

Code of Conduct for the Delivery of Banking Services to Seniors

Annual Public Report (2021)

The voluntary code of conduct sets out principles that apply to banks to guide them when they deliver banking products and services to Canada’s seniors. Bank of China (Canada) (“the Bank”) has taken the below steps to comply with *Code of Conduct for the Delivery of Banking Services to Seniors* (“the Code”).

Principle 1

In 2020, the Bank established and implemented the appropriated policy and procedures to guide employees how to meet seniors’ banking needs during daily operations. To serve the interests of seniors, the Bank has identified circumstances where seniors may require assistance with their banking activities. Also, the Bank’s Complaint Handling Procedures provide guidance to employees to address complaints raised for seniors. Employees are required to escalate any potential financial abuse or fraud incidents following Bank’s Fraud Risk Management Policy escalation process.

The Bank had incorporated the Code’s requirements into its regulatory compliance management framework, including by updating the Bank’s identified obligations and related control measures. This policy and procedures are scheduled for review and update in 2022.

Principle 2

To help ensure the Bank communicates effectively with seniors, in 2020 it developed consolidated disclosure information relevant to seniors, including information for establishing powers of attorney and joint deposit accounts, fraud, financial abuse and scams prevention, private space for seniors, customer service center contact information and complaint handling procedures. For easy access by seniors, the disclosure is

prominently displayed in physical format at branches and digitally on the Bank's public website as following documents:

- Services to Seniors Consolidated Disclosure of Information Relevant to Seniors
- Joint Deposit Account and Power of Attorney Information Disclosure
- Customer Complaint Handling Procedure

The Bank also ensures that the branch employees are aware of the accessible formats and delivery channels available to seniors.

Principle 3

To ensure there's appropriate training to our employees who serve seniors, the Bank provided Seniors Code of Conduct Training to all client-facing employees and representatives in March 2021. The training was to help employees to identify seniors banking needs, understand how to protect the seniors away from financial abuse and fraud, available resources for employees in the Bank, and escalation steps for unresolved issues in the branch. Complaint Handling Policy and Procedures Training is also conducted on an annual basis and required for new staff. All training programs are provided on an ongoing basis.

Principle 4

The Bank has appropriate resources available to client-facing employees to help them understand matters relevant to seniors' banking needs. This includes making relevant information available on the Bank's internal website, and resource persons who are trained and knowledgeable to assist frontline employees in delivering bank products and services to seniors. The latter can assist employees by providing additional information about topics such as bank resources related to seniors, financial abuse, fraud, scams, incapacity and the powers of attorney and joint deposit accounts. There were no related updates made to these public resources.

Principle 5

To help the Bank to mitigate potential financial harm to seniors, the Bank has existing anti-money laundering transactions monitoring, and fraud detection and prevention programs in place. In order to respect clients' privacy, and security and autonomy, each of our branches has a quiet and accessible space where private discussions can be held. There were no related updates made to these public resources.

Principle 6

The Bank has a small number of branch locations, and the closure of a branch location does not occur often. The Bank's existing related procedure complies with obligations under Financial Consumer Agency of Canada (FCAC) *Guidance 14 "Branch Closure Guidance – Pre-closure consultation process*. Accordingly, the Bank will inform the FCAC of any planned measures, as appropriate, including to meet this principle should there be a branch closure. The Bank will make all efforts to communicate with seniors and help seniors to understand alternatives banking options.

The Bank did not close any branch in 2021.

Principle 7

The Bank will publicly disclose the steps taken to support the principles set out in the Code, and any other steps taken to improve the delivery of banking services to seniors. In line with the Bank's related policy, annually we will publish a report on the Bank's website within 135 days of our financial year-end.

In May 2021, the Bank published a report for 2020.

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