# Manulife Bank's Code of Conduct for Relationships with Small and Medium-sized Businesses

## **INTRODUCTION**

Manulife Bank's goal is to become your preferred banking partner. We recognize the important role that small and medium-sized businesses play in our economy, and we are committed to fostering the growth of such enterprises in Canada. We are dedicated to making your dealings with us as easy as possible so that you can focus on running your business.

## **OUR PLEDGE:**

#### 1. OPENNESS

Manulife Bank appreciates the importance of small and medium-sized businesses to Canada's economy. We aim to ensure that our relationship with you is always open and transparent. We are dedicated to building a relationship with you based on trust and open communication. Regardless of your business type, we are here to support your business banking needs. If you have any questions or concerns about our services, please reach out to us.

We commit to being clear, honest, and transparent in all our communications and documents, providing you with straightforward explanations of our products and services. For information on any Manulife Bank product or service, please reach out to our advisors.

When you use our products and services, we will provide you with agreements that are written in clear, simple language, detailing the terms and conditions. We will explain why we request certain information from you on our application forms and how it will be used. Information about our services is available on our website, in person, or over the phone through our Customer Contact Centre.

You can view a list of Codes of Conduct and Public Commitments on our <u>website</u>. You can also ask your bank representative who would be happy to help.

### 2. ACCOUNTABILITY

A dedicated senior officer of the Manulife Bank ensures that this Code is implemented and adhered to by all bank employees. A copy of this code is also filed with the <u>Financial Consumer Agency of Canada (FCAC)</u>, which protects the rights and interests of consumers of financial products and services.

## 3. CREDIT PROCESS

We are dedicated to a transparent credit process.

## Application for Credit:

When you apply for credit, Manulife Bank will:

- Provide you with direction on how to apply for credit with us
- Let you know what information we need to process your application and why
- Tell you if there are certain requirements, and why they are necessary (e.g. collateral security)
- Provide you with a guideline on how to prepare a business plan if required
- Let you know approximately how long it will take for you to get an answer

## · Credit Approval:

Each application will be evaluated on its own merits. If approved, we will inform you of the terms and conditions, including the necessary information and documentation before and after the loan is granted. This information will be provided in writing upon request.

#### If Credit is Declined:

If Manulife Bank declines your application for credit, we will:

- > Provide our decision with reasons why the application was declined
- > Tell you what we need to possibly reconsider the application
- Provide you with information on alternative sources of financing which might be more suitable to your business needs, such as government programs, venture capital etc.

# Changing Circumstances in the Credit Relationship:

There may be circumstances in which your business requirements could change, due, for instance, to financial difficulty or the need for additional funding. Manulife Bank will carefully review your existing credit arrangement, and we will give you an opportunity to provide any ongoing, additional information which we may require. If our review finds that a change in the credit arrangement is required, we will provide you with at least 15 calendar days' notice of any changes to your credit relationship with us.

If we find that amendments are required to our overall credit facilities, (e.g. a change in the terms and conditions, fees, lending margins, financing), we will notify you, in writing, with at least 30 days' notice of the details of the amendments. However, if amendments are required to protect the Bank's interests (e.g. compliance issues or fraud-related concerns), immediate action may be taken. Notice of these types of changes will be sent to you within a reasonable period.

Details regarding your credit account can be found in the product terms and conditions provided to you upon account opening.

## 4. COMPLAINT HANDLING

Complaint resolution is important to us, and it is incumbent upon us to respond to complaints promptly, accurately and with the utmost courtesy. We will provide you with accessible means with which to communicate your complaint, and we will employ our best efforts to respond and resolve the issue. All complaints and personal information are handled in a timely, professional and confidential manner.

Full details of our complaints process can be found on our website in our <u>complaint resolution</u> <u>process</u>.

# Initiating a Complaint:

To initiate a complaint, contact your bank advisor or the customer contact centre. If you are not completely satisfied with our staff member's response, ask to speak to the manager in that department who may be able to resolve your complaint.

For credit cards call 1-844-323-7053

For all other Manulife Bank products call 1-877-765-2265

Email us at: Manulife\_bank@manulife.ca

#### Ask for a further review:

If your complaint is not resolved within 14 days of the first step above, it will be transferred to the Customer Care Team, or if you are not satisfied with the manager's response, you can escalate your complaint to the Customer Care Team for additional review.

Call us toll-free at: 1-855-891-8671.

Email us at: <a href="mailto:escalated\_customer\_complaints@manulife.ca">escalated\_customer\_complaints@manulife.ca</a>

Fax us at: 1-888-259-6351.

## What you can expect:

Upon receipt of an escalated verbal or written complaint, your concerns will be acknowledged, and an investigation will begin.

## The complaint investigation:

We may:

- Contact you to clarify information you have already provided
- Contact you to request additional information in writing
- > Share your complaint and supporting documentation with your advisor, if applicable
- Request additional information from other parties involved
- Provide you with updates throughout the complaint handling process
- Advise you of any action we will be taking

## Our response to you:

Once the investigation has been completed, you will receive a written response explaining the reasons for the decision, except in some cases where an issue can be addressed easily and to your satisfaction over the phone.

## Client Dispute Resolution Office (CDRO):

If the Customer Care Team is unable to resolve the problem to your satisfaction, please write to:

## **Client Dispute Resolution Office**

Manulife Bank of Canada and Manulife Trust Company 500 King Street North PO Box 1602, Station Waterloo Ontario N2J 4C6

Email us at: ClientDisputeResolutionOffice@manulife.ca

The CDRO aims to resolve each complaint as quickly as possible, however, should this exceed 56 days from the date you filed your complaint at step 1 above, you have the option for external recourse below. If your complaint has been resolved by the CDRO, you will be sent a written response.

# External Complaints Body:

If after following the above steps, you continue to remain dissatisfied and wish to pursue your complaint, or your complaint has not been resolved within 56 days since you raised your complaint in step 1 above, external recourse is available to you through The Ombudsman for Banking Services and Investments (OBSI). OBSI has been designated as the single external complaints body for banking in Canada. They are responsible to provide a fair and impartial review of unresolved banking complaints. Please write to:

# Ombudsman for Banking Services and Investments (OBSI)

20 Queen Street West, Suite 2400 PO Box 8 Toronto, Ontario M5H 3R3

Email at: ombudsman@obsi.ca
Call toll-free at: 1-888-451-4519
Or in Toronto: 416-287-2877
Fax at: 1-888-422-2865

# Manulife Trust Complaints in Quebec

In the Province of Quebec, the Regulatory Body for financial institutions is the Autorité des Marchés Financiers. If, after dealing with the Manulife Trust Client Dispute Resolution Officer, you remain dissatisfied with the way in which your complaint has been handles or with the results of the process, you may ask that your file be transferred to the Autorité.

Call toll-free at: 1-877-525-0337 Or in Quebec City at: 418-525-0337 Or in Montréal at: 514-395-0337

# • Financial Consumer Agency of Canada:

The Financial Consumer Agency of Canada (FCAC) supervises federally regulated financial institutions to ensure compliance with federal consumer protection laws. For instance, banks and trust companies are required by law to provide consumers with information about complaint handling procedures, borrowing costs on credit cards and loans, fees/charges and interest rates.

For regulatory complaints, you can contact the FCAC in writing, by telephone or through their website.

In writing: Financial Consumer Agency of Canada

427 Laurier Avenue West, 6th floor Ottawa, Ontario K1R 1B9

**By telephone**: 1-866-461-3222

FCAC website: Financial Consumer Agency of Canada - Canada.ca