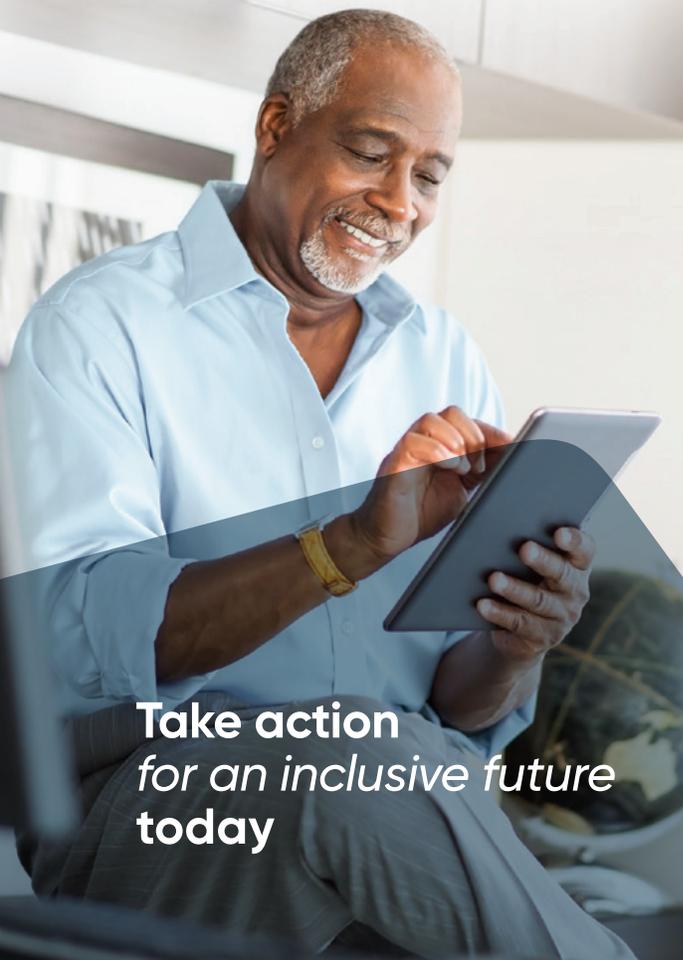


# Annual Report on the Protection of Seniors

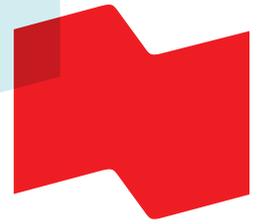
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**Take action  
for an inclusive future  
today**



# Serving and protecting seniors



At National Bank, we aim to have a positive impact on people's lives by always putting people first. Delivering a simple and people-centric experience to all our clients is an integral part of our One Mission. The Bank is committed to identifying the best practices to meet the needs of all clients, including seniors (clients aged 60 and over). That is why the Bank complies with the [Code of Conduct for the Delivery of Banking Services to Seniors](#). This report outlines the measures taken to support the principles set out in this Code and to improve services to seniors.

## 1 Put in place the necessary measures to comply with the Code

### Implement sustainable policies, procedures and processes

We have provided our employees<sup>1</sup> with policies, procedures and processes to ensure the protection of seniors. Employees have access to these tools to help them:

- › Offer additional assistance to seniors with their banking
- › Detect possible cases of financial abuse or fraud

These tools are consolidated in one location on our internal communications platforms to make them easily accessible to employees. These tools cover the following topics:

- › Serving clients who are 60 and older
- › Financial abuse
- › Mandates and powers of attorney
- › Incapacity

An internal process is in place to make it easier to report potential cases of financial abuse or fraud to the experts, and ensure action is taken quickly.

Standards and procedures, including those to handle complaints, are kept up to date. Employees are called upon to provide services in an accessible manner specifically to clients who are seniors, vulnerable individuals or people with a disability who require additional assistance.

Employees are supported when reviewing the power of attorney tools made available to them.

### Better understand the experience of our clients who are seniors

By consulting clients and the employees who serve them, we traced the client's journey, including the irritants and obstacles with which seniors are faced.

This process helped us identify the key moments in the relationship with our clients (detecting a situation of vulnerability, managing a power of attorney, reporting abuse, etc.) and to prioritize initiatives accordingly (employee training, access to powers of attorney via all channels, etc.).

### Follow through on our actions

We have identified the key measures and alerts required to ensure the right level of control in our processes and how we respond to this client segment:

- › Following up on requests for support from employees
- › Putting in place alerts for unusual transactions
- › Categorizing complaints
- › Using tools (training, consulting the tools, dedicated phone line for seniors, etc.)

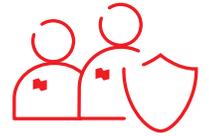
These metrics will be put in place in the various sectors concerned and will be used to monitor results and trends involving seniors.

<sup>1</sup> The Bank is committed to ensuring that its representatives, agents and other intermediaries who sell or further the sale of a bank product or service also comply with the relevant requirements of the Code.

## Governance of the Code

We incorporate all of the Code's principles into our regulatory compliance management framework.

Our clients are at the heart of our mission. We therefore include the experience of seniors in our thought process and projects to ensure the protection of this client segment and raise employee awareness. With this proactive and ongoing approach, we can raise the issues we encounter, and come up with concrete solutions and effective ways of handling these issues. In the organization, an executive-level leader from the Client Experience sector is identified to ensure compliance with the seniors code.



## 2 Communicate effectively with seniors

Our relationships with our clients and communication are at the heart of the measures in place to support seniors. We use all our communication channels to make services more accessible and onboard clients.

