

Instruction page for completion of Identity verification and third party determination for entity owners

For all universal life and permanent life insurance products, complete 4831-E form – select Life insurance.

For non-registered investment and wealth products: accumulation annuities (including segregated funds), guaranteed investment certificates (GICs), payout annuities and mutual funds, complete 4831-E form – select Investments and Wealth.

To be completed with the understanding that Sun Life Financial will rely on the information to conduct client due diligence required under the Proceeds of Crime (Money Laundering) and Terrorist Financing Act (PCMLTFA) and to satisfy applicable regulatory requirements.

In order to be exempt from completing the 4831-E, an entity must meet the following criteria as stated in Sections 62(2)(m) and (n) of the (PCMLTFA) Regulations:

- (m) The entity must be a public body, or a corporation that has minimum net assets of \$75 million on its last audited balance sheet and whose shares are traded on a Canadian stock exchange or a stock exchange designated under subsection 262(l) of the Income Tax Act (Canada), and operates in a country that is a member of the Financial Action Task Force; or
- (n) The entity is a subsidiary of a public body or a corporation referred to in paragraph (m) and the financial statements of the entity are consolidated with the financial statements of that public body or corporation;

From Section 1(2) of the (PCMLTFA) Regulations, 'public body' means:

- (a) any department or agent or mandatary of Her Majesty in right of Canada or of a province;
- (b) an incorporated city, town, village, metropolitan authority, township, district, county, rural municipality or other incorporated municipal body or an agent or mandatary in Canada of any of them; and
- (c) an organization in Canada that operates a public hospital and that is designated by the Minister of National Revenue as a hospital authority under the Excise Tax Act, or any agent or mandatary of such an organization.

If the entity is exempt, select **Yes** and complete sections 5 and 6 of the 4831-E.

If the entity is not exempt, select **No** and complete all sections of the form that apply to the type of entity.

Refer to the diagram on page 8 for an example of how to complete this form for the multiple layers of ownership of the entity applicant.

If completing a paper form and additional space is needed for any section of this form, complete the applicable sections on a new 4831-E form, along with sections 5 and 6.

1 Identity verification

1.1 Entity signing officer/trustee/executor

- Complete section for all signing officers of a corporation, partnership other non-corporate entity (not for profit entities) and all trustees of a trust or executors of an estate.
- If there are more than 3 people with signing authority for this contract/policy, then the identity verification of only 3 signing officers is required.
- For Detailed occupation/pre-retired occupation/principal business, a detailed occupation or job title is required. Examples: manager of customer service or salesperson of office equipment. If 'retired' is provided as the occupation, include details of the pre-retirement occupation. Examples: retired building contractor or retired teacher.
- The address must be the residential address of the signing officer (include the street, city, province, country and postal code). PO Box and general delivery addresses are not acceptable. Provide the address that a 911 responder would be dispatched to.
- **Identification Method** – Complete one of the options (A or B) as outlined below. Record all information on the 4831-E; **do not attach photocopies to the form.**

• Method A) Photo identification

Note: This is the primary method to be used when verifying a client's identity and must **always** be used when a client has valid photo identification.

View an original, valid and current Canadian passport, driver's licence or document issued by a Canadian federal, provincial or territorial government for that individual (documents issued by municipal governments are not acceptable). A foreign photo identification document is acceptable if it is equivalent to an acceptable Canadian photo identification document. Examples: a valid foreign passport or driver's licence is acceptable.

1 Identity verification (continued)

Notes:

- Acceptable documents must be one with a photo. A valid document is an original (not a copy), has a unique identifying number and has not expired.
- Original documents must be viewed while in the presence of the individual whose identity is being verified. Viewing photo identification online, through a video conference or through any type of application is not acceptable.
- Viewing a copy of a digitally scanned image of the photo identification document is not acceptable.

