

# **Accessibility Plan**

2026 – 2029

**Questbank and Community Trust Company**

*Members of the Questrade Financial Group of Companies*

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## **1. General**

This 2026-2029 Accessibility Plan outlines the policies and actions that Questbank and Community Trust Company (“CTC”) have put in place to improve opportunities for people with disabilities and to identify, remove, and prevent barriers.

### **1.1 Scope**

This Accessibility Plan applies to both Questbank and CTC. While they are separate legal entities, both are members of the Questrade Financial Group of Companies (QFG) and are federally regulated and supervised by the Office of the Superintendent of Financial Institutions (OSFI).

This plan applies to both Questbank and CTC and reflects the accessibility commitments of each. For ease of reading, Questbank and CTC are referred to collectively in this plan as “the Company,” “we,” “us,” and “our,” with any brand-specific variations noted where applicable.

### **1.2 How to provide feedback**

People and Culture is responsible for receiving feedback on behalf of the Company. Feedback can be submitted anonymously. You can provide feedback on this plan or report accessibility barriers encountered across either Questbank or CTC by:

- Mailing Address: 5700 Yonge St., Suite 1900 Toronto, ON, M2M 4K2  
Canada
- Phone: 1-888-403-8440
- Email: [accessibility@questbank.com](mailto:accessibility@questbank.com)

### **1.3 Alternative Formats**

The Company will provide an alternate format of this plan (e.g., Braille, Large Print, Audio) upon request within the timelines required by the Accessible Canada Regulations.

## **2. Statement of Commitment**

The Company is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessible Canada Act (ACA). As federally regulated entities supervised by OSFI, both Questbank and CTC are governed by the Accessible Canada Act (ACA), and the Company is compliant with the Accessibility for Ontarians with Disabilities Act (AODA) Integrated Accessibility Standards Regulation (IASR) and any other applicable accessibility law. To ensure a consistent, barrier-free experience, the Company applies its highest accessibility standards to every community we serve. Our plan shows how the Company will play its role in making our services accessible for all across Canada.

## **3. Consultation**

### **3.1 Consultation and Employee Input**

The Company is committed to strengthening a culture of accessibility and supporting the full participation of all individuals. As part of implementing our Accessibility Plan, we actively seek input from persons with disabilities, caregivers, and allies to help guide ongoing improvements and ensure our practices remain inclusive and responsive.

In June 2026, the Company launched an Employee Accessibility Survey to gather direct feedback on our workplace culture, tools, and environments. The consultation invited input from all team members, including those who identify as

having a disability, those who preferred not to disclose, and those without a disability. The survey evaluated several core areas of the employee experience:

- Physical accessibility of our workplaces
- Accommodation awareness and comfort levels
- Digital tools and internal communication systems
- Travel and transportation
- Feedback culture and psychological safety

### 3.2 Key Themes and Insights

The qualitative feedback provided valuable, transparent insights that our People and Culture team used to shape the priority actions in this plan. Two critical themes emerged as our most immediate opportunities for improvement:

- **Awareness of the Accommodation Process:** The feedback indicated that a majority of employees are either unaware of or unclear about our formal workplace accommodation process.
- **Effectiveness and Experience:** Of the employees who have navigated the accommodation process, many noted that the experience was ineffective or only partially met their needs. Additionally, respondents with disabilities expressed lower comfort levels providing open feedback, highlighting a clear need to strengthen psychological safety.

Based on these insights, the Company's top priority under this plan is to overhaul, clarify, and build deep trust in our workplace accommodation framework.

### 3.3 Governance and Oversight

We are translating consultation feedback into immediate, measurable changes. The following initiatives are already underway:

- **Streamlining Accommodations:** People and Culture is redesigning the accommodation workflow to make it highly visible, straightforward, and secure. We are introducing enhanced confidentiality safeguards so employees can request support with total peace of mind.
- **Upgrading Physical Workplaces:** Our Workplace Experience Team is actively reviewing and addressing physical accessibility barriers across our office spaces.
- **Enhancing Assistive Technology:** We are auditing our internal digital ecosystems and exploring new adaptive tools to better support employees who rely on assistive technologies.

## 4. Priority Areas

### 4.1 Employment

The Company is committed to fair and accessible employment practices. We strive to create an inclusive workplace where employees of all abilities can contribute, grow, and succeed. Our focus is on identifying and removing barriers across the employment lifecycle and ensuring that accessibility is embedded in how we hire, support, and develop our people.

#### **Barriers Identified**

- Employees are unaware of or unclear about the Company's formal workplace accommodation process.
- The accommodation process is not consistently effective and may only partially meet employees' needs.
- Employees with disabilities may feel less comfortable providing open feedback, indicating a need to strengthen psychological safety.

