

Accessibility Plan Progress Report 2025

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1 General

1.1 About China Construction Bank Toronto Branch

China Construction Bank Corporation, Toronto Branch ("CCBTO" or "we") under the guidance, direction and order of Canada's Minister of Finance and the Office of the Superintendent of Financial Institutions (OSFI), received its "Order to Commence Business" in October, 2014.

The Toronto Branch, which supports China- Canada economic business development, specializes in comprehensive wholesale banking business including Corporate Banking, Trade Finance, Treasury, Foreign Exchange, Time and Demand Deposits for corporate customers.

CCBTO has no retail / consumer operations nor deployed any self-service (ATM) machines, no payment or credit card business, and the Branch do not accept natural-person customers nor offer any walk-in services. Our sole office space, with the entire 37-person staff, is located in an A-class office tower in downtown Toronto that meets all accessibility standards. Our office is not open to the general public and access is restricted to authorized persons only.

1.2 Contact Information

For questions on any of our accessibility initiatives, to provide feedback, to receive a description of our feedback progress, or to request alternate formats of this progress report in an accessible format, please contact:

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1.3 Statement of Commitment

CCBTO is committed to fostering an inclusive, barrier-free, and accessible environment for everyone-employees, customers, stakeholders, and the broader community. These commitments include:

- identifying opportunities to extend our reach and accommodations to persons with disabilities,
- training our employees on accessibility and disability inclusion,
- providing employees and job applicants with reasonable accommodations,
- providing information in ways that are accessible to everyone, and
- complying with the requirements of the Accessible Canada Act (the "ACA"), and its applicable regulations.

CCBTO has been developing this Multi-Year Accessibility Plan (the "Accessibility Plan") to conform with the requirements of the ACA.

CCBTO's Accessibility Plan and its progress reports address the following key elements that create change and drive a culture of accessibility:

- Policies, programs and procedures: CCBTO will apply an accessibility lens and update its policies and programs to provide clarity and consistency about what needs to be done, how it needs to be done and who is responsible for doing it.
- Training and learning: CCBTO employees will receive training to understand the new policies, programs and processes, and their role in implementing them.
- Communications: CCBTO will integrate accessibility into internal and external communications and support staff in applying this in their work.
- Key process integration: CCBTO will integrate accessibility into every aspect of the design and delivery of its work.
- Procurement: CCBTO enters into contracts for external services and supplies.
 CCBTO will apply an accessibility lens at every stage of the procurement life cycle.
- Prioritization: Leadership will consider all the elements of the Accessibility Plan and will prioritize which to address first.

2 Focus Areas in Section 5 of the ACA

2.1 Employment

We have implemented the initiatives outlined in our Accessibility Plan. Over the past year, we have taken the following actions to ensure an inclusive and accessible workplace:

- Recruitment & Hiring: We have notified all job applicants about the availability of
 accommodations during the recruitment, assessment, and selection processes.
 This was communicated through job postings, interview invitations, and direct
 discussions with applicants as needed.
- **Employee Onboarding:** All newly hired employees received information on our policies for supporting employees with disabilities as part of their onboarding process. We also provide training for managers, where applicable, to ensure they understand their role in implementing these policies effectively.

- Accommodation & Return-to-Work Support: We are in the process of establishing a structured process for developing individual accommodation plans and return-to-work policies for employees who return to work with a disability. This includes collaboration between HR, department managers, and employees to ensure tailored support is provided. There is currently no employee with such needs.
- **Workplace Adjustments**: We have taken corrective actions where necessary to remove employment barriers, including providing assistive technologies, modifying workspaces, and offering flexible work arrangements when required.
- Policy & System Reviews: We conducted reviews of our employment systems, policies, and practices to identify and address barriers to employment, promotion, and training. Adjustments were made where possible to enhance accessibility and inclusivity.

At this time, no additional actions have been identified beyond those already implemented. We remain committed to maintaining an accessible work environment and will continue to monitor our policies and practices for any necessary improvements.

2.2 The Built Environment

CCBTO, in collaboration with its landlord and its industry-leading property management company, has ensured that our office remains accessible. Key accessibility features, including automatic doors and accessible washroom access, are in place and fully operational within the office tower.

To maintain accessibility, CCBTO has implemented the following procedures for managing service disruptions affecting accessible areas of its public spaces:

- Proactive Communication: Property management promptly informs CCBTO of any disruptions to accessibility-related services within the building.
- Alternative Arrangements: When accessibility is impacted, CCBTO provides necessary temporary arrangements to ensure continued access to our business office. These may include alternative entry points, remote service options, or other accommodations as needed.
- Notification Process: In the event of a service disruption, we notify employees and any other impacted parties about the issue, expected resolution time, and available alternatives.
- **Limited Public Interaction:** As CCBTO does not serve natural person customers, offer walk-in services, or operate any retail banking services, our office is not open

to the general public. Nonetheless, we remain committed to ensuring accessibility for all stakeholders who require access to our premises.

At this time, no additional actions have been identified beyond those already implemented. CCBTO will continue to monitor accessibility measures and make improvements as needed to uphold our commitment to an inclusive and accessible workplace.

2.3 Information and communication technologies (ICT)

CCBTO is committed to ensuring that individuals with impairments or disabilities can communicate effectively in our environment. We strive to create an inclusive and welcoming workplace where both clients and employees can choose the communication methods that best meet their needs.

