



## **Compliance Program Summary**

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

### **1. Regulatory Framework**

B-Transfert Inc. is a licensed Money Services Business (MSB) under Canadian law and is registered with FINTRAC (Financial Transactions and Reports Analysis Centre of Canada). The Company operates in strict compliance with:

- The Proceeds of Crime (Money Laundering) and Terrorist Financing Act (PCMLTFA – Canada).
- FATF Recommendations on AML/CTF.
- International sanctions and regulatory requirements.

### **2. Compliance Objectives**

- Prevent misuse of B-Transfert services for money laundering, terrorist financing, or fraud.
- Ensure full compliance with Canadian and international AML/CTF regulations.
- Protect institutional clients by maintaining transparent and secure FX operations.
- Build trust with global organizations through strong compliance practices.

### **3. Key Components of the Program**

#### **3.1 Customer Due Diligence (CDD)**

- Mandatory KYC verification for all customers (individuals, corporates, NGOs).
- Enhanced Due Diligence (EDD) for high-risk clients (PEPs, high-risk jurisdictions, large transactions).
- Ongoing monitoring to ensure transactions align with client profiles.

#### **3.2 Risk-Based Approach**

- Clients are classified into low, medium, or high risk.
- Enhanced verification and controls applied to higher-risk relationships.

### **3.3 Record Keeping**

- All KYC and transaction records are kept for five (5) years in secure storage.

### **3.4 Reporting Obligations**

- Suspicious Transaction Reports (STRs) submitted to FINTRAC.
- Large Cash Transaction Reports (LCTRs) and Electronic Funds Transfer Reports (EFTRs) filed as required.

### **3.5 Governance & Oversight**

- Compliance Officer: responsible for program implementation, monitoring, and reporting.
- Senior Management: accountable for approving policies and ensuring compliance resources.
- Employee Training: AML/KYC training provided at onboarding and annually thereafter.

## **4. Institutional Counterparty Due Diligence**

- Verification of licenses and registration.
- Review of AML/KYC frameworks and governance.
- Screening against international sanctions and watchlists.
- Approval by Compliance Officer before partnerships.

## **5. Commitment to Transparency**

B-Transfert Inc. is committed to cooperating fully with regulators, correspondent banks, and institutional partners. The Company provides transparency and compliance assurance to counterparties, ensuring secure and reliable foreign exchange transactions for clients.