

## Digital Commerce Bank Accessibility Plan, 2024-2027

### General

#### About Digital Commerce Bank

Digital Commerce Bank (DCBank) is a Schedule 1 Canadian chartered bank and a fintech leader for corporate online banking. Unlike a traditional bank, DCBank does not have retail branches and does not typically provide in-person retail service, nor does DCBank deal in cash transactions. DCBank's offerings extend beyond traditional banking. We offer flexible payment acceptance solutions for corporate clients including custom branded prepaid cards, digital wallets, acquiring services for Network card transactions such as Visa and Mastercard, payment acceptance and integration for Interac e-Transfer payments, and other innovative banking solutions. We offer best-in-class API developer tools to provide powerful options for integration, payments, and reporting.

At the heart of DCBank is innovation and the use of technology. We consistently develop new product offerings that solve problems for clients and make business easier. We are dedicated to our customers, helping each of them build successful products and services.

#### Introduction

This is our first Accessibility Plan under the *Accessible Canada Act (ACA)*<sup>1</sup>. The ACA is a law that aims to make Canada barrier-free by 2040. This Accessibility Plan outlines DCBank's strategies and actions to identify, prevent and remove barriers over the next three years.

#### Accessibility Statement

DCBank is committed to treating all people in a way that lets them maintain their dignity and independence. We are committed to meeting our obligations to identify, prevent and remove barriers for people with disabilities.

#### Consultations

Our commitment to accessibility includes consulting with people with disabilities. We are committed to listening to people with disabilities and learning from their experiences.

To help us identify any specific barriers to accessibility, DCBank has consulted on this Accessibility Plan with a third-party organization that has relevant financial industry experience in identifying and addressing barriers to accessibility. This third-party process also involved having people with disabilities review and consult on our Accessibility Plan. Through this meaningful consultation process, we have been able to gather insights, identify barriers and considered strategies to enhance accessibility across our organization.

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<sup>1</sup> *Accessible Canada Act*, S.C. 2019, c. 10. Link: <https://laws-lois.justice.gc.ca/eng/acts/a-0.6/>

## Looking Ahead

As we implement this Accessibility Plan, we will prepare regular progress reports as part of our obligations under the *Accessible Canada Act*. As we do that, we will consider the feedback that we receive through our feedback process and track our progress. We will continue to consult with people with disabilities to ensure that we accomplish the objectives we've set out to achieve.

## Feedback

Our commitment to accessibility incorporates a feedback process so that employees, clients and members of the public can share their ideas and input with us. This can also be done anonymously. To provide feedback on accessibility, please use one of the contact methods below. If you require support while providing feedback, please let us know, and we will do our best to meet your needs. If you provide your contact information, we are committed to responding to your feedback in a timely manner and in the format that we receive it.

For more information, contact our Accessibility Officer:

**Attention:** Accessibility Officer  
**By Mail:** 736 Meridian Road NE, Calgary, Alberta T2A 2N7  
**By Phone:** [1-844-836-6040](tel:1-844-836-6040)  
**By Email:** [accessibility@dcbank.ca](mailto:accessibility@dcbank.ca)

## Addressing areas identified in the *Accessible Canada Act*

### Accessibility Plan Scope

There are seven priorities areas described under the *Accessible Canada Act*. They are:

1. Employment
2. The Built Environment
3. Information and Communication Technologies (ICT)
4. Communication (non-ICT)
5. Procurement of Goods and Services
6. Design and Delivery of Programs and Services
7. Transportation

Within the seven priority areas identified in the *Accessible Canada Act*, DCBank has highlighted below what we are doing well under each priority. We have also identified potential barriers along with planned actions to address each of them.

#### **1. EMPLOYMENT**

##### **About:**

DCBank has under 80 employees. We aim for a culture where all employees are respected and supported to meet their full potential. The Employment Priority relates to the lifecycle of employees, from recruitment and onboarding, through to advancements within DCBank. This means making sure that employees with disabilities can conduct their work in a manner that respects their dignity and independence.

##### **We currently have in place the following:**

- We have an HR Committee comprised of executives of DCBank.
- The HR Committee oversees all employment related matters, including addressing any matters that are determined to impact an employee's ability to do their jobs.
- Additionally, the HR Committee reviews accommodation requests from employees and ensure that employees with disabilities receive appropriate accommodations that meet their needs and respect their dignity. DCBank has already appointed a DCBank Accessibility Officer.

##### **Potential Barriers:**

- Hiring managers and applicants may not be informed about accessibility options in our hiring practices.
- Employees may not know how to access or request a workplace accommodation.
- Our Human Resources policies and procedures could benefit from being updated to include information about accessibility.

**Planned Actions:**

Action	Estimated Timeline
Review and update our recruitment and hiring practices ensure the accessible nature of the process.	By December 2024
Create clear written policies and procedures that are easily accessible to employees documenting the workplace accommodation process.	Dy December 2024

**2. BUILT ENVIRONMENT**

**About:**

DCBank conducts its business from two office spaces in Calgary, Alberta. The head office is in the Northeast quadrant of the city, with a secondary satellite office in downtown Calgary. We also have a third smaller leased location in Toronto, Ontario. The offices are primarily used by our employees since our banking services are provided to our clients virtually. However, in some limited instances, customers may visit a physical location.

