

Introduction

As Canadians live longer, some seniors may face challenges that impact their ability to do banking. The Canadian government has called on banks to help make banking safer and more secure for seniors. Industrial and Commercial Bank of China (Canada) (the “ICBK” or the “Bank”) is pleased to release our 2024 Seniors Code Annual Report. Armed with knowledge in financial education, elder abuse, fraud, age bias and other aspects of the Seniors Code (defined below), ICBK is committed to educating our employees and representatives on how to serve and protect senior clients.

Background – The Seniors Code

In July 2019, the Canadian Bankers Association (the “CBA”) released its *Voluntary Code of Conduct for the Delivery of Banking Services to Seniors* (the “Seniors Code” or “Code”). The Code sets out principles to guide banks in the delivery of banking products and services to Canadian seniors. The Code recognizes that while not all seniors will be affected by the same issues, certain issues may affect a higher proportion of seniors than individuals in other age groups. In the context of the Code, “senior” is an individual in Canada who is 60 years of age or older and who is transacting for non-business purposes.

The Seniors Code applies to banks operating under the *Bank Act* which are also member banks of the CBA. The Financial Consumer Agency of Canada (the “FCAC”) monitors compliance with the Code. This report outlines how the Bank complies with the Code.

The Seniors Champion

Banks will designate a member of management to promote seniors’ interests. This member will be called the “Seniors Champion.” The Seniors Champion will have sufficient stature, knowledge, and resources to execute their duties. The duties of the Seniors Champion may include:

- Providing leadership in the implementation of the Code
- Promoting and raising awareness of matters affecting seniors
- Engaging with seniors, subject matter experts and organizations representing seniors

The Bank's Seniors Champion is Mr. Delei Li, Co-Head of Retail Banking Department.

In 2024, the Seniors Champion hosted events with two seniors’ communities, three events in total, to speak directly with seniors in the communities we serve, to promote and raise awareness on financial topics that matter to them. A total of 100 participants attended those events.

- February 25, 2024 – ICBK visited the Oakville Seniors Association and participated in its 2024 Dragon Year Lantern Festival “Dumpling Feast” event.
- June 11, 2024 – ICBK visited the Mississauga Golden Maple Seniors Association and attended its 2024 Golden Maple 5th Anniversary Members’ Conference.
- December 29, 2024 – ICBK was invited by the Mississauga Golden Maple Seniors Association to participate in the “Golden Maple 2024 Christmas Celebration” event.

At each event, the Seniors Champion, Mr. Li, provided a comprehensive introduction to ICBK, outlining its history, core business strengths, and specialized financial solutions designed for the Chinese community. The presentation covered key personal banking products and services, with a focus on cross-border remittances and interactions with domestic financial institutions. Attendees responded positively, recognizing the advantages of ICBK localized service model and retail branch network in addressing their specific financial needs.

Mr. Li also conducted an in-depth session on financial fraud prevention, highlighting the increasing prevalence of scams targeting seniors. He shared real-world fraud cases, analyzed the latest fraudulent schemes and the tactics commonly used by fraudsters. Through case studies and scenario-based analysis, he provided practical guidance on identifying and mitigating financial fraud risks.

Leveraging over 30 years of industry expertise, Mr. Li shared insights through real-life examples and interactive discussions. His presentation not only enhanced attendees’ financial awareness but also equipped them with the necessary knowledge and resources to safeguard their assets and seek assistance when encountering potential fraud risks.

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

The Bank established and implemented *Guidelines for Delivery of Banking Services to Seniors* (“Guidelines”) that sets out procedures and practices related to:

- The mandate of the Seniors Champion;
- Training of employees and representatives;
- Identifying circumstances where Seniors may require assistance with their banking activities; and
- Identifying and escalating incidents of suspected financial abuse and fraud.

The Guidelines establish measures to facilitate effective communication, such as:

- Expressly having communication materials that consider needs of seniors;
- Ensuring employees and representatives are aware of the Bank’s accessible formats and delivery channels;

- Providing information in an accessible format; and
- Consolidated resources and information on accessibility options in the Bank's *Commitment on Powers of Attorney and Joint Deposit Accounts*.

All Bank employees and representatives complete mandatory competency-based annual training on the Code and how the Bank meets its commitment with topics including:

- Financial abuse, fraud and scams, and how to have sensitive discussions;
- The Bank's Commitment on Powers of Attorney and Joint Deposit Accounts;
- Available resources for employees on matters relevant to seniors' banking needs; and
- Escalation processes.

Additional measures in the Guidelines to protect seniors include:

- Anti-money laundering and fraud detection transaction monitoring;
- Quiet, accessible spaces where private discussions can be held; and
- Branch closure processes.

The Bank incorporated the Code into its Regulatory Compliance Management ("RCM") Framework. The RCM Framework refers to the structures, processes and other control elements through which the Bank manages and mitigates regulatory compliance risk inherent in its banking activities. The Bank will update its policies, procedures and practices related to the Code annually and as needed to comply with regulatory development and best practices to serve the needs of seniors.

Principle 2: Banks will communicate effectively with seniors.

