

Community Opportunity Foundation of Alberta

Anti-Terrorism and Money Laundering Policy

1. OBJECTIVE & SCOPE OF POLICY

In order to combat organized crime groups and other criminals including those who finance terrorist activities, Canada has enacted legislation including the *Anti-terrorism Act* and *The Proceeds of Crime (Money Laundering) and Terrorist Financing Act*. This policy sets out standards to ensure compliance with the requirements set forth in the above noted legislation.

The Community Opportunity Foundation of Alberta (the "Foundation") is committed to preventing the use of its operations for money-laundering or other criminal or terrorist purposes.

The Foundation observes all legislative and regulatory requirements and will cooperate with law enforcement agencies to the full extent permitted by law during the course of an investigation into terrorist financing or money laundering.

2. DEFINITIONS

For the purposes of this policy:

"**FATF**" means the intergovernmental Financial Action Task Force on money laundering;

"**FINTRAC**" means the Financial Transactions and Reports Analysis Centre of Canada; and

"**Money Laundering**" means any act or attempt to disguise the source of money or assets derived from criminal activity;

3. OVERVIEW OF LEGISLATION

Anti-terrorism and money laundering legislation sets out requirements for client identification and record keeping. Financial institutions and other intermediaries, such as the Foundation, are required to report financial transactions to FINTRAC if there are reasonable grounds to suspect that they are related to the commission of a money laundering offence. FINTRAC collects and analyzes these reports and disclosed suspicions of money laundering to law enforcement agencies.

4. ANTI-TERRORISM

The Foundation and its directors, officers, and employees will not knowingly enter into transactions with, or provide or assist in providing, directly or indirectly, financial or other services to, or for the benefit of, states, entities, organizations and individuals targeted by applicable anti-terrorism measures.

5. **MONEY LAUNDERING**

The Foundation will not knowingly transact business with sanctioned individuals or entities identified as terrorist or suspected terrorist organizations. The Foundation is in compliance with FATF recommendations including:

- Identifying and verifying clients;
- Continuous monitoring of client relationships;
- Maintaining appropriate records;
- Reporting suspicious transactions; and
- Compliance with law enforcement during an investigation

6. **ADDITIONAL INFORMATION**

For further information regarding the Foundations efforts to combat terrorism and money laundering, you may e-mail the Privacy Officer at info@saveoursalmon.ca, or you may contact the Privacy Officer at (403) 720-6050.