



CANADA AGENT

**ANTI-MONEY LAUNDERING AND
TERRORIST FINANCING PREVENTION
COMPLIANCE REGIME**

CANADA AGENT
ANTI-MONEY LAUNDERING AND TERRORIST FINANCING PREVENTION
COMPLIANCE REGIME

TABLE OF CONTENTS

SECTION 1 – USER INFORMATION

SECTION 2 – COMPLIANCE OVERVIEW

SECTION 3 – COMPLIANCE OFFICER

SECTION 4 – RISK ASSESSMENT

SECTION 5 – EMPLOYEE TRAINING

SECTION 6 – STRUCTURING AND SUSPICIOUS ACTIVITY

SECTION 7 – RECORD KEEPING AND REPORTING REQUIREMENTS

SECTION 8 – KNOW YOUR CLIENT

SECTION 9 – RESPONSE TO LAW ENFORCEMENT REQUESTS

SECTION 10 – INDEPENDENT REVIEW OF COMPLIANCE REGIME

AMENDMENT A – COMPLIANCE REGIME EMPLOYEE TRAINING GUIDE

SECTION 1

USER INFORMATION

INSTRUCTIONS

This document contains policies and procedures to help your business comply with Canadian compliance regulations and MoneyGram requirements. In order for this document to be considered an adequate Compliance Regime, you must:

- Document business specific policies and procedures, which include, but are not limited to the designation of the Compliance Officer, employee training, acceptable IDs, transaction limits, and / or easy to follow instructions for employees.
- Review and update this document on a periodic basis to ensure that the contents and procedures are current and reflect actual business practices.

LEGAL DISCLAIMER

Although this document contains legal information, it is not intended to be, nor should it be considered legal advice.

For legal advice, including the interpretation and application of any law, please consult an attorney.

CIVIL & CRIMINAL SANCTIONS

The penalties for violating Canadian compliance regulations are severe, and under certain circumstances, may be assessed against a business and / or one or more employee(s).

Violations may cause a loss of client goodwill and unfavorable publicity, as well as civil and criminal penalties.

All persons who sell, offer and / or process money transfers must be aware of the liability that can be imposed on them if the Business and / or its employees are willfully blind to suspicious activity or knew information that he / she “should have known” was suspicious.

Any employee that violates these policies and procedures, either unknowingly or intentionally may be subject to disciplinary action, including but not limited to, civil penalties, criminal penalties and termination of employment.

SECTION 2
COMPLIANCE OVERVIEW

ADOPTION OF COMPLIANCE REGIME

Name of Business

to be known herein as the 'Business'
hereby certifies and adopts the policies and procedures contained in this document and the
MoneyGram Anti-Money Laundering Canada Agent Compliance Guide
as its Compliance Regime.

Print Name

Title

Signature

Date

STATEMENT OF POLICY

The Business supports the fight against money laundering and terrorism and has adopted this Compliance Regime to prevent its financial services from being used in promoting criminal activity.

The Business will fully comply with both the intent and letter of all laws and regulations relating to compliance, the prevention of terrorist financing and economic sanctions (including, but not limited to the *Criminal Code*, the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* (PCMLTFA), the *United Nations Act*, *Suppression of Terrorism Regulations* and the *Special Economic Measures Act*). The Business will train its employees to comply with these laws and regulations.

A copy of this Compliance Regime will be kept at each of its locations conducting money services business (MSB) transactions in a place that is accessible to employees. Every employee who conducts or is involved in MSB operations is required to understand and comply with the contents of this document.

MONEY LAUNDERING DEFINITION AND DESCRIPTION

Money laundering is the attempt to conceal or disguise the nature, location, source, ownership or control of illegally obtained money. If illegal money is successfully laundered, criminals maintain control over their funds and they can establish a separate cover for their illicit source of income. The compliance regulations apply to any funds derived from illegal activities, such as funds held by drug traffickers, terrorists, organized crime, tax evaders and other groups and individuals seeking to transfer, spend and / or invest money derived from any type of crime.

The money laundering cycle includes placing funds into the financial system by sending money transfers. Once the funds have entered the system, the source of illegal funds is further disguised by transferring them through layers of financial institutions, such as bank or investment accounts. Finally, the funds are legitimized by investing or purchasing items, such as real estate, real property, stocks and bonds.

Money laundering is not limited to cash; money laundering can be conducted through any type of financial transaction, including, but not limited to, funds transfers, money orders, checks, debit cards, stored value and credit card transactions.

