



Our Commitment to Seniors

Peoples Bank adheres to the principles set out in the Code of Conduct for the Delivery of Banking Services to Seniors (the "Code"). The Code is a voluntary code of conduct published by the Canadian Bankers Association to guide banks in delivering banking products and services to seniors. This report describes the steps Peoples Bank has taken to meet our obligations under the Code.

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

- Peoples Bank recognizes that seniors are not a homogenous group and that issues that affect some seniors may not be relevant to others. However, there are certain difficulties and vulnerabilities that are more common or uniquely associated with providing banking services to seniors. We have developed and implemented internal procedures to ensure our banking services are appropriately tailored to accommodate the needs of our senior customers. Our internal procedures detail:
 - mandatory employee training requirements;
 - how to facilitate effective communication with senior customers, including identifying circumstances where additional assistance may be required and how to meet these needs;
 - how to determine when a senior customer may be experiencing financial harm resulting from abuse or fraud and our process for escalating these concerns;
 - the responsibilities of our employees to treat senior customers with respect and tailor the delivery of banking services to meet their individual needs;
 - the responsibilities of our management, and our Seniors Champion to promote and raise awareness of matters affecting seniors; and
 - the steps that we take to verify that third parties, who will be interacting with members of the public on behalf of Peoples Bank, meet the Code's expectation when providing banking services to Seniors
- The Code and its principles are incorporated into our regulatory compliance management framework. We have ensured that the content of the Code is embedded within the information library on our regulatory compliance management system. This allows us to regularly assess Peoples Bank's compliance with the Code. Processes, procedures, and other key controls are reviewed regularly to ensure they remain applicable and appropriate for complying with the Code's principles.
- In addition to our procedures that focus on the delivery of banking services to seniors, Peoples Bank maintains robust policies designed to protect all of our customers, including fraud prevention and privacy.

Principle 2: Banks will communicate effectively with seniors

- We have developed a Seniors Resource page on our website to house information relevant to seniors. This includes information on how seniors can bank with us and accessibility options. It also contains information about:
 - powers of attorney and joint bank accounts
 - protection against financial abuse
 - protection against fraud and scams
 - our complaints procedure
 - our privacy policy
 - how to contact our Seniors Champion

- Our employees and representatives are trained on the resources we have available for Seniors and all the ways in which we communicate with Seniors, which includes:
 - by telephone (including toll free)
 - email
 - online
 - physical mail
 - in-person meeting at our downtown Vancouver premises
- We have consolidated information related to seniors into a booklet that is available at our physical location in downtown Vancouver and, on request, can be mailed to customers.
- We have appointed a Seniors Champion to promote and raise awareness within the organization of matters affecting seniors. Our Seniors Champion is a member of our senior management and provides leadership in implementing the Code.

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

- We provide ongoing training to our customer-facing employees to equip them with the knowledge, skills, competencies, and information required to provide banking services to seniors. Our competency-based training includes information on the following subjects:
 - our obligations under the Code
 - how to effectively communicate with senior customers
 - accessible banking options available for senior customers
 - resources available to seniors and employees
 - how to recognize and respond to suspected financial harm
 - who to contact to escalate concerns or obtain additional support or assistance
 - what to know about powers of attorney and joint bank accounts
 - relevant case studies on recent instances and trends in financial abuse, fraud and scams
- Our training program is completed on an annual basis and, for new customer-facing employees, as part of their onboarding training requirements.
- The content of our training is reviewed for currency, relevance and effectiveness on an annual basis by consumer protection subject matters experts within our Corporate Compliance function, in conjunction with our Seniors Champion.

Principle 4: Banks will make appropriate resources available to client-facing employees and representatives to help them understand matters relevant to seniors' banking needs.

- We have an internal resource and information hub to distribute communication, updates, and educational materials that employees should be aware of when assisting seniors. All employees have access to these resources through the homepage on their internet browser.
- We prepare and send out a bi-weekly newsletter, The Bulletin, that informs employees of regulatory and legal development including those that concern Seniors.
- If additional support is required to meet the needs of a senior customer, our Seniors Champion and dedicated resource person is available to offer additional support.

Principle 5: Banks will endeavor to mitigate potential financial harm to seniors.

- We continue to strengthen our fraud transaction monitoring protocols to mitigate further the risk of financial harm to all customers, including seniors. For increased detection, response, and prevention of financial harm, we have grown our fraud prevention team and implemented additional fraud prevention tools.
- Seniors are encouraged to contact us as soon as possible if they become aware of any suspicious or unknown transactions on their accounts so that we can take the necessary steps to protect their accounts.
- On our Peoples Bank dedicated seniors page, we have information for seniors on:
 - tips for protecting themselves from fraud
 - common frauds and scams
 - how to report fraud
 - risks and benefits associated with powers of attorney and joint accounts

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

Principle 6 does not apply, Peoples Bank does not have any branches.

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

In 2024, Peoples Bank has implemented enhanced measures to underpin the principles set out in the Code. Including updates to our internal processes and procedures to:

- protect and support seniors throughout the lifecycle of Peoples Bank products and services; and
- oversee our third party partners' prioritising seniors' needs when interacting with customers on behalf of Peoples Bank.

On an annual basis, Peoples Bank will publish this report on our website and provide a copy to the Financial Consumer Agency of Canada.