**We currently have in place the following:**

- No barriers to accessibility have been identified by persons with disabilities in our Toronto office.
- No barriers to accessibility have been identified by persons with disabilities in our downtown Calgary office.
- While we generally only provide digital services, there are some very limited circumstances in which a client may choose to meet with a DCBank representative in person. In these instances, we can arrange to have clients attend our offices. Alternatively, a DCBank representative may attend the customer’s office or other location if there are barriers to accessing our offices.
- As DCBank's current arrangements expire and we explore new facilities, we will work towards making new offices spaces meet the accessibility goals of DCBank.
- For employee accessibility, we offer the opportunity for workplace accommodations to address barriers if there are limitations to accessing the office space. Remote work is one option for employee accommodation.

**Potential Barriers:**

- The head office in Calgary may be difficult to access for persons with disabilities.
- The office locations may not be designed for those with sensory processing disabilities.

**Planned Actions:**

Action	Estimated Timeline
Complete an accessibility review of each of the office locations to identify barriers to accessibility.	By December 2025
Complete an action plan to address review findings.	By December 2026

**3. INFORMATION AND COMMUNICATION TECHNOLOGIES**

**About:**

It is important to DCBank that we provide Information and Communications Technologies (ICT) for ensuring accessibility for employees and clients. This includes all digital content and technologies that we use for communication, including our public website, social media and digital tools employees use to do their work.

DCBank communicates information to its employees through ICT including email, through video chat and through our training portal/website. DCBank also communicates with our clients electronically, and contracts are usually signed electronically.

**We currently have in place the following:**

- DCBank currently uses Microsoft Office 365. This includes accessibility tools such as:
  - Accessibility Checker: Ensures content is easy for people with disabilities to read and edit.
  - Subtitles and Closed Captions: Microsoft Teams meetings can include live captions and transcripts for those who are deaf or hard of hearing.
  - Immersive Reader: Allows documents, posts or even chat messages to be read out loud to the user and simultaneously highlights the text. Font and Page colour may also be changed to make them easier to read.
  - Navigation Features: Office 365 offers keyboard shortcuts, screen reader compatibility, and other navigation tools, ensuring ease of use for individuals with mobility or visual impairments.

**Potential Barriers:**

- There may be some barriers with websites, electronic documents, telecommunications, software, and hardware for both employees and clients.
- DCBank's website does not fully meet the most current Web Content Accessibility Guidelines that are published by the Web Accessibility Initiative of the World Wide Web Consortium, the main international standards organization for the Internet.
- DCBank does not currently provide training to employees on accessibility features that are available through ICT.

**Planned Actions:**

Action	Estimated Timeline
Complete an accessibility review of our ICT to identify barriers to accessibility.	By December 2025
Complete an action plan to address the findings of our review.	By December 2026
Incorporate training for employees on PolicyTech on how to access accessibility features of ICT.	By December 2027

**4. COMMUNICATION, OTHER THAN ICT**

**About:**

This section refers to non-digital communication. This includes telephone communications, print materials, publications, presentations and other methods of communication. We believe everyone should have equal access to important information. DCBank is committed to providing communications in various accessible formats for people who require them.

**We currently have in place the following:**

- DCBank attempts to use language that is clear and easy to understand when creating communications.

**Potential Barriers:**

- DCBank does not have alternative communication formats, such as Braille or Teletypewriter (TTY), readily available.
- DCBank does not have policies or standards that set requirements for accessible communications. Because of this, not all materials are fully accessible.

**Planned Actions:**

Action	Estimated Timeline
Create communication standards to ensure consistency and availability of accessible communication.	By December 2025
Review and where applicable, use clearer and simpler language in communications.	By December 2026
Create a process for requesting and receiving documents and materials in alternate formats.	By December 2027

## 5. PROCUREMENT OF GOODS, SERVICES AND FACILITIES

### About:

This section relates to how goods, services, and facilities are purchased by DCBank. It also includes ensuring that all documents related to procurement are accessible and have accessibility considerations in mind.

### We currently have in place the following:

- Our in-house legal team assists the business in negotiating contracts to procure goods, services and facilities. This team has an employee with specialized training in disability management.

### Potential Barriers:

- There are potential process enhancement opportunities to identify accessibility requirements when goods, services and facilities are purchased by DCBank.

### Planned Actions:

Action	Estimated Timeline
Update our Third-Party Risk Management Framework, which addresses all vendor relationships and contracting standards, to include accessibility considerations.	By December 2025

## 6. DESIGN AND DELIVERY OF PROGRAMS AND SERVICES

### About:

DCBank strives to eliminate barriers and improve our offering to clients, regardless of their accessibility needs.

### We currently have in place the following:

- We have appointed an Accessibility Officer who can identify accessibility barriers when programs and services are designed.

### Potential Barriers:

- Client-facing employees may not have enough training on how to accommodate and adapt service delivery for the needs of clients with disabilities.

**Planned Actions:**

Action	Estimated Timeline
Deepen our understanding of the needs of clients with disabilities and barriers to accessibility through ongoing consultations.	By December 2025
Provide training to employees specific to their roles so that they can apply accessibility requirements to their work.	By December 2026

**7. TRANSPORTATION**

While transportation is an area of priority in the *Accessible Canada Act*, DCBank does not provide transportation services and, therefore, transportation is not addressed in this Accessibility Plan.

**Conclusion**

DCBank recognizes that there are opportunities to improve accessibility in our organization. We will continue to listen to people with disabilities to become more accessible. This Accessibility Plan will guide DCBank and keep us accountable as we work towards becoming an organization that is barrier free.