



# Invested in Canadian Communities



**MCAN Financial Group**

**BASEL III PILLAR 3 DISCLOSURES**

**March 31, 2022**

## **1. Scope of Application**

This document represents the Basel III Pillar 3 disclosures for MCAN Mortgage Corporation d/b/a MCAN Financial Group (the "Company", "MCAN" or "we") at March 31, 2022. These disclosures are made pursuant to the Pillar 3 Disclosure Requirements of the Office of the Superintendent of Financial Institutions ("OSFI"). Additional information can be found on OSFI's Financial Data for Loan Companies website: <https://www.osfi-bsif.gc.ca/Eng/wt-ow/Pages/FINDAT-lc.aspx>.

The amounts disclosed in the tables below represent the carrying amounts included in the Company's interim consolidated financial statements at and for the quarter ended March 31, 2022, which are prepared in accordance with International Financial Reporting Standards ("IFRS") and use the accounting policies described therein. This document is unaudited and is reported in thousands of Canadian dollars, unless otherwise noted.

The Basel III capital adequacy framework is applied to the consolidated operations of the Company, which include the Company's wholly-owned subsidiary, XMC Mortgage Corporation, which has legally changed its name effective April 1, 2022, to MCAN Home Mortgage Corporation.

MCAN is a Loan Company under the *Trust and Loan Companies Act* (Canada) (the "Trust Act") and a Mortgage Investment Corporation ("MIC") under the *Income Tax Act* (Canada) (the "Tax Act"). As a Loan Company under the Trust Act, the Company is subject to the guidelines and regulations set by OSFI. MCAN is incorporated in Canada with its head office located at 200 King Street West, Suite 600, Toronto, Ontario, Canada. MCAN is a public company listed on the Toronto Stock Exchange under the symbol MKP.

MCAN Home Mortgage Corporation is an originator of residential mortgage products across Canada.

The Company generates a reliable stream of income by investing in a diversified portfolio of Canadian mortgages, including residential, residential construction, non-residential construction and commercial loans, as well as other types of securities, loans and real estate investments, including our investment in MCAP Commercial LP. The Company employs leverage by issuing term deposits that are eligible for Canada Deposit Insurance Corporation deposit insurance and are sourced through a network of independent financial agents. Leverage can be up to a maximum of five times capital (on a non-consolidated tax basis in the MIC entity) as limited by the provisions of the Tax Act applicable to a MIC. The Company also participates in the National Housing Act ("NHA") mortgage-backed securities ("MBS") program.

## **2. Capital Structure and Capital Adequacy**

The Company's Common Equity Tier 1 ("CET 1") capital consists of share capital, contributed surplus and retained earnings. The Company does not hold any additional Tier 1 capital instruments; therefore, its CET 1 capital is equal to its Tier 1 capital. The Company's Tier 2 capital consists of Stage 1 and Stage 2 mortgage allowances calculated under IFRS, a portion of which is allowed to be included in CET 1 under OSFI transitional arrangements issued March 27, 2020. Total Capital equals CET 1 or Tier 1 capital plus Tier 2 capital.

The Company's authorized share capital consists of an unlimited number of common shares with no par value. As at March 31, 2022, the Company had 31,372,921 common shares outstanding.

As a Loan Company under the Trust Act, OSFI oversees the adequacy of the Company's capital. OSFI requires all federally regulated institutions to meet the minimum capital to risk-weighted asset ratios of 7% CET 1 capital, 8.5% Tier 1 capital and 10.5% Total capital and a minimum leverage ratio which is calculated on a different basis from the MIC leverage ratio. The risk-weighting of all on-balance sheet assets and all off-balance sheet assets is based on a prescribed percentage of the underlying asset position, in addition to adjustments for other items such as impaired mortgages. Risk-weighted assets also include an operational risk charge, which is based on certain components of the Company's net investment income over the past 12 quarters. The Company uses the standardized approach for credit risk and the basic indicator approach for operational risk. The Company maintains internal target minimum CET 1, Tier 1 and Total capital ratios.

