible to customers who use assistive technology. Accessibility teams within our digital and technology areas consult with product teams on accessibility design, development, testing, and defect remediation processes, including how to use our vendor-provided accessibility testing tool suite.

We also have a dedicated team to provide extensive training and tooling to technology engineers for coding with accessibility in mind. Using consistent accessibility standards and processes, we conduct automated and manual testing on our digital properties and encourage aggressive defect remediation. This multi-phase approach produces digital properties that not only meet our definition of done (DoD) but also optimizes the accessibility experience for our customers.

Our accessibility banking policy and corresponding digital accessibility standard set forth requirements for WCAG compliance. These documents are updated on an annual basis and are available upon request by contacting our Accessibility Banking Office, AccessibilityBanking@usbank.com.

Communication, other than ICT

We provide auxiliary aids and services as requested, including large print and braille, sign language interpretation, captioning and relay calls.

Procurement of goods, services and facilities

Canada Branch is committed to collaborating with diverse suppliers, including disability owned business entities (DOBEs). The mission of the Canada Branch supplier diversity program is to identify, develop and build strong relationships with certified diverse businesses that are qualified to supply Canada Branch with quality products and services.

Our communities are made up of an increasingly diverse population. Veteran and service-disabled veteran-owned, disability-owned, women-owned, lesbian/gay/bi-sexual/transgender-owned, and minority-owned businesses are rapidly growing and progressing from suppliers of small commodity lines to providers of a wide variety of manufactured products and corporate services. By doing business with diverse suppliers, we build bridges with the community and contribute to the growth of companies who, in turn, help us build the best bank in North America.

Our Supplier Diversity Program was created in 1998 to help grow and support this initiative. The Supplier Diversity team is staffed by two full-time employees.

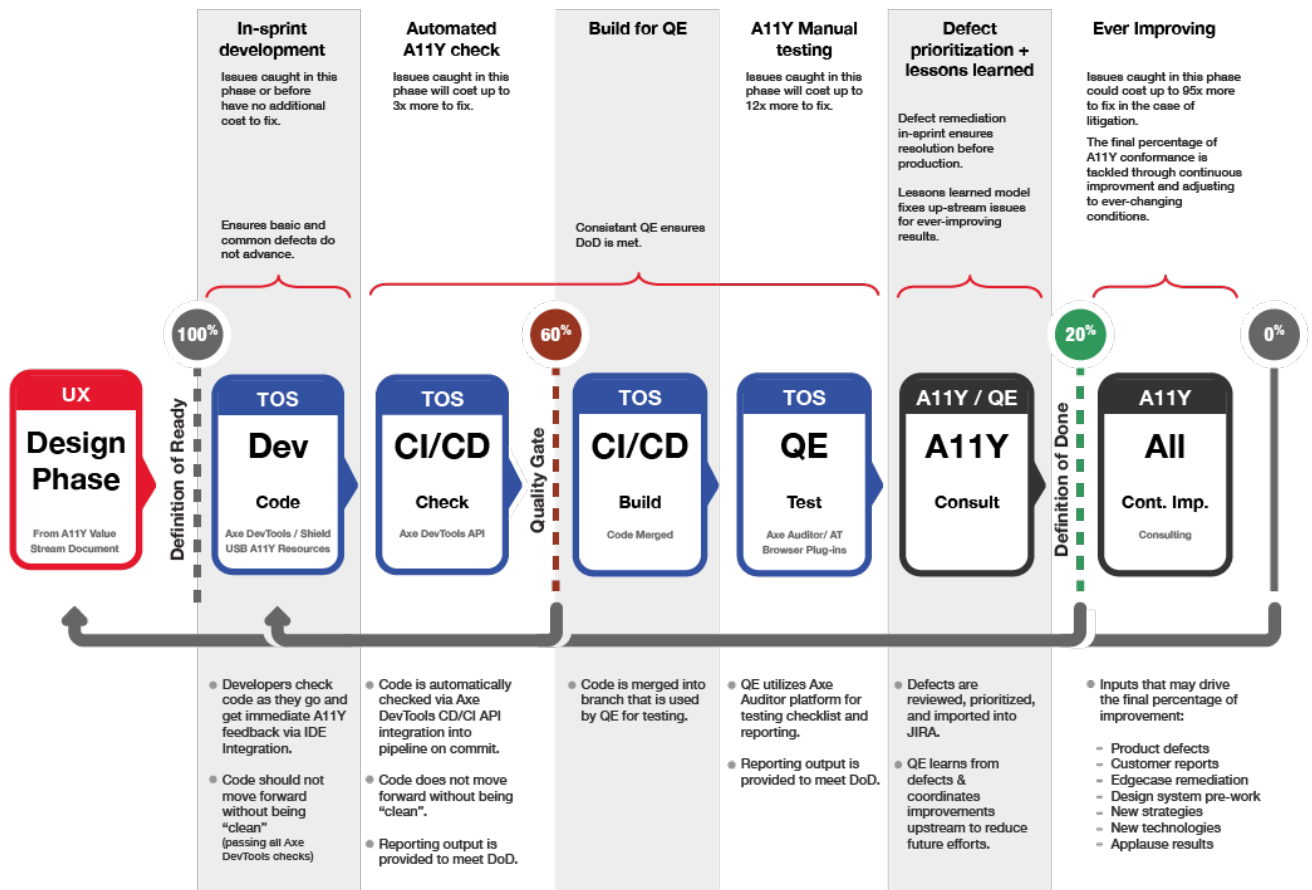
We strive to identify business opportunities for certified diverse suppliers to participate equally with other suppliers in the competitive supplier evaluation process. The Supplier Diversity strategy includes engagement by all business lines towards meeting the enterprise-wide goals and objectives of supply chain diversification and economic impact.

