

Welcome to ReallyTrusted! We've prepared this document to assist our Brokerage partners in understanding all of the options available within the system for your Brokerage.

ReallyTrusted Brokerage Rights

“Rights” can be assigned to any account that exists on *ReallyTrusted* - but the individual who should have those rights will need to have an account on the system. To that end, please have the individual(s) create their account at <https://app.reallytrusted.com> and send a ticket through the ‘Help’ section to request the rights. Those rights will only be assigned once our support team has confirmed that the individual is entitled to that level of access with the brokerage owner/manager. Each brokerage can have as many of each role as the brokerage would like.

Admin:

Accounts involved in enrollment and administration of agents. Rights include:

- **Users:** View and remove agents from the brokerage account
- **Users:** Move agents between branches (must be Admin for both branches)
- **Users** then **Edit User:** Assign User-Specific Forms Email for integration with transaction management platform (available upon request)

Data:

Accounts involved in supervising agents. Rights include:

- **Users:** View agents from the brokerage account
- **Branches** then **Data:** Download a CSV summary (within specified date range) of all created forms with corresponding alphanumeric *Document ID* (column C)
- **Documents:** Input the alphanumeric *Document ID* from CSV summary, locate and download the full PDF copy of a specific record

Compliance Officer(s): (FINTRAC)

- **Branches** then **Business Relationships:** Review business relationships with monitoring records via clients
- Automated email notifications for Medium and High Risk Assessments (if enabled)

Compliance Exception Handler(s): (FINTRAC)

- Receives a policy exception email when an agent does not review business relationship(s) following multiple notifications requesting action
- May be the compliance officer(s) or a delegate of the compliance officer(s)

***ReallyTrusted* Brokerage Copy of Forms**

Brokerages can receive 0, 1 or 2 copies of all forms created by their agents and can choose to either allow agents to see and modify where that form goes or not (which we refer to as being “locked” or not.) The brokerage to select either, none or both of the following:

- o Generic Brokerage Email

- One brokerage wide email address that all forms will be copied to for Brokerage record keeping

- o Per-User Email

- Each agent on the system can have a specific email address where the brokerage copy of the forms will be delivered
- This is generally optimal for an integration with an external transaction management platform. (Create a transaction titled “Agent Bob’s ReallyTrusted Forms” in your transaction management software and use the email address for that transaction)
- An admin person for the brokerage can have access to this setting in their module in order to help minimize typos and ensure the brokerage retains control

***ReallyTrusted* Remote FINTRAC**

ReallyTrusted built our Remote FINTRAC feature as a way to assist agents in minimizing the use of mandataries in their practice. The tooling was built using the FINTRAC guidance originally issued Oct 2019 (and updated since then). The tool is compliance with FINTRAC’s requirements for dual checks (verification of the ID being presented and matching the individual presenting the ID with the ID being presented) but, FINTRAC guidance does also require the brokerage FINTRAC policy manual to reflect how agents can remotely verify their clients - to that end, we wish to remind you to amend your policy manual appropriately.

***ReallyTrusted* FINTRAC v3.0 Thresholds**

The below options are important for the brokerage compliance officer to appropriately customize their brokerages policies and tune *ReallyTrusted* appropriately.

- **Risk Thresholds**

- o After reviewing our list of ‘Agent Risk Assessment of Client’ and ‘Suspicious Transactions’ (see attached FINTRAC ID record below), please select how many indicators will cause a medium and a high risk rating
- o System defaults are *one* indicator will force a Medium Risk determination and *two* indicators will force a High Risk rating

- If you do not want a Medium Risk rating, simply select a higher threshold for medium than for high

- **Risk Determination Explanation Requirement**

- Medium and High Risk Assessment Explanations are required by default ○ Brokerage can require a Risk Explanation for Low Risk ratings if desired

