



ANNUAL SENIORS CODE REPORT FOR 2024

In 2019, the Canadian Bankers Association (the “CBA”) introduced the [Code of Conduct for the Delivery of Banking Services to Seniors](#) (the “Code”). This voluntary code of conduct sets out principles to guide banks that deliver banking products and services to seniors in Canada.

Fairstone Bank of Canada and its subsidiaries (collectively, “Fairstone”) have enhanced our existing procedures to adopt each applicable principle of the Code when delivering services to customers over the age of 60. In addition, Fairstone has appointed a Seniors Champion to promote and raise awareness of matters impacting seniors and provide leadership in the implementation of the Code.

PRINCIPLE 1: BANKS WILL ESTABLISH AND IMPLEMENT APPROPRIATE POLICIES, PROCEDURES, AND PROCESSES TO SUPPORT THE CODE.

Fairstone has implemented appropriate policies and procedures to support the Code:

- Annual training for all employees, plus targeted modules for customer-facing employees;
- Documented procedure for customer-facing employees including identified circumstances where seniors may need additional assistance with their Fairstone banking activities, and providing accessible account-related information;
- Integration of the Code into our RCM framework for review within the regulatory risk and controls assessment process.

PRINCIPLE 2: BANKS WILL COMMUNICATE EFFECTIVELY WITH SENIORS.

Fairstone has implemented measures to facilitate effective communication with seniors including:

- Providing employees and representatives with access to communication materials that consider the needs of seniors;
- Procedures and training to employees and representatives on accessible formats and delivery channels that are available to seniors;
- Provide customers, on request, with documents in an accessible format;
- Fairstone websites include a link at the bottom of each webpage to aggregated information related to seniors (e.g., resources for seniors, powers of attorney, complaint handling procedures and duplicate statement requests).

PRINCIPLE 3: BANKS WILL PROVIDE APPROPRIATE TRAINING TO THEIR EMPLOYEES AND REPRESENTATIVES WHO SERVE SENIORS.

Fairstone provides annual Seniors Code training to employees and representatives, including mandatory online training, searchable intranet materials, and targeted email training communications as needed related to:

- Compliance with the Seniors Code (7 Principles);
- Communicating with seniors;
- Where to find seniors-related resources;
- How to identify senior abuse such as financial abuse, fraud and scams;
- Fairstone’s Commitment on Powers of Attorney and Joint Deposit Accounts;
- Complaint handling and escalation procedures.

PRINCIPLE 4: BANKS WILL MAKE APPROPRIATE RESOURCES AVAILABLE TO CLIENT-FACING EMPLOYEES AND REPRESENTATIVES TO HELP THEM UNDERSTAND MATTERS RELEVANT TO SENIORS' BANKING NEEDS.

Fairstone has implemented training and made appropriate resources available to client-facing employees and representatives including:

- Annual training for all employees, plus targeted modules for customer-facing employees;
- Online training, searchable intranet materials, and targeted email training communications

PRINCIPLE 5: BANKS WILL ENDEAVOR TO MITIGATE POTENTIAL FINANCIAL HARM TO SENIORS.

Fairstone has implemented processes to identify and mitigate potential financial harm for seniors and all customers, including:

- Anti-money laundering and fraud detection transaction monitoring;
- Identity verification procedures to respect customer privacy and security;
- Annual training for all employees, plus targeted modules for customer-facing employees on the continued importance of building relationships with our customers and KYC procedures as part of our business model;
- Dedicated Fraud and Security resource pages which includes content related to the most common types of fraud and scams which may target seniors:
www.walmartrewards.ca/en/support/fraud-security
www.fairstonebank.ca/resources-for-seniors
- Implementation of an annual “Check your credit score day”, during which we remind Canadians of the importance of understanding one’s credit report and credit history, and the values of regular monitoring including early fraud identification.

PRINCIPLE 6: BANKS WILL TAKE INTO ACCOUNT MARKET DEMOGRAPHICS AND THE NEEDS OF SENIORS WHEN PROCEEDING WITH BRANCH CLOSURES.

Fairstone does not have branches applicable under this Principle, as Fairstone branch locations do not offer retail deposit accounts or provide cash disbursements through a natural person. Fairstone would however include the needs of seniors if it was to consider closure of a retail location.

PRINCIPLE 7: BANKS WILL PUBLICLY DISCLOSE THE STEPS THEY HAVE TAKEN TO SUPPORT THE PRINCIPLES SET OUT IN THE CODE.

Fairstone publishes this report annually to disclose steps that we’ve taken to support each principle of the Code and any other steps taken to improve the delivery of banking services to seniors.