

## Digital Commerce Bank Accessibility Plan Progress Report 2026

### 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.

#### Summary and Overview

This is our second progress report on the implementation of our Accessibility Plan (the "**Progress Report**"). This Progress Report outlines how we are taking steps to meet our obligations under the *Accessible Canada Act (ACA)*.

This Progress Report outlines the steps taken over the past twelve months in DCBank's continued effort to identify, prevent and remove barriers. This Progress Report also sets out areas where DCBank has completed its existing action items and sets new goals for the coming year. DCBank will continue to update its action items as they are achieved and will provide an update in our next progress report on the status of those tasks.

#### 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.

#### Contact Us

To provide feedback on accessibility, please use one of the contact methods below. This can also be done anonymously. 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)

## Progress Report – Updates and Action Items

In our Accessibility Plan we considered what DCBank was doing well under each of the seven priority areas identified in the *Accessible Canada Act*. We also identified potential barriers, and our corresponding action items for each.

This section of our Progress Report sets out our progress related to each action item. Each action item will have a corresponding progress update column that will note if the action item is (1) On Track, (2) Ongoing, (3) Delayed, or (4) Completed.

### 1. EMPLOYMENT

Action Item	Progress Update
Review and update our recruitment and hiring practices to ensure the accessible nature of the process.	<b>Status: Delayed</b> The target date for completion has been rescheduled to December 2026. DCBank completed a review of its recruitment and hiring practices and has identified opportunities to improve the accessibility of the process. We have determined that implementation of improvements will require further time and are scheduled to complete this work by December 2026.
Create clear written policies and procedures that are easily accessible to employees documenting the workplace accommodation process.	<b>Status: Completed</b> DCBank created and implemented a policy and procedure in December 2024 setting out when and how employees are able to request workplace accommodations. This policy has been posted on the DCBank policy management system and is accessible to all employees.

## 2. BUILT ENVIRONMENT

DCBank will be moving into its new Toronto, Ontario office by fall of 2026, and into its new Calgary, Alberta office by mid 2027. The new Calgary, Alberta office will become the head office. The findings from our accessibility review are being considered for the design of the new locations.

Action Item	Progress Update
Complete an accessibility review of each of the office locations to identify barriers to accessibility.	<b>Status: Completed</b> We developed an accessibility audit framework and conducted audits in both the Calgary, Alberta and Toronto, Ontario offices in the fall of 2025.
Complete an action plan to address review findings.	<b>Status: On Track</b> The results of the accessibility review will help create an action plan to address the findings.

## 3. INFORMATION AND COMMUNICATION TECHNOLOGIES

Action Item	Progress Update
Complete an accessibility review of our Information and Communication Technologies (ICT) to identify barriers to accessibility.	<b>Status: Completed</b> This project was completed in August of 2025.
Complete an action plan to address the findings of our review.	<b>Status: On Track</b> Based on the results of the accessibility review, DCBank will create a corresponding action plan by December 2026.
Incorporate training for employees on PolicyTech on how to access accessibility features of ICT.	<b>Status: On Track</b> This work has not yet commenced but is on track for completion by December 2027.

#### 4. COMMUNICATION, OTHER THAN ICT

Action Item	Progress Update
Create communication standards to ensure consistency and availability of accessible communication.	<b>Status: Ongoing</b> This project has commenced and is ongoing. Completion is anticipated by December 2026.
Review and where applicable, use clearer and simpler language in communications.	<b>Status: On Track</b> Following the completion of the communication standards, we will commence this work with a projected completion date of mid 2027.
Create a process for requesting and receiving documents and materials in alternate formats.	<b>Status: On Track</b> This work has not commenced but is scheduled for completion in December 2027.

#### 5. PROCUREMENT OF GOODS, SERVICES AND FACILITIES

Action	Estimated Timeline
Update our Third-Party Risk Management Framework, which addresses all vendor relationships and contracting standards to include accessibility considerations.	<b>Status: Completed</b> This project was completed in November of 2025.

#### 6. DESIGN AND DELIVERY OF PROGRAMS AND SERVICES

Action	Estimated Timeline
Deepen our understanding of the needs of clients with disabilities and barriers to accessibility through ongoing consultations.	<b>Status: Delayed</b> An updated completion date of December 2026 is anticipated.

Action	Estimated Timeline
Provide training to employees specific to their roles so that they can apply accessibility requirements to their work.	<p><b>Status: Delayed</b></p> <p>Upon completing the accessibility review, DCBank will create a corresponding action plan by December 2027.</p>

## 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 Progress Report.

### Consultation

When creating its Accessibility Plan, DCBank consulted 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.

Throughout 2025 DCBank remained committed to accessibility for employees and collected feedback from employees with disabilities on their experiences.

### 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. Individuals can also provide feedback anonymously.

### Taking Feedback into Consideration

DCBank has provided ways for individuals to submit feedback on its Accessibility Plan, and we are committed to making sure all voices are heard. Since publishing its Accessibility Plan, and first annual Accessibility Plan Progress Report, DCBank has not received any feedback through those designated channels.