The Company maintains prudent capital planning practices to ensure that it is adequately capitalized and continues to satisfy minimum standards and internal targets. In conjunction with the annual strategic planning and budgeting process, the Company completes an Internal Capital Adequacy Assessment Process ("ICAAP") in order to ensure that it has sufficient capital to support its business plan and risk appetite. The ICAAP assesses the capital necessary to support the various

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inherent risks that the Company faces, including liquidity and funding, credit, interest rate, market, operational, regulatory compliance, strategic and reputational risks. The Company's business plan is also stress tested under various adverse scenarios to determine the impact on its results from operations and financial condition. The ICAAP is reviewed by both management and the Board of Directors (the "Board") and is submitted to OSFI annually. In addition, the Company performs stress testing on its internal forecasts for capital adequacy on a quarterly basis, and the results of such testing are reported to the Board.

The Company's total balance sheet exposures, regulatory capital and leverage ratio are outlined in the table below. OSFI's Basel III guidance for non-Domestic Systemically Important Banks (non-DSIBs) prescribes standardized row numbers when disclosing certain capital information to facilitate comparability across regulated entities.

(in thousands except %)		
<b>At March 31, 2022</b>	<b>OSFI ROW #</b>	
On-balance sheet items	1	\$ 4,002,175
Deductions from Tier 1 capital	4	(53,002)
<b>Total On-Balance Sheet Exposures</b>	5	<u>3,949,173</u>
Mortgage and investment funding commitments (50%)	17	736,878
Less: conversion to credit equivalent amount (50%)	18	(368,439)
Letters of credit (50%)	17	46,830
Less: conversion to credit equivalent amount (50%)	18	(23,415)
<b>Total Off-Balance Sheet Items</b>	19	<u>391,854</u>
<b>Common Equity Tier 1 and Tier 1 Capital</b>	20	389,154
<b>Common Equity Tier 1 and Tier 1 Capital - Transitional Expected Credit Losses Arrangements not Applied<sup>1</sup></b>	20a	388,811
<b>Total Exposure/Regulatory Assets</b>	21	<u>\$ 4,341,027</u>
<b>Leverage Ratio</b>	22	8.96 %
<b>Leverage Ratio - Transitional Expected Credit Losses Arrangements not Applied<sup>1</sup></b>	22a	8.96 %

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The Company's regulatory capital information at March 31, 2022 is outlined in the table below. OSFI's Basel III guidance for non-DSIBs prescribes standardized row numbers when disclosing certain capital information to facilitate comparability across regulated entities.

(in thousands except %)			
At March 31, 2022		OSFI ROW #	
Share capital and contributed surplus	1	\$	348,478
Retained earnings	2		93,367
<b>Common Equity Tier 1 capital before regulatory adjustments</b>	6		441,845
Total regulatory adjustments to Common Equity Tier 1 capital	28		(52,691)
<b>Common Equity Tier 1 capital (CET 1)</b>	29		389,154
<b>Common Equity Tier 1 capital (CET 1) - transitional arrangements not applied<sup>1</sup></b>	29a		388,811
<b>Tier 1 capital</b>	45		389,154
<b>Tier 1 capital - transitional arrangements not applied<sup>1</sup></b>	45a		388,811
<b>Tier 2 capital</b>	58		5,055
<b>Total capital</b>	59	\$	394,209
<b>Total capital - transitional arrangements not applied<sup>1</sup></b>	59a	\$	394,177
Total risk-weighted assets	60	\$	2,013,867
<b>Regulatory Capital Ratios</b>			
CET 1 capital to risk-weighted assets ratio	61		19.32 %
CET 1 capital to risk-weighted assets ratio - transitional arrangements not applied <sup>1</sup>	61a		19.31 %
Tier 1 capital to risk-weighted assets ratio	62		19.32 %
Tier 1 capital to risk-weighted assets ratio - transitional arrangements not applied <sup>1</sup>	62a		19.31 %
Total capital to risk-weighted assets ratio	63		19.57 %
Total capital to risk-weighted assets ratio - transitional arrangements not applied <sup>1</sup>	63a		19.57 %



The Company's assets, analyzed on a risk-weighted basis, are outlined in the table below.

