

Seniors Public Disclosure – 2024

As a member of the Canadian Bankers Association ("CBA"), Motus Bank ("motusbank" or the "Bank") adopted the Code of Conduct for the Delivery of Banking Services to Seniors (the "Code"). Listed below are the steps that motusbank undertook in 2023 to support each principle of the Code.

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

The Provision of Services to Seniors Policy (the "Seniors Policy") was approved by the Bank's senior management and became effective October 8, 2020. The Seniors Policy and the Seniors Champion mandate were reviewed by the Seniors Champion, the Chief Operating Officer, and the Chief Compliance Officer in 2022, with the next review taking place in 2025 as part of the triennial review cycle.

The requirements of the Code are incorporated into the Bank's regulatory compliance management framework.

Principle 2: Banks will communicate effectively with Seniors

A support web page dedicated to seniors is incorporated into the Bank's public website and information relevant to seniors consolidate on that page.

The seniors support web page was enhanced to include information on the CBA's Commitment on Powers of Attorney and Joint Deposit Accounts on accessibility. https://www.motusbank.ca/support/Support-for-seniors.

The Bank developed modules that can be electronically delivered to seniors to explain its digital banking environment and how to use self-service options.

The Bank offers a dedicated line that allows seniors to bypass the interactive voice response technology and is directly passed to one of motusbank's Contact Centre representatives without having to use phone queues.

Bank Contact Centre staff are knowledgeable in how to support all members with navigating the Bank's website and mobile app. Additionally, the Contact Centre has a process in place to pass along feedback for improvement, called the Digital Improvement Board.

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

The Bank developed a comprehensive training program for employees which includes content dedicated to providing banking services to seniors. The training program is a requirement for all front-line employees. Components of the training program include:

- Protecting seniors from financial abuse;
- Accessing resources to support seniors' banking needs;
- Powers of attorney and joint deposit accounts;
- Complaints escalation processes; and
- Multiple fraud-related training programs with emphasis on red flags related to financial abuse and scams of seniors.

Training programs are developed in collaboration with the Seniors Champion who monitors interactions between the Bank and seniors, monitors fraud activity and scams that target seniors (e.g. the "grandparent scam"), and develops training that can help staff identify and address issues that could be harmful to older members.

The Bank rolled out a dedicated training session to employees on powers of attorney ("POA") documents and situations. The two-part training module included:

- What is a POA?
- Types of POA.
- Capacity required to grant POA, determining incapacity, and factors to consider when facing issues of incapacity.
- Who can be an attorney for POA for property?
- What power will an attorney have?
- Requirements for a valid POA in Ontario.
- Acceptable use of a POA.
- Most common POA questions and case scenarios.

New hire training and dedicated, periodic fraud training includes content specifically tailored to members who are seniors.

New hire training topics include:

- What to be aware of specifically for seniors (e.g. awareness about senior financial abuse, changes in behaviour and understanding why).
- How to identify fraud, common types of fraud that seniors may be vulnerable to, and how to escalate to the Fraud Management department.

Periodic fraud training topics include:

- Detailed explanation of how to review a member file to understand the member's situation and determine if the details make sense.
- If suspicious, clear instructions on how to escalate for further review and handling.

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

The Bank appointed the Director, Member Services as the Seniors Champion. The Bank hosts an internal internet site that contains information about the Seniors Policy, the Seniors Champion mandate, training presentations, the CBA commitment on joint accounts and POA, the Bank's POA policy and procedures, and information about senior abuse.

Employees are made aware of these resources in the new hire training program and periodically throughout the year through communications from the Seniors Champion and managers.

The Bank's member service team has strong awareness about the banking needs of seniors and provides extra care to senior members, especially for online banking and other digital processes that may prove challenging.

Activities in 2024 included:

- Internal articles raising awareness on the emergency/grandparent scam, so that employees can identify red flags and then stop and report the scam activity.
- Fraud and scam articles relocated to the new Fraud Management and Corporate Security internal site, to which all motusbank employees have access.

- Updates to fraud strategies that are quicker to identify scams scenarios that are targeting Bank senior membership base.
- For confirmed senior fraud/scam victims, fraud investigators conduct in-depth interviews to understand the fraud scenario and provide fraud/scam education and quidance to prevent recurrence.
- Development of the Suspected Senior Abuse Intake form and an escalation pathway
 that is used by motusbank staff when they suspect financial exploitation of members
 who are seniors. The escalation pathway includes wellness checks by law enforcement
 and notifying the Office of the Public Guardian and Trustee.

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

The Bank's member services and Fraud Management teams work together to mitigate financial harm to seniors.

In 2024, training modules were updated to remain current with fraud trends.

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

This Principle does not apply to the Bank as it does not maintain physical branch locations.

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

As noted in Principle 2, the Bank consolidated information and resources for seniors in the "Support for Seniors" webpage and ensured it was easily accessible through relevant search terms.