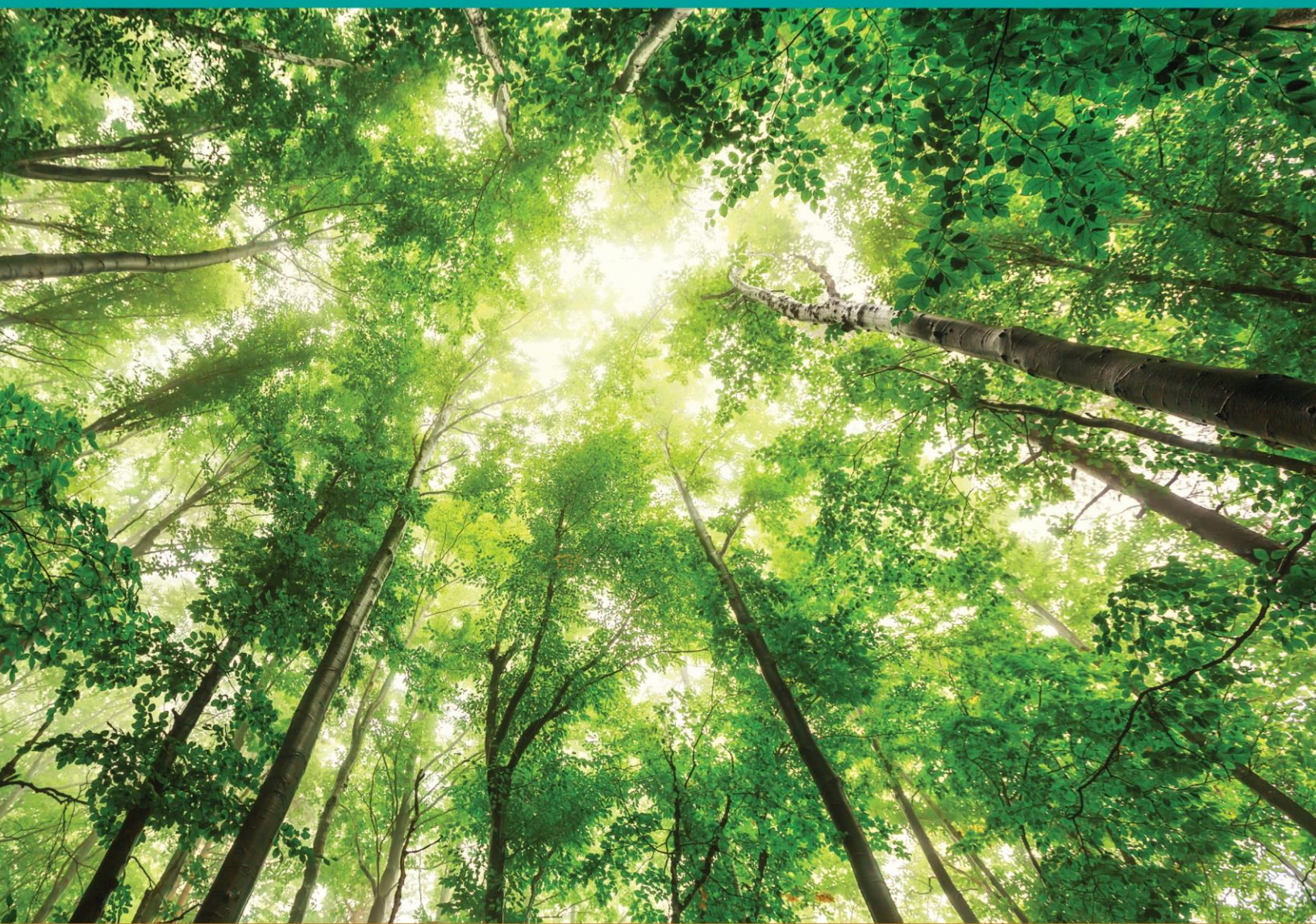


Concentra[®]



Annual Report on the Protection of Seniors

May 15, 2021

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Serving and Protecting Seniors

At Concentra, we are committed to making things easily understood and accessible for all our clients and especially those in their senior years. We want to ensure the ways we communicate to seniors meets their unique needs. As a bank, we also have an obligation to help protect our clients from financial abuse, fraud and scams. In 2019, we adopted the [Code of Conduct for the Delivery of Banking Services to Seniors \(Seniors Code\)](#), a voluntary code of conduct published by the Canadian Bankers Association, to guide banks in how they deliver banking products and services to Canada's seniors. The following outlines how we are applying the Seniors Code and enhancing services to seniors.

Measures to support the Seniors Code

Concentra has designated our Chief Banking Officer as the Seniors Champion, a role that provides leadership in the implementation of the code and raises awareness of matters affecting seniors.

With adoption of the code, we have created additional policies, procedures and processes, communicated to employees and enhanced training is scheduled for 2021. A robust internal process is also in place to help identify and report potential cases of financial abuse or fraud to ensure immediate action is taken to safeguard seniors.

Governance of the Code

We incorporate all of the Code's principles into our Regulatory Compliance Management framework.

Communicating with seniors

Concentra understands our clients have diverse needs and we strive to ensure all documentation and correspondence to clients are easily accessible. Our website dedicates a section to the banking needs of seniors. It includes accessibility information, contact information for specific requests or feedback, resources related to senior financial education and information on power of attorneys and joint bank accounts.

Specific training for employees who serve seniors

Employee Training

Concentra

"We want to make your experience with us easy and accessible. We understand some customers face barriers and we are committed to providing access to our products, services and website."

Concentra has introduced Seniors Code policies and procedures and has additional training planned for 2021. Our goal is to ensure all our customers' unique needs are fully met by our employees.

Employee Resources

Whether its swiftly identifying situations where seniors may be vulnerable to financial harm or simply providing additional assistance with their banking needs, Concentra employees are trained and empowered to work with seniors.

Employees have access to a wide range of consolidated resources to continually learn how to better support our senior clients. We have created an internal resource library that enables our employees to enable client success. Resource topics include:

- Compliance with the Code
- Governance
- Training
- Financial Abuse and Fraud of Seniors
 - Power of Attorneys
 - Elder Abuse
 - Romance Scams

- Special Circumstances requiring additional assistance
 - Communicating with Seniors
 - Public Disclosure
- Mass Marketing Fraud
 - Financial Abuse
 - Escalation Processes

Mitigating potential financial harm to seniors

Concentra’s Anti-Money Laundering and Fraud teams have processes and procedures to assist in protecting all of our clients. This includes specific escalation processes when there is suspected financial harm to seniors.

Our Continued Promise

At Concentra Bank we recognize and appreciate the meaningful contribution of seniors to our society and in respecting their needs we will strive to continuously improve how we support them with their banking needs.