

THE NORTHERN TRUST COMPANY, CANADA BRANCH ACCESSIBILITY PLAN

General

Northern Trust Corporation is a leading provider of wealth management, asset servicing, asset management and banking solutions to corporations, institutions, families and individuals. Northern Trust Corporation is a financial holding company conducting business through various subsidiaries, including The Northern Trust Company (Bank). The Bank conducts its business through its U.S. operations and its various U.S. and non-U.S. branches and subsidiaries, including The Northern Trust Company, Canada Branch. The Bank operates in Canada as an authorized foreign bank (a Schedule III bank) under the Bank Act (Canada) providing asset servicing for Canadian non-retail institutional clients.

Northern Trust believes that diversity, equity, and inclusion are inextricably linked. That is why we are committed to advancing an inclusive culture where every individual, including those with disabilities, feels respected, supported and valued. One of Northern Trust's core cultural values emphasizes the importance of being "intentionally inclusive" by consciously welcoming and valuing the experiences, perspectives and viewpoints of all employees.

We recognize the importance of creating equitable access and opportunities for all individuals, including those with disabilities. While Northern Trust applies its core cultural values across its global enterprise, our commitment as a federally regulated financial institution in Canada includes meeting the accessibility requirements under the Accessible Canada Act.

This Canada Accessibility Plan highlights our continuing efforts to create a more accessible environment for our clients, employees, and other stakeholders—reflecting our founding principles of service, expertise and

integrity. This Plan was developed in accordance with the Accessible Canada Act, and it outlines Northern Trust's strategy to remove and prevent barriers to accessibility in the following areas of focus:

- employment
- the built environment
- information and communication technologies
- communication, other than information and communication technologies
- the procurement of goods, services and facilities
- the design and delivery of programs and services
- transportation

Feedback

Northern Trust welcomes feedback and input regarding this Plan and accessibility matters, as we continue our work to remove and prevent barriers to accessibility. Please contact us at:

Email:

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Phone:

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If desired, feedback may be submitted anonymously. Please do not include any personal information if the

feedback is submitted anonymously. Northern Trust will acknowledge receipt of feedback in the same manner in which it is received, unless the feedback is received anonymously.

Alternate Formats

This Plan is in compliance with assistive technology. Print, large print, braille, audio formats and electronic formats compatible with adaptive technology are available upon request. To request alternate formats of this Plan or a description of the feedback process, please contact us through the contact information provided above.

Areas of Focus

EMPLOYMENT

Northern Trust is committed to diversity, equity, and inclusion in opportunities for all. Northern Trust is also committed to working with and providing accommodations to individuals with disabilities. This section provides an overview of some of our key employment practices in Canada in connection with accessibility for all phases of employment.

Talent Acquisition

Candidates for employment opportunities apply to open positions via a platform that is designed to be digitally accessible and used by individuals with disabilities. Additionally, candidates are invited on our [Careers site](#) to request reasonable accommodations during the application and interview process. When interviews are being arranged, Northern Trust also invites individual candidates to request reasonable accommodations as necessary.

Learning and Development

Northern Trust offers learning and development opportunities for employees on its corporate learning system. E-learning programs offered on such system contain intuitive user interfaces, transcripts, subtitles, audio for videos, and an accessible color palette to reach a wide variety of types of learners.

Northern Trust provides a range of learning resources to support physical and mental well-being at the workplace. In addition, we developed a three-part training series for managers on unconscious bias to raise awareness on how implicit biases may influence how managers attract talent, and reward and recognize employee contributions. Further, Canada employees completed accessibility training within the last year.

Workplace Accommodations

Northern Trust's accessibility measures for Canada are set out in its Accessibility Policy in its Employee Handbook. Northern Trust has a dedicated medical accommodations process that provides reasonable accommodations to qualified individuals with disabilities. Our process is interactive and confidential. We are committed to removing barriers in the workplace faced by individuals with disabilities. It is important to Northern Trust that all employees find our workplace to be welcoming and supportive.

