

FINTRAC COMPLIANCE FORM

The FINTRAC compliance form is designed to help you assess the risk of violating the Proceeds of Crime (Money Laundering) and Terrorist Financing Act.

You **MUST** complete this document at the first opportunity when you are required to verify the identity of an individual or entity; **one form per person**. Uploading it to DocEM is **MANDATORY** even if no transaction is completed (expired or cancelled purchase/sale/lease brokerage contracts and expired or cancelled purchase/lease offers).

Broker's name AND licence number	
Name of the individual	
Special status of the person	POLITICALLY EXPOSED, HEAD OF AN INTERNATIONAL ORGANIZATION, NON-CANADIAN RESIDENT
Primary source of income	OCCUPATION, BUSINESS, COUNTRY
Nature of the transaction	PURCHASE, SALE, LEASE, CONTRACT NUMBER

TRUE FALSE

I have confirmed the client's identity using one of these four methods: in person, dual-process, via videoconference, or through an agent.	<input type="checkbox"/>	<input type="checkbox"/>
Since I have known the client, I have not observed any issues related to: <ul style="list-style-type: none"> identity verification the client's behavior the financial profile of the person or entity atypical transactional activity transactions structured to avoid reporting or identity-verification requirements foreign jurisdictions the use of third parties or nominees the financing of terrorist activities 	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
In my opinion, the context surrounding these observations provides a reasonable explanation for the issues above for which I answered FALSE?	<input type="checkbox"/>	<input type="checkbox"/>

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If you have checked at least one box in this column, contact our FINTRAC compliance officer **without delay**, Mr Pascal Goovaerts at 514.360.3000



BROKER'S SIGNATURE



REMINDER

Examples of issues related to identity verification

- The client refuses to provide information, or provides false, contradictory, misleading, or substantially incorrect information.
- The identification documents presented by the client cannot be authenticated.
- There are inconsistencies in the identification documents or the various identification elements provided by the client, such as name, address, date of birth, or telephone number.

Examples of issues related to client behavior

- The client declares having participated in criminal activities.
- The client displays nervous behavior.
- The client reacts defensively to questions.
- The client refuses to identify the source of funds or provides false, misleading, or substantially incorrect information.
- The client shows no concern for the cost of the transaction or for fees higher than usual.

Examples of issues related to the financial profile of the person or entity

- The client appears to live beyond their means.
- Transaction value or type is atypical compared with what is expected of the client.
- The client uses multiple accounts at multiple financial institutions for no apparent reason.
- There is suspicion that personal funds are being used for business purposes, or vice-versa.

Examples of issues based on atypical transactional activity

- A series of complex fund transfers for a deposit that appear to be an attempt to conceal the source of funds.
- The transaction is unnecessarily complex relative to its purpose.
- The transaction targets a suspected fictitious entity (an entity that has no economic or logical reason to exist).

Examples of issues related to transactions structured to avoid reporting or identity-verification requirements

- The client appears to be collaborating with others to avoid client identity verification or reporting thresholds.
- The client asks questions that suggest an intent to avoid reporting requirements.
- The client demonstrates knowledge of reporting thresholds.

Examples of issues related to foreign jurisdictions

- Transactions with a person who resides in a foreign jurisdiction considered higher risk for facilitating ML/TF, or with an entity that conducts business in such a country.
- Transactions involving countries considered high-risk or non-cooperative by the Financial Action Task Force (FATF).

Examples of issues related to the use of third parties or nominees

- Unrelated parties with no apparent connection to the client provide a deposit for the transaction.
- The client conducts a transaction while accompanied, supervised, or directed by another party.
- The client appears or claims to act on behalf of another party.
- The client participates in a suspicious transaction but refuses or is unable to answer questions about the transaction.

Examples of issues related to the financing of terrorist activities

- Transactions with a person who resides, or with an entity that operates, in certain high-risk territories such as areas in or near an armed conflict where terrorist groups operate, or places subject to weaker ML/TF controls.
- The person or entity declares or alludes to supporting violent extremism or radicalization.
- The client provides multiple variations of their name, address, telephone number, or additional identification information.

Examples of issues more specific to the real estate sector

- The client sells a property below market value and offers to make an additional “off-the-books” payment.
- The client buys a property without visiting it.
- The client repurchases a property they recently sold.
- The property changes hands frequently, especially if the owners know each other or are connected.