

Royal LePage Team Realty FINTRAC Checklist

Identification Type	What To Do	Forms	How / Details
Individuals	<p>Identify every individual and/or those providing deposit funds</p> <p>1. Government issued photo id with unique identifier: Driver's License Passport Record of landing Permanent resident card Old age security card Indian Status (no Ontario Health card)</p> <p>2. Credit File. Consulting a Canadian credit file that has been in existence for at least three years. The credit file must match the name, address and date of birth that the client has provided. Equifax Canada and TransUnion Canada are Canadian credit bureaus that provide credit file information for identification purposes. Make sure you complete section A.2 in the Individual Identification Information Record.</p> <p>3. Dual Process Method. The dual process method to confirm an individual's identity requires that you refer to any two of the following:</p> <ul style="list-style-type: none"> ● documents or information from a reliable source that contain the individual's name and date of birth; ● documents or information from a reliable source that contain the individual's name and address; or ● documents or information that contain the individual's name and confirms that they have a deposit, credit card or other loan account with a financial entity. 	Individual Identification Information Record – CREA or TEAM Realty	<p><u>MUST BE FACE TO FACE</u> – (no email or fax) you must see identification and document</p> <p>*Be descriptive with occupation</p> <p>*Jurisdiction is usually Canada, Ontario</p> <p>*Do Not Submit photocopies, only FINTRAC forms</p> <p>Complete C-Client Risk Portion for all clients. Contact compliance officer if you suspect any level of risk (refusal to provide info or sign, purchases in someone else's name, inflated purchase price, under table payments, deposit from unrelated 3rd party, offshore deposits, corporate veil, no inspection, multiple transactions, etc.)</p> <p>Complete D – Business Relationship for all clients. Contact compliance officer if the individual has completed 2 or more transactions with the brokerage within a 5 year period. Realtors®, Staff, Mgmt, & Deal Administration bear the responsibility.</p>

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Corporation / Company	<p>Review official corporate records to ensure: Individual has authority to bind corporation/company, company address, Directors Shareholders (ex. Certificate of incumbency, articles of incorporation, bylaws of corporation). You must also complete individual ID forms for person(s) conducting transaction.</p>	<p>Corporation/Entity Identification Information Record – CREA or TEAM Realty + Individual Identification Information Record – CREA or TEAM Realty</p>	<p>Retain a copy of corporate record that states individual has authority to bind company ID Individual with authority to bind corporation. Must be received within 30 days of closing. Be descriptive for business Complete C-Client Risk Portion for all clients. Contact compliance officer if you suspect any level of risk (refusal to provide info or sign, purchases in someone else’s name, inflated purchase price, under table payments, deposit from unrelated 3rd party, offshore deposits, corporate veil, no inspection, multiple transactions, etc.) Complete D – Business Relationship for all clients. Contact compliance officer if the individual has completed 2 or more transactions with the brokerage within a 5 year period. Realtors®, Staff, Mgmt, & Deal Administration bear the responsibility.</p>
Mandatory / Agent (Non Face To Face) Mandatory completes mandatory form and identification on behalf of our brokerage	<p>Arrange for Realtor®, Dentist, Medical Doctor, Notary Public, Judge, Lawyer, CA / CGA, P Eng., Vet. to identify</p>	<p>Identification Mandatory/Agent Agreement – CREA + Individual or Corporation/Entity forms completed as per above instructions</p>	<p>Mandatory & You complete Mandatory/Agent Agreement Mandatory identifies individuals using procedures above All forms/documents are sent back to you</p>
Unrepresented Parties	<p>You must make reasonable efforts to ascertain the identity of FSBO’s/Mere Postings/Unrepresented Sellers/etc. if they have not already been identified. If they refuse document on identification form and submit with paperwork.</p>	<p>Individual or Corporation/Entity forms completed as per above instructions (ensure section A.4 is complete)</p>	<p>ASK FSBO, Mere Posting / Unrepresented Seller if they have been identified by another brokerage. If they have do not ask for identification. If they refuse document details.</p>

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Third Parties	Individual that conducts the transaction other than the individual on/going on title (law firm, trustee, executor, Power of Attorney)	Individual Identification Information Record – OREA 630 <i>Or</i> Corporation/Entity Identification Information Record – OREA 631 Individual you are dealing with completes “Verification of Individual” or “Verification of Corporation or other Entity” section “Verification of Third Parties” you don’t identify but complete as owner or purchaser.	Identify Individual you are dealing with. Complete Form (CREA) Identify who they are working on behalf of under 3 rd party portion
Receipt of Funds	Receipt of Funds Record – (CREA or TEAM REALTY) - Always completed by buyer agent for every deposit - Must be completed for every deposit (including multiple deposits) we receive. - Only completed when funds are being held in real estate trust account - If a bank draft is received, the name of account holder and account number the draft was purchased from is to recorded - Not required if deposit is submitted to builder or lawyer - Completed for all types of deposit transactions - ID anyone depositing funds (ex. Family member providing deposit for son/daughter) - Complete Large Cash Transaction Report & Report to FINTRAC when receiving one (or multiple deposits within 24 hours) of \$10,000 or more and the deposits cannot be linked to an account or client name, ex. Cash.		
Large Cash Transaction Report	- One or multiple cash deposits in excess of \$10,000 - Complete ID forms for individual providing deposit		

Realtor® Notes: As per Royal LePage Team Realty policy complete and submit Section C-Client Risk portion and D-Business Relationship for all clients and/or customers. ALL FINTRAC forms for all transactions will be submitted to your frontdesk. All forms/documents must be held by Royal LePage Team Realty for 10 years. Ensure ID forms are completed when agreement has been accepted.

No requirement for self identification if you are buying or selling a property and are a registered Realtor® in Canada. FINTRAC Identification not required for leases

No requirement to identify: Very large corporations / Lending institutions / Federal or Crown Agencies (minimum 75 million net assets, operate in Canada, publicly traded)

We are required to file reports with FINTRAC if:

- We are involved in a suspicious transaction or attempted suspicious transaction
- We are involved in a large cash transaction
- We are aware of a property owned or being purchased by a terrorist or terrorist group