### Our documentation

- › Make large print documents available for easier reading.
- › Review content on an ongoing basis, using plain and simple language.
- › Produce the [Serving and Protecting Seniors](#) leaflet for our clients.



### In branches

- › Create quiet and secluded areas to discuss finances and easily have confidential conversations with a representative.
- › Provide explanations on how e-readers work (read-aloud tool) for visually impaired clients.
- › Make an audio function available for ABMs.
- › Provide support to clients using ABMs.



### By phone

- › Put in place a dedicated phone line for our clients aged 70 and over. They can therefore reach us quickly to access banking services with our direct line for this segment: **1-844-413-5598**.



### Online

- › Put together all the tools and information for seniors, notably concerning powers of attorney and joint accounts on our [Protecting our clients aged 60 and over](#) page.



### 3 Provide training to employees who interact with seniors

Our employees are faced with different situations with our clients who are seniors. They must be able to detect these situations correctly and respond to them appropriately. We have put in place specific training that is mandatory for all employees, especially upon hiring. This training covers the following topics:

- › How to detect financial abuse and fraud
- › How to mitigate potential financial harm
- › The internal reporting process for potential cases of financial abuse or fraud
- › Legal incapacity and powers of attorney (Canadian Bankers Association's Commitment on Powers of Attorney and Joint Deposit Accounts)
- › The resources available to meet the banking needs of seniors
- › Providing quiet, accessible areas where private discussions can be held with seniors



We have centralized the content dedicated to seniors and vulnerable individuals to make it easier for our employees to consult. In addition to stating the general principles of the Code as well as the best practices to adopt with this client segment, our communication and training tools have been fine-tuned to reflect the trends and needs expressed:

- › The initial training deployed when the Code took effect is mandatory and must be completed by any new employee joining the Bank.
- › The annual regulatory compliance training is essential as a reminder of the important principles set out in the seniors code. As in previous years, the 2023 version will cover several topics including the broader theme of consumer protection, with a component on the protection of seniors. The cases and notions presented are based on situations that have been observed and conclusions reached throughout the year.

### 4 Provide employees with appropriate resources to help them understand the banking needs of seniors

All employees in direct contact with seniors, as well as support staff, are trained and knowledgeable about how to best serve this client segment. Employees have access to experts who can provide additional information on:

- › Financial abuse and fraud
- › Legal incapacity and powers of attorney

Policies and procedures are consolidated to make them easier for employees to access and consult. These resources are promoted through internal communications and by the training department.

In addition to the training and tools, employees who are in contact with seniors can count on teams of experts (Legal Affairs, Compliance, Security, etc.) to provide support in more complex situations.

We are putting in place metrics to assess how situations are handled and ensure timeframes are met.

## 5 Work on mitigating potential financial harm to seniors

At National Bank, transaction monitoring is integrated into the regulatory compliance management framework to prevent and mitigate potential financial harm to seniors.

This monitoring helps detect potential cases of financial abuse, fraud, scams and money laundering. It covers transactions related to financing, credit cards, investments and banking transactions. The monitoring perimeter and characteristics are also evolving. They take into account the previous year's conclusions and aim to make established processes more efficient.

Employee vigilance is essential. If an employee has reason to believe that the client is a victim of financial abuse or fraud, it is their responsibility to intervene in order to protect the client's interests while respecting the client's privacy, security and independence.

The employee must:

- › Determine whether the transaction is in the client's best interest by asking them questions about the requested transaction
- › Determine whether it is appropriate to carry out this transaction
- › Put the transaction on hold until an analysis is carried out
- › Provide quiet and accessible areas where private one-on-ones can be held with the client
- › Report any financial abuse to the experts using the internal reporting process so that they can take charge of the file to minimize the impact of potential financial abuse

**Financial health depends on financial education. We therefore make a wide array of resources available to our clients. These resources provide them with information about various topics related to personal finances. Many articles and videos are available on [nbc.ca](https://www.nbc.ca), covering various aspects of the banking needs of seniors:**

- › How to create a strong password
- › Social media scams
- › Financial exploitation of seniors:
  - Telemarketing scams
  - Romance scams
  - Grandparent (or grandchild) scams
- › Online banking fraud
- › Protecting your credit card
- › Protecting yourself against identity theft





## 6 Take market demographics and the needs of seniors into account when closing branches

We comply with [CG-14 Branch Closure Guidance – Pre-closure consultation process](#).

Before closing a branch, we take into account the needs of seniors. Seniors as well as the general public may at any time consult the page dedicated to seniors for resources and information on how to get in touch with us. To ensure they receive adequate financial services, we've put in place the following measures before closing a branch:

- › Organize a roundtable to target clients most affected by the closure, including seniors
- › Be proactive in contacting those clients targeted during the roundtable
- › Assist these clients with the transition to the new branch, notably during the open house
- › Provide alternative solutions to those clients most affected so they can continue to access banking services after the branch closes
- › Provide seniors with contact information for additional help and information
- › Raise awareness among the employees of the affected branches and those in call centres to provide adapted services and ensure a smooth transition
- › Make sure the new branch meets accessibility standards

### Code of Conduct

Our [Code of Conduct](#)<sup>2</sup> requires that employees, executives and directors comply with applicable rules and regulations such as the *Code of Conduct for the Delivery of Banking Services to Seniors*. Every year, all employees, executives and directors confirm their compliance with the principles set out in this Code.

<sup>2</sup> This Code covers the activities and decisions of National Bank and its subsidiaries.