

ONE Investment Board Statement of Policy			
Policy:	Anti-Money Laundering	Date approved: October 15, 2021 Date of Next Review: October 2022	Person Most Responsible: Chief Compliance Officer

Purpose statement

The purpose of this policy is to ensure compliance with the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* (referenced as Anti-Money Laundering (AML)), including any guidance provided by The Financial Transactions and Reports Analysis Centre of Canada ("FINTRAC"). FINTRAC is the federal agency responsible for administering AML regulation, and for analyzing information that has been filed with it pursuant to the requirements of legislation.

Scope

This is a policy of the ONE Investment Board and covers municipalities investing under the Prudent Investment regime.

Policy Principles

ONE Investment is committed to compliance with Canada's AML regime.

ONE Investment shall develop an AML compliance regime that will consist of the following activities:

1. Establish record keeping requirements with respect to investor accounts
2. Verify the existence of the municipal entity investors
3. Report actual and attempted "suspicious transactions" to FINTRAC, in accordance with the requirements under AML regulation
4. Identify a list of authorized individuals for trade instructions on the Funds
5. Provide staff training on AML and on the policies and procedures adopted by ONE Investment to comply with AML
6. Conduct an annual review of ONE Investment's AML Policies and Procedures and risk assessment that ONE uses for money laundering purposes as a result of its business activities and relationships
7. Conduct an annual review on the effective implementation of the AML

compliance regime

The Chief Compliance Officer (CCO) will develop and maintain procedures for the AML compliance regime.

Review

This policy shall be reviewed at annually.