

THE NORTHERN TRUST COMPANY, CANADA BRANCH 2025 ACCESSIBILITY PROGRESS REPORT

GENERAL

On June 1, 2024, The Northern Trust Company, Canada Branch launched The Northern Trust Company, Canada Branch Accessibility Plan, outlining our commitment to identify, remove and prevent barriers to accessibility for persons with disabilities in accordance with the requirements of the Accessible Canada Act (ACA).

The Northern Trust Company, Canada Branch 2025 Accessibility Progress Report outlines activities taken and progress made from June 1, 2024 through May 30, 2025. Except where the context requires otherwise, references in this document to “Northern Trust,” “we,” “our,” or similar terms means Northern Trust Corporation and its subsidiaries, including but not limited to The Northern Trust Company, Canada Branch, on a consolidated basis.

Feedback

Northern Trust welcomes feedback and input regarding this 2025 Progress Report and any accessibility matters, as we continue our work to remove and prevent barriers to accessibility. Please contact us via:

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Northern Trust will acknowledge receipt of feedback in the same way it is received unless the feedback is received anonymously. If desired to submit feedback anonymously, please do not include any personal information.

Alternate Formats

The 2025 Progress Report 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 2025 Progress Report or a description of the feedback process, please contact us through the contact information provided above.

PROGRESS MADE TO REMOVE OR PREVENT BARRIERS TO EMPLOYMENT

Accommodation Process, Training and Information

BARRIERS IDENTIFIED	ACTIONS TO ADDRESS BARRIERS	STATUS ON ACTION STEPS
While Northern Trust maintains a dedicated disability accommodation process, there is an opportunity to enhance awareness of the process and ways in which employees can access it.	<ul style="list-style-type: none"> Highlight the reasonable accommodation request process by sharing information about it with Canada employees through live presentations and/or electronic messaging. 	<ul style="list-style-type: none"> Our Canada leadership team issued a communication to employees to reiterate our commitment to accessibility and to inform employees about the accommodation process. The communications allowed employees to link directly to the Canadian handbook, which includes details on the accommodation request process.
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.	<ul style="list-style-type: none"> 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. Leverage the existing Canada Business Resource Council (BRC) Inclusion team to include accessibility information and resources on its internal website. 	<ul style="list-style-type: none"> A new e-learning course was introduced to all Canadian employees in alignment with the Accessibility Awareness Week in May 2025. This 50-minute self-paced online course is available through our learning platform and focuses on the accessibility standards in Canada. <ul style="list-style-type: none"> The course aims to identify, remove and prevent barriers for people with disabilities The training highlights requirements on accessibility in areas of customer service, information and communication, employment, transportation and the built environment. The Canada BRC Inclusion team has added new links to its page on the Company's intranet for employees to access resources and information on accessibility, well-being and disability

PROGRESS MADE TO REMOVE OR PREVENT BARRIERS TO EMPLOYMENT

Careers Site Accessibility-Related Information

BARRIERS IDENTIFIED	ACTIONS TO ADDRESS BARRIERS	STATUS ON ACTION STEPS
While the Careers site invites requests for reasonable accommodation, more information and resources regarding accessibility could be provided, in order to attract candidates with disabilities.	<ul style="list-style-type: none"> Develop Careers site content to create a more welcoming environment for potential candidates with accessibility needs. 	<ul style="list-style-type: none"> Information posted on the external Careers site highlights Northern Trust's commitment to accessibility.

Built Environment

Accessible Office Design

BARRIERS IDENTIFIED	ACTIONS TO ADDRESS BARRIERS	STATUS ON ACTION STEPS
Northern Trust has an opportunity to review accessibility enhancements as it proceeds with the planned Toronto office upgrades.	<ul style="list-style-type: none"> Northern Trust, as part of the 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. 	<ul style="list-style-type: none"> The engaged architect has ensured the office design meets building codes inclusive of those governing accessibility. To date, all required approvals have been granted and construction has started. Completion is targeted for Q2 2025.
	<ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> The office design includes features such as ergonomic chairs and height-adjustable desks for workstations and offices. The office signage package supports wayfinding throughout the office, which includes signage in braille. It is in our standard to include signage with higher contrast text for enhanced visibility and braille as and where required by code.
	<ul style="list-style-type: none"> Northern Trust will continue to work with property management to address accessibility issues as they arise. 	<ul style="list-style-type: none"> A unisex single user accessible washroom has been established in the office building. Northern Trust has also created a new position focused on Health and Life Safety. As it relates to the Canada office, this individual will participate in Work-place Health and Safety Committee meetings where issues around accessibility can be raised and subsequently addressed.

Information and Communication Technologies

Digital Tools/Resources and Technology Inventory

BARRIERS IDENTIFIED	ACTIONS TO ADDRESS BARRIERS	STATUS ON ACTION STEPS
<p>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.</p> <p>Currently, there is no comprehensive aggregated inventory of existing technology tools and their digital accessibility levels.</p>	<ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> In 2024, Northern Trust held an event in Chicago to promote the awareness of digital accessibility design systems and a digital accessibility library for Technology employees and other employees. In 2025, Northern Trust has held ongoing weekly office hours and issued biweekly messages through internal communications channels to further promote the awareness and use of Northern Trust design systems and the digital accessibility library. Northern Trust's design systems include accessibility in all of the components as well as documentation on how the components should work with assistive technology. Work is in progress on the development of an inventory of existing technology applications.

