

IGM Financial Inc.

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Mackenzie Financial Corporation

## **IGM Anti-Money Laundering, Anti-Terrorist Financing and Sanctions Program**

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IGM Financial Inc. (“IGM”) maintains an enterprise Anti-Money Laundering (“AML”), Anti-Terrorist Financing (“ATF”) and Sanctions program (collectively the “AML Program”) reasonably designed to (i) deter, detect and report money laundering and terrorist financing activity in accordance with applicable laws and regulations, and (ii) fulfill obligations under applicable sanctions regimes in the jurisdictions in which its businesses operate.

Key elements of IGM’s AML program include:

- Designation of a Chief Anti-Money Laundering Officer;
- Risk assessments of products and services, client relationships, geographic locations, and technology;
- Policies and procedures;
- Customer due diligence and ongoing monitoring;
- Monitoring and reporting of suspicious transactions;
- Terrorist and sanctions screening;
- Independent effectiveness reviews;
- Delivery of ongoing training to IGM personnel;
- Senior management and board oversight; and
- Recordkeeping and retention in accordance with the applicable regulations.

IGM and its operating companies have established policies and procedures under the IGM AML Program reasonably designed to mitigate risks associated with money laundering, terrorist financing and sanctions and achieve compliance with applicable regulations in the jurisdictions in which its businesses operate.