TRANSACTION MONITORING

The Compliance Officer will establish procedures for the review of higher-risk, out-of-the-ordinary transactions involving money transfers in order to identify transactions that may require special record keeping or reporting, including the reporting of suspicious activity.

MONEY SERVICES BUSINESS (MSB)

The definition of a money services business (MSB) is any business, entity or individual engaged in the Business of:

- Dealing of foreign exchange;
- Remitting or transmitting funds by any means or through any person, entity or electronic funds transfer network; or
- Issuing or redeeming money orders, traveler's cheques or other similar negotiable instruments except for cheques payable to a named person or entity.

Alternative money remittance systems such as Hawala, Hundi or Chitti are money services businesses.

Unless the Business conducts MSB activity outside of the MoneyGram agent relationship, or processes transactions for another MSB, the Business is covered by MoneyGram's MSB registration with FINTRAC.

SECTION 3

THE COMPLIANCE OFFICER

Name of Person

Title

is hereby designated as the Compliance Officer.

COMPLIANCE OFFICER RESPONSIBILITIES

The Compliance Officer as well as senior management's responsibilities include:

- Ensuring ongoing compliance with all applicable compliance and Terrorist Financing Prevention regulations.
- Coordinating and implementing the Compliance Regime.
- Assessing money laundering and terrorist financing risk.
- Ensuring that all employees are trained on compliance requirements before conducting MSB transactions.
- Ensuring regular compliance training is conducted in an effective manner for all appropriate employees.
- Ensuring all training is documented, including the date of the training, name of the trainer/trainee and topics discussed.
- Monitoring day-to-day compliance with the related laws and regulations.
- Ensuring accurate record keeping and reporting as mandated by the PCMLTFA.
- Ensuring that an Independent Review of the Compliance Regime is conducted every two (2) years.
- Reviewing and updating the Compliance Regime as necessary due to changes in laws or regulations and ensuring that all affected employees have been advised of these changes.
- Cooperating with law enforcement and MoneyGram on compliance investigations.

SECTION 4

RISK ASSESSMENT

REQUIREMENTS

The Business must assess and document the risk of money laundering or terrorist financing offences in the course of the Businesses transactions / activities.

The risk assessment must take into account the Businesses:

- Client and business relationships;
- Products, services and delivery channels;
- Geographic location where activities are conducted; and
- Any other relevant factors.

RISK MATRIX

The following matrix should be used to assess the Businesses risk of money laundering and terrorist activity.

	Low	Moderate	High
Client and Business Relationships	Stable, known client base	Client base increasing due to branching, merger, or acquisition	A large and growing client base in diverse geographic area
	Few international accounts or very low volume of currency activity in the accounts	Moderate level of international accounts with unexplained currency activity	Large number of international accounts with unexplained currency activity
	Few high-risk clients	Moderate number of high-risk clients	Large number of high-risk clients
Products, Services and Delivery Channels	No electronic transaction services or the Web site is informational or non-transactional	You offer limited products and services.	You offer a wide array of transaction services (i.e., multiple money transfer companies, money orders, currency exchange, etc.).
	There are few or no large currency transactions.	There is a moderate volume of large currency or structured transactions.	There is a significant volume of large currency or structured transactions.
	A limited number of fund transfers for clients, non clients, limited third-party transactions, and no foreign funds transfers	A moderate number of fund transfers, a few international fund transfers from personal or business accounts with typically low-risk countries	Frequent funds from personal or business accounts to or from high-risk jurisdictions, and financial secrecy havens or jurisdictions.
	No transactions with high-risk geographic locations	Minimal transactions with high-risk geographic locations	Significant volume of transactions with high-risk geographic locations

	Low	Moderate	High
Geographic Location	Your business is located in an area known to have low crime rate.	Your business is located in an area known to have moderate crime rate.	Your business is located in an area known to have high crime rate.
Other Relevant Factors	Low turnover of key anti-money laundering personnel and frontline personnel (i.e., client service representatives, tellers, or other personnel)	Low turnover of key anti-money laundering personnel, but frontline personnel may have changed	High turnover, especially in key anti-money laundering personnel positions

BUSINESS RISK ASSESSMENT

The Business has assessed the following risk factors for money laundering and terrorist financing.

