

The following outlines the steps Rogers Bank has taken to support each principle of the **Code of Conduct for the Delivery of Banking Services to Seniors** (“the Code”). Rogers Bank is committed to ensuring our services are consistently available and accessible to our senior consumers.

Principle	Steps Taken
<p>Principle 1: Banks will establish and implement appropriate policies, procedures, and processes to support the Code.</p>	<p>Rogers Bank established and implemented the following changes and training to ensure compliance with the Code:</p> <ul style="list-style-type: none"> • Sales training documents were updated to help frontline team members effectively communicate and recognize when a senior needs additional help, including: <ul style="list-style-type: none"> ○ How to be more proactive with information about Rogers Bank ○ How to adjust their tone and be patient with seniors ○ How to present information that is relevant to seniors • Created a new seniors support page on the rogersbank.com website titled, Supporting Our Seniors. Seniors can visit this page for help managing their credit card accounts and to learn about tips to protect their accounts from fraud. • Training resources are available on our Intranet site for our front-line teams to reference when supporting seniors. • Controls are available to ensure changes within projects do not impact accessibility features that support our senior consumers. • The Code for Seniors procedure document describes the processes, reporting, and training implemented to support the Code. • All Rogers Bank employees receive annual training, which includes understanding barriers that seniors face while banking, tips to effectively

	<p>communicate with seniors, role-based training to recognize when a senior needs more assistance, and fraud and scam assistance training.</p> <ul style="list-style-type: none"> • Assistance accessing our self-serve tools can be found on the Supporting Our Seniors page. • All call centre agents are trained to help senior cardholders sign in to view their account on their mobile devices or desktop. • Rogers retail agents are trained annually to help seniors that suspect they were harmed financially.
<p>Principle 2: Banks will communicate effectively with seniors.</p>	<p>Rogers Bank sustained the following to effectively communicate with seniors:</p> <ul style="list-style-type: none"> • The Rogers Bank website adheres to the World Wide Web Consortium (W3C) Web Content Accessibility Guidelines. Here are some of the ways Rogers makes it easier to communicate with seniors: <ul style="list-style-type: none"> ○ Ensure text is easy to see and present with adequate contrast ○ Make it easy to read or hear content, providing alternative communications for visuals, and make text compatible with assistive technologies ○ Content adaptable to different screens without losing structure or information ○ Improve the site and app navigation ○ Videos to help navigate self-serve features • The new Supporting our Seniors page on the Rogers Bank website includes resources that seniors may find helpful:

	<ul style="list-style-type: none"> ○ A summary of our self-serve features that include the new Rogers Bank app, online banking, and our automated phone system ○ How to enroll in pre-authorized debit, to make it easy to pay Rogers Bank statements ○ Information about common fraud, scams, and phishing techniques ○ How to set up a Power of Attorney ○ Where to find account statements • The Rogers Bank app gives seniors another way to manage their Rogers Bank Mastercard account anywhere they go. <ul style="list-style-type: none"> ○ The app has a simplified view that helps seniors: <ul style="list-style-type: none"> ▪ Stay on top of their cash back rewards balance ▪ View 24 months of statements ▪ View transaction history ▪ Manage their account ○ The app also has device-specific accessibility features that help with reading and visual impairments: <ul style="list-style-type: none"> ▪ Zoom in and out to view account details on Android and Apple devices ▪ On Apple devices: text-to-speech and colour inversion for the visually impaired, Siri assistance to open the
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	<p>app, and shake to undo the last keystroke</p> <ul style="list-style-type: none"> ▪ In Android devices: larger text size and a screen reader • We will continue to improve the accessibility features for both Android and Apple devices with future enhancements of the mobile app. • Increased font size of our credit cards. <p>In the unlikely event that our website, online banking portal, or the Rogers Bank app are unavailable, we may reach out to notify cardholders via email, text message, chatting with our chatbot, or announcing our website. If anyone experiences a service outage, cardholders can contact our Call Centre by telephone or utilize one of our other Self Service options. This information is posted on the accessibility page. https://rogersbank.com/en/accessibility</p>
<p>Principle 3: Banks will provide appropriate training to their employees and representatives who serve seniors.</p>	<p>Ongoing mandatory training for new and existing team members is scheduled on an annual basis. The training was completed by January 2023. The training material for our frontline teams includes:</p> <ul style="list-style-type: none"> • Rogers retail agents are trained to effectively communicate and help senior cardholders if they suspect they've experienced financial harm. • Trained our frontline Rogers Bank Call Centre team in the following areas: <ul style="list-style-type: none"> ○ Recognizing and assisting with red flags and other issues that affect seniors, such as romance scams, grandparent scams, and financial abuse ○ Educating seniors about credit monitoring and consumer statement alerts with the bureau ○ Recognizing when a senior needs additional support understanding information

