

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

Follow the instructions below and complete questions as indicated. Try to answer all applicable questions as per your brokerage's policies and procedures. Please see brokerage's Compliance Officer if you have questions about when to complete this 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 the date when the determination above was made: .....

If you selected None of the Above, there is no need to proceed further. Otherwise, proceed to step 3.

3. 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: .....

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 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, 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 in 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 individual 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, 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 the individual's wealth: .....
- iii. Name of senior management that has reviewed transaction: .....
- iv. Date that senior management reviewed transaction: .....



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## Definitions:

- Politically exposed foreign person” (foreign PEP): an individual holding one of the following offices in or on behalf of a foreign state:
  - o 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:
  - o 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:
  - o an international organization established by the governments of states; or
  - o 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*.