The following section outlines barriers identified in the Plan development process and actions to be taken by Northern Trust to remove and prevent identified barriers to accessibility in the area of Employment.

Barriers Identified in the Plan Development Process:

- Accommodation Policy and Training: While Northern Trust maintains a dedicated disability accommodation process, there is an opportunity to enhance awareness of the process and ways in which Northern Trust employees can access it.
- Learning Experience: While Northern Trust has provided an accessibility training course for its employees in Canada, there is an opportunity to enhance employees' foundational awareness of accessibility in the workplace.
- Careers Site Accessibility-Related Information: Our Careers site invites requests for reasonable accommodation, but more information and resources regarding accessibility could be provided, in order to attract candidates with disabilities.

Actions To Be Taken by Northern Trust to Remove and Prevent Barriers to Accessibility:

- Highlight the reasonable accommodation request process by sharing information about the process with Canada partners through live presentations and/or electronic messaging.
- Identify and review potential new courses to include within Northern Trust's existing learning resources management platform, including a foundational accessibility e-learning course for all employees.
- Develop Career site content to create a more welcoming environment for potential candidates with accessibility needs.
- Leverage the existing Canada Business Resource Council Inclusion team (Canada BRC Inclusion Team) and the work they currently do on topics such as diversity to include accessibility information and resources on its internal website.

BUILT ENVIRONMENT

Northern Trust strives for accessibility for all clients, employees, and guests in the built environment in its Toronto location and any future Canadian locations. In our Toronto office, which is a leased space in a multi-tenant office building, we work with the building's property manager on accessibility issues in the common spaces of the building. The building has received an accessibility certification from the Rick Hansen Foundation Accessibility Certification™ Program for commercial spaces. This certification measures the level of meaningful access beyond the building code requirements and recognizes the property manager's commitment to accessibility in shared spaces such as underground parking levels, exterior courtyards, the lobby and elevators. Northern Trust is currently planning several upgrades to its Toronto office space to meet our future business requirements. The space will be designed by an architect in the local market with knowledge of local building codes and applicable laws governing the built environment, including those governing accessibility. These upgrades are scheduled to be effective in 2025.

The following section outlines barriers identified in the Plan development process and actions to be taken by Northern Trust to remove and prevent identified barriers to accessibility in the area of the Built Environment.

Barriers Identified in the Plan Development Process:

- Northern Trust has an opportunity to review accessibility enhancements as it proceeds with the planned Toronto office upgrades.

Actions To Be Taken by Northern Trust to Remove and Prevent Barriers to Accessibility:

- Northern Trust, as part of its planned Toronto office space upgrade, will engage an architect who will ensure the design meets all building codes and all applicable laws governing the built environment, including those governing accessibility. Northern Trust will monitor construction to ensure the architect's design is implemented, and all required approvals for the new space are granted and received.
- As architectural designs are being developed for the new office space, accessibility features such as height adjustable desks and enhanced signage for wayfinding within the office space will be considered.
- Northern Trust will continue to work with property management to address accessibility issues as they arise.

INFORMATION AND COMMUNICATION TECHNOLOGIES

The Information Technology team within Northern Trust is committed to ongoing efforts to provide productivity tools and technologies that are accessible to all potential and existing clients as well as our employees and other stakeholders.

We currently deploy digital products and provide guidance to users on accessibility features that are built into core programs and applications used by all

employees. Examples of such features include screen magnifiers and voice activated typing functions. The accessibility features empower users with needs in areas including vision, hearing, neurodiversity, learning, mobility and mental health.

Current practices to address accessibility needs include:

- Offering disability awareness training and providing digital accessibility guidelines for IT and content creators.
- Technology project teams providing guidance on WCAG 2.2 AA standards for all new projects and updates to specific pages.
- Ongoing efforts to ensure that the northeritrust.com website and mobile applications meet Web Content Accessibility Guidelines (WCAG) Level AA or higher.
- Digital and design teams with expertise in digital accessibility standards implementing tools and standards into a design library, a design system library, and a digital accessibility library. A specialized Digital Accessibility Team consults with development project teams when accessibility issues are found and helps them understand how to prioritize and resolve issues.
- Internal and external videos produced by the Northern Trust Global Marketing and Communications team are closed captioned.