#### **2026-2029 Commitments**

- Work to prevent and remove accessibility barriers identified.
- Update the accommodation workflow and Policy to make it highly visible, straightforward, and secure, introducing enhanced confidentiality safeguards so employees can request support when needed.
- Strengthen psychological safety by establishing confidential and anonymous channels for employees with disabilities to raise concerns, and by training people leaders to respond supportively, so employees feel safe providing open feedback.

## **4.2 Information and Communication Technologies (ICT)**

The Company is committed to making our digital platforms accessible to everyone. We are continuously working to align with industry and regulatory accessibility standards and to enhance our digital infrastructure to support ongoing improvements. Our goal is to ensure a consistent, inclusive, and accessible digital experience.

### **Barriers Identified**

- Assistive software such as text-to-speech and screen readers is not available on workstations, and some hardware issues (non-functioning monitors, missing equipment) were reported.
- Employees are unsure whether internal tools and equipment are accessible, and accessibility features are not consistently communicated when new technology is introduced.

### **2026-2029 Commitments**

- Deploy and maintain assistive software (including screen readers and text-to-speech) on workstations, and assess additional adaptive tools to support employees who rely on assistive technologies.
- Establish a clear process and service standard for reporting and promptly resolving hardware issues (such as non-functioning monitors or missing

equipment), and communicate available accessibility features whenever new technology is introduced.

- Provide training on digital accessibility standards and the accessible functionalities of the tools we use.

#### **4.3 Communication, other than ICT**

The Company is committed to meeting the communication needs of people with disabilities. We recognize that individuals communicate in different ways, and we aim to provide information in formats that support a wide range of needs.

##### **Barriers Identified**

- Major announcements are often shared only through informal channels such as Slack, where they can be missed, and frequent use of acronyms can disadvantage employees for whom English is an additional language.
- Opportunities exist to better streamline internal channels for employees to share ongoing accessibility feedback and concerns.

##### **2026-2029 Commitments**

- Provide information and communication materials in alternative accessible formats (such as digital, audio, or large print) promptly upon request.
- Share major announcements through reliable, formal channels (such as company-wide email or the intranet) in addition to informal tools like Slack, so important information is not missed.
- Adopt plain-language guidance for internal communications, spelling out acronyms on first use, to support employees for whom English is an additional language.
- Streamline and clearly communicate the internal channels through which employees can share ongoing accessibility feedback and concerns.

- Ensure the digital platforms for both Questbank (questbank.com) and CTC (communitytrust.com) are compliant to Web Content Accessibility Guidelines (WCAG) 2.2 standards, regularly auditing both sites to identify and remove any emerging digital barriers for clients.

#### **4.4 The Built Environment**

The Company is committed to designing and constructing physical spaces that are welcoming, safe, and accessible to everyone. Accessibility considerations will guide how we design, construct, and update our spaces to support an inclusive experience for all.

##### **Barriers Identified**

- Physical barriers were reported in some spaces, most commonly parking along with some washrooms and building entrances that are not fully accessible.
- Sensory accessibility features, such as hearing loops and visual alerts, are missing in some spaces, and some workstation equipment is not suited to employees with physical conditions.

##### **2026-2029 Commitments**

- Review and address physical accessibility barriers across our office spaces.
- Assess and improve sensory accessibility features (such as hearing loops and visual alerts) and provide workstation equipment suited to employees with physical conditions, prioritizing the parking, washroom, and entrance barriers identified.

#### **4.5 Procurement of goods, services and facilities**

The Company is committed to being responsive to the needs of all its clients, employees, and visitors. We ensure that goods, services, facilities, and

procurement processes; including bidding, evaluation, and documentation are accessible and barrier-free.

#### **Barriers Identified**

- The Company has not identified barriers in this area at this time and will identify and address any barriers through ongoing review and feedback.

#### **2026-2029 Commitments**

- Recognize the diverse needs of our clients, employees, and visitors and respond by striving to provide services and facilities that are accessible to all.

### **4.6 Design and delivery of programs and services**

The Company will develop a strategy and process for persons requesting accessible formats and communications support related to information about the Company's services. We will continue to strengthen our practices to ensure our services, supports, and interactions remain accessible, inclusive, and barrier-free for everyone.

#### **Barriers Identified**

- The Company has not identified barriers in this area at this time and will identify and address any barriers through ongoing review and feedback.

#### **2026-2029 Commitments**

- Develop a strategy and process for persons requesting accessible formats and communications support related to information about the Company's services.

- Incorporate language into marketing materials stating that accessible formats may be made available on request.

#### **4.7 Transportation**

This section is not applicable.

### **5. Conclusion**

The Company is committed to an ongoing dialogue. We will maintain accessible, year-round feedback channels, including anonymous options, to ensure that the insights and feedback we receive from our employees, clients, and the public continue to guide our ongoing accessibility journey.