The document must include all of the following:

- individual's name
- date of birth
- a photograph of the individual
- a unique document/identifier number
- expiry date
- place of issue (province and country)

Examples of acceptable documents include, but are not limited to:

- Driver's licence
- Passport
- Health card (with photo) (except PEI, ON, NS & MB)
- Provincial photo ID card
- Citizenship card (with photo issued prior to 2012)
- Permanent Resident card
- Work permit/work visa
- Secure Certificate of Indian Status
- Landed Immigrant card
- Convention Refugee Status card
- Nexus card

Examples of unacceptable documents include, but are not limited to:

- Baptismal certificate
- Birth certificate
- Social Insurance Number (SIN) card
- Hospital certificate of birth
- Provincial health card for PEI, Ontario, Nova Scotia or Manitoba. In Quebec, you cannot request to see a client's health card but you may accept it if the client wants to use it for identification purposes.
- Firearms licence
- Temporary driver's licence
- Reference to another application/contract

• Method B) Dual process

Note: The dual process method is not a best practice method of verifying a client's identity. This method is to be used **only** if a client does not have valid photo identification.

To use the dual method to verify the client's identity, you must view original documents or information from two different reliable and independent sources. The information may be found in documents from these sources or may be information that these sources are able to provide.

You cannot rely on information issued by a single source, even if it confirms an account and contains the name, address and date of birth. It is also important to note that you cannot use the same source for the two categories of information you use to ascertain the client's identity. For example, you can refer to a bank statement that contains the client's name and address from Bank A and confirm the client's name and deposit account at Bank B. It would not be acceptable, however to view a statement from Bank A and confirm a deposit account at Bank A. As another example, you cannot rely on a Canada Revenue Agency (CRA) document that contains the client's name and address and a different CRA document that contains the client's name and date of birth, because CRA is the same source for both documents.

If you refer to an original document that has an expiry date, it must be current. If there is no expiration date, it must be a recent version of the document. For example, if the client provides you with a CRA notice of assessment, it would need to be the latest one received by the client. The information obtained from these documents must match the information you already have about the client.

You must collect required information from 2 out of the 3 options listed below (one option cannot be used twice):

1. Client's name and address (the document must be dated within the past 2 months)
2. Client's name and date of birth
3. Client's name and proof of Canadian deposit account, or Canadian loan account (the document must be dated within the past 2 months)

1 Identity verification (continued)

For example:

- You use one source to verify the client's name and address and a second source to verify their name and date of birth.
- You use one source to verify the client's name and address and a second source to verify their name and confirm a financial account.
- You use one source to verify the client's name and date of birth and a second source to verify their name and confirm a financial account.

What is a reliable source?

A reliable source is an originator or issuer of information that you trust to verify the identity of the client. When you are relying on a source to verify a client's name and address or a client's name and date of birth, the source must be reliable.

Reliable source information:

- Source should be well known and considered reputable (examples include federal, provincial, territorial and municipal levels of government, crown corporations, financial entities or utility providers).
- Source cannot be Sun Life Financial.
- Source cannot be you (the advisor), as the reporting entity.
- Source cannot be the individual whose identity is being verified.
- Cannot rely on information issued by a single source, even if it confirms name, address, date of birth and account.

What is an acceptable original document?

- Original paper or electronic document and not a copy must be viewed. If any information has been obscured, the document is not acceptable.
- Must have been received or obtained from the issuer through posted mail or electronically.
- Must be unaltered.

Electronic document (a document received through email directly from the issuer or downloaded directly from the issuer's website):

- Client can show the original electronic document they received or downloaded.
- Client can email you the original electronic document they received or downloaded.
- Client can show the document on their electronic device (examples: smartphone, tablet or laptop).
- Client can print the electronic document they received or downloaded.
- Client can show you the document in the original form such as .pdf (Adobe) or .xps (Microsoft viewer).
- Photocopies, faxed or digitally scanned documents are not acceptable.

Note: Credit card statements/information cannot be used (Sun Life Financial does not/will not store any credit card information).

Examples of reliable sources of information under the dual process method:

