APPENDIX

Attached are amendments to this *Compliance program for anti-money laundering and terrorism financing*,effective (insert date).

**How we identify risks**

**Other factors include:**

Ministerial directives and transaction restrictions received from subscribing to the FINTRAC mailing list and/or through insurer communications are reviewed and assessed to determine impact on our risk assessment.

**Risk assessment**

**Automatic high-risk characteristics for “Relationship-based risk assessment” now include:**

A client with transactions sent to or received from North Korea, regardless of amount.

Processes currently in place for our “Group B” high-risk clients will be followed.

Additionally we follow our current processes in the “Business-based risk assessment” section under Geography, which includes “Connections to high-risk countries” and North Korea.