



CODE OF CONDUCT

Delivery of products and services to seniors

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HEADQUARTERS
295 Saint-Pierre Boulevard West
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uni.ca

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Purpose

Canadians are living longer. The older they get, the more susceptible they are to cognitive, health and mobility changes that can affect their ability to conduct financial transactions.

UNI Financial Cooperation (UNI) has a Code of Conduct (the Code) in the delivery of products and services to seniors. The Code recognizes that while not all seniors will be affected in the same way, some of these changes may affect a higher proportion of seniors than people in other age groups.

Scope

UNI recognizes that seniors are a diverse group and that their personal information, decisions and presumption of capacity must be respected.

For the purposes of this Code, a senior is defined as any individual in Canada 60 years of age or older who engages in transactions for non-commercial purposes.

Compliance

All employees, representatives, consultants, agents or other UNI intermediaries are required to abide by this Code, as well as UNI's Code of Ethics, which sets out guidelines based on the principles of respect for clients, integrity and compliance with applicable regulatory legislation and policies.

Individuals designated by UNI are responsible for implementing and ensuring compliance with this Code.

The Financial Consumer Agency of Canada (FCAC) is responsible for monitoring UNI's compliance with this Code.

Seniors' Champion

The Seniors' Champion is responsible for promoting the interests of seniors. At UNI, the Chief Compliance Officer is responsible for consumer protection and is designated the Seniors' Champion.

The duties of the Seniors' Champion include:

- Demonstrating leadership in the implementation of the Code
- Promoting and raising awareness of seniors' issues
- Consulting with seniors, subject-matter experts and organizations representing seniors

To contact the Office of the Seniors' Champion:

UNI Financial Cooperation
Compliance Direction
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Principles

This Code sets out seven principles that guide UNI in the delivery of products and services to seniors.

Principle 1 | Implement appropriate policies, procedures and processes to support and comply the Code

UNI establishes and implements appropriate policies, procedures and processes to support and comply with the Code based on the following:

- Training of employees and representatives
- Guidance for seniors regarding product and service offerings
- Financial literacy resources for seniors

UNI respects applicable accessibility standards at its business locations.

Principle 2 | Communicate effectively with seniors

UNI takes steps to ensure effective communication with seniors, including:

- Providing communication tools that take into account the specific needs of seniors
- Ensuring that employees and representatives have the knowledge they need in the delivery of products and services to seniors
- Providing information in an accessible manner

UNI delivers pertinent information regarding seniors in easily accessible public, physical or digital locations, as appropriate.

Principle 3 | Provide appropriate training to employees and representatives who interact with seniors

All UNI employees and representatives who interact with seniors must complete training on topics including the following:

- Financial abuse, fraud and scams, including the circumstances described in Principle 5, as well as how to address such matters with seniors, if applicable
- Powers of attorney and joint accounts
- Resources available to employees and representatives on issues related to the financial needs of seniors

Principle 4 | Provide employees and representatives who interact with client members, specifically seniors, with appropriate resources to help them understand issues related to seniors' needs

UNI provides its employees and representatives with appropriate resources to help them better serve seniors.

UNI takes steps to make employees and representatives aware of the availability of appropriate resources.

UNI ensures that competent and trained resource people assist employees and representatives in the delivery of products and services to seniors.

Principle 5 | Ensure that potential financial harm to seniors is mitigated

When UNI becomes aware of potential financial harm to a senior due to financial exploitation, fraud or scams, UNI will work to mitigate that potential while respecting the senior's privacy, security and autonomy. The following are examples of appropriate actions that UNI can take:

- Monitoring financial transactions for possible money laundering or fraudulent activities
- Providing quiet and accessible spaces for private discussions

Principle 6 | Consider market demographics and the needs of seniors when closing business locations

When closing business locations, UNI takes into account the demographics of the client member market, specifically the needs of seniors.

UNI's response may include:

- Proactive calling programs
- Resource person's contact information for additional information and assistance with available alternatives
- Open houses or information sessions at various business locations
- Communications targeting those most affected by the closure
- Ensuring appropriate consultation

Principle 7 | Publicly disclose actions taken in support of the principles set out in the Code

At least once per year, UNI publishes a report on:

- Actions taken to support each principle of the Code
- Any other measures taken to improve the delivery of products and services to seniors

UNI publishes the report on its website within 135 days after the end of its fiscal year.

This Code sets out seven principles that guide UNI in the delivery of products and services to seniors.