Documents or information to verify name and address	Documents or information to verify name and date of birth	Documents or information to verify name and confirm a financial account
<p>Issued by a Canadian government body</p> <ul style="list-style-type: none"> • Any card or statement issued by a Canadian government body (federal, provincial, territorial or municipal) <ul style="list-style-type: none"> o Canada Pension Plan (CPP) statement o Property tax assessment issued by a municipality o Provincially issued vehicle registration • Benefits statement <ul style="list-style-type: none"> o Federal, provincial, territorial and municipal levels • CRA documents: <ul style="list-style-type: none"> o Notice of assessment o Requirement to pay notice o Installment reminder/receipt o GST refund letter o Benefits statement <p>Issued by other Canadian sources</p> <ul style="list-style-type: none"> • Utility bill (for example, electricity, water, telecommunications) • T4 statement • Record of Employment • Investment account statements (for example, RRSP, GIC.) *not issued by SLF <p>Issued by a foreign government</p> <ul style="list-style-type: none"> • Travel visa 	<p>Issued by a Canadian government body</p> <ul style="list-style-type: none"> • Any card or statement issued by a Canadian government body (federal, provincial, territorial or municipal) <ul style="list-style-type: none"> o Canada Pension Plan (CPP) statement of contributions o Original birth certificate o Marriage certificate or government-issued proof of marriage document (long-form which includes date of birth) o Divorce documentation o A permanent resident card o Citizenship certificate o Temporary driver's licence (non-photo) <p>Issued by other Canadian sources</p> <ul style="list-style-type: none"> • Insurance documents (home, auto, life) 	<p>Confirm that the client has a deposit account, or loan account by means of:</p> <ul style="list-style-type: none"> • Bank statement • Loan account statement (for example, mortgage) • Cheque that has been processed (cleared, non-sufficient funds) by a financial institution

1 Identity verification (continued)

1.2 Corporation (only complete this section if the entity is a Corporation)

- Complete section 1.1 for all signing officers (maximum 3).
- A corporate search will be conducted to confirm the corporation's existence and in good order status.
- Complete sections 1.2 a) through 1.2 c).
- **Mandatory:** Submit the Certificate of incumbency (E4207) form, the International tax classification for an entity (4545-E) form and paper copies of all relevant corporate documents to provide details on the ownership, control and structure of the corporation. (Example: articles of incorporation, applicable bylaws, annual returns).

1.2 a) Corporation

- Complete all fields in this section.
- Corporate name, complete with the name of the corporation.
- Detailed principal business (Examples: office equipment leasing or residential landscaping). If the corporation is a holding company you must indicate their active or passive holdings.

Holding company-active:

If more than 50% of the income is from businesses actively involved in providing goods or services, the holding company would be active. Example: A holding company that has 40% of its income come from an active landscaping business, 40% from an active snowplowing business and 20% from investments would be considered active. Indicate the following on the 4831: Holding company-landscape/snowplowing

Holding company-passive:

If more than 50% of the income is from passive income. Example: A holding company actively collecting rent from a couple of rental properties that accounts for less than 50% of the income the holding company recognizes with the rest of the income coming from passive investments. Indicate the following on the 4831: Holding company-passive investments).

- Indicate the not for profit status of the corporation. Select either **No** or **Yes**.
 - If **Yes**, indicate whether the not for profit solicits public contributions, is registered with CRA and if so, record the CRA registration number.

1.2 b) Directors of the board

- All directors need to be named (attach a list to the 4831-E if required).
- For Detailed occupation/pre-retired occupation/principal business, a detailed occupation or job title is required. Examples: manager of customer service or salesperson of office equipment. If 'retired' is provided as the occupation, include details of the pre-retirement occupation. Examples: retired building contractor or retired teacher.

1.2 c) Individual shareholders. 100% of the ownership or control of the entity must be accounted for. (If there are any entities that own all or part of the entity owner, complete section 2).

- Record the name of each individual who has an ownership interest in the entity applicant.
- Each individual owner must be asked if they own 25% or more of the entity applicant.
- In each case where the shareholder owns 25% or more of the entity applicant, the following information must be provided:
 - For Detailed occupation/pre-retired occupation/principal business, a detailed occupation or job title is required. Examples: manager of customer service or salesperson of office equipment. If 'retired' is provided as the occupation, include details of the pre-retirement occupation. Examples: retired building contractor or retired teacher.
 - The address needs to be the residential address of the shareholder (include the street, city, province, country and postal code). PO Box and general delivery addresses are not acceptable. Provide the address that a 911 responder would be dispatched to.

1.3 Partnership (only complete this section if the entity is a partnership)

- Complete section 1.1 for all signing officers of the partnership.
- Complete sections 1.3 a) and 1.3 b).
- **Mandatory:** Submit the Certificate of incumbency (E4207) form, the International tax classification for an entity (4545-E) form and paper copies of all relevant partnership documents including the partnership agreement.

