

FINTRAC & CLIENT IDENTIFICATION

Dear Clients,

Effective June 23, 2008, the Canadian Real Estate industry is obliged, under new Federal Legislation, to actively confirm the identity of all parties involved in any Real Estate transaction conducted in Canada as well as to maintain permanent identification files related to these transactions.

This new requirement is part of the Canadian Government's FINTRAC (Financial Transactions and Reports Analysis Centre) program. This program is best summarized as our government's strategy "to fight money laundering, terrorist financing and threats to the security of Canada."

**For more information about FINTRAC, please call their
toll free service line at 1-866-346-8722.**



Financial Transactions and Reports
Analysis Centre of Canada

Centre d'analyse des opérations
et déclarations financières du Canada

Canada

WHAT'S REQUIRED?

- **Your REALTOR® will request a piece of personal identification and confirmation of the following information for all clients involved in a Real Estate transaction:**
 - ⇒ Name
 - ⇒ Permanent Address
 - ⇒ Date of Birth
 - ⇒ Client occupation or nature of their principle business
- **Your REALTOR® will be required to photocopy one of the following pieces of Personal Identification:**
 - ⇒ Valid Canadian Passport
 - ⇒ Valid Provincial Driver's License with photo
 - ⇒ Government of Canada Citizen's Card with photo
 - ⇒ Old Age Security Card
 - ⇒ Birth Certificate (provincial certificate with a serial number on it)

PRIVACY AND PROTECTION OF INFORMATION

At Coldwell Banker Associates Real Estate Limited we commit to providing the finest Real Estate services possible to our clients. We can ensure you that any personal information collected in regard to FINTRAC or the execution of our fiduciary duties, is carefully and securely stored in accordance with the Personal Information and Electronic Documents Act of Canada (PIPEDA). For further information regarding our Privacy Policies please visit our website at www.halifaxhomes.net or contact our Privacy Compliance Officer at 902-864-5050.

Thank you on behalf of the staff, REALTORS® and Brokers of Coldwell Banker Associates Real Estate Limited.



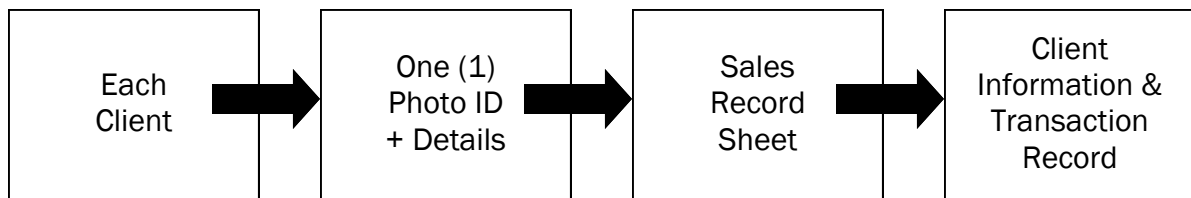
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AGENT ORIENTATION—FINTRAC

New Federal Legislation obliges the Canadian Real Estate industry to comply with new FINTRAC regulations for the purchase or sale of Real Estate. All Agents and Brokers will keep certain records, identify clients in specific ways and report certain types of transactions and incidents to FINTRAC. This new legislation takes effect June 23, 2008.

Overview of Agent Obligations

1. In all instances of a listing, purchase or sale of Real Property the Agent is obliged to confirm the identification of the client(s) with property photo ID, and to record this information on the revised SALES RECORD SHEET that will become part of the permanent Client Information and Transaction Records stored at Coldwell Banker Associates Real Estate Limited. For example:



2. Client Identification is necessary in all situations involving the receipt, payment, deposit, withdrawal or transfer of funds by any means. The new Sales Record Sheet contains all the necessary fields for this purpose.
3. Agents must immediately report to their Broker any suspicious transaction or attempted transaction related to the commission or attempted commission of money laundering or any terrorist financing request.
 - a. The Broker will then submit a Suspicious Transaction Report to FINTRAC as required and retain a permanent internal record.

Client Information Record

As of June 23, 2008 all Agents will carefully record the following Client Identification Information in the Sales Record Sheet:

- Client(s) Name(s)
- Client(s) Permanent Address
- Client(s) Date of Birth
- Nature of the Client(s) principle business or occupation

If the client is a corporation you must include a copy of the corporate records which identifies those individuals mandated to represent the company and this as well must be included in the “Sales Record Sheet.”



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When to complete the Client Identification

Identification must happen at the time of the transaction. In the case of the identification of a corporation or another type of entity (i.e. not for profit association etc.) the identification must happen within 30 days of the transaction.

What to do in non-agency situations?

In cases that a party to a transaction (customer) is not represented by an Agent or a Broker, the Agent will have to confirm their identity as well as that of their own client(s). Agents will attach the confirmed customer identification information to the Sales Record Sheet.

What can be used as proof of a Client(s) or Non-Agency Party Identity?

The following documents may be photocopied and attached to the "Sales Record Sheet" as proof of identification:

- Valid Canadian Passport
- Valid Provincial Driver's License with photo
- Government of Canada Citizen's Card with photo
- Old Age Security Card
- Birth Certificate (provincial certificate with a serial number on it)
- Certificate of Aboriginal Status

What to do if the Client is not physically present?

In the case of distance or overseas transactions (i.e. a buyer buying a home from across the country) there are two basic ways to confirm the identity:

1. Use an agent or mandatary to confirm the individual's identity (i.e. banker, lawyer). You must have a written agreement with the Agent outlining their responsibilities and acceptance of their role. All information that was obtained must be sent to you by the Agent, including the photocopied identification pieces.
2. Use ANY TWO of the following methods:
 - a. Refer to a credit file with the individual's permission
 - b. Use an independent identification product (cannot be combined with item a. above)
 - c. Obtain an attestation from a guarantor or commissioner of oaths (i.e. Justice of the Peace)
 - d. Confirm that a cheque drawn from the individual's account has cleared the bank
 - e. Confirm that the individual has a deposit account with a registered financial entity (bank, credit union, trust company, etc. Note: cannot be used with item d. above)

NB: The individual's information must be consistent in each of the chosen methods and with the information in your records.