



Anti-Money Laundering (AML) changes – Frequently Asked Questions

1) **When do the new regulations come into effect?**

June 1, 2021

2) **What ivari products do these changes apply to?**

These requirements apply to all Universal Life insurance policies and non-registered annuity contracts (including segregated funds, GIA and SPIA contracts). Term policies are exempt.

3) **What happens if I use an old form when submitting business without the new requirements embedded in the form?**

Using an older version, without the new AML requirements, could result in you needing to obtain additional information from your clients, which may delay the processing time of the request. To minimize or avoid delivery requirements, it is important to use the current ivari 360 eApp, and up-to-date forms.

4) **In what circumstances should the identity of a client be verified??**

You must verify the identity of a person or entity or beneficiary for:

- Large cash transactions
- Suspicious transactions
- Client Information records
- Death Benefit amount(s) paid to beneficiary(ies)

5) **What is required when the death benefit is \$10,000 or more?**

Each beneficiary receiving an amount of \$10,000 or more will need to complete a claimant statement.

6) What new information is required for collection on a beneficiary?

- New information on the CL213 and CL766 forms includes date of birth, occupation/principal business, collection of client ID.
- For an individual beneficiary:
 - Beneficiary(ies) outside of Canada – in addition to the above information they will also need to provide two pieces of ID from the Dual Process chart (see NF2F Guidelines and process).
- For an estate – information required on the Executor
- For a trust – information required on the Trustee
- For a corporation – information required for the signing officer
 - In addition, completion of form IP-LP1166 is required

7) What do I do if I determine the beneficiary is a domestic or foreign Politically Exposed Persons (PEP) or Head of International Organization (HIO)?

Remittance amount(s) to a beneficiary(ies) in the amount of \$100,000 or more will require completion of the new PEP form (CL2110) – designed for beneficiary(ies)

8) What is the timeframe for verifying a client's identity?

You must identify the annuitant, policy holder, or beneficiary within 30 days of creating the information record.

9) Where can I find more information?

For more information, please visit <https://www.fintrac-canafe.gc.ca/guidance-directives/1-eng>