1.3 a) Partnership

- Complete all fields in this section.
- Name, complete with the name of the partnership.
- Detailed principal business (examples: accounting services, optometrists or lawyers)

1 Identity verification (continued)

- 1.3 b) Individual partners. 100% of the ownership or control of the entity must be accounted for. (If there are any entities that own all or part of the entity owner, complete section 2).
- Record the name of each individual who has an ownership interest in the entity applicant.
 - Each individual owner must be asked if they own 25% or more of the entity applicant.
 - In each case where the shareholder owns 25% or more of the entity applicant, the following information needs to be provided:
 - For Detailed occupation/pre-retired occupation/principal business, a detailed occupation or job title is required. Examples: manager of customer service or salesperson of office equipment. If 'retired' is provided as the occupation, include details of the pre-retirement occupation. Examples: retired building contractor or retired teacher.
 - The address needs to be the residential address of the shareholder (include the street, city, province, country and postal code). PO Box and general delivery addresses are not acceptable. Provide the address that a 911 responder would be dispatched to.
- 1.4 Trust or Estate (only complete this section if the entity is a Trust or an Estate)
- Complete section 1.1 for trustee(s) or executor(s).
 - Complete sections 1.4 a) and 1.4 b) if the entity is an Estate.
 - Complete sections 1.4 a) through 1.4 c) if the entity is a Trust.
 - **Mandatory:** Submit the International tax classification for an entity (4545-E) form and paper copies of the trust deed or other trust instrument (or relevant sections of these documents) to confirm the existence of the trust. For estates, provide a copy of the will.
- 1.4 a) Trust or Estate
- Complete all fields in this section.
 - Name, complete with the name of the trust or estate.
- 1.4 b) Trust/estate beneficiaries
- Complete this section for all trust or estate beneficiaries.
 - For Detailed occupation/pre-retired occupation/principal business, a detailed occupation or job title is required. Examples: manager of customer service or salesperson of office equipment. If 'retired' is provided as the occupation, include details of the pre-retirement occupation. Examples: retired building contractor or retired teacher.
 - The address needs to be the residential address of the trust/estate beneficiary (include the street, city, province, country and postal code). PO Box and general delivery addresses are not acceptable. Provide the address that a 911 responder would be dispatched to.
- 1.4 c) Trust settlor (required for Trust only)
- Complete all fields in this section.
 - A trust settlor is a person who settles property on a trust for the benefit of beneficiaries. A settlor can be a trustor, grantor, donor or payor.
 - For Detailed occupation/pre-retired occupation/principal business, a detailed occupation or job title is required. Examples: manager of customer service or salesperson of office equipment. If 'retired' is provided as the occupation, include details of the pre-retirement occupation. Examples: retired building contractor or retired teacher.
 - The address needs to be the residential address of the trust/estate beneficiary (include the street, city, province, country and postal code). PO Box and general delivery addresses are not acceptable. Provide the address that a 911 responder would be dispatched to.
- 1.5 Other non-corporate entities, including unincorporated not for profit entities (only complete this section for non-corporate entities)
- Complete section 1.1 for signing officers.
 - Complete sections 1.5 a) through 1.5 c).
 - **Mandatory:** Submit the Certificate of incumbency (E4207) form, the International tax classification for an entity (4545-E) form and paper copies of all relevant entity documents (example: articles of association, board resolution and copy of CRA registration).

1 Identity verification (continued)

1.5 a) Other non-corporate entities, unincorporated not for profit entities

- Complete all fields in this section.
- Type of non-corporate entity, select Unincorporated not for profit or Other (and provide details).
- Name, complete with the name of the entity.
- Detailed principal business (Examples: office equipment leasing or residential landscaping, charity for the homeless). If the corporation is a holding company you must indicate their active or passive holdings (Example: If the corporation is a holding company you must indicate either active or passive holdings:
Holding company-**active**:
If more than 50% of the income is from businesses actively involved in providing goods or services, the holding company would be active. Example: A holding company that has 40% of its income come from an active landscaping business, 40% from an active snowplowing business and 20% from investments would be considered active. Indicate the following on the 4831: Holding company-landscape/snowplowing
Holding company-**passive**:
If more than 50% of the income is from passive income. Example: A holding company actively collecting rent from a couple of rental properties that accounts for less than 50% of the income the holding company recognizes with the rest of the income coming from passive investments. Indicate the following on the 4831: Holding company-passive investments).
- Indicate the not for profit status of the corporation. Select either **No** or **Yes**.
 - If **Yes**, indicate whether the not for profit solicits public contributions, is registered with CRA and if so, record the CRA registration number.