(in thousands)	
<b>At March 31, 2022</b>	
<b>On-Balance Sheet Assets</b>	
Cash and cash equivalents	\$ 26,833
Cash held in trust	10,020
Marketable securities	67,013
Mortgages - corporate	1,160,963
Mortgages - securitized	93,555
Non-marketable securities	125,464
Equity investment in MCAP Commercial LP	44,216
Deferred tax asset	1,334
Other assets	19,929
	<u>1,549,327</u>
<b>Off-Balance Sheet Items</b>	
Letters of credit	23,415
Commitments	302,475
	<u>325,890</u>
Charge for operational risk <sup>2</sup>	<u>138,650</u>
<b>Risk-Weighted Assets</b>	<b>\$ 2,013,867</b>

<sup>1</sup>Effective March 31, 2020, the total capital ratio reflects the inclusion of stage 1 and stage 2 allowances on the Company's mortgage portfolio in Tier 2 capital. In accordance with OSFI's transitional arrangements for capital treatment of ECL issued March 27, 2020, a portion of stage 1 and stage 2 allowances that would otherwise be included in Tier 2 capital are included in CET 1 capital. The adjustment to CET 1 capital will be measured each quarter as the increase, if any, in stage 1 and stage 2 allowances compared to the corresponding allowances at December 31, 2019. The increase, if any, is subject to a scaling factor that will decrease over time and was 70% in fiscal 2020, 50% in fiscal 2021 and is set at 25% in fiscal 2022.

<sup>2</sup> We use the basic indicator approach for operational risk, which is equal to 15% of the previous three-year average of net investment income from corporate and securitized assets excluding provisions for credit losses multiplied by a factor of 12.5.

### 3. Credit Risk

Credit risk is the risk of financial loss resulting from the failure of a counterparty, for any reason, to fully honour its financial or contractual obligations to the Company, primarily arising from our investments and lending activities. Fluctuations in real estate values may increase the risk of default and may also reduce the net realizable value of the collateral property to the Company. These risks may result in defaults and credit losses, which may result in a loss of earnings.

#### Credit Risk Management

Credit risk is managed through prudent risk management policies and procedures that emphasize the quality and diversification of our investments and lending activities. Credit policies include credit risk limits in alignment with the Risk Appetite Framework ("RAF"). These credit risk limits include, but are not limited to, concentration by asset class, geographic region, dollar amount and borrower. These policies are amended on an ongoing basis and approved by the Board to reflect changes in market conditions and risk appetite.

The Capital Commitments Committee, which is comprised of management, is accountable for decision-making on credit risk issues and provides oversight of proposed investments for the construction, commercial and marketable and non-marketable securities portfolios.

Credit and commitment exposure are closely monitored by operational and oversight business units. The Risk and Compliance Committee, which is comprised of management, monitors and challenges credit risk exposures, monitors portfolio and underwriting quality and performance against credit risk limits on a monthly basis. The Enterprise Risk Management and Compliance Committee ("ERM&CC") reviews all material risks affecting the Company on a quarterly basis, which includes the identification, assessment, and monitoring of material credit risks.

The Company identifies potential risks in our mortgage portfolio by way of regular review of market and portfolio metrics, which are a key component of quarterly market reports provided to the Board by management. Existing risks in our mortgage portfolio are identified by arrears reporting, portfolio diversification analysis, post funding monitoring and risk rating trends of the entire mortgage portfolio. The aforementioned reporting and analysis provide adequate monitoring of and control over our exposure to credit risk.

