

2024 Annual Report

Code of Conduct for the Delivery of Banking Services to Seniors



VersaBank
Choice Through Innovation

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.

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.

We are pleased to disclose our fifth annual report outlining the measures taken to demonstrate our support to and compliance with the principles set out in this Code.

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

Background

On July 25, 2019, a Code of Conduct for the Delivery of Banking Services to Seniors (the Code) was developed. The Code is centered around the following 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

1 *Banks will establish and implement appropriate policies, procedures, and processes to support the Code.*

5 *Banks will endeavor to mitigate potential financial harm to seniors.*

2 *Banks will communicate effectively with seniors.*

6 *Banks will take into account market demographics and the needs of seniors when proceeding with branch closures.*

3 *Banks will provide appropriate training to their employees and representatives who serve seniors.*

7 *Banks will publicly disclose the steps they have taken to support the principles set out in the Code.*

4 *Banks will make appropriate resources available to client-facing employees and representatives to help them understand matters relevant to seniors’ banking.*

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 has designated Lisa Southam, Manager of Deposit Services, as our Seniors Champion. As a member of the Bank's management team, Lisa provides leadership in executing the Bank's Senior Code policies, procedures, and training program. She is also responsible for promoting seniors' interests, engaging with VersaBank employees to raise awareness of issues affecting seniors, and serving as a contact for assistance and resolution.

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

Principle 1

Banks will establish and implement appropriate policies, procedures, and processes to support the Code.

VersaBank has established comprehensive, Board-approved policies and procedures for the delivery of banking services. These policies incorporate the seven principles of the Code and focus on:

- **Providing Targeted Training:** Training for employees and representatives on issues affecting seniors.
- **Enhancing Identification Capabilities:** Improving our ability to identify circumstances where seniors may require additional assistance with their banking activities.
- **Mitigating Harm to Seniors:** Strengthening our ability to identify and escalate incidents of suspected financial fraud against seniors.

These policies and procedures are regularly reviewed and updated to ensure they continue to reflect changes that may impact seniors' ability to bank.

Governance with the Code

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

Principle 2

Banks will communicate effectively with seniors.

Commitment to Accessibility and Communication for Seniors: VersaBank is dedicated to ensuring that employees and representatives are aware of the Bank's accessibility options and communication channels for seniors. To facilitate the dissemination and consolidation of valuable information and resources, VersaBank maintains a dedicated webpage titled [Information for Seniors](#). This page is publicly accessible to seniors, their families, their communities, and our representatives, providing essential educational and support materials.

The webpage includes:

- Information and web links related to The Code.
- Direct contact information for our designated Seniors Champion.
- Our Annual Report.
- The CBA's commitment on Powers of Attorney and Joint Deposit Accounts.
- Accessibility options.
- Fraud protection, scams, and financial abuse resources.
- Additional relevant resources.

VersaBank employees receive training related to the Seniors Code, which includes information on how to access senior-related communication materials, as well as the accessible formats and delivery channels available to seniors.

Principle 3

Banks will provide appropriate training to their employees and representatives who serve seniors.

VersaBank launched its Seniors Code training program in November 2020. Since then, we have continuously focused on evolving and enhancing its contents to ensure it remains a comprehensive and valuable resource. Our training platform includes both live training sessions and written materials. The live training sessions, conducted by our Seniors Champion, provide an excellent forum for employees to strengthen and refresh their knowledge of the Code, share experiences, ask questions, and receive feedback, which has been particularly beneficial for new hires. The written component highlights available resources and provides reference tools to support seniors in their banking activities.

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

Key Components of the Bank's Training Program:

- **Participants:**
 - Training is mandatory for employees who serve seniors, as defined by the Code.
- **Content:**
 - The Seniors Code, its background, and its principles.
 - VersaBank's policies, procedures, and guides.
 - Detecting senior financial abuse, fraud, and scams.
 - Effective communication with seniors.
 - The CBA's commitment on powers of attorney and joint deposit accounts.
 - Consolidated resources on matters relevant to seniors' banking needs.
 - Escalation processes.
 - Employees' roles and 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:**
 - Training includes the CBA’s Your Money seniors-focused program and related materials.
 - Collaboration with the Canadian Licensed Insolvency Trustee industry to include materials focused on senior insolvency issues.
- **Representatives:**
 - Representatives are trained on the resources available for seniors.
 - The requirements of the Code.
 - Informed about the Bank’s Seniors Champion and provided direct contact information.
 - How to detect senior financial abuse.

Principle 4

Banks will make appropriate resources available to client-facing employees and representatives to help them understand matters relevant to seniors’ banking needs.

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 facilitate the communication and consolidation of valuable information and resources for seniors, VersaBank maintains a dedicated webpage titled [Information for Seniors](#). This page is publicly accessible to seniors, their families, and their communities, providing essential educational and support materials.

To ensure VersaBank representatives have accurate and up-to-date resources to assist seniors, they are provided with guidance on accessing these consolidated materials for ease of reference.

