

NOTE: An Individual Identification Information Record is required by the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act*. This Record must be completed by the REALTOR® member whenever they act in respect to the purchase or sale of real estate. It is recommended that the Individual Identification Information Record be completed:

- (i) for a buyer when the offer is submitted and/or a deposit made, and (ii) for a seller when the seller accepts the offer.

Transaction Property Address:
.....
Sales Representative/Broker Name:
Date Information Verified/Credit File Consulted:

A. Verification of Individual

NOTE: ONLY ONE of Section A.1, A.2, or A.3 must be completed for your individual clients or unrepresented individuals that are not clients, but are parties to the transaction (e.g. unrepresented buyer or seller). Where you are unable to identify an unrepresented individual, complete section A.4 and consider sending a Suspicious Transaction Report to FINTRAC if there are reasonable grounds to suspect that the transaction involves the proceeds of crime or terrorist activity. Where you are using an agent or mandatary to verify the identity of an individual, see procedure described in CREA's materials on REALTOR Link®.

1. Full legal name of individual:
2. Address:
3. Date of Birth:
4. Nature of Principal Business or Occupation:
5. Employer:

A.1 Federal/Provincial/Territorial Government-Issued Photo ID

Ascertain the individual's identity by comparing the individual to their photo ID. **The individual must be physically present** unless you are using technology capable of assessing a government-issued photo identification document's authenticity.

1. Type of Identification Document*:
(must view the original, ID must have a photo, see CREA's FINTRAC materials on REALTOR Link® for examples – CANNOT USE Health Card in Ontario or S.I.N. card)
2. Document Identifier Number:
3. Issuing Jurisdiction: Country:
(insert applicable Province, Territory, Foreign Jurisdiction or "Canada")
4. Document Expiry Date:
(must be valid and CANNOT BE expired by the Completion Date of a transaction)

A.2 Credit File

Ascertain the individual's identity by comparing the individual's name, date of birth and address information above to information in a Canadian credit file that has been in existence for at least three years and is derived from more than one source. If any of the information does not match, you will need to use another method to ascertain client identity. Consult the credit file at the time you ascertain the individual's identity. **The individual does not need to be physically present.**

1. Name of Canadian Credit Bureau Holding the Credit File:
2. Reference Number of Credit File: Written Permission Obtained? Yes

A.3 Dual ID Process Method

1. Complete two of the following three checkboxes by ascertaining the individual's identity by referring to information in two independent, reliable, sources. Each source must be well known and reputable (e.g., federal, provincial, territorial and municipal levels of government, crown corporations, financial entities or utility providers). As of July 2019, you are permitted to rely on a fax, photocopy, scan or electronic image of such documentation. **The individual does not need to be physically present.**

Verify the individual's name and date of birth by referring to a document or source containing the individual's name and date of birth*
 Name of Source:
 Account Number**:
 Verify the individual's name and address by referring to a document or source containing the individual's name and address*
 Name of Source:
 Account Number**:
 Verify the individuals' name and confirm a financial account*
 Name of Source:
 Financial Account Type:
 Account Number**:

*See CREA's FINTRAC materials on REALTOR Link® for examples. ** Or reference number if there is no account number. Account numbers must be valid and not expired, must be recent if no expiry date.



A.4 Unrepresented Individual Reasonable Measures Record (if applicable)

Only complete this section when you are unable to ascertain the identity of an unrepresented individual.

1. Measures taken to Ascertain Identity (check one):

- Asking unrepresented individual for information to ascertain their identity
Other, explain:
Date on which above measures taken:

2. Reasons why measures were unsuccessful (check one):

- Unrepresented individual did not provide information
Other, explain:

B. Verification of Third Parties

NOTE: Only complete Section B for your clients. Take reasonable measures to determine whether your clients are acting on behalf of third parties by completing this section of the form.

B.1 Third Party Reasonable Measures

Is the transaction being conducted on behalf of a third party according to the client? (check one):

- Yes
No

Describe why you think your client may be acting on behalf of a third party:

B.2 Third Party Record

Where there is a third party, complete this section.

- 1. Name of other entity (third party):
2. Address:
3. Telephone number:
4. Date of Birth:
5a. Nature of Principal Business or Occupation:
5b. Employer:
6. Registration or Incorporation number and jurisdiction and country that issued that number (if applicable):
7. Relationship between third party and client:



Individual Identification Information Record

Upd. 03/22

NOTE: Only complete Sections C and D for your clients.

C. CLIENT RISK (ask your Compliance Officer if this section is applicable)

Determine the level of risk of a money laundering or terrorist financing offence for this client by determining the appropriate cluster of client in your policies and procedures manual this client falls into and checking one of the checkboxes below:

Low Risk

- Canadian Citizen or Resident Physically Present
- Canadian Citizen or Resident Not Physically Present
- Canadian Citizen or Resident – High Crime Area – No Other Higher Risk Factors Evident
- Foreign Citizen or Resident that does not Operate in a High Risk Country (physically present or not)
- Other, explain:

Medium Risk

- Explain:

High Risk

- Foreign Citizen or Resident that operates in a High Risk Country (physically present or not)
- Other, explain:

If you determined that the client's risk was high, tell your brokerage's Compliance Officer. They will want to consider this when conducting the overall brokerage risk assessment, which occurs every two years. It will also be relevant in completing Section D below. Note that your brokerage may have developed other clusters not listed above. If no cluster is appropriate, the agent will need to provide a risk assessment of the client, and explain their assessment, in the relevant space above.

D. BUSINESS RELATIONSHIP

D.1. Purpose and Intended Nature of the Business Relationship (Check the appropriate boxes.)