The Company assigns a credit score and risk rating for all mortgages at the time of underwriting based on the assessed credit quality of the borrower and the value of the underlying real estate. Risk ratings are reviewed annually at a minimum, and more frequently whenever there is an amendment, or a material change such as a default or impairment.

As part of the Company's credit risk management process, the Company monitors its loan portfolio for early indicators of potential concern. The "monitored/arrears" category includes construction and commercial loans that may experience events such as slow sales, cost overruns or are located in geographic markets in which risks have arisen. Loans in this category are included in stage 2. Considering factors such as borrower equity, portfolio loan to value ratios and project liquidity, at March 31, 2022, there have been no indications at the portfolio level of potential loss of principal in excess of the allowances for credit losses recorded for mortgages in stage 1 and 2. These collective allowances are based on forward-looking economic assumptions and other factors.

The maximum credit exposure on our individual financial assets is equal to the carrying value of the respective assets, except for our corporate mortgage portfolio, where maximum credit exposure also includes outstanding commitments for future mortgage fundings and our investments in non-marketable securities, where maximum credit exposure includes our total remaining commitments.

As a response to COVID-19, the Company has increased the frequency of monitoring and reporting of our credit risk profile, including enhanced arrears reporting and pipeline monitoring. Employment levels and real estate prices have, and may continue to be, impacted due to the national response to the pandemic or additional variants, which may adversely impact the ability of borrowers to make timely payments on mortgages.

#### Corporate mortgages by exposure type

At March 31, 2022	Gross		Allowance				Net					
	Principal		Stage 1	Stage 2	Stage 3	Total	Principal					
Corporate Portfolio:												
Residential mortgages												
Insured	\$	210,401	\$	—	\$	—	\$	210,401				
Uninsured		835,179		1,097		231		27	1,355	833,824		
Uninsured - completed inventory		38,136		200		—		—	200	37,936		
Construction loans		726,297		3,378		92		—	3,470	722,827		
Commercial loans												
Multi family residential		79,178		222		77		—	299	78,879		
Other commercial		18,139		6		60		—	66	18,073		
	\$	1,907,330	\$	4,903	\$	460	\$	27	\$	5,390	\$	1,901,940

#### Corporate mortgages by geography

At March 31, 2022	Residential Mortgages	Construction Loans	Commercial Loans	Total	% of Total
Ontario	\$ 905,137	\$ 188,773	\$ 87,838	\$ 1,181,748	62.2 %
Alberta	77,202	81,453	—	158,655	8.3 %
British Columbia	61,345	452,601	—	513,946	27.0 %
Quebec	24,621	—	4,144	28,765	1.5 %
Atlantic Provinces	7,863	—	—	7,863	0.4 %
Other	5,993	—	4,970	10,963	0.6 %
	<b>\$ 1,082,161</b>	<b>\$ 722,827</b>	<b>\$ 96,952</b>	<b>\$ 1,901,940</b>	<b>100.0 %</b>

### Allowances for credit losses

The measurement of impairment losses under IFRS 9, *Financial Instruments* ("IFRS 9") across all categories of financial assets requires judgment, in particular, the estimation of the amount and timing of future cash flows and collateral values when determining impairment losses. These estimates are driven by a number of factors, changes in which can result in different levels of allowances.

The Company groups its financial assets into stage 1, stage 2 and stage 3, depending on whether the assets are performing, in arrears or impaired. The Company's allowance for expected credit loss ("ECL") calculations are model outputs with a number of underlying assumptions regarding the choice of variable inputs and their interdependencies. Elements of the ECL models that are considered accounting judgments and estimates include:

- The Company's criteria for assessing if there has been a significant increase in credit risk which results in allowances being measured on a lifetime versus 12-month ECL basis;
- The segmentation of financial assets for the purposes of assessing ECL on a collective basis;
- Development of ECL models, including the various formulas and the choice of inputs;
- Determination of associations between macroeconomic scenarios and economic inputs, such as unemployment levels and collateral values, and the effect on Probability of Default, Loss Given Default, and Exposure at Default; and
- Forward-looking information used as economic inputs.

