2023 Annual Report

Code of Conduct for the Delivery of Banking Services



VersaBank's commitment to the Delivery of Banking Services to Seniors

VersaBank is committed to the Code of Conduct for the Delivery of Banking Services to Seniors (The Code). Since its implementation in 2019 we continue to review and enhance our corporate policy and procedures, our training regime, resources, and accessibility of information and banking services to seniors.

We are pleased to disclose our fourth annual report outlining the measures taken to support the principles set out in this Code and to enhance the way we deliver banking services to seniors.

This annual report is published on our dedicated <u>Information for Seniors</u> web page and is provided to the Financial Consumer Agency of Canada (FCAC) for their review and publication.

At VersaBank (the Bank), we strive to deliver superior products and exceptional customer service that meet the needs of all our customers. Providing banking services and financial protection to seniors is an integral part of that commitment. We recognize it is our responsibility to provide appropriate resources, accessibility to services and information, and to protect seniors by mitigating the potential for financial harm from fraud, financial abuse, and scams.

Background

On July 25, 2019, the Canadian Bankers Association (CBA) released its voluntary Code of Conduct for the Delivery of Banking Services to Seniors (the Code). The Code is centered around seven principles that apply to banks to guide them when they deliver banking products and services to Canada's seniors.

Seven Principles of the Code

- Banks will establish and implement appropriate policies, procedures, and processes to support the Code.
- Banks will communicate effectively with seniors.
- Banks will provide appropriate training to their employees and representatives who serve seniors.
- Banks will make appropriate resources available to client-facing employees and representatives to help them understand matters relevant to seniors' banking

- Banks will endeavor to mitigate potential financial harm to seniors.
- Banks will take into account market demographics and the needs of seniors when proceeding with branch closures.
- Banks will publicly disclose the steps they have taken to support the principles set out in the Code.

Compliance with the Code

VersaBank, as a bank operating under the *Bank Act* and a member of the CBA is proud to adhere to the Code and to support the banking needs of seniors. Recognizing that seniors are a diverse group we continue to identify and address the issues that seniors may encounter in our delivery of financial services.

Seniors Champion and Designated Officer

VersaBank is proud to have elected Lisa Southam, Manager Deposit Services, as our Seniors Champion. As a member of the Banks management team, Lisa is responsible for providing leadership in the execution of the Bank's Senior Code policies, procedures, and training program. She is also responsible for promoting seniors' interests and engaging with VersaBank employees to raise awareness of matters affecting seniors.

Lisa has over 30 years of banking experience and directly manages the customer facing team who deliver the Bank's products and services to seniors. She continues to advocate for increased awareness in our organization, evolve our training program and guide our team to be vigilant and well prepared to handle the unique banking needs of our senior clients.

VersaBank has designated the Vice President, Deposit Services as the officer responsible for implementing the Code and ensuring that the Bank remains in compliance.

Corporate Policies and Procedures

VersaBank has established comprehensive Board approved Code of Conduct for the Delivery of Banking Services Policy and Procedures.

These include the seven principles of the code and focus on:

- Providing targeted mandatory training to employees and representatives on issues affecting seniors
- Enhancing our ability to identify circumstances where seniors may require additional assistance with their banking activities
- Improving our ability to identify and escalate incidents of suspected financial fraud against seniors

These policies and procedures are reviewed and updated on a regular basis to ensure they continue to reflect changes that may impact the ability of seniors to bank.

Governance with the Code

The Code is incorporated into the Bank's Regulatory Compliance Management Framework

Training

VersaBank first launched its Seniors Code training program in November 2020, since then we continue to focus on evolving and enhancing its contents to ensure it is a comprehensive and valuable resource. Our training platform includes both live training sessions as well as written materials. The live training conducted by our Seniors Champion provides an excellent forum for employees to strengthen and refresh knowledge about the Code, share experiences, ask questions, and receive feedback which has been beneficial for our new hires. The written component highlights the resources available and provides reference tools for supporting seniors in their banking activities.

Our objective is to integrate Seniors Code awareness into our everyday banking.



