

CASH ACCEPTANCE POLICY

Sea Land Air Management Ltd. (SLA) limits the amount of cash that it can accept from each client, to help prevent money laundering.

1. Definition of cash

Cash means

- current coin within the meaning of the Currency Act
- notes intended for circulation in Canada issued by the Bank of Canada pursuant to the Bank of Canada Act, and
- current coin or bank notes of countries other than Canada

Note that bank drafts, money orders, electronic or wire transfers of funds are not considered cash.

2. Maximum Amount of Cash accepted from each client

SLA will only accept less than a total of \$10,000 Canadian with respect to any one client file per year. This includes the client or any third party providing cash on behalf of the client.

SLA will not receive more than \$2,000 CAD in cash from each client, either in a single transaction or in multiple transactions, within a 24-hour period.

SLA must identify every individual who conducts a large cash transaction at the time the transaction takes place. A large cash transaction occurs when SLA receive \$2,000 Canadian in cash in a single transaction. A large cash transaction also occurs when there are multiple cash transactions of less than \$2,000 each that total \$2,000 within a 24 hour period, when SLA knows they are conducted by, or on behalf of, the same individual or entity.

Foreign currency will be deemed to have received it in an amount as converted into Canadian funds in accordance with the exchange rate in effect on date of receipt.

3. Verification of Identity

- a. For all individual remitting \$2,000 CAD in cash to SLA in a single transaction, SLA requires the individual to provide valid, current and original photo identification issued by a federal, provincial or territorial government. Foreign issued photo identification document if it is equivalent to a Canadian issued photo identification document listed in this guideline is acceptable but photo identification documents issued by any municipal government, Canadian or foreign, are not acceptable.
- b. SLA will view the original document while in the presence of the individual in order to compare them with their photo. The photo identification document must:
 - i. indicate the individual's name;

- ii. have a photo of the individual;
 - iii. have a unique identifier number.
- c. It is not acceptable to view photo identification online, through a video conference or through any virtual type of application; nor will SLA accept a copy or a digitally scanned image of the photo identification.
- d. information to be recorded when using the photo identification method :
- i. The individual's name;
 - ii. The type of card or document used (for example, driver's license, B.C. Services Card);
 - iii. The unique identifier number of the document or card;
 - iv. The issuing jurisdiction and country of the document;
 - v. The expiry date of the document or card, if available (if the information appears on the document or card, you must record it);
 - vi. The date on which you verified the information
- e. In the case of a corporation, in addition to confirming its existence, SLA also has to determine the corporation's name, address and the names of its directors. SLA will use the same document to confirm the directors' information and the corporation's existence. SLA will need to see the list of the corporation's directors that was submitted with the application for incorporation.
- f. To confirm the existence of a corporation, as well as its name and address, refer to:
- i. the corporation's certificate of corporate status;
 - ii. a record that has to be filed annually under provincial securities legislation; or
 - iii. any other record that confirms the corporation's existence, such as the corporation's published annual report signed by an independent audit firm, or a letter or a notice of assessment for the corporation from a municipal, provincial, territorial or federal government.

SLA understands that the use of personal information in Canadian commercial activities is protected by the Personal Information Protection and Electronic Documents Act (PIPEDA), or by substantially similar provincial legislation.

4. Recordkeeping

SLA will keep a record of every large cash transaction. A large cash transaction occurs when SLA receives \$2,000 CAD in cash from a client in a single transaction. A large cash transaction also occurs when there are multiple cash transactions of less than \$2,000 each that total \$2,000 within a 24-hour period, when it is known they are conducted by, or on behalf of, the same individual or entity.

When a client conducts a large cash transaction, SLA record must indicate the receipt of the amount of cash, along with the following:

- a. the name, date of birth and address of the individual from whom you received the cash, and the nature of their principal business or occupation;
- b. the amount and currency of the cash received;
- c. the date of the transaction;
- d. the purpose and details of the transaction, including:
 - i. the type of transaction (for example, the cash was to be transferred on the client's behalf, etc.); and
 - ii. whether any other individuals or entities were involved in the transaction;
- e. how the cash was received (for example, in person, by mail or any other way); and
- f. if an account was affected by the transaction, include:
 - i. the account number and type of account;
 - ii. the full name of the account holder; and
 - iii. the currency in which the account's transactions are conducted.

Retention: SLA will keep large cash transaction records for at least five years from the date the record was created.