



UBS Bank (Canada)'s Commitment to the Seniors' Code (Updated 2023)

Background

Canadian seniors are a diverse group seeking financial advice, guidance and services making up a significantly increasing population of clients in the financial marketplace. UBS Bank (Canada)¹ (hereinafter "UBS", "we", "our" and similar terms) is committed to servicing seniors in their retirement years and at the time a recommendation is made, carefully assess all aspects of the senior client's best interest, suitability and eligibility requirements.

On July 25, 2019, the Canadian Bankers Association (CBA) released its voluntary *Code of Conduct for the Delivery of Banking Services to Seniors* (the [Seniors' Code](#)). Since then, we've taken the opportunity to revisit and enhance our existing practices as they relate to seniors' private banking and wealth management, which is the primary aspect of our business in Canada.

UBS has designated a member of the business management team to promote seniors' interests known as the "Seniors Champion" whose role in UBS is to lead the implementation of the internal policies and procedures that have been implemented for working with ageing and vulnerable clients.

Policies, Procedures and Processes

As part of our commitment to implement the Seniors' Code, we enhanced our internal policies, procedures and processes with respect to working with aging and vulnerable clients. These documents provide guidance to employees as well as training to new employees to ensure that all client advisors are aware of the actions taken to incorporate the Seniors' Code to our day-to-day practice. Since the introduction of the Seniors' Code, we have implemented and continue to improve on the followings:

- Updating our internal procedures and manuals to be more comprehensive and relevant when conducting business dealings with seniors;
- Providing training to employees on issues affecting our senior clients;
- Enhancing client experience through personalized communication from their advisor;
- Taking initiatives on fraud and financial abuse prevention;

¹ UBS Bank (Canada) is a Schedule II bank and wholly owned subsidiary of UBS AG. UBS Investment Management Canada Inc., a wholly owned subsidiary of UBS Bank (Canada), is registered as a portfolio manager and exempt market dealer with securities regulatory authorities of all provinces of Canada except Prince Edward Island.



- Performing regular check-ins on senior clients to support their banking needs;
- Obtaining Trusted Contact Person information in case of concerns about potential financial exploitation or diminished mental capacity;
- Offering broad channels to communicate concerns raised by seniors and vulnerable clients and escalating these concerns immediately to the Seniors Champion to ensure a quick resolution.

Effective Communication with Seniors

Everyone should have equal access to important information. At UBS, senior clients get individualized attention from their own private banking professional. Our communication with seniors is designed with customization and accessibility in mind. Our client advisors have developed a personal relationship with our clients and contact clients via accessible emails, direct phone calls, and face-to-face or video meetings based on the client's preference and needs. Accessible email communication ensures that they are usable by the widest range of clients, including senior clients with an undisclosed disability who use assistive technology. We confirm that all client-facing employees are aware of the accessible formats and delivery channels that are available to seniors and facilitate effective communication with seniors based on their preference.

Employee Training

In addition to internal policies and manuals in place, all client-facing employees and their supervisors are required to complete a training module for elderly and vulnerable clients. All new hires must complete this training when they first join UBS and revisit the training on an annual basis.

The training focuses on how to recognize signs of cognitive decline and financial exploitation, how to prepare clients for these possibilities, and how to escalate concerns.

Vulnerability can manifest itself in many ways. Some examples of red flags of diminished capacity or vulnerability include a known medical condition that impairs cognitive function, the client exhibiting extremely confused or erratic behavior, and abrupt changes in investment styles or unusual or unexplained disbursement.



Resources

To ensure the spirit of the Seniors' Code is being applied to our day to day interactions with senior clients, our employees have access to training, written procedures and support from the Seniors Champion. When senior related topics arise, employees are encouraged to reach out directly to the Seniors Champion for support and guidance. In order for the Seniors Champion to provide accurate guidance and to review client advisors' interactions with senior clients, client advisors are asked to document their conversations with the client.

Controls and Fraud Prevention

We offer personalized wealth management services and limited banking services to High and Ultra-High Net Worth Clients. Due to the nature of our business, we do not offer traditional banking products such as credit cards, mortgages, etc. We have the followings controls in place to help clients navigate through our unique product offerings and to mitigate potential financial harm for all customers, especially elderly and vulnerable clients:

Prevention

- Robust 'Know Your Customer' (KYC) and customer due diligence processes;
- Red flag employee guide focused on anti-money laundering and fraud, senior vulnerability factors, signs of financial abuse, Powers of Attorney (POA) abuse, and information regarding other types of seniors scams;
- Protecting our client's privacy and reporting all privacy incidents;
- Policies, procedures and processes to provide a framework for employees.

Ongoing Monitoring

- Detecting communication from unfamiliar communication channels or third-parties;
- Conducting suitability analysis of the client's activity, given their risk tolerance and risk capacity;
- Ongoing client activities/transactions monitoring;
- Seniors Champion has been and will continue to be the point of contact for client advisors to discuss issues around elderly and vulnerable clients, POA's and joint accounts;
- Based on our client-focused approach, client advisors adjust delivery channels to perform regular check-ins on senior clients.



Understanding Seniors Scams

We endeavor to mitigate financial harms that target seniors and exploit seniors' love and trust for their family and loved ones. Through common types of senior scams, learn to recognize and prevent financial scams, and what to do to protect yourself from fraud.

Common Senior Scams

- In a "Grandparent Scam", the scammer will often call on behalf of a grandchild or another family member pretending they are caught up in an "emergency situation" that requires an immediate money transfer.
- Elder financial abuse is carried out by someone a senior knows. This can be a family member, friend, power of attorney, or caregiver.

Tips to Avoid Becoming a Victim

- Don't let the caller rush you;
- Don't provide any personal information to a stranger;
- If the call is concerning a family member, check with that person by calling their regular phone number;
- Never provide any banking information or wire money under uncertain conditions;
- Designate a Trusted Contact Person which means an individual identified by you, whom client advisors may contact with concerns about possible financial exploitation in accordance with your written consent.

Office Closures

In the unlikely event that our offices close or relocate, we will ensure a smooth transition to all of our customers, especially our senior customers, through customized communication channels including accessible emails, personalized phone calls, branch posters and signage, and direct mails.

Reporting

UBS will publicly disclose the steps taken to support the principles set out in the Seniors' Code at least on an annual basis and provide a copy of the report to the Financial Consumer Agency of Canada (FCAC). UBS will also publish the Report on its website within 135 days following the end of its financial year.