	Low	Moderate	High
Client and Business Relationships	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Products, Services and Delivery Channels	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Geographic Location	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other Relevant Factors	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

For all transactions / activities that pose a high money laundering or terrorist financing risk, the Business must:

- Mitigate the identified risks;
- Take reasonable measures to keep client ID and beneficial owner information up to date; and
- Take reasonable measures to conduct ongoing monitoring to detect suspicious transactions.

ADDITIONAL / ALTERNATIVE POLICIES AND / OR PROCEDURES

SECTION 5

EMPLOYEE TRAINING

TRAINING REQUIREMENTS

Training must be provided to all employees who are involved with MSB transactions. At a minimum, that training must include:

1. Identifying suspicious activity and structured transactions;
2. Record keeping and reporting requirements;
3. Verifying client identification; and
4. Familiarity with compliance forms.

Before conducting any MSB transactions, new employees are required to understand and comply with the contents of this Compliance Regime and sign an acknowledgement form that will be retained in their personnel file or with the Compliance Regime files.

Existing employees who conduct MSB transactions will receive periodic refresher training that will be documented and retained in their personnel file or with the Compliance Regime files.

Amendment A of this Compliance Regime provides an overview that can be used to help train employees. Employee and Compliance Officer Training is also available on-line at www.MoneyGramU.com.

SCHEDULING EMPLOYEE TRAINING

The Business Compliance Officer will schedule and ensure periodic employee compliance training is conducted:

- Every month
- Semi-Annually (every 6 months)
- Annually (every 12 months)
- Every 18 months
- Bi-Annually (every 24 months)
- As necessary
- Other: _____

SECTION 6

STRUCTURING AND SUSPICIOUS ACTIVITY

The Government requires MoneyGram to file Suspicious Transaction Reports to FINTRAC on any transaction – or pattern of transactions – that is attempted or conducted if an employee knows, suspects or has reason to suspect that the activity:

1. Involves funds derived from illegal activity or is intended to hide funds derived from illegal activity;
2. Is structured to avoid record keeping or reporting requirements;
3. Has no business or apparent lawful purpose; and / or
4. Facilitates criminal activity.

The Compliance Officer shall report suspicious transactions to MoneyGram by completing and sending a Canadian Activity Report (CAR) to the MoneyGram AML Compliance Team within five (5) calendar days of the suspicious event.

The Compliance Officer will immediately notify the appropriate law enforcement authority of any situation(s) that require immediate attention, such as ongoing money laundering schemes or potential terrorist financing. In addition, the Compliance Officer will notify MoneyGram by filing the CAR.

Employees must not alert the client conducting the transaction of their suspicions or that a CAR has been or will be completed.

STRUCTURING

Structuring is the act of breaking up large transactions into several smaller transactions to avoid providing personally identifying information. Many money launderers are familiar with the dollar thresholds that require record keeping and reporting; to remain anonymous and avoid the detection of law enforcement officials, money launders attempt to structure their transactions to avoid triggering record keeping and / or reporting requirements

Money launderers may also attempt to trick employees into allowing them to structure transactions by splitting up transactions with several accomplices or by trying to “con” employees with a hard luck story. Employees need to be on the lookout for structuring so that they can prevent it from occurring.

It is illegal to structure transactions or to help clients avoid record keeping or reporting requirements. Employees may not tell or even imply to a client that he / she can avoid providing information by conducting smaller transactions.

The following examples of potential structuring are specifically designed to avoid record keeping requirements that should be reported for further research, review and possible CAR filing.

1. A client asks to conduct six (6) money transfers for \$500 each, totaling \$3,000.
2. Early in the morning, a client conducts three (3) money transfers for \$250 each, totaling \$750. Later in the day, the same client returns and conducts an additional three (3) money transfers for \$250 each. When combined, the six (6) transactions total \$1,500.
3. A client asks to send four (4) money transfers for \$850 each totaling \$3,400 on the same day to the same receiver.

It is illegal for the Business, its employees or clients to structure transactions in order to avoid the record keeping or reporting requirements.

Employees should never help anyone structure a transaction to avoid compliance reporting or record keeping requirements.

Employees should never tell clients how to avoid any transaction limitation.

SUSPICIOUS ACTIVITY

Suspicious activity can vary from one transaction to another based on the circumstances surrounding the transaction or group of transactions. One client's transaction(s) may be normal based on your knowledge of that client, while another client's transaction(s) may be suspicious.

