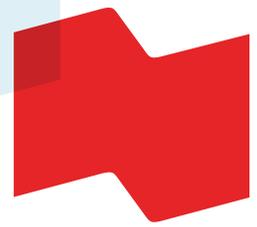




**Annual Report on the
Protection of Seniors**

2020

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 more human experience to all of our clients is an integral part of our mission. The Bank is committed to identifying best practices in order 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 for seniors.

1 Implement the necessary measures to comply with the Code

Implementing policies, procedures, processes and training

We have provided our employees¹ with policies, procedures, processes and training to ensure the protection of seniors. Employees have access to these resources in order to help them:

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

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

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

An internal reporting process is in place to facilitate the transmission of potential cases of financial abuse or fraud to the experts and ensure quick action is taken.

Governance of the Code

We incorporate all of the Code's principles into our regulatory compliance management framework. Our employees took mandatory training in fall 2020. A section on seniors will be added to the 2021 annual compliance training, which is mandatory for all employees.

An Ambassadors Committee has also been formed. This committee promotes the interests of seniors, ensures their protection, and heightens employee awareness by raising encountered issues.



¹ 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.

2 Communicate effectively with seniors

We have implemented measures to communicate effectively with seniors:

- › We continuously review our documents using plain and simple language.
- › We make our products and services accessible by offering:
 - Meetings with a representative to discuss finances and ask questions in a quiet and secluded area (making it easier to focus)
 - Meetings with a representative to receive additional explanations about products or services
 - Large-print documents for easier reading
 - Explanations on how e-readers work (read-aloud tool) for visually impaired clients
 - Help using ABMs as well as our online banking and mobile application
 - An ABM audio function
- › We consolidate resources and information for seniors, including information on powers of attorney and joint accounts on our [Protecting our clients aged 60 and over](#) page and in branches for easy access.
- › We provide a direct line (1-844-413-5598) to our clients aged 70 and over who need prompt assistance to access banking services.

Financial health depends on financial education. We therefore make a wide range of resources available to our clients. These resources provide them with information about various topics related to personal finances. Numerous articles and videos covering various aspects related to seniors' banking needs are available on [nbc.ca](#):

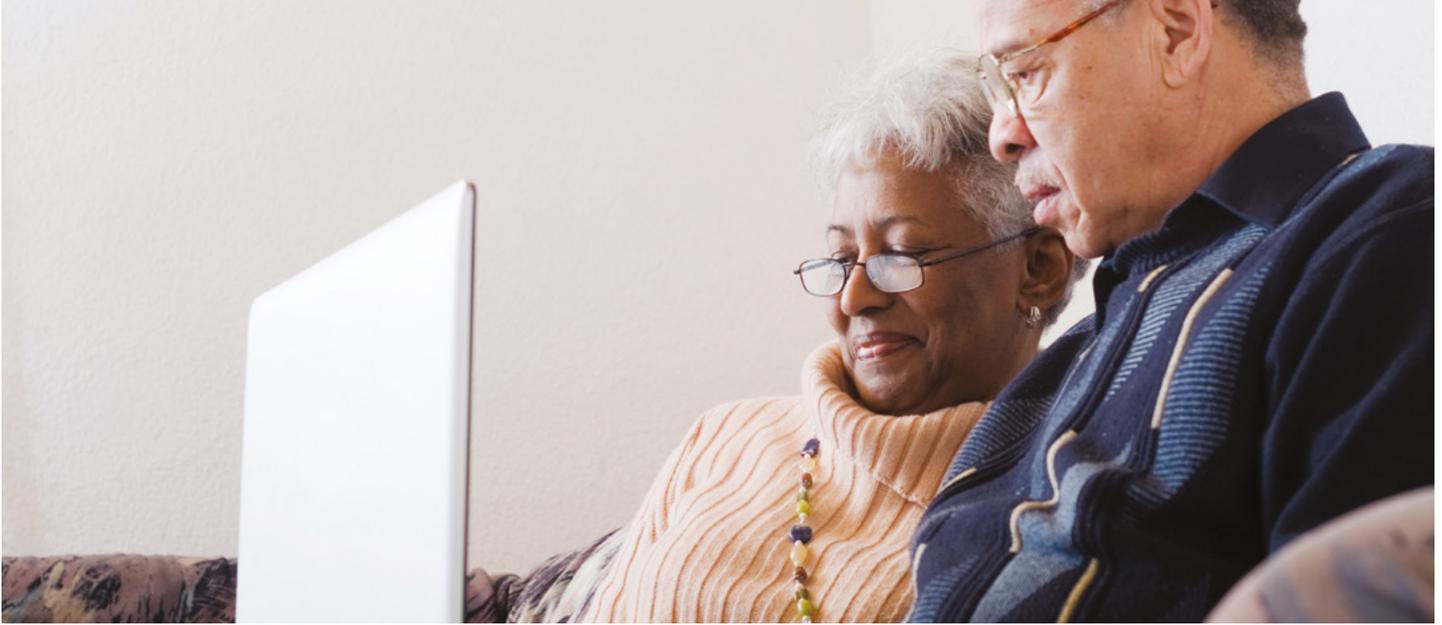
- › Creating a secure password
- › Scams on social networks
- › Online bank fraud
- › Protecting your credit card
- › Protection against identity theft



3 Provide training to employees who serve seniors

We provide training on how to protect and serve seniors to better meet their needs. These employee training sessions address the following topics:

- › Detecting financial abuse and fraud and mitigating any potential financial harm to seniors
- › Discussing topics such as financial abuse and fraud with seniors
- › Understanding the internal reporting process that helps transmit potential cases of financial abuse or fraud to the experts to ensure quick action
- › Being familiar with legal incapacity and powers of attorney (Canadian Bankers Association's Commitment on Powers of Attorney and Joint Deposit Accounts)
- › Being familiar with the resources available to meet seniors' banking needs
- › Providing quiet, accessible spaces where private discussions can be held with seniors



4 Provide employees with appropriate resources to help them understand seniors' banking needs

All client-facing employees and support staff are trained and knowledgeable in delivering banking services to seniors. Employees have access to experts who can provide additional information on:

- › Financial abuse and fraud
- › Legal incapacity and powers of attorney (Canadian Bankers Association's Commitment on Powers of Attorney and Joint Deposit Accounts)

Policies and procedures are consolidated to make them easier for employees to access and browse. These resources are promoted through internal communications, training, and the Ambassadors Committee.

5 Focus 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 allows the detection of potential cases of financial abuse, fraud, scams and money laundering. It covers transactions related to financing, credit cards, investments, money laundering and banking transactions.

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 autonomy.

The employee must:

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



6

Take into account market demographics and the needs of seniors 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. To ensure they receive adequate financial services, we have put in place the following measures before closing a branch:

- › Organize a roundtable to identify clients most affected by the closure, including seniors
- › Be proactive in contacting those clients identified at the roundtable
- › Assist these clients with the transition to the new branch, especially during the open house
- › Provide alternatives to 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 the call centre to provide an adapted service and ensure a smooth transition
- › Make sure the new branch meets accessibility standards

Code of Conduct and Ethics

Our [Code of Conduct and Ethics](#)² requires employees, executives and directors to comply with applicable rules and regulations such as the *Code of Conduct for the Delivery of Banking Services to Seniors*. Each year, all employees, executives and directors confirm their compliance with the principles of the Code of Conduct and Ethics.

² This report covers the activities and decisions of National Bank and its subsidiaries.