



Anti-Money Laundering (AML) & Know Your Customer (KYC) Policy

B-Transfert Inc. – Licensed Money Services Business (Québec, Canada)

1. Introduction

B-Transfert Inc. (“the Company”) is committed to the highest standards of anti-money laundering (AML), counter-terrorist financing (CTF), and Know Your Customer (KYC) compliance. This policy outlines the principles and procedures adopted by the Company to prevent its services from being used for money laundering, terrorist financing, fraud, or any other financial crime. The Company operates under the regulations of FINTRAC (Financial Transactions and Reports Analysis Centre of Canada) and complies with applicable Canadian and international AML/CTF laws, as well as FATF recommendations.

2. Objectives

- Establish and maintain robust internal systems and controls to prevent money laundering and terrorist financing.
- Ensure that all employees and agents of B-Transfert Inc. are aware of and comply with AML/CTF requirements.
- Build confidence and trust with counterparties, financial institutions, and international organizations such as UNICEF.

3. Customer Due Diligence (CDD) & KYC

B-Transfert Inc. applies a risk-based approach to Customer Due Diligence.

3.1 Identification & Verification

- All customers must provide valid government-issued identification.
- Corporate clients: certificate of incorporation, ownership structure, directors, and signatories.
- NGOs/institutions: proof of registration and authorized representatives.

3.2 Enhanced Due Diligence (EDD)

- Applied to high-risk clients (PEPs, high-risk jurisdictions, large transactions).
- Requires source of funds/wealth and management approval.

3.3 Ongoing Monitoring

- Transactions are monitored for unusual or suspicious activity.
- Red flags are escalated to the Compliance Officer.

4. Risk Assessment

The Company maintains a structured risk assessment framework:

- Low risk: salaried individuals, domestic clients, transparent corporates.
- Medium risk: SMEs with moderate cross-border activities.
- High risk: PEPs, cash-intensive businesses, entities from weak AML jurisdictions.

Risk assessments are updated annually or upon significant operational changes.

5. Record Keeping

- Customer identification records retained for 5 years after relationship ends.
- Transaction records retained for 5 years after execution.
- Records are securely stored and made available to regulators upon request.

6. Reporting Obligations

B-Transfert Inc. complies with all mandatory reporting obligations under Canadian law:

- Suspicious Transaction Reports (STRs) filed with FINTRAC.
- Large Cash Transaction Reports (LCTRs) for amounts \geq CAD 10,000.
- Electronic Funds Transfer Reports (EFTRs) for cross-border transfers \geq CAD 10,000.

7. Compliance Governance

- Compliance Officer: oversees AML/KYC program and monitoring.
- Management: ultimate responsibility for AML/CTF compliance.
- Employee Training: provided at onboarding and annually.

8. Prohibited Transactions

B-Transfert Inc. strictly prohibits:

- Anonymous or fictitious accounts.
- Transactions with sanctioned persons/entities (UN, OFAC, EU).
- Business relationships with shell banks.

9. Cooperation with Regulators and International Institutions

The Company maintains open communication with regulators, correspondent banks, and institutional partners. B-Transfert Inc. commits to transparency with organizations such as UNICEF to ensure safe and reliable FX operations.

10. Policy Review

This policy is reviewed annually and updated to comply with new regulations and international best practices.