1.5 b) Directors of the board

- If the non-corporate entity has a board of directors, **all** directors need to be named (attach a list to the 4831-E if required).
- For Detailed occupation/pre-retired occupation/principal business, a detailed occupation or job title is required. Examples: manager of customer service or salesperson of office equipment. If 'retired' is provided as the occupation, include details of the pre-retirement occupation. Examples: retired building contractor or retired teacher.

1.5 c) Individual owners or controllers (not applicable for unincorporated not for profit entities) 100% of the ownership or control of the entity must be accounted for. (If there are any entities that own all or part of the entity owner, complete section 2).

- Record the name of each individual who has an ownership interest in the entity applicant.
- Each individual owner must be asked if they own 25% or more of the entity applicant.
- In each case where ownership is 25% or more of the entity applicant, the following information needs to be provided:
 - For Detailed occupation/pre-retired occupation/principal business, a detailed occupation or job title is required. Examples: manager of customer service or salesperson of office equipment. If 'retired' is provided as the occupation, include details of the pre-retirement occupation. Examples: retired building contractor or retired teacher.
 - The address needs to be the residential address of the shareholder (include the street, city, province, country and postal code). PO Box and general delivery addresses are not acceptable. Provide the address that a 911 responder would be dispatched to.

2 Entity ownership

Select either **No** or **Yes** if the entity owner identified in section 1 is owned in whole or in part by another entity.

- If **No**, proceed to section 3.
- If **Yes**, 100% of the entity ownership or control of the entity must be accounted for.

Completion of an additional 4831-E form with sections 2, 5 and 6 is required for every additional entity that:

- Owns or controls a portion of the entity applicant
- Or, owns or controls all or a portion of any entity that owns or controls the entity applicant
 - Enter name of entity and select entity type. (If other has been selected provide entity type).
 - Select either **No** or **Yes** if the entity owner is an exempt entity under the Proceeds of Crime (Money Laundering) and Terrorist Financing Regulations (**corporate and other entities only**).
 - o If **Yes**, completion of section 2 is not required.
 - Select either **No** or **Yes** if this entity has 25% or more ownership.
 - o If **No**, proceed to section 3.
 - o If **Yes**, complete section 2 according to the type of entity.

If entity is owned or controlled by a corporation – complete sections 2.1 a) though 2.1 c)

A corporate search will be conducted to confirm the corporation's existence and in good order status. Submit paper copies of all relevant corporate documents to provide details on the ownership, control and structure of the corporation.

If this corporation is owned or controlled (in whole or part) by another entity, completion of an additional 4831-E form with sections 2, 5 and 6 is required.

For further clarification on how to complete each of the required sections for this entity type refer back to information provided in sections 1.2 a) to 1.2 c).

2 Entity ownership (continued)

If entity is owned or controlled by a partnership – complete sections 2.2 a) and 2.1 b)

Mandatory: Submit paper copies of all relevant partnership documents to provide details on the ownership, control and structure of the partnership.

If this partnership is owned or controlled (in whole or part) by another entity completion of an additional 4831-E form with sections 2, 5 and 6 is required.

For further clarification on how to complete each of the required sections for this entity type refer back to information provided in sections 1.3 a) and 1.3 b).

If entity is owned or controlled by a trust or estate – complete sections 2.3 a) though 2.3 c) for a Trust and 2.3 a) and 2.3 b) for an Estate

Mandatory: Submit paper copies of the trust deed or other trust instrument (or relevant sections of these documents) to confirm the existence of the trust. For estates, provide a copy of the will.

If this trust or estate is owned or controlled (in whole or part) by another entity completion of an additional 4831-E form with sections 2, 5 and 6 is required.

For further clarification on how to complete each of the required sections for this entity type refer back to information provided in sections 1.4 a) to 1.4 c).

If entity is owned or controlled by a non-corporate or unincorporated not for profit entity – complete sections 2.4 a) though 2.4 c)

Mandatory: Submit paper copies of all relevant non-corporate entity documents to provide details on the ownership, control and structure of the non-corporate entity.

