

Code of Conduct for the Delivery of Banking Services to Seniors

Annual Public Report – For Year 2022

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”) in year 2022.

Principle 1

The Bank has 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. Specifically, seniors are more likely to experience issues when conducting online banking and to be affected by the closure of a branch. Seniors need to receive more detailed information to protect themselves from financial abuse, fraud or scams. Also, the Bank’s Complaint Handling Procedures provide guidance to employees to address complaints including those raised from 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 reviewed and updated periodically.

Principle 2

To help ensure the Bank communicates effectively with seniors, the Bank maintained 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

All digital versions can be adjusted to a larger font size for better reading experience by seniors. The Bank's customer service hotline is available to answer enquiries from seniors. 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, including new hires, who serve seniors, the Bank provided Seniors Code of Conduct Training to all client-facing employees and representatives in April 2022. The training focused on the following topics: 1) seniors banking experiences; 2) Code of Conduct for the Delivery of Banking Services to Seniors; 3) joint deposit account and power of attorney; 4) financial abuse and fraud. Other training programs are also available to Bank employees in the form of daily compliance knowledge sharing, branch regular meetings and case studies. Training on the Bank's Complaint Handling Policy and procedures is also conducted on an annual basis.

The training helps 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. All training programs are provided on an ongoing basis.

Training materials are reviewed and updated periodically. In 2023, the Bank intends to seek input from relevant subject matter experts in order to potentially improve its training.

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. When conducting training program, employees are reminded on how to obtain internal resources regarding the matters affecting seniors. 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. All client-facing employees are trained how to communicate with seniors if a fraud transaction indicator is identified and take steps in discussion with a senior to freeze or delay the transaction. 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 realizes that seniors are more likely to be impacted by a branch closure and the Bank will make extra efforts to communicate with seniors including but not limited to proactively provide guidance to seniors instead of only posting a public notice or mailing them a notice, to help seniors to find alternative banking options, and to invite seniors to attend community meeting holding by the branch.

The Bank did not close a branch in 2022.

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 2022, the Bank published a report for 2021.

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