Information and Communication Technologies

Awareness of Accessibility-Related Digital Tools

BARRIERS IDENTIFIED	ACTIONS TO ADDRESS BARRIERS	STATUS ON ACTION STEPS
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.	<ul style="list-style-type: none"> Create an IT communications awareness campaign. 	<ul style="list-style-type: none"> IT Communications and the IT Digital Accessibility team implemented an ongoing awareness campaign between May and October 2024 to educate Northern Trust employees on digital accessibility. In May 2025, IT Communications implemented a communications plan to highlight Accessibility Awareness Week for employees.

Communication, Other than Information and Communication Technologies

Awareness of Other Accessibility-Related Resources

BARRIERS IDENTIFIED	ACTIONS TO ADDRESS BARRIERS	STATUS ON ACTION STEPS
While alternate formats for documents are available, access to alternate formats for documents can sometimes be challenging for employees to find or request.	<ul style="list-style-type: none"> Identify ways to better educate employees on where to locate or request alternate formats for documents. 	<ul style="list-style-type: none"> Northern Trust is assessing current non-technological document accessibility needs. Efforts will continue in 2025 and 2026 to better educate employees on where to locate or request alternate formats for documents.
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.	<ul style="list-style-type: none"> Increase employee awareness and education regarding the accessibility needs of individuals with disabilities, in order to enhance inclusivity of others. 	<ul style="list-style-type: none"> Northern Trust publishes a bi-weekly newsletter for North American employees, which includes accessibility information and BRC event invitations regarding accessibility resources and programming such as International Day of People with Disabilities, Global Well-Being Week and Mental Health Awareness Month. In addition, the Canada BRC Inclusion team's intranet site has been updated to reflect the team's goal to share accessibility and related resources with employees.

Procurement of Goods, Services, and Facilities

Enhancing Accessibility through Supplier Partnerships

BARRIERS IDENTIFIED	ACTIONS TO ADDRESS BARRIERS	STATUS ON ACTION STEPS
Some suppliers may not be aware of our expectations regarding accessibility in the products and services that we procure.	<ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> The Procurement Policy now emphasizes accessibility in order to clarify Northern's focus on accessible products and services and to facilitate the consideration of accessibility as part of our purchasing process.
Employees may need more awareness of the accessibility best practices when procuring goods and services from suppliers.	<ul style="list-style-type: none"> Increase awareness among Procurement staff regarding accessibility and what to consider as part of one's role within Procurement. 	<ul style="list-style-type: none"> Northern Trust plans to increase Procurement staff awareness of accessibility by discussing accessibility at a meeting in 2025 for the entire global Procurement department.

Design and Delivery of Programs and Services

Amplify Accessibility Process and Programs

BARRIERS IDENTIFIED	ACTIONS TO ADDRESS BARRIERS	STATUS ON ACTION STEPS
<p>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.</p> <p>Employees surveyed have also highlighted the need for improved ways to navigate Northern Trust's intranet to locate information regarding accessibility resources, including the employee accommodations process.</p>	<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • The collective employee resource groups including the Canada BRC Inclusion team in North America co-sponsored the Mental Health Awareness Month in May 2025 which supports employee well-being. • The Abilities BRC and the Canada BRC Inclusion team intranet sites include links to accessibility resources, information and program recordings. Examples of linked information include: <ul style="list-style-type: none"> — Global Well-Being Hub — Neurodiversity Hub

TRANSPORTATION

Northern Trust does not provide transportation services and has not identified barriers under this area of focus in its Plan.

CONSULTATIONS

In developing this 2025 Progress Report, Northern Trust consulted virtually with representatives from two employee BRCs: the North America Abilities BRC and the Canada BRC Inclusion team. A virtual consultation approach was used in order to engage as many employees from these groups as possible. During the consultation held on March 4, 2025, the participants reviewed the Plan's identified barriers, proposed actions and status updates. Feedback was given not only on the status but on other potential actions that could be taken.

Overall, the feedback from the Abilities BRC and Canada BRC Inclusion team was positive regarding the actions Northern Trust has taken to address accessibility barriers. Most notably, they commended the proactive launch of additional accessibility training and awareness communications for Canada office employees. This directly improved understanding of the accommodation process where it was previously lacking.

Employees from the Canada office were pleased to hear about the progress made on upgrades to the Toronto office space – ensuring that it meets all building codes and applicable laws governing the built environment including those governing accessibility.

In addition to increasing the awareness of various accessibility resources and programs, the Canada BRC Inclusion team has reconfirmed its commitment to host meetings that further educate and inform employees on the topic. Specifically, there is a continued need to raise employee awareness of available technology solutions, especially when interacting with clients who have accessibility needs. As such, the feedback from this consultation process will be used to inform how we continue to implement actions for the remainder of 2025 and throughout 2026.

Northern Trust will leverage future consultations to refine and develop future accessibility plans.

Feedback

Since launching The Northern Trust Company Canada Branch Accessibility Plan in June 2024, we did not receive any feedback through the established communications channels noted above. We encourage ongoing feedback to help inform our continued efforts in the accessibility space.