The following section outlines barriers identified in the Plan development process and actions to be taken by Northern Trust to remove and prevent identified barriers to accessibility in the area of Information and Communication Technologies.

Barriers Identified in the Plan Development Process:

- While digital accessibility and design libraries have been created, there is an opportunity to promote greater awareness and usage of such libraries by Technology staff.
- Currently there is no comprehensive aggregated inventory of existing technology tools and their digital accessibility levels.

- While Northern Trust employees may have some awareness of accessibility technology that exists in the Company, there is an opportunity to enhance employee awareness of such technology.

Actions To Be Taken by Northern Trust to Remove and Prevent Barriers to Accessibility:

- Expand awareness of digital accessibility and design libraries for Technology employees
- Initiate efforts to create an aggregated inventory of existing technology applications with user interface and digital accessibility levels.
- Create an IT Communications awareness campaign.

COMMUNICATION, OTHER THAN INFORMATION AND COMMUNICATION TECHNOLOGIES

Northern Trust believes that effective communication is essential to fostering an inclusive environment and building strong relationships with our clients, employees, and other stakeholders. This section highlights the steps we have taken to enhance the accessibility of our communications channels and the strategies we have implemented to ensure that everyone can access and understand the information we provide.

Northern Trust's Global Marketing and Communications team aims to ensure that its writing is clear, concise, and well-organized. The team also works to ensure that its writing helps our various internal and external audiences to find and understand the information they need. We use the "Smart Brevity" approach for most of our communications. It is a communications practice based on brain science and data that helps us craft and format information to be clear, engaging and memorable. Journalists created "Smart Brevity" to prioritize essential news, explain its impact on readers, and deliver both in a concise and visual format, when applicable.

The Global Marketing and Communications team develops and provides to client facing employees corporate slide deck templates that are formatted for accessibility. The team is experienced in creating

and auditing digital materials as well as reviewing and formatting presentations and documents in alternate formats as needed.

The following section outlines barriers identified in the Plan development process and actions to be taken by Northern Trust to remove and prevent identified barriers to accessibility in the area of Communication, Other Than Information and Communication Technologies.

Barriers Identified in the Plan Development Process:

- While alternate formats for documents are available, access to alternate formats for documents can sometimes be challenging for employees to find or request.
- Employees may not be aware of what it means to be a person with a disability and how it impacts their day-to-day activities.

Actions To Be Taken by Northern Trust to Remove and Prevent Barriers to Accessibility:

- Identify ways to better educate employees on where to locate or request alternate formats for documents.
- Increase employee awareness and education regarding the accessibility needs of individuals with disabilities, in order to improve inclusivity of others.

PROCUREMENT OF GOODS, SERVICES AND FACILITIES

Northern Trust is committed to recognizing and supporting firms that exhibit a commitment to diversity, equity and inclusion, irrespective of company size, longevity, and ownership. Through our Business Diversity360 program, we seek to stimulate and promote economic development in the communities where we work by engaging with certified and qualified diverse businesses and firms that demonstrate their commitment to diversity. This program collects relevant data regarding our suppliers to allow us to make more informed decisions in our purchases. For example, one of Northern Trust's innovative

staffing suppliers provides neurodiverse professionals to support our IT organization.

Similarly, through Northern Trust's Supplier Code of Conduct, our organization highlights to our suppliers our expectations regarding inclusion in all their business practices, which sets the tone for the principles and pillars we expect from our entire supply chain.

The following section outlines barriers identified in the Plan development process and actions to be taken by Northern Trust to remove and prevent identified barriers to accessibility in the area of Procurement of Goods, Services and Facilities.

Barriers Identified in the Plan Development Process:

- Some suppliers may not be aware of our expectations regarding accessibility in the products and services that we procure.
- Our employees may need more awareness of the accessibility best practices when procuring goods and services from suppliers.