VersaBank’s dedicated webpage, [Information for Seniors](#), provides a comprehensive collection of resources, including:

- The Code
- VersaBank’s Commitment to the Code
- The Bank’s Designated Seniors Champion
- VersaBank’s Annual Report
- Powers of Attorney and Joint Deposit Accounts
 - Including the CBA’s Commitment on Powers of Attorney and Joint Deposit Accounts
- Accessibility Services for Seniors
 - Details on accessibility services available to seniors
- Fraud Protection for Seniors
 - Guidance on what to do if a victim of fraud
 - Information on various types of frauds and scams, including:
 - Identity fraud
 - Telemarketing scams
 - Emergency scams
 - Romance scams

- Financial Abuse
 - Examples of financial abuse
 - Strategies to protect against financial abuse
- Additional Links to Related Resources, including:
 - The Canadian Anti-Fraud Centre
 - Programs and Services for Seniors from the Government of Canada
 - The Canadian Bankers Association "About Your Money Seniors"
 - The Canadian Bankers Association "Managing Debt"

VersaBank Internal Resource Hub

VersaBank has an internal resource hub available to employees who serve seniors. Employees can easily access resources and educational materials related to assisting seniors, financial abuse, fraud and scams and the Bank's training program.

Accessibility Services for Seniors

At VersaBank, we are dedicated to creating an accessible environment and experience for seniors.

We are committed to addressing the accessibility needs of seniors, including:

- A user-friendly website featuring clear and simple language and straightforward navigation.
- Consolidated resource materials and helpful links available on a single, easy-to-locate webpage.
- Bilingual services, offering client support in both English and French.
- Availability of duplicate and large print statements upon request.
- Arrangements for conversations with accessibility experts.
- Provision of quiet spaces for private communication with seniors.

Principle 5

Banks will endeavor to mitigate potential financial harm to seniors.

VersaBank is committed to safeguarding seniors from financial harm.

As fraud and scams continue 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.

To ensure that the Code and consideration of seniors are an integral part of our daily operations, VersaBank has implemented comprehensive Anti-Money Laundering (AML) and fraud detection training, procedures, and escalation requirements designed to protect seniors and remain vigilant against potential harm. Our processes are regularly reviewed to ensure they effectively identify potential elder financial abuse or exploitation, as the financial needs and risks of seniors in the industry continually evolve.

Key components of the Bank's compliance regime include:

- **Comprehensive training:** Our training program emphasizes awareness and education regarding the Code, senior financial abuse, fraud, and scams. It covers Powers of Attorney and Joint Deposit Accounts, focusing on detecting senior financial abuse, identifying red flags to assess risks, and preventing fraud and harm from the outset.
- **Robust Know Your Customer (KYC):** The Bank's comprehensive KYC due diligence measures mandate the identification of senior individuals. Additionally, when a power of attorney is in place, the attorney's identity must undergo the same rigorous KYC verification. Should any concerns arise during the KYC due diligence process, the situation must be escalated.
- **AML 'Did you Know':** regular internal bulletins and periodic updates on regulations, trends, and topics to provide ongoing tips and information.
- **Unusual Transactions Reports (UTRs):** As part of the Bank's fraud detection processes, if a situation is identified as unusual or suspect, a UTR must be completed to support further escalation.
- **Early Redemptions:** Given that VersaBank's deposit offerings consist of Guaranteed Investment Certificates (GICs), requests for early redemption have been identified as a crucial measure to mitigate potential harm to senior depositors. Requests for the early redemption of a GIC related to a senior depositor must first be escalated to the Bank's Seniors Champion for review, before being forwarded to a senior executive for final approval.
- **Fraudulent Transaction Activity:** The Bank's Anti-Money Laundering (AML) procedures mandates a review of transactions for unusual or suspicious activity. Should any suspicious activity be detected, it must be escalated.
- **Privacy procedures:** VersaBank abides by strong privacy practices that govern the Bank's collection, use and disclosure of customers information under the Bank's control. These procedures help safeguard sensitive personal identification data and financial information reducing the risk of personal identity theft and fraud.

Principle 6

Banks will take into account market demographics, and the needs of seniors when proceeding with branch closures.

Principle 6 does not apply, as VersaBank does not have branches.

Principle 7

Banks will publicly disclose the steps they have taken to support the principles set out in the Code.

VersaBank is committed to publishing this annual report on our dedicated [Information for Seniors](#) web page to disclose the steps we have taken to support the code and improve the delivery of banking services to seniors, and to providing a copy to the Financial Consumer Agency of Canada (FCAC) within 135 days of our financial year end.

Our Commitment to the Future

VersaBank acknowledges the significance of the Code and recognizes its responsibility, as a member of the financial industry, to continuously adapt and enhance the delivery of banking services to seniors, whose needs are ever evolving.

The Bank remains committed to the ongoing assessment and refinement of our policies, procedures, training programs, and services. Our focus is on developing resources and improving accessibility for seniors, ensuring compliance with the principles of the Code.

Contact Us

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