Many factors are involved in determining whether transactions are suspicious, including, but not limited to the amount, the location of the store, comments made by the client, the client's behavior and the client's previous transaction history.

The following list provides examples of potentially suspicious activity that should be reported for further research, review and possible CAR filing.

- A client or an employee appears to structure transactions in an attempt to avoid compliance record keeping or reporting requirements.
- An individual provides minimal or fictitious information concerning their name and other identifying data.
- A client asks an employee how to avoid reporting or record keeping requirements.
- A client conducts one or more money transfers several times a day, or over a period of several days that when added together exceed the \$1,000 record keeping limit.
- A client uses a false or obviously altered ID.
- A client is unable or unwilling to provide ID.
- Two or more clients use the same or similar IDs.
- A client tries to alter his / her transaction after being asked to show his / her ID.
- A client deliberately changes the spelling of his / her name on multiple transactions.
- A client states he / she does not have a local address but he / she appears to reside locally because he / she is a repeat client.
- Two or more clients apparently work together to break one transaction into two or more transactions to avoid record keeping requirements.
- A client uses two or more locations or cashiers in the same city on the same day to process transactions or conduct money transfers.
- A client offers bribes, tips or threatens employees to avoid record keeping requirements.
- A client admits that the cash for his / her transactions came from illegal conduct.
- A client makes large transactions that are not consistent with his / her occupation or business practice.

REPORTING STRUCTURING AND SUSPICIOUS ACTIVITY

1. Employees will report all suspicious activity to the Compliance Officer or an assigned delegate, regardless of the dollar amount.
2. The Compliance Officer or an assigned delegate will investigate the activity to determine if the activity is suspicious.
 - If the activity is suspicious, a CAR form will be submitted within **five (5) days** of the activity. Completed CAR forms will be faxed to:
MoneyGram Compliance
720-568-8640
ATTN: CAR
 - A copy of the filed CAR must be maintained in the Compliance Regime file for five (5) years.
 - If the activity is determined not to be suspicious, the Compliance Officer will document the reason and will keep the documentation for a minimum of five (5) years in the Compliance Regime files.
3. Copies of filed CAR forms and any supporting documentation must be maintained in the Compliance Regime files for five (5) years and made available to appropriate law enforcement and regulatory agencies upon request. Supporting documentation must be identified in the Narrative Section of the CAR.

ADDITIONAL / ALTERNATIVE POLICIES AND / OR PROCEDURES

SECTION 7

RECORD KEEPING AND REPORTING REQUIREMENTS

All reporting and record keeping procedures are designed to comply with compliance regulations. Complying with the compliance regulations requires that the Business:

1. Keep records of money transfers of at least \$1,000.
2. File CARs.
3. Obtain and retain other records as necessary.

COLLECTION OF CLIENTS' INFORMATION

When processing MSB transactions for clients, the client may be asked to prove his / her name, address and phone number in addition to other information as required by the compliance regulations, including, but not limited to:

- Government issued photo ID;
- Date of birth (DOB); and
- Occupation

The client must provide a physical address where he / she resides. A post office box (P.O. Box) is not acceptable unless the P.O. Box is listed as the client's official address on his / her photo ID. The client CANNOT use the Businesses' address to process a transaction.

When documenting a client's photo ID, the Business will include the type of ID, the ID number, and the issuer of the ID.

If a client refuses to provide the information required by Compliance Regulations, the Business CANNOT process the transaction.

THIRD PARTY INFORMATION

If the client who is conducting a transaction is doing so for someone else, the information must be obtained for both parties. Examples of third parties are an employee of a business conducting a transaction on behalf of the Business, or a relative of an elderly or disabled person conducting the transaction for that person. Complete the Multiple Persons or Third Party sections on reporting and record keeping forms.

MAINTENANCE OF RECORDS

All record keeping and reporting documentation required by the PCMLTFA will be maintained for a minimum of five (5) years and they will be made readily available to FINTRAC upon request.

The Business will protect clients' personal and private information. All documents that contain clients' private and personal information will be stored in a secure location. If the Business discards any MSB documents, the documents must be completely destroyed prior to disposal.

ACCEPTABLE FORMS OF PHOTO IDENTIFICATION

When processing MSB transactions for clients, the client may be required to provide a valid form of government issued photo ID to verify the client's identity. The client's name and picture must match the information and picture on the photo ID, if available.