- **Validity Period of Risk Assessment**

- The period of time after which the agent is required to reevaluate their risk assessment prior to creating a new FINTRAC record (ID data will automatically expire based on the expiry of the ID provided)
- System defaults are Low (12 months), Medium (6 months) and High (3 months)
- During the data validity period, agents will be able to create a new Transaction Record without needing to reconfirm questions about their clients occupation, nature of business relationship, presence of third party, risk determination, PEP/HIO status

- **Relationship Monitoring Intervals**

- The brokerage can establish the appropriate periodic interval for all of their business relationships monitored in ReallyTrusted.
- Different time periods can be applied to Low, Medium and High Risk Assessments (and it is recommended that different intervals are used)
- System defaults are Low (24 months), Medium (12 months) and High (6 months)
- The agent responsible for the business relationship will receive 3 emails ahead of the deadline (approximately weekly for the month preceding the deadline) and the compliance officer will be notified if the business relationship monitoring task has not been completed by the brokerage's policy interval as above.

Third Party Identification (blank if not applicable)

Full Legal Name _____ Date of Birth _____

Street Address _____

Nature of Principal Business/Occupation

Incorporation Number and Place of Issue (if applicable)

Relationship Between Third Party and Client

Purpose and Intended Nature of the Business Relationship

Acting as an agent for the purchase or sale of (check one and provide reason):

- | | |
|---|---|
| - Purchase of Residential Property | - Sale of Residential Property |
| - Purchase of Land | - Sale of Land |
| - Purchase/Lease of Commercial Property | - Sale/Lease of Commercial Property |
| - Purchase/Lease of Commercial Business | - Sale/Lease of Commercial Business |
| - Purchase of Rights to a Contract (Assignment) | - Sale of Rights to a Contract (Assignment) |

Specify the reason for the purchase or sale (i.e. - Personal Residence, Investment, etc.)

Agent Risk Assessment of Client

Country of Operation: (Indicate which country your client largely operates in, regardless of residency.)

- Canada - United States - Other

The following are known money laundering and terrorist indicators. Check ALL that apply to your transaction:

- | | |
|---|--|
| - Unclear identity, or difficult to identify | - Client is unconcerned by costs, fees or market value |
| - Client's business is cash intensive | - Client is an intermediary |
| - Client uses intermediate vehicles (i.e. corporations, trusts, foundations, partnerships) or other structures that seem unusual, complex or unnecessary for their business | - Client is using unsupervised intermediaries |
| - Source of deposit is concealed or obfuscated | - Client has engaged in an activity that is consistent with a suspicious transaction (see below) |
| - None of the aforementioned | - Agent has not met client |
| | - Transaction is an assignment of a legally binding contract |

Transaction Risk Indicators

Activities that may be consistent with a suspicious transaction

- Renovations
- Flipping
- Defaulting
- Anonymity
- Income Generating
- Transaction Speed
- None of the Above
- Geography
- Inconsistency
- Value
- Structuring
- Direct

Risk Determination

Based on your assessments, please classify the likely level of money laundering or terrorist financing risk?

- Low
- Medium
- High

Explanation of Risk Assessment: _____

Politically Exposed Person/Head of International Organization Determination (PEP/HIO)

Is the individual a:

- 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

When was this determination made? _____

How was this determination made?

- Asked individual
- Internet Search

Other, explain _____

Client is a High Risk PEP/HIO? Yes No

Politically Exposed Person/Head of International Organization Details (blank if not applicable)

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

Name of organization in which position is held

Source of the individual's wealth

PEP/HIO \$100,000 in cash or virtual currency received (blank if not applicable)

Source of cash or virtual currency

Name of Senior Management that has reviewed the transaction

Date that Senior Management reviewed the transaction

**REMINDER: Completing this form does not satisfy all of your FINTRAC obligations.
If you become aware of new facts that would cause you change your assessment of risk above, please ensure
you submit an updated version of this form to your brokerage ASAP
Whenever you see something suspicious, report it to your Compliance Officer and/or consult your brokerage
policy and procedures manual.**