Acting as an agent for the purchase or sale of:

- | | |
|---|--|
| <input type="checkbox"/> Residential property | <input type="checkbox"/> Commercial property |
| <input type="checkbox"/> Residential property for income purposes | <input type="checkbox"/> Land for Commercial Use |
| <input type="checkbox"/> Other, please specify: | |

Optional: Describe your business dealings with the client and include information that would help you anticipate the types of transactions and activities that the client may conduct.

D.2. Measures Taken to Monitor Business Relationship and Keep Client Information Up-To-Date

D.2.1. Ask the Client If their name, address or principal business or occupation has changed and if it has include the updated information on page one.

D.2.2 Keep all correspondence with the client on file in order to maintain a record of the information you have used to monitor the business relationship with the client. Optional - if you have taken measures beyond simply keeping correspondence on file, specify them here:

NOTE: Business Relationship Continued on page 4...



D.2.3. If the client is high risk you must conduct enhanced measures to monitor the brokerage's business relationship and keep their client information up to date. Optional - consult your Compliance Officer and document what enhanced measures you have applied:

D.3 Suspicious Transactions

Don't forget, if you see something suspicious during the transaction report it to your Compliance Officer. Consult your policies and procedures manual for more information.

E. Terrorist Property Reports

Don't forget to follow your brokerage's procedures with respect to terrorist property reports. Consult your policies and procedures manual for more information.

POLITICALLY EXPOSED PERSON / HEAD OF INTERNATIONAL ORGANIZATION Checklist / Record

Definitions are found on the following page. Try to answer all applicable questions as per your brokerage's policies and procedures. Please see your brokerage's Compliance Officer if you have questions about when to complete the form.

1. Name of individual under review:

2A. Determine whether the individual is any of the following. Check all relevant boxes:

- Politically exposed foreign person (foreign PEP) or family member / close associate of one
- Politically exposed domestic person (domestic PEP) or family member / close associate of one
- Head of an international organization (HIO) or family member / close associate of one
- None of the Above

2B. Indicate how you made this determination:

- Asked individual
- Internet search
- Consulting a commercial PEP/HIO database that the agent's brokerage has subscribed to
- Other, explain

3. Indicate the date when the determination above was made:

*** IF YOU SELECTED NONE OF THE ABOVE, THERE IS NO NEED TO PROCEED FURTHER. OTHERWISE, CONTINUE TO STEP 4 ***

4. Position held by PEP or HIO or their family member/close associate:

5. Name of Organization in which position is held:

6. Complete this question for CLIENTS. If you are not dealing with a client, proceed to step 7.

A. If domestic PEP/HIO:

Is the client high risk according to brokerage policies and procedures Yes No
If No, no further action required. If yes, proceed to 6B.

B. If foreign PEP/HIO, or a high-risk domestic PEP/HIO, or a family member/close associate of one, indicate:

- A. Source of the individual's wealth:
- B. Verified that enhanced measures taken as per brokerage policies and procedures. Check this box when completed:

If individual also provided \$100,000 in cash or virtual currency, proceed to step 7. Otherwise, there is no need to proceed further.

7. If \$100,000 cash or virtual currency has been received from this individual, complete this question.

A. If individual is domestic PEP/HIO, or family member/close associate of one::

Is the client high risk according to brokerage policies and procedures Yes No
If No, no further action required. If yes, proceed to 7B.

B. If foreign PEP/HIO, or a high-risk domestic PEP/HIO, or a family member/close associate of one, indicate:

- i. Source of cash or virtual currency:
- ii. Source of individual's wealth:
- iii. Name of senior management that has reviewed transaction:
- iv. Date that senior management reviewed transaction:



Definitions of Politically Exposed Person / Head of International Organization Checklist / Record

This page is for informational purposes and is not required to be filed as part of the Individual Identification Record.

- **“Politically exposed foreign person” (foreign PEP):** an individual holding one of the following offices in or on behalf of a foreign state:
 - Head of state or head of government member of the executive council of government or member of a legislature; deputy minister or equivalent rank; ambassador, or attaché or counsellor of an ambassador; military officer with a rank of general or above; president of a state-owned company or a state-owned bank; head of a government agency; judge of a supreme court, constitutional court or other court of last resort; or leader or president of a political party represented in a legislature.
- **“Politically exposed domestic person” (domestic PEP):** an individual who holds or has held within the last 5 years one of the following specific office or positions in or on behalf of the Canadian federal government, a Canadian provincial or territorial government, or a Canadian municipal government:
 - Governor General, lieutenant governor or head of government; member of the Senate or House of Commons or member of a legislature; deputy minister or equivalent rank; ambassador, or attaché or counsellor of an ambassador; military officer with a rank of general or above; president of a corporation that is wholly owned directly by Her Majesty in right of Canada or a province; head of a government agency; judge of an appellate court in a province, the Federal Court of Appeal or the Supreme Court of Canada; leader or president of a political party represented in a legislature; or mayor.
- **“Head of an international organization” (HIO):** an individual who currently holds or has held within the last 5 years the specific office or position of head of an international organization and the international organization that they head or were head of is either:
 - an international organization established by the governments of states; or
 - an institution established by an international organization
- **“Family member”:** a spouse or common law partner, biological or adoptive child, mother or father, mother or father of spouse or common law partner, or sibling.
- **“Close associate”:** a person who is closely connected to a PEP or HIO for personal or business reasons. For example, they are in a romantic relationship with a PEP/HIO or are business partners with a PEP or HIO. FINTRAC Guidance includes additional examples.

For more information see Compliance Officer or FINTRAC Guidance *Politically exposed persons and heads of international organizations guidance for non-account-based reporting entity sectors and Politically exposed persons and heads of international organizations guidance.*