



IGM Financial Inc.

Investors Group Inc.

Mackenzie Financial Corporation

Investment Planning Counsel Inc.

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

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IGM Financial Inc. (IGM) maintains an enterprise-wide Anti-Money Laundering (AML) and Anti-Terrorist Financing (ATF) program designed to deter, detect and report money laundering and terrorist financing activity in accordance with the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* and applicable regulations.

Key elements of IGM's AML/ATF program include:

- Designation of a Chief Anti-Money Laundering Officer;
- Assessment of risks associated with products and services, client relationships, geographic locations, and technology;
- Policy and procedures;
- Delivery of ongoing training to IGM personnel;
- Customer due diligence;
- Monitoring and reporting of suspicious transactions;
- Independent effectiveness reviews;
- 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/ATF program to mitigate risks associated with money laundering and terrorist financing in accordance with applicable regulations.

IGM is committed to maintaining an effective AML/ATF program, the effectiveness of which is tested regularly to ensure compliance with applicable regulations and guidance set out by the Financial Transactions Reports Analysis Centre of Canada (FINTRAC) and other applicable regulatory bodies.