Additionally, we obtain the vendor’s commitment to accessibility through specific language and accessibility requirements within our purchase and services agreement. Third parties that have telephone contact with customers of the Company must have procedures in place for accepting relay calls.

Design and delivery of programs and services

At Canada Branch, we define a digital property as a user interface (UI), website or a hardware device that has a screen/UI, such as a mobile application (native or WebView). This includes content, code and features. At the time of this plan’s publication, all new or modified digital properties must comply with WCAG 2.1, Level AA. This requirement also applies to any digital content embedded within or made available through a digital property.

The process of how product teams meet definition of done (DoD) using automated and manual tools is illustrated in the included graphic. Evidence of compliance documentation, an output from our manual testing tool, is required as proof of execution. The graphic also illustrates the various roles with details on how they contribute to meeting DoD.



Accessibility consultants work with product teams across design, development and quality assurance to include accessibility in the process. They supplement this by testing throughout, using automated and manual tools and processes. Teams are required to provide evidence of WCAG compliance (that is, DoD) when implementing new or modified digital properties or content.

Policy prohibits critical or severe accessibility defects from being released into production, and any moderate or mild defects not remediated must be tracked through a remediation plan, which is shared with business line risk management and the Accessibility Banking Office for oversight.

Where possible, digital properties are also regularly scanned and monitored via an accessibility dashboard, which measures the ongoing accessibility status of that property.

All external-facing digital properties are captured within a digital property inventory built in Smartsheet. On an as-needed (minimally annual) basis, product owners certify the information on their digital property, including required fields for accessibility. This provides a holistic view into the status of digital properties across the company.

Transportation

This section does not apply; we do not provide transportation services.

Consultations

U.S. Bank National Association has an active and robust disability business resource group made up of employees with disabilities, caregivers and allies. The Global Disability Business Resource Group (BRG) board reviewed this plan and provided feedback using track changes. Additionally, employees with disabilities within our accessibility teams reviewed and contributed to the plan.

Glossary

Auxiliary aids and services: Includes equipment, materials and personal services that may be necessary to ensure effective communication for individuals with disabilities (for example, qualified interpreters, exchange of written notes, accessible electronic and information technology, braille materials and displays, large print materials, and other similar services or products).

Digital property (DP): A user interface (UI), website or a hardware device that has a screen/UI such as a mobile application (native or WebView). Includes content, code and features.

Digital content: Video, audio, utilities, widgets, graphics, PDFs, tables, narratives or communications content that is embedded within or made available via a digital property.

Digital accessibility requirement: The conformance level of Web Content Accessibility Guidelines (WCAG) required by the Accessibility Banking Policy for all new and modified digital properties. The current digital accessibility requirement is WCAG 2.1 AA.

Budget

In 2022, U.S. Bank National Association engaged Deque (deque.com) to perform a maturity assessment of the accessibility program. The deliverable from this engagement was an extensive playbook of recommendations to further mature the accessibility program. This information was shared with key stakeholders throughout the company.

Enterprise-wide licenses to Deque's accessibility testing tool suite and Deque University training courses are available. Additionally, employees throughout the company are dedicated to accessibility and disability inclusion, including a disability and accessibility consultant in Human Resources, an accessibility team in UX Design, an accessibility team in technology services, an accessibility banking director in compliance, and accessibility leads within various teams.

Training

Canada Branch provides training to all employees that examines biases and speaks to how to be inclusive. Additionally, people leaders are required to complete online training for disability awareness and workplace accessibility. Employees have access to training resources, including a disability etiquette guide created by employees with disabilities. Employees who design and develop our digital products and services receive training from our vendor on digital accessibility laws, guidelines and best practices, and from our technology accessibility team on testing tools and assistive technology usage. The technology accessibility team also holds weekly office hours to provide consultation and support to the product teams.

Training and instruction will be provided on the following matters:

- The purposes of the Accessible Canada Act and the requirements of its regulations
- Accessibility standards
- How to interact and communicate with people with various types of disabilities
- How to use assistive devices or equipment that are available on Bank premises
- What to do if a person with a disability is having difficulty accessing Bank premises or services

The training will be provided to existing employees as soon as practicable, targeting the second half of 2023 for assignment and completion. Any new hires will undertake training as part of their orientation. Canada Branch will provide ongoing training in relation to any changes to its policies, practices and procedures that govern the provision of services. This will ensure that employees continue to meet the requirements of the ACA and its regulations, as it pertains to persons with disabilities.