The Company may also make qualitative adjustments or overlays using expert credit judgment in the calculations of ECLs, which represent accounting judgments and estimates which have been heightened due to the COVID-19 and current inflationary environments. Key judgments and estimates, including around probability weights to assign to each scenario and the impacts of government policy and stimulus measures, will be heavily influenced by the extent and severity of these events. These judgments and estimates have been made with reference to the facts, projections and other circumstances at the interim consolidated balance sheet dates. IFRS 9 does not permit the use of hindsight in measuring provisions for credit losses. Any new forward-looking information subsequent to the interim consolidated balance sheet dates are reflected in the measurement of provisions for credit losses in future periods, as appropriate.

### Corporate mortgage allowance continuity

		Stage 1	Stage 2	Stage 3	Total
Balance, January 1, 2022	\$	5,847	\$ 787	\$ 13	\$ 6,647
Recovery of credit losses		(944)	(327)	14	(1,257)
<b>Balance, March 31, 2022</b>	<b>\$</b>	<b>4,903</b>	<b>\$ 460</b>	<b>\$ 27</b>	<b>\$ 5,390</b>

### Impaired and past due mortgages

The Company considers a financial instrument defaulted and therefore stage 3 (credit-impaired) for ECL calculations in all cases when the borrower becomes 90 days past due on its contractual payments. In certain other cases, where qualitative thresholds indicate unlikelihood to pay as a result of a credit event, the Company carefully considers whether the event should result in an assessment at stage 2 or 3 for ECL calculations.

The combined impact of several events may cause financial assets to become defaulted as opposed to one discrete event. The decision whether to classify an asset as stage 1 or stage 2 once cured depends on the current assessment of SICR.

### Corporate mortgages past due but not impaired

At March 31, 2022		1 to 30 days	31 to 60 days	61 to 90 days	Total
Residential mortgages - insured	\$	1,282	\$ —	\$ 59	\$ 1,341
Residential mortgages - uninsured		5,739	2,007	321	8,067
	<b>\$</b>	<b>7,021</b>	<b>\$ 2,007</b>	<b>\$ 380</b>	<b>\$ 9,408</b>

The provincial breakdown of mortgages past due but not impaired is as follows:

At March 31, 2022	Total
Ontario	\$ 7,372
Alberta	1,179
British Columbia	546
New Brunswick	123
Quebec	188
	<b>\$ 9,408</b>

#### Impaired corporate mortgages

At March 31, 2022	Residential Mortgages		Total
	Insured	Uninsured	
Ontario	\$ —	\$ 411	<b>\$ 411</b>
Atlantic Provinces	162	—	<b>162</b>
	<b>\$ 162</b>	<b>\$ 411</b>	<b>\$ 573</b>

#### 4. Securitizations

The Company is an NHA MBS issuer, which involves the securitization of insured mortgages to create MBS. The Company issues MBS through its internal market MBS program and the Canada Housing Trust Canada Mortgage Bonds ("CMB") program. When the MBS is sold to third parties and the interest-only strip is retained by MCAN, the securitized mortgages remain on MCAN's consolidated balance sheet while a corresponding financial liability from securitization is incurred, due to the fact that the Company retains significant continuing involvement with the assets. When the Company has transferred substantially all the risks and rewards of ownership of the MBS or when the Company has neither transferred nor retained substantially all the risks and rewards of ownership of the MBS but has transferred control of the financial asset, the securitized mortgages are derecognized from MCAN's consolidated balance sheet.

The primary risks associated with the market MBS program and CMB program are prepayment, liquidity and funding risk, including the obligation to fund 100% of any cash shortfall related to the Timely Payment obligation. Prepayment risk includes the acceleration of the amortization of mortgage premiums, as applicable, as a result of early payouts.

During Q1 2022, the Company securitized \$136,560 of MBS through the market MBS program and CMB program and \$nil of insured multi family mortgages through the CMB program.



