

ANNUAL SENIORS CODE REPORT FOR 2025

Fairstone Bank of Canada and its subsidiaries (collectively, “Fairstone”) values our senior customers, and as part of its commitment to support them, has adopted the Canadian Bankers Association’s (the “CBA”) Voluntary [Code of Conduct for the Delivery of Banking Services to Seniors](#) (the “Code”). The Code sets out principles to identify and address the unique challenges that seniors may face when they access banking services. Fairstone has appointed a Seniors Champion to promote and raise awareness of matters impacting seniors and provide guidance in the implementation of the Code. This public report as detailed below outlines the steps that Fairstone has taken to support the principles set out in 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:

- Identification of employee and management roles and responsibilities.
- Training for all employees, plus targeted modules for customer-facing employees.
- Identification of circumstances where seniors may require additional assistance with their banking activities.
- Identification and escalation of incidents of suspected financial abuse and fraud of seniors.
- Monitoring customer complaints and fraud claims to identify trends and typologies of issues related to seniors.
- Continuous review of financial risks faced by seniors.
- Integration of the Code into our Regulatory Compliance Management framework.

Principle 2: Banks will communicate effectively with seniors.

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

- Training for employees and representatives on formats and delivery channels that can be easily accessed by and are available to seniors.
- Making customer communications available in formats that consider the needs of seniors; this includes making employees available to provide live assistance to seniors to help with navigation of our online services.
- Adherence to clear language principles to ensure that communications with all customers, including those directed towards seniors, are clear, simple and not misleading.
- Presenting consolidated information related to seniors (e.g., resources for seniors, powers of attorney, complaint handling procedures and duplicate statement requests) on Fairstone websites.

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

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

- Compliance with the Code (7 Principles).
- Communicating with seniors.
- Available resources on matters relevant to seniors' banking needs.
- Detection and prevention of financial abuse and mistreatment, fraud and scams.
- Fairstone's Commitment on Powers of Attorney and Joint Deposit Accounts.
- Escalation processes for complaints and reports of fraud, financial abuse or scams.

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:

- 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 to identify unusual transactions.
- Identity verification procedures to respect customer privacy and security.
- Identify and document indicators of potential financial harm to seniors.
- Ongoing enhancements to fraud detection and prevention strategies to protect customers from fraud.
- Ensure that new products and services are reviewed for potential financial harm to 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.

Although Fairstone does not have branches applicable under this Principle, Fairstone would consider the needs of seniors in any decision taken to close 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.