	<ul style="list-style-type: none"> ○ Encouraging customer care representatives to educate seniors about our self-serve options, such as the Rogers Bank app and online banking to view statements, and recent transactions, lock and unlock their account, sign up for pre-authorized debit, etc. ○ Educating seniors about the features of the new Supporting our Seniors page that should be used as a reference, and where they can find more information about our Power of Attorney process and alternative ways to contact us ○ Taught employees where to find information about the Voluntary Code of Conduct Banking Services for Seniors ○ Taught employees about how to educate seniors on the features we have in place to protect them from financial abuse and mistreatment ○ Specialized training was created for fraud and AML agents to bring more attention to the needs of seniors and issues that may affect seniors more than other age groups. ○ A seniors fraud escalation queue was created for vulnerable senior cardholders. ● Training is built and designed by Rogers Learning and Development team. ● Training material is reviewed by the seniors code working group to ensure that it includes relevant information to help our seniors cardholders.
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<p>Principle 4: Banks will make appropriate resources available to client-facing employees and representatives to help them understand matters relevant to seniors’ banking needs.</p>	<ul style="list-style-type: none"> • Training documentation is available to employees to reference within Intranet sites. • The Supporting Our Seniors page is another source of information available to employees and clients. • Team members have been designated to help support and provide information about The Code for seniors. • Rogers Bank designated Michelle Butler, VP & Chief Marketing Officer as the Seniors Champion. As the Seniors Champion, Michelle Butler ensures that Rogers Bank considers the unique challenges of our senior cardholders when making decisions regarding operational processes and the introduction of new products and services. This includes ensuring accessibility is built into new features and communication material is clear and easy to read. Every quarter, Michelle reviews reporting for the Code to gain insight into the needs of our senior cardholders and to make informed decisions if required.
<p>Principle 5: Banks will endeavor to mitigate potential financial harm to seniors.</p>	<p>The following steps outline areas that help mitigate the potential for financial harm while respecting clients’ privacy, security, and autonomy:</p> <ul style="list-style-type: none"> • Rogers Bank will continue to monitor cardholders, including seniors, as we do today. We have a suite of monetary and non-monetary rules designed to detect potential fraud on a Rogers Bank cardholder’s account. Rules are designed primarily to detect uncharacteristic spending patterns on established accounts, as well as risky spending on brand-new accounts, particularly those in a non-face-to-face manner. • Seniors or caregivers can visit the Supporting our Seniors page where we

	<p>provide the following links, if required, for more information about:</p> <ul style="list-style-type: none"> ○ The Voluntary Code of Conduct for the Delivery of Banking Services to Seniors ○ The Government of Canada page with information POA 'What every older Canadian should know about Powers of Attorney (for financial matters and property) and joint bank accounts <ul style="list-style-type: none"> ● Accounts are currently risk-scored based on a combination of various elements. These scores influence the monitoring of account usage, thereby ensuring standard and enhanced due diligence of accounts as needed. Accounts held by seniors have been allocated additional scores that work alongside other factors to help determine the final risk score of the account. ● The Fraud and Complaints Handling teams play a critical role in investigating areas of concern with our senior cardholders. By leveraging their expertise and experience, the Fraud and Complaints Handling teams managed 33 cases of potential harm to senior cardholders in 2022. All issues were resolved.
<p>6: Banks will take into account market demographics and the needs of seniors when proceeding with branch closures.</p>	<p>Rogers Bank does not have branches, therefore principle 6 does not apply.</p>
<p>Principle 7: Banks will publicly disclose the steps they have taken to support the principles set out in the Code.</p>	<p>Rogers Bank will post the report annually on rogersbank.com and the report will be sent to the FCAC. Rogers Bank took the following steps to support the principles set out in the Code:</p> <ol style="list-style-type: none"> 1. Established a team to support the Code for seniors. 2. Modified processes and procedures to support the Code for seniors. 3. Prepared training material to teach employees about the Code for seniors 4. Incorporated the code into Rogers Bank's regulatory Compliance management framework.

	<p>5. Created a repository on the Rogers Bank website (Supporting our Seniors page) and an area within the Rogers Bank Intranet for employees to reference information about how to support our senior consumers.</p>
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