### Securitized mortgages exposure by type

At March 31, 2022, the Company had \$1,658,839 of securitized mortgages which consisted of insured residential mortgages securitized through the market MBS program and CMB program.

### Securitized mortgages past due not impaired

	1 to 30 days	31 to 60 days	61 to 90 days	Total
At March 31, 2022	\$ 2,935	\$ 596	\$ 490	\$ 4,021

As at March 31, 2022, there were \$103 of impaired securitized mortgages in the Atlantic provinces.

## 5. Operational Risk

Operational risk is the potential for loss resulting from people, inadequate or failed internal processes, systems, or from external events.

### *Operational Risk Management*

The Operational Risk Management Framework ("ORMF") covers all components of MCAN's operational risk management including processes and control activities to ensure adherence with business and regulatory requirements. The ORMF sets out an integrated approach to identify, measure, monitor, manage and report on known and emerging operational risks. Management and the Board review operational risk on a quarterly basis.

As a response to COVID-19, the Company has taken proactive actions to protect the health and well-being of our employees by implementing a company-wide remote working policy. To ensure operational resiliency, the Company has enhanced and implemented its Business Continuity Plan, bolstered its employee communications, provided effective tools to work from home, and has increased training on cybersecurity risks and other areas where appropriate.

## 6. Marketable Securities

Marketable securities, consisting of real estate investment trusts ("REIT"), are designated as fair value through profit or loss. Fair values are based on bid prices quoted in active markets, and changes in fair value are recognized in the consolidated statements of income. Marketable securities provide MCAN with additional liquidity at yields in excess of cash and cash equivalents.

At March 31, 2022	Total
Marketable Securities - REIT	\$ 67,013

In 2022, we began to see volatility in REIT prices from current geopolitical conflicts, and the inflationary and rising interest rate environments.

## 7. Interest Rate Risk

Interest rate risk is the potential impact of changes in interest rates on our earnings and capital. Interest rate risk arises when the Company's assets and liabilities, both on- and off-balance sheet, have mismatched repricing and maturity dates. Changes in interest rates where the Company has mismatched repricing and maturity dates may have an adverse effect on its financial condition and results of operations. Risk factors that MCAN regularly considers are credit spreads, duration, repricing gaps, basis risk, yield curve risk and the timing between mortgage origination and funding by deposits or securitization.

### Interest Rate Risk Management

The Interest Rate Risk Management Framework, which is reviewed and approved by the Board, provides guidance on MCAN's interest rate risk measurement tools, including stress testing, roles and accountabilities, and monitoring and reporting requirements. Additionally, it establishes appropriate interest rate risk limits and articulates appetite for interest rate exposures.

The Company evaluates its exposure to a variety of changes in interest rates across the term spectrum of its assets and liabilities including, both parallel and non-parallel changes in interest rates. By managing and strategically matching the terms of corporate assets and term deposits, the Company seeks to reduce the risks associated with interest rate changes, especially in the current expected rising interest rate environment. In conjunction with liquidity management policies and procedures, the Company also manages cash flow mismatches. The Asset and Liability Committee ("ALCO") reviews the Company's interest rate exposure on a monthly basis using an interest rate spread and gap analysis as well as an interest rate sensitivity analysis based on various scenarios. This information is also formally reviewed by the Board each quarter.

The Company is exposed to interest rate risk on insured residential mortgages between the time that a mortgage rate is committed to borrowers and the time that the mortgage is funded, and, in the case of mortgages securitized through the market MBS or CMB programs, the time that the mortgage is securitized. To manage this risk, the Company may employ various hedging strategies.

### Interest Rate Risk – Quantitative Impact

An immediate and sustained parallel 1% increase to market interest rates on interest-bearing financial instruments at March 31, 2022 would have an estimated positive effect of \$5,562 to net income over the following twelve month period. An immediate and sustained parallel 1% decrease to market interest rates at March 31, 2022 would have an estimated adverse effect of \$4,600 to net income over the following twelve month period. The reason for the large differential between our downside risk and our upside risk is due to our construction portfolio, which mostly all have interest rate floors.