To support this commitment, CCBTO has implemented the following measures:

- Accessible Technology: All devices provided to employees are equipped with built-in accessibility features, such as screen readers, voice-to-text capabilities, and adjustable display settings, to accommodate various needs.
- **Support & Accommodations:** Employees and clients who require additional communication support may request accommodations, such as alternative document formats, assistive listening devices, or other aids as needed.
- **Ongoing Improvements:** CCBTO regularly reviews its accessibility practices to identify areas for enhancement and ensures that new technologies and communication tools remain inclusive.

At this time, all planned accessibility measures have been successfully implemented. We remain dedicated to fostering an accessible and supportive environment for all individuals.

2.4 Communication, other than ICT

CCBTO remains committed to meeting the communication needs of people with disabilities. Over the past year, we have successfully implemented the planned initiatives outlined in our accessibility framework. The following actions have been taken to enhance communication accessibility:

- Accessible Public Information: We have ensured that all publicly available information, including policies and feedback processes, is accessible upon request.
 Staff have been informed to direct accessibility requests to the appropriate areas promptly.
- Internal Communication & Meeting Accessibility: Accessibility options for internal meetings will be made available if requested; allowing employees, where

- required, to request accommodations like adjustable desks for ergonomic comfort, voice recognition software for hands-free communication, and captioning services or assistive listening devices for employees with hearing impairments.
- Emergency Communication & Response: A process is being established to provide employees with disabilities (currently none) individualized emergency response information as necessary. Collaboration with property management will ensure that emergency signage and exit instructions remain in compliance with accessibility standards.

At this stage, planned accessibility measures have been successfully implemented. CCBTO will continue to evaluate and refine its communication accessibility practices to uphold an inclusive and supportive environment for all employees and stakeholders.

2.5 Procurement of goods, services and facilities

- Accessibility in Procurement. Accessibility considerations has been included in our procurement policy and factored into purchasing decisions. Vendors and suppliers demonstrating a commitment to accessibility will be prioritized where appropriate.
- Assistive Device Accommodation CCBTO premise is located in an office tower that
 meets accessibility standards for mobility support. Branch-provided devices for
 staff have build-in accessibility support (e.g., screen reader) from manufacturers
 that can be activated if needed.
- **Support Person Accessibility** Employees requiring the assistance of a support person or animal are fully accommodated. Although visitors on premise are very uncommon, the accommodation extends to visitors as well.

CCBTO remains committed to ongoing accessibility improvements and will continue to assess and enhance its accessibility initiatives to meet the evolving needs.

2.6 Design and delivery of programs and services

Over the past year, CCBTO has worked on initiatives to enhance accessibility in the design and delivery of our programs and services.

- Employee Engagement & Barrier Identification We have encouraged staff to report accessibility barriers to proactively assess and address workplace challenges via a survey to all employees (currently numbered at 37), and is establishing a review process to evaluate and remove barriers in program design and service delivery.
- Accessible Customer Service We have ensured all service-related materials will be available in alternative formats upon request, including large print, audio, and

accessible digital formats to ensure our corporate clients and their representatives can request accommodations as needed, and reinforced staff training on accessible practices to improve interactions with diverse clients.

• **Continuous Improvement & Feedback** We have implemented an accessibility feedback process, allowing employees to submit concerns and will review feedback to identify trends and improvement opportunities where required.

With these actions, CCBTO remains committed to ongoing enhancements in accessibility, ensuring that our programs and services continue to be inclusive and responsive to evolving needs.

3 Consultations

The principle of "Nothing without us" recognizes that persons with disabilities are equal participants in all areas of life. The principle reaffirms that persons with disabilities should be engaged in all decision making on:

- Policies
- programs
- practices, and
- service delivery

In preparing this progress report, CCBTO consults in normal course of business among its employees and clientele. The branch has also roll out a survey to staff, including customer-facing relationship managers to our corporate clients (note: CCBTO has no natural person customers), to gather information on any accessibility barriers to employees and corporate customers.

We asked participants to share their experiences with any existing barriers and provide feedback on potential solutions. Participants provided valuable insights that will help CCBTO in ensuring we meet our accessibility commitment.

4 Feedback

CCBTO remains committed to fostering an accessible and inclusive environment by actively seeking and considering feedback on accessibility. Over the past year, we have received feedback regarding the implementation of our Accessibility Plan and potential barriers in our workplace and services.

The feedback received has not identified any gap. CCBTO has begun to enhance internal processes for potential accommodation requests. While no barriers have been identified, CCBTO continues to encourage feedback to proactively address any future concerns.

We recognize the importance of continuously improving our feedback process and will explore additional ways on how individuals can provide input. Feedback remains a vital part of our commitment to accessibility, and we will integrate ongoing insights into future improvements.

5 What We Have Learned

Throughout the implementation and updating of our accessibility plan, we gained insights that have shaped our approach to identifying and addressing barriers.

Among the staff of 37 individuals and the clientele of corporate-only customers, no accommodation request has been received. Given that CCBTO has no natural person customers and participates primarily in the syndication loan market through agent banks, accessibility need focus mainly falls on employees. To-date, the Branch has no employee with disabilities and no accessibility gap has been observed or reported.

The above notwithstanding, CCBTO will continue to monitor for evolving circumstances and ensure our commitment to accessibility is upheld.

6 Training

To strengthen our capacity to address accessibility, we implemented comprehensive training programs for all employees. Over the past year, all staff completed mandatory courses on disability awareness and accessible customer service. All employees are required to pass a post-training knowledge test.

The training enabled us to create aware of accessibility need within the workplace and ensures staff is capable of addressing accommodation needs and requests.