The Bank has implemented measures to facilitate effective communication with seniors, such as:

- Offering banking services in English, Cantonese and Mandarin to best help clients, particularly for seniors, by reducing language barriers and ensuring accurate support;
- Employees and representatives are encouraged to be respectful, exercise patience and allocate the necessary time when serving seniors, who may have questions and need additional support;
- Employees and representatives are trained to provide clear and transparent explanations of all products and services when responding to seniors' questions, ensuring they have a thorough understanding of the Bank's offerings;
- Having communication materials at physical locations (e.g., Branches) and digital public locations (e.g., dedicated page on the Bank's website) for seniors to reference;
- Providing information in accessible formats, including large-print documents, and in-branch notification that large-print disclosures are available on request;

- Ensuring employees and representatives are aware of the accessible formats and delivery channels that are available to seniors;
- All branches are equipped with private areas to assist seniors with their banking needs, allowing them to meet with employees in a quiet and secluded space for discussions on finances and inquiries;
- All branches are equipped with accessible facilities, including counters of varying heights to cater to seniors' needs; and
- 24/7 telephone banking service at 1-877-779-5588.

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

All Bank employees and representatives complete mandatory competency-based annual training on the Code and how the Bank meets its commitment with topics including:

- How to prevent financial abuse, fraud and scams, and how to communicate with clients on these sensitive topics;
- The Bank's *Commitment on Powers of Attorney and Joint Deposit Accounts*;
- Available resources for employees on matters relevant to seniors' banking needs; and
- Escalation processes.

More specifically:

- Providing banking services to seniors, described in Principle 1 of this report;
- Effective communication with seniors, described in Principle 2 of this report;
- Complaint resolution procedures;
- Available resources for employees on matters relevant to seniors' banking needs, described in Principle 4 of this report;
- Detecting financial abuse, fraud and scams, including in circumstances described in Principle 5 of this report, how to discuss topics such as these with seniors;
- Having a quiet, accessible space available for private discussions when needed; and
- Details of the Bank's *Commitment on Powers of Attorney and Joint Deposit Accounts*.

In addition to annual training, more training and resources materials are available on the Bank's intranet for accessible to all employees to deliver patient, attentive and respectful service.

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

It is important that client-facing employees and representatives understand their roles, when assisting seniors with their banking needs. In order to best serve the Bank's senior clients, the Bank provides employees with appropriate resources, including:

- Training for client-facing employees and representatives, ensuring adherence to relevant provisions in the *Branch Procedure Manual* when dealing with seniors;
- Providing access to training resources related to seniors available on the internal platform, with employees being trained to understand these resources;
- Regular participation in community activities, and gathering feedback;
- On-site branch support and assistance from Bank Operations Officers for client-facing; and
- Available support from the Compliance Department or the Head of Retail Banking Department.

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

Should the Bank become aware of the likelihood of financial harm to a Senior due to financial abuse, fraud or scams, the Bank will endeavor to mitigate the potential for financial harm, while respecting clients' privacy, and security and autonomy.

Examples of appropriate steps include:

- Implementing anti-money laundering and fraud detection transaction monitoring,
- Providing quiet, accessible spaces where private discussions can be held,
- Sending real-time low balance and transaction alerts to clients' registered email address, keeping them informed about the latest activities in their accounts,
- Training employees and representatives to identify and address the possibility of financial harm to seniors while respecting their privacy and autonomy;
- Regularly conduct financial security knowledge seminars for seniors in various senior communities. In 2024, a total of three successful seminars were held, and
- Conduct monthly inspections of senior service at branch locations.

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

In the event of a branch closure, the Bank will consider market demographics, including the needs of seniors. Appropriate steps will be taken in alignment with obligations under FCAC's Guideline on the consultation process for branch closures and the Bank Act.

These steps may involve:

- In-branch posters and signage: visual display informing clients of an upcoming branch closure;
- In-branch client cues: prompting employees to speak to seniors about the closure after the senior complete an in-branch transaction;
- Website updates: providing information with closing dates and alternate locations;
- Outreach efforts: sending notices to all Bank clients, including seniors;
- Implementing proactive client-calling programs;
- Holding open houses or in-branch information sessions;
- Provide alternatives to those clients most affected so they can continue to access banking services after the branch closes;
- Providing seniors and their support persons with a dedicated toll-free phone number for additional information, help, and assistance regarding available alternatives; and
- Ensuring the consultation is appropriate for the members of the affected community, including seniors.

The Bank will inform the FCAC of any planned measures taken to meet these principles as part of Branch Closure notification or in subsequent communications.

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

The Bank will publicly disclose the *2024 Seniors Code Annual Report* (this report) with steps it has taken to support the principles set out in the Code. The Bank will post the report annually on www.icbk.ca and the report will be sent to the FCAC.

The Bank undertook the following actions to align with the Code's principles:

- Steps taken to support each principle of the Code,

- Any other steps taken to improve the delivery of banking services to Seniors,
- Training materials to educate employees on the Code's implications for seniors; and
- Active participation of branches in senior community programs.

The Bank will publish the report on its website within 135 days following the end of its financial year, and provide a copy of the report to the FCAC.

The Future – Maintaining Compliance with the Seniors Code

The Bank continues to strive to help and protect its senior clients as best as possible. We provide our employees and representatives with information and training programs to best enable employees to help our senior clients. Our staff are available to answer any questions by referring to the contact information below.

Contact us by:

Email: info@icbk.ca

Telephone: 1-877-779-5588

Mail: Industrial and Commercial Bank of China (Canada)

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“Seniors are valued clients for Industrial and Commercial Bank of China (Canada) and we take great care to protect them. It is all of our responsibility to protect seniors from potential financial harm, and we endeavour to mitigate this while respecting seniors' privacy, security and autonomy.”

-Delei Li, Seniors Champion