The Company has an integrated balance sheet approach to interest rate risk and the management of liquidity and funding risk. The Company expects that the impact of an immediate and sustained interest rate change would be partially mitigated by the effect of changes in interest rates on the value of other financial instruments, given the Company's balance sheet composition.

## 8. Liquidity and Funding Risk

Liquidity and funding risk is the risk that cash inflows, including the ability to raise term deposits and access to other sources of funding, supplemented by assets readily convertible to cash, will be insufficient to honour all cash outflow commitments (both on- and off-balance sheet) as they come due.

The following table summarizes the Company's corporate assets by maturity:

At March 31, 2022	Within 3 months	3 Months to 1 Year	1 to 3 Years	3 to 5 Years	Over 5 Years	Total
Cash and cash equivalents	\$ 131,637	\$ —	\$ —	\$ —	\$ —	\$ 131,637
Marketable securities	67,013	—	—	—	—	67,013
Mortgages - corporate	308,072	932,446	462,533	146,411	52,478	1,901,940
Non-marketable securities	—	5,207	—	—	66,430	71,637
Other loans	3,452	—	—	—	—	3,452

### Liquidity Risk Management

On a daily basis, the Company monitors its liquidity position to ensure that the level of liquid assets held, together with its ability to raise new deposits and other funding sources, is sufficient to meet its funding commitments, deposit maturity obligations, and other financial obligations.

The Board is accountable for the approval of the Liquidity Risk Management Framework (“LRMF”). The LRMF establishes a framework to maintain sufficient liquidity, including holding a portfolio of high-quality liquid assets to meet commitments as they come due. The LRMF provides guidance for the daily, monthly and quarterly analyses that are performed by management, and includes a framework for daily funding requirements, gap analysis between assets and liabilities, deposit concentration levels, liquidity risk limits, and stress testing requirements, in alignment with both the standards set under the Trust Act and regulations and guidelines issued by OSFI. Further to the LRMF, the Company maintains a Contingency Funding Plan that details the strategies and action plans to respond to stress events that could materially impair its access to funding and liquidity.

ALCO, which is comprised of management, is accountable for liquidity management oversight. On a monthly basis, or more frequently as required, ALCO reviews the Company’s liquidity risk profile, reviews funding strategies and regularly monitors performance against established liquidity risk limits. Results of the monitoring of liquidity risk is reported to the Board and any exceptions or breach of key limits are immediately reported by ALCO to the ERM&CC. At March 31, 2022, the Company was in full compliance with the LRMF, key liquidity risk limits and regulatory requirements.

Stress testing is reviewed monthly by ALCO and quarterly by the Board. Liquidity stress testing is performed on singular and simultaneous scenarios. MCAN’s stress testing is designed to assess the adequacy of liquidity and funding channels, as well as contingency funding to remain within the liquidity risk appetite and Board-approved liquidity risk limits under the stress test scenarios. At March 31, 2022, the Company held sufficient liquidity and maintained the ability to fund obligations over the forecast period under the stress test scenarios.

The Company has access to liquidity through its ability to issue term deposits eligible for Canada Deposit Insurance Corporation deposit insurance. These term deposits also provide the Company with the ability to fund asset growth as needed.

The Company maintains a demand loan revolver facility to meet its short-term obligations as required. Under the facility, there is a sublimit for issued letters of credit, which may be used to support the obligations of borrowers to municipalities in conjunction with construction loans. The facility limit is \$120,000 but subsequent to quarter end has been increased to \$220,000. At March 31, 2022, the outstanding facility balance was \$10,141. At March 31, 2022, there were letters of credit in the amount of \$46,830 issued and additional letters of credit in the amount of \$24,249 committed but not issued.