If the client indicates that he / she is not a resident of Canada, he / she must present a passport, alien identification card or other official document evidencing nationality or residence.

Photo identification presented to process an MSB transaction must be issued by a legitimate government agency and should include a picture and expiration date.

The Business must deny any form of identification that is expired or appears to be altered or fabricated.

The Business will only accept the following forms of government issued photo ID. Please mark all that apply in the following list:

- Driver's licence (province or territory)
- Province or Territory ID
- Provisional driver's licence
- Passport
- Gov't or Military ID Card
- Social Insurance Card
- Other: _____

LARGE CASH TRANSACTION REPORT (LCTR)

LCTRs must be completed and filed within 15 days of any cash transaction \$10,000 or more conducted by one person within a 24-hour period. Multiple transactions must be treated as a single transaction if any employee(s) have / has knowledge that they are by or on behalf of the same person and total \$10,000 or more, within a 24-hour period. The \$10,000 threshold includes the face amount of the transaction and all fees paid by the client.

The following information required on the LCTR must be obtained from the client **BEFORE** the transaction is completed:

- Name;
- Address;
- Phone Number (if the client doesn't have a phone number, please reflect that on the form);
- Valid ID;
- Date of birth; and
- Occupation.

MoneyGram will file this report for The Business.

Some examples of situations that require the filing of the LCTR are:

- A client brings in \$12,000 in cash to conduct a money transfer;
- A client brings in cash several times during the same day and conducts money transfers that add up to \$10,000 or more, , within a 24-hour period;
- A client brings in \$11,000 in cash, requests an \$8,000 money transfer and purchases stored value cards totaling \$3,000, within a 24-hour period; and / or
- A client receives cash for three money transfer transactions of \$3,500 each, totaling \$10,500.

LARGE INTERNATIONAL ELECTRONIC FUNDS TRANSFER (EFT) REPORT

The EFT report must be filed with FINTRAC for each money transfer involving a large international EFT requested by (or on behalf of) the same person of \$10,000 or more within five (5) days of the transfer. An EFT Report is required for:

- Single money transfers of \$10,000 or more to a destination outside Canada;
- Receipt of a money transfer from a destination outside Canada; and / or
- Multiple international money transfers performed in any consecutive 24-hour period requested by any person or on behalf of any third party that total \$10,000 or more.

Multiple money transfers must be treated as a single transaction the transactions are requested by (or on behalf of) the same person and total \$10,000 or more during any 24 hour period.

MoneyGram will file this report for The Business.

REQUIRED CLIENT INFORMATION ON MONEY TRANSFER SEND TRANSACTIONS

Specific client information must be documented at different send transaction amounts, regardless of the method of payment.

The send client's information must be documented **BEFORE** the transaction is processed:

- **\$0.00 - \$999.99**
 - ✓ Name
 - ✓ Address
 - ✓ Phone number
 - ✓ Transaction amount
 - ✓ Transaction date
- **\$1,000.00 and greater**
 - ✓ Name
 - ✓ Address
 - ✓ Phone number
 - ✓ Transaction amount
 - ✓ Transaction date
 - ✓ Valid government issued photo ID
 - ✓ Date of birth
 - ✓ Specific occupation

The Business must contact the MoneyGram AML Compliance Team at **1-800-642-8050** ext. 4899 **BEFORE** completing multiple transactions totaling \$20,000 or greater.

The send client's information must be documented on both the front and back of the MoneyGram Send Form and or the transaction receipt. The client must sign the form and / or the transaction receipt.

RECORDKEEPING REQUIREMENTS:

- MoneyGram recommends that **all transactions receipts under \$1,000** be maintained for at least **six (6) months**
- **Transaction receipts of \$1,000 or more** must be retained for **five (5) years** in the Businesses Compliance Regime files.

SEND TRANSACTION LIMITS

- The Business provides MoneyGram money transfer send services.

The Business limits individual money transfer send transactions for one person in a 24-hour period to the maximum amount of:

\$ _____

The Business limits combined money transfer send transactions for one person in a 24-hour period to the maximum amount of

\$ _____

Transactions that are structured at or below compliance thresholds must be considered suspicious activity and must be filed on a CAR.

The Business is solely responsible for ensuring money transfer send limitations are enforced.

- The Business DOES NOT provide MoneyGram money transfer send services.