Participants

- Training Is mandatory for all client-facing employees who serve seniors
- In 2023, The Bank's Anti-Money Laundering (AML) compliance team also completed the training



Content

- The Seniors Code, its background and its **Principles**
- VersaBank's Policy, Procedures and Guides
- Detecting Senior financial abuse, fraud &
- How to communicate effectively with seniors
- The CBA's Commitment on Powers of Attorney and Joint Deposit Accounts
- Consolidated resources on matters relevant to seniors' banking needs
- Our escalation processes
- Employee's roles & responsibilities



Requirements

- Attend live training sessions
- Review training materials
- Take a comprehensive test
- Complete an attestation of understanding
- Submit all documentation to the Seniors Champion for evaluation



Delivery Timelines

- Training is completed at least annually and periodically through updates to procedures and ongoing communications
- Training is conducted as part of our new hire onboarding process



Subject Matter Experts

- To enhance our training program and ensure it reflects current challenges and vulnerabilities that seniors face we have subscribed to the CBA's Your Money seniors-focused program
- We are introducing a training module to include the CBA's related financial literature and videos
- We have engaged with the Canadian Association of Insolvency and Restructuring Professionals (CAIRP) to develop a component focused on senior insolvency issues
- We will continue to seek out opportunities in our community to bolster our awareness and resources



Representatives

- The Bank's Deposit Agents are members of the Registered Deposit Broker Association (RDBA). The RDBA has a Seniors Code training course specific to the Deposit Broker Network
- The Bank distributes a written Deposit Agent Directive that identifies the Bank's Senior Champion, contact information, access to resources, and materials regarding compliance with the Code, as well as our complaint resolution process

Resources and Communication

VersaBank understands seniors have diverse needs. We endeavor to ensure information is easily accessible and adhere to clear language principals to make sure information is provided in a clear and simple format that is not misleading.

VersaBank Seniors Webpage

To assist in communicating and ensuring valuable information and resource materials are consolidated and readily available to educate and support seniors, VersaBank maintains a dedicated webpage identified as <u>Information for Seniors</u>. This page is available to all including seniors, their families, and their communities.

In addition, VersaBank representatives are issued a Deposit Agent Directive that provides direction to these consolidated materials for ease of access and reference.

VersaBank's dedicated webpage Information for Seniors contains consolidated resources including:

- Our Commitment to the Code
- Our Seniors Code Annual Report
- Our Seniors Champion contact information
- Information on powers of attorney and joint deposit accounts
- Accessibility Services for Seniors

- Fraud Protections for Seniors
 - Identity Fraud, protecting your PIN
 - Telemarketing Scams
 - Romance Scams
 - What to do if you are a Victim of Fraud
- Financial Abuse
- Helpful Links to additional resources

VersaBank Internal Resource Hub

VersaBank has an internal resource hub available to all customer facing employees who serve seniors that contains consolidated senior related materials and is linked to the Bank's training program.

Accessibility Services for Seniors

At VersaBank we strive to create an accessible environment and experience for our clients. Meeting our seniors' unique needs is a top priority.

We are committed to meeting the accessibility needs of our senior clients in a variety of ways, including:

- A user-friendly website with clear and simple language and straightforward navigation.
- Resource materials and helpful links consolidated under a single easy to locate webpage.
- Bilingual services, client support available in both English and French.
- Duplicate and large print statements available upon request.
- Conversations with accessibility experts can be arranged.
- Providing guiet spaces where we can communicate privately with seniors

Mitigating Potential Harm to Seniors

VersaBank is committed to safeguarding seniors from financial harm.

As fraud continues to escalate in Canada, we recognize this requires executive attention and have placed heightened awareness on crimes that impact seniors.

Garry Clement, VersaBank's Chief Anti-Money Laundering Officer, has over 35 years of financial crime expertise with years of policing experience, having worked as the National Director for the RCMP's Proceeds of Crime Program before joining the Bank in 2022. He continues to evolve the Bank's strategy on financial crime detection, protection, and prevention.

Comprehensive Anti-Money Laundering (AML) and fraud detection training, processes and procedures are regularly reviewed and enhanced to identify, protect and be vigilant against potential harm to seniors.

In 2023 the Bank enhanced its internal reporting process for handling day-to- day clearing items and chargebacks to ensure transactions suspected of fraud that involved seniors are escalated to the Seniors Champion for further evaluation.

Key components of the Banks AML/ATF regime include:

- · Robust 'Know Your Client' (KYC), customer due diligence and ongoing monitoring measures
- Comprehensive training focused on awareness and education of the Code and on senior financial abuse, fraud and scams, Powers of Attorney and Joint Deposit Accounts
- Streamlined escalation process specific to senior related matters
- Regular AML 'Did you Know' internal bulletins and periodic updates on fraud trends and topics to provide ongoing tips and information.

Branch Closures

VersaBank does not have branches; Principle 6 does not apply.

Our Commitment to the Future

VersaBank recognizes the importance of the Code, and that as a member of the financial industry we have a responsibility to ensure we continue to evolve the delivery of our banking services to seniors as their banking needs are constantly changing.

VersaBank remains committed to the ongoing evaluation and updating of our policies and procedures, training program, and services. VersaBank is focused on building resources and accessibility for seniors to support our obligations set out in the principles of the Code and to ensure that our senior clients can depend on us for their financial well-being today and in the future.

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