The Company has a credit agreement with a Canadian Schedule I Chartered bank for a \$100,000 senior secured mortgage warehouse facility. The facility is used to fund insured residential mortgages prior to securitization activities. At March 31, 2022, the outstanding facility balance was \$97,190.

The Company also has an agreement with a Canadian Schedule I Chartered bank that enables the Company to execute repurchase agreements for liquidity purposes. This facility provides liquidity and allows the Company to encumber certain eligible securities for financing purposes. As part of the agreement, the Company may sell assets to the counterparty at a specified price with an agreement to repurchase at a specified future date. The interest rate on the borrowings is driven by market spot rates at the time of borrowing. The Company will execute these repurchase agreements to provide alternative sources of liquidity when it is efficient and effective to do so. At March 31, 2022, the outstanding facility balance was \$nil.

As a response to COVID-19, the Company has enhanced the monitoring and reporting of its liquidity risk profile, its funding markets such as the term deposit and securitization markets and its liquidity risk position.

## **9. Strategic Risk**

Strategic risk is the risk of loss due to fluctuations in the external business environment, and the failure of management to adjust its strategies, business model and business activities to adapt or respond appropriately.

### *Strategic Risk Management*

Strategic risk factors generally arise from either choosing the wrong strategy, or poor execution of the right strategy. The inability to proactively develop business strategies, plans or clearly define objectives, or failure to develop internal capabilities can also result in strategic risk.

Strategic risk is managed by the CEO and management. The Board approves the Company's strategies at least annually and regularly reviews results and needed changes as applicable against those strategies. Strategies are aligned to be consistent with the RAF, regulatory and other internal requirements.

#### **10. Regulatory Compliance Risk**

Regulatory compliance risk arises from the Company's potential non-conformance with existing and new laws, rules, regulations, prescribed practices, or ethical standards in any jurisdiction in which it operates. Regulatory compliance risk also arises from the exercise of discretionary oversight by regulatory or other competent authorities that may adversely affect the Company, including by limiting the products or services that the Company provides, restricting the scope of its operations or business lines, limiting pricing and availability of products in the market, increasing the ability of competitors to compete with its products and services or requiring it to cease carrying on business. The Company's failure to comply with applicable laws and regulations may result in sanctions and financial penalties that could adversely impact its earnings and damage its reputation. Increasing regulations and expectations, both globally and domestically, have increased the cost and resources necessary to meet regulatory expectations for the Company.

The Company's Chief Compliance Officer, Chief Anti Money Laundering Officer & Privacy Officer independently oversees the adequacy of, adherence to, and effectiveness of day-to-day compliance procedures in alignment with the Company's Regulatory Compliance Management Framework. Additionally, the Risk and Compliance Committee and the Board review and effectively challenge regulatory compliance risk-related reports on a quarterly basis.

#### **11. Reputational Risk**

Reputational risk is a risk of loss or adverse impacts resulting from damages to MCAN's reputation, regardless of whether the facts that underlie the event are true or not.

The loss of reputation can greatly affect shareholder value through reduced public confidence, a loss of business, legal action, or increased regulatory oversight. Reputation refers to the perception of the enterprise by various stakeholders. Typically, key stakeholder groups include investors, borrowers, depositors, employees, suppliers, regulators, brokers and strategic partners. Perceptions may be impacted by various events including financial performance, specific adverse occurrences from events such as cybersecurity issues, unfavourable media coverage, and changes or actions of the Company's leadership. Failure to effectively manage reputational risk can result in reduced market capitalization, loss of client loyalty, reduced access to deposit funding and the inability to achieve the Company's strategic objectives.

##### *Reputational Risk Management*

The Company believes that the most effective way to safeguard its public reputation is through embedding successful processes and controls, along with the promotion of appropriate conduct, risk culture and risk management. Reputational risk is mitigated by management of the underlying risks in the business and is monitored and reported to the Board on a quarterly basis.

#### **12. Remuneration**

For information regarding the remuneration of executives of the Company, refer to the "Compensation Discussion and Analysis" section of the 2022 Management Information Circular.