PROCESSING SEND TRANSACTIONS

1. Prior to conducting any MoneyGram money transfer transaction, the Business will verify the client completes all appropriate and necessary sections and signs the MoneyGram Send Form. If the Business does not use MoneyGram Send Forms, the Business will ensure the client signs the MoneyGram transaction receipt.
2. The employee processing the transaction will correctly input the information provided by the client into MoneyGram money transfer system.
3. The Business may require a client to provide personally identifying information **BEFORE** completing any MSB transaction depending on the type, amount or circumstances surrounding the transaction.
4. The Business retains the right to refuse to process any transaction that appears suspicious.

REQUIRED CLIENT INFORMATION ON MONEY TRANSFER RECEIVE TRANSACTIONS

Specific client information must be documented at different receive transaction amounts. At all transaction receive amounts, the client receiving a money transfer must provide appropriate information and / or documentation to The Businesses satisfaction to demonstrate the right to receive the transaction.

The receive client's information must be documented **BEFORE** the transaction is processed:

- **\$0.00 - \$999.99**

- ✓ Name
- ✓ Address
- ✓ Phone number
- ✓ Transaction amount
- ✓ Transaction date

If the receive client does not have acceptable Photo ID, test questions are permitted to receive money transfers up to \$999.99.

- **\$1,000.00 and greater**

- ✓ Name
- ✓ Address
- ✓ Phone number
- ✓ Transaction amount
- ✓ Transaction date
- ✓ Valid government issued photo ID
- ✓ Social security number or tax identification number, if receiver is US citizen / resident
- ✓ Date of birth
- ✓ Specific occupation

The client's information should be documented on both the front and back of the MoneyGram Receive Form and or the transaction receipt. The client must sign the form and / or the transaction receipt.

RECORDKEEPING REQUIREMENTS:

- MoneyGram recommends that **all transactions under \$1,000** be maintained for at **least six (6) months**
- **Transactions of \$1,000 or more** must be retained for **five (5) years** in the Businesses Compliance Regime file.

BUSINESS TRANSACTION LIMITS FOR MONEY TRANSFER RECEIVE TRANSACTIONS

- The Business processes MoneyGram receive transactions.

The Business limits individual money transfer receive transactions for one person in a 24-hour period to the maximum amount of:

\$ _____

The Business limits combined money transfer receive transactions for one person in a 24-hour period to the maximum amount of

\$ _____

Transactions that are structured at or below compliance thresholds must be considered suspicious activity and must be filed on a CAR.

The Business is solely responsible for ensuring money transfer receive limitations are enforced.

- The Business DOES NOT process MoneyGram receive transactions.

PROCESSING RECEIVE TRANSACTIONS

1. Prior to conducting any MoneyGram money transfer receive transaction, The Business will verify that the client completes all appropriate and necessary sections and signs the MoneyGram Receive Form. If the Business does not use MoneyGram Receive Forms, The Business will ensure the client signs the MoneyGram transaction receipt.
2. The employee processing the transaction will correctly input the information provided by the client into MoneyGram money transfer system.
3. The Business may require a client to provide personally identifying information **BEFORE** completing any MSB transaction depending on the type, amount or circumstances surrounding the transaction.
4. The Business retains the right to refuse to process any transaction that appears suspicious.

ADDITIONAL / ALTERNATIVE POLICIES AND / OR PROCEDURES

SECTION 8

KNOW YOUR CLIENT

One of the most effective ways to protect a business from becoming the victim of financial crimes starts with verifying the identity of the clients and knowing with whom MSB transactions are conducted.

To avoid processing transactions that could put the Business at risk, the Business will implement a 'Know Your Client' policy that includes, but is not limited to:

- Only accepting valid, government issued photo ID documents, such as a driver's licence, passport or alien identification card that contains the client's name, address and photograph
- Requesting and documenting required client information before processing transactions
- Monitoring client transaction activity

ADDITIONAL / ALTERNATIVE POLICIES AND / OR PROCEDURES

SECTION 9

RESPONSE TO LAW ENFORCEMENT REQUESTS

AUTHORITY TO SUMMON TESTIMONY AND RECORDS

Government regulators and law enforcement agencies may seek information and records from time to time. Any person associated or connected with the Business who receives or is served with a summons, subpoena or court order related to MoneyGram business should immediately contact the MoneyGram Compliance Department for assistance.

