

Code of Conduct

For authorized
insurance activities

At National Bank of Canada, we are committed to meeting our clients' insurance needs by providing them with access to authorized insurance products in a manner that serves their interests. We ensure that representatives offering these products are knowledgeable, provide clear product disclosure, respect clients' privacy, and provide prompt investigation of any problems clients may experience.

Our Code of Conduct sets out the minimum standards that apply to bank representatives who promote authorized insurance products in Canada. We will review this code from time to time to make ensure it remains relevant and up to date.

The scope of this Code

Our Code of Conduct for Authorized Insurance Activities applies to all authorized insurance products promoted in Canada, our employees and any independent intermediaries acting as our agents (collectively referred to as "representatives" throughout the Code) who promote authorized insurance products.

Authorized insurance products are those prescribed for the purposes of Section 416 of the *Bank Act in the Insurance Business (Banks and Bank Holding Companies) Regulations*.

These include the following defined types of insurance and any additional types that may be prescribed by future amendments to these regulations:

- (a) credit or charge card-related insurance,
- (b) creditors' disability insurance,
- (c) creditors' life insurance,
- (d) creditors' loss of employment insurance,
- (e) creditors' vehicle inventory insurance,
- (f) export credit insurance,
- (g) mortgage insurance, and
- (h) travel insurance.

Compliance with this Code

We ensure that this Code of Conduct is implemented, understood and followed by all our representatives. We also ensure compliance with this code of Conduct and designate an officer to be responsible for compliance with this Code.

Training

National Bank representatives who promote authorized insurance products are properly trained, qualified and knowledgeable.

We are committed to providing continuing education to our representatives on authorized insurance products.

We also review educational programs on an ongoing basis to ensure relevance to marketplace developments.

Disclosure

National Bank is committed to providing clear and understandable disclosure in the documentation related to our authorized insurance products. This helps our clients make informed decisions about the insurance products we promote.

When promoting authorized insurance products, we will ensure that the following is disclosed to our clients:

- > that the product being applied for is an insurance product;
- > key terms and definitions related to the insurance;
- > all client fees and charges associated with the insurance product and how they would be payable;
- > that insurance coverage from a specific company is optional if a separate charge is levied for the coverage (an example of insurance for which a separate charge is not applied would be coverage through a specific credit card);
- > name of the insurance company underwriting the insurance product;
- > how and when the client will be notified of acceptance or rejection of the insurance;

- > when insurance coverage would come into effect and when it would terminate;
- > the duration of any “free look” period during which, should the client elect to cancel the insurance coverage, all premiums charged would be refunded;
- > the client’s responsibilities and right to cancel insurance coverage at any time;
- > terms and conditions that might limit or exclude coverage;
- > claims procedures; and
- > how to obtain additional information about the insurance coverage.

Promotion practices

National Bank will not impose undue pressure on or coerce a person to obtain a product or service from a particular person, including the Bank and any of its affiliates, as a condition for obtaining any other product or service we offer. For further information, see our brochures on coercive tied selling.

The National Bank representatives responsible for promoting authorized insurance products will make all reasonable efforts to ensure that:

- > the insurance policy or coverage being promoted is appropriate for the credit product or the needs as expressed by the client; and
- > the client understands the coverage.

Privacy of personal information

To protect our clients’ privacy, National Bank complies with the provisions of the *Personal Information Protection and Electronic Documents Act*.

In the case of creditor insurance, the insurer may require health information. This information is provided separately by the client exclusively for the insurer. It may be gathered by the Bank on behalf of the insurer, but will not be retained or used by the Bank or any of its subsidiaries or affiliates to help assess loan applications or market other products.

Continuity of coverage

Each eligible client who is accepted for insurance coverage is provided with disclosure documentation that sets out the terms and conditions of coverage.

There may be situations where customer-initiated changes in the financing or other terms and conditions of a banking arrangement could result in the need to apply for new authorized insurance coverage.

Our representatives will make clients aware that they:

- > are choosing to terminate their insurance coverage;
- > are applying for new coverage and will be subject to the provisions of the new coverage; and
- > should review the decision carefully, particularly if there has been a change in their health or other circumstances since they applied for the initial coverage.

Complaint procedures

At National Bank, we have well-established policies and procedures to receive, investigate and respond to clients' complaints with respect to the promotion and administration of authorized insurance products. We inform our clients of our procedures, which are easy to understand and use. These procedures set out a clear complaint resolution process and identify appropriate contact persons within our organization. Information concerning these complaint procedures is available from personnel at any of our branches, on our website and in brochures explaining the process in detail.

We make every effort to respond to complaints fairly and promptly.

If clients are not satisfied with the way we have responded to their complaints, they can contact ADR Chambers – Banking Ombuds Office.

The insurer also has complaint procedures in place. We will provide information on how to find out more about these procedures to our clients.

Complaint settlement

All complaints

(in writing, in person or by telephone)

Customer Service manager of your branch

Complaint not settled to your satisfaction by the Customer Service manager

(in writing or by telephone)

**Customer Service National Bank Life
Insurance Company**

1100 University Street, 5th Floor

Montreal, Quebec H3B 2G7

Telephone: 514-871-7500

Toll-free: 1-877-871-7500

Complaint not settled to your satisfaction by Customer Service National Bank Life Insurance Company Department

(in writing or by telephone)

Office of the National Bank Ombudsman for clients

P.O. Box 275

Montreal, Quebec H2Y 3G7

Telephone: 1-888-300-9004

Fax: 1-888-866-3399 or 514-866-3399

Website: nbc.ca

Complaint not settled to your satisfaction by the National Bank Ombudsman for clients

(in writing or by telephone)

ADR Chambers – Banking Ombuds Office

P.O. Box 1006

31 Adelaide Street East

Toronto, Ontario M5C 2K4

Telephone: 1-800-941-3655

Fax: 1-877-803-5127

Website: bankingombuds.ca

Email: contact@bankingombuds.ca

Complaint related to insurance

Clients with complaints related to insurance can direct them to the AMF or OLHI after receiving the National Bank Ombudsman's final position.

Autorité des marchés financiers (Quebec only)

800 Square Victoria

22th Floor, P.O. Box 246, tour de la Bourse

Montreal, Quebec H4Z 1G3

Telephone: Montreal: 514-395-0337

Quebec city: 418-525-0337

Toll-free: 1-877-525-0337

Website: lautorite.qc.ca

OmbudService for Life & Health Insurance (other provinces)

401 Bay Street, P.O. Box 7

Toronto, Ontario M5H 2Y4

Attention: General Manager

Toll-free: 1-888-295-8112

Website: olhi.ca

At all times

If you have a complaint regarding a possible breach of federal consumer protection legislation or of provisions of public commitments or voluntary codes of Conduct adhered to by the Bank, you can use the method of communication that suits you best to contact:

The Financial Consumer Agency of Canada

Enterprise Building

427 Laurier Avenue West, 6th Floor

Ottawa, Ontario K1R 1B9

Telephone: 1-866-461-3222

Website: fcac-acfc.gc.ca

Should you have any questions,
do not hesitate to contact us.

—
1-888-835-6281

[nbc.ca](https://www.nbc.ca)



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