If this non-corporate entity is owned or controlled (in whole or part) by another entity completion of an additional 4831-E form with sections 2, 5 and 6 is required.

For further clarification on how to complete each of the required sections for this entity type refer back to information provided in sections 1.5 a) to 1.5 c).

3 Third party determination

A third party is any person or entity that is not the owner, who may give instructions, make use of or make payments to the application/contract.

Some examples of third parties include:

- a power of attorney acting on behalf of the applicant/owner.
- a person or entity paying for the application/contract who is not the applicant/owner.
- a collateral assignee/hypothecary creditor.

A **No** or **Yes** answer must be given to the third party question. It cannot be left blank.

- If **No**, proceed to section 4.
- If **Yes**, provide additional information about the third party.

If the third party is an individual,

- For Detailed occupation/pre-retired occupation/principal business, a detailed occupation or job title is required. Examples: manager of customer service or salesperson of office equipment. If 'retired' is provided as the occupation, include details of the pre-retirement occupation. Examples: retired building contractor or retired teacher.
- The address must be the residential address of the third party (include the street, city, province, country and postal code). PO Box and general delivery addresses are not acceptable. Provide the address that a 911 responder would be dispatched to.

If the third party is an entity,

- For Detailed principal business (holding companies must indicate the nature of their principal holding whether active or passive)
- The address must be the business address of the third party (include the street, city, province, country and postal code). PO Box and general delivery addresses are not acceptable. Provide the address that a 911 responder would be dispatched to.

If unable to obtain any of the required third party information, record the measures taken and why you were unsuccessful in obtaining it.

If you have reasonable grounds to suspect there is an undisclosed third party, email details to money.laundering@sunlife.com.

4 Source of payment and purpose of product

4.1 Source of payment for this application/contract (select all that apply)

- Complete to identify how the money being deposited to the contract was obtained.

4.2 Purpose and intended use of the product applied for (select only one)

- Select the most appropriate option from the list provided.

Note: The type of product applied for cannot be provided as the purpose or intended use of product. Example: Life insurance policy or GIC cannot be indicated.

5 Applicant/owner/signing officer declaration

Each signing officer/trustee/executor must review the answers recorded, then sign and date this section. By signing this section they confirm the following:

- The information was obtained in a face to face manner.
- They are authorized to act on behalf of the entity applicant.
- They have an understanding that Sun Life Financial will rely on the information.

6 Advisor attestation

The advisor must complete this section to confirm that the necessary original identity verification documents have been viewed in person and that the advisor understands that Sun Life Financial will rely on the information provided. If the client is the advisor, this section must be completed by another licensed advisor or a financial centre manager.

The advisor has the responsibility to collect all required information with respect to entities and/or individuals who directly or indirectly have control of the entity applicant. (ABC Corp.)

Dawn Lewis owns 100% of PQR Corp.
Complete section 2.1 c) on form 4831-E or complete the same sections on a new 4831-E.

Scott DaSilva owns 50% of MNO Corp.
Complete section 2.1 c) on form 4831-E or complete the same sections on a new 4831-E.

PQR Corp. owns 50% of MNO Corp.
Click to add entity owner and complete sections 2.1 a) and 2.1 b) on form 4831-E or complete the same sections on a new 4831-E.

Angela Jones owns 5% of DEF Corp.
Complete section 2.1 c) on form 4831-E.

Bob Martin owns 5% of DEF Corp.
Complete section 2.1 c) on form 4831-E.

JKL Corp. owns 5% of DEF Corp.
Complete section 2 on form 4831-E.

MNO Corp. owns 85% of DEF Corp.
Click to add entity owner and complete sections 2.1 a) and 2.1 b) on form 4831-E or complete the same sections on a new 4831-E.

Mike Smith owns 20% of ABC Corp.
Complete section 1.2 c) on form 4831-E.

DEF Corp. owns 80% of ABC Corp.
Complete sections 2.1 a) and 2.1 b) on form 4831-E.

**ABC Corporation
ENTITY APPLICANT**

- Complete sections 1.1, 1.2 a) and 1.2 b) on form 4831-E.
- Submit the Certificate of incumbency (E4207), the International tax classification for an entity (4545-E) and paper copies of all relevant corporation documents