The Business will assist these entities in their investigations, provided the request(s) is / are conducted in a lawful manner. This is necessary to ensure that the Business complies with client privacy laws. Furthermore, government agents are not permitted to use their summons authority to go on unwarranted "fishing" expeditions in our records. Employees should not feel pressured by government agents to release consumer or company information without first receiving a proper summons, subpoena or production order.

SECTION 10

INDEPENDENT REVIEW OF COMPLIANCE REGIME

The Business will conduct periodic independent reviews of its Compliance Regime as required by compliance regulations. The Independent Review will be conducted by a person or persons who are knowledgeable about the compliance requirements that apply to MSBs. The Business' Independent Review cannot be conducted by the Business' designated Compliance Officer or any MoneyGram representative.

The Business will conduct / conducted an Independent Review of its Compliance Regime on:

_____ , _____
Month Day Year

The Independent Review of the Businesses Compliance Regime was conducted by:

_____.

The Business Compliance Officer will schedule and ensure an Independent Review of the Businesses Compliance Regime every two (2) years.

ADDITIONAL / ALTERNATIVE POLICIES AND / OR PROCEDURES

AMENDMENT A

COMPLIANCE REGIME EMPLOYEE TRAINING GUIDE

Businesses and their employees who conduct MSB transactions must understand:

- The concept of money laundering;
- How to identify suspicious activity; and
- How to comply with the record keeping and reporting requirements.

STRUCTURING AND SUSPICIOUS ACTIVITY

- **Structuring** is the act of breaking up potentially larger transactions into several smaller ones in order to avoid record keeping or reporting requirements. See the *MoneyGram Anti-Money Laundering Canada Agent Compliance Guide* for more information and examples.
- **Suspicious Activity** is based on many different factors, including the amount of the transaction, the location of the Business, comments made by the client, the client's behavior, etc. Suspicious activity may be very different from one transaction to another based on all of the circumstances involved. See the *MoneyGram Anti-Money Laundering Canada Agent Compliance Guide* for examples of suspicious activity.

CANADIAN ACTIVITY REPORT

A CAR must be filed for any transaction(s), or pattern of transactions, that is attempted or conducted where it is known or suspected that the transaction:

- Involves funds derived from illegal activity or is intended to hide funds derived from illegal activity
- Is structured to avoid record keeping or reporting requirements
- Has no business or apparent lawful purpose, or
- Facilitates criminal activity

If suspicious activity occurs, The Business must:

- File CAR with MoneyGram Compliance personnel and include as much information as is known about the client
- Retain the CAR for five (5) years

LARGE CURRENCY TRANSACTION REPORT (LCTR)

- LCTRs must be filed for all MSB cash transactions \$10,000 or more; *MoneyGram will file the report for the Business.*

LARGE CURRENCY ELECTRONIC FUND TRANSFER (EFT) REPORT

- EFTs must be filed for all international MSB transactions \$10,000 or more. *MoneyGram will file the report for the Business.*

RECORD KEEPING FOR MONEY TRANSFER SEND TRANSACTIONS

Record the following information on the MoneyGram Send form at the following amounts:

- **\$0.00 - \$999.99**
 - ✓ Name
 - ✓ Address
 - ✓ Phone number
 - ✓ Transaction amount
 - ✓ Transaction date
- **\$1,000.00 - \$10,000.00**
 - ✓ Name
 - ✓ Address
 - ✓ Phone number
 - ✓ Transaction amount
 - ✓ Transaction date
 - ✓ Valid government issued photo ID
 - ✓ Date of birth
 - ✓ Specific occupation

See the *MoneyGram Anti-Money Laundering Canada Agent Compliance Guide* for more information and examples.

RECORD KEEPING FOR MONEY TRANSFER RECEIVE TRANSACTIONS

In addition to identifying the receive client's right to receive the transaction, the following receive client's information must be documented **BEFORE** the transaction is processed:

- **\$0.00 - \$999.99**

- ✓ Name
- ✓ Address
- ✓ Phone number
- ✓ Transaction amount
- ✓ Transaction date
- ✓ Valid government issued photo ID

If the receive client does not have acceptable photo ID, test questions are permitted to receive money transfers up to \$899.99.

- **\$1000.00 - \$10,000.00**

- ✓ Name
- ✓ Address
- ✓ Phone number
- ✓ Transaction amount
- ✓ Transaction date
- ✓ Valid government issued photo ID
- ✓ Date of birth
- ✓ Specific occupation

See the *MoneyGram Anti-Money Laundering Canada Agent Compliance Guide* for more information and examples.

