

Annual Seniors Code Public Disclosure – 2021

As a member of the Canadian Bankers Association, Motus Bank ("motusbank" or the "Bank") has adopted the Code of Conduct for the Delivery of Banking Services to Seniors (the "Seniors Code" or the "Code). Listed below are the steps that motusbank undertook in 2021 to support each principle of the Seniors Code.

Principle 1	Banks will establish and implement appropriate policies, procedures and processes to support the Code	
	 The Provision of Services to Seniors Policy was approved by the Bank's Senior Management, effective October 8, 2020; All existing Bank Policies and Procedures were reviewed to ensure alignment with the Code; Adherence to the Code will be monitored by the Bank's Chief Compliance Officer. 	
Principle 2	Banks will communicate effectively with Seniors	
	 A seniors support web page was incorporated into the Bank's public website; The Bank's member facing employees received training on effective and accessible communication with seniors. 	
Principle 3	anks will provide appropriate training to their employees and representatives who serve seniors	
	 The Bank has developed a comprehensive training program dedicated to the Seniors Code and providing banking services to Seniors. The training program is a requirement for all front-line staff. 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. 	
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 has developed an internal intranet site dedicated to staff resources for supporting seniors. A comprehensive training program regarding supporting seniors' banking needs has been rolled out to all member facing staff. 	
Principle 5	Banks will endeavor to mitigate potential financial harm to seniors	
	 The Bank's Member Services, Fraud Management, and Anti-Money Laundering ("AML") teams work together to mitigate financial harm to seniors. 	
Principle 6	Banks will take into account market demographics and the needs of seniors when proceeding with branch closures	
	• Principle 6 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	
	 The Annual Seniors Code Disclosure was approved for publication by the Board of Directors at its February 2022 meeting. 	

Listed below are additional action items that the Bank undertook in 2021 to improve the delivery of banking services specifically for seniors.

Appointment of Designated Officer	Effective January 1, 2020 the Chief Operating Officer of the Bank was appointed as the senior officer responsible for implementation of the Code.
Appointment of Seniors Champion	Effective January 1, 2020 the Director, Member Services was appointment as the Seniors Champion.
Board and Senior Management Training	In November 2020, Senior Management and members of the Risk Committee of the Board of Directors received an education session on the Seniors Code and reviewed the Bank's readiness.
2021 Activities	Continuing maturity of senior member needs and issues awareness: including staff awareness and detection of elder abuse; and the execution of employee training on the Code.