Actions To Be Taken by Northern Trust to Remove and Prevent Barriers to Accessibility:

- Include accessibility considerations in future procurement policy. This will allow Northern Trust an opportunity to better assess accessibility in a potential new supplier's (at contract initiation) or a current supplier's (at contract renewal) products or services.
- Increase awareness among procurement staff regarding accessibility and what to consider as part of one's role within Procurement.

DESIGN AND DELIVERY OF PROGRAMS AND SERVICES

Northern Trust believes that individuals with disabilities should receive the same level of service and access to products as individuals who have no disabilities.

For clients, Northern Trust maintains a [Customer Service Policy](#) in Canada that outlines this principle as it relates to our delivery of client services. In our delivery of services, we seek to provide accommodations to individuals with disabilities, including through our communication channels, in our facilities, and in our technology solutions.

Northern Trust employees have the opportunity to participate in an employee-led network known as the Abilities Business Resource Council (Abilities BRC). Since 2004, the Abilities BRC has been focused on contributing to Northern Trust's efforts to advance disability inclusion in the workplace as well as advocate for Northern Trust's clients with disabilities. The Abilities BRC connects with outside organizations to gain an understanding of best practices around accessibility needs, disability inclusion and neurodiversity awareness, and hosts employee educational sessions on those best practices. The Abilities BRC has also participated in publicly published articles on accessibility topics, such as a business and employment social media platform article regarding driving inclusion with digital design, technology and workplace accessibility at Northern Trust.

The Canada BRC Inclusion Team supports all facets of diversity including disability and neurodiversity for Northern Trust employees in Canada. It also amplifies messages for the eleven Northern Trust BRCs in North America, including the Abilities BRC. The Canada BRC Inclusion Team invites local employees to assist with and attend various BRC virtual events.

The following section outlines barriers identified in the Plan development process and actions to be taken by Northern Trust to remove and prevent identified barriers to accessibility in the area of Design and Delivery of Programs and Services.

Barriers Identified in the Plan Development Process:

- Employees surveyed have highlighted some potential gaps in comprehensive awareness about the available accessibility programs, technologies and services, as well as the employee accommodations process.
- Employees surveyed have highlighted the need for improved ways to navigate Northern Trust's intranet to locate information regarding accessibility resources, including the employee accommodations process.

Actions To Be Taken by Northern Trust to Remove and Prevent Barriers to Accessibility:

- Increase connectivity between the Abilities BRC and the Canada BRC Inclusion Team to increase employees' knowledge and awareness about accessibility programs, technologies, and services.
- Use additional intranet sites to enhance employee visibility of available accessibility resources.

TRANSPORTATION

Northern Trust recognizes that there are transportation barriers for individuals with disabilities. Northern Trust does not provide transportation services and has not identified barriers under this area of focus.

Consultation

In developing this Plan, Northern Trust consulted with representatives from its employee and client populations. Northern Trust conducted two virtual employee focus group meetings – one with the Abilities BRC and the other with the Canada BRC Inclusion team. These meetings focused on understanding barriers experienced by employees with disabilities, as well as potential solutions. In both sessions, employees highlighted a desire to better understand the resources and services available to support individuals with accessibility needs. This theme has been recognized and is targeted to be addressed within this Plan.

We also consulted with representatives from two client organizations in Canada who provided feedback on barriers to accessibility with our Company and ways to address any such barriers. The feedback provided was positive and identified instances of accommodations made by Northern Trust specific to the particular client. While no current barriers at Northern Trust were identified, the client consultations did identify potential future barriers involving individuals having language challenges or needing transcription services.

Additionally, clients have the opportunity to provide us with feedback on a wide range of topics, including accessibility, through regular satisfaction surveys that we conduct.

Conclusion

This Plan highlights Northern Trust’s ongoing efforts to remove and prevent barriers to accessibility. We seek further understanding of barriers and strive to enhance accessibility for clients, employees and other stakeholders. At Northern Trust, we believe ensuring accessibility for all our clients, employees and other stakeholders is critical to our shared success.