**Anti Money Laundering Strategic Timeline: Three Year Plan** Year 2 (2021/22) Year 1 (2020/2021) Year 3 (2022/23) Year 0 (In progress) Years 4+ GOAL 1: A coherent and agile approach to the identification and prevention of money laundering Strategy 1.1.1: Identify a governing body with responsibility for AML ▶ 1.1.1a: Analyze need for independent body to oversee AML

★ > 1.1.1b: Develop a recruitment plan to ensure strong future provincial capacity and AML expertise in BC ▷ 1.1.1c: Set expectations with stakeholders Strategy 1.1.2: Ongoing engagement with other jurisdictions on best practices in AML > 1.1.2a: Continue to work with the feds on the BC Canada working group on ML in real estate ▶ 1.1.2b: Develop relationships with leading AML experts and agencies Strategy 1.1.3: Ensure AML lens is applied to consider the impact actions may have on law-abiding citizens > 1.1.3a: Provide guidance and training to real estate agents on potential impacts of ML ▶ 1.1.3b: Develop materials to provide guidance to regulators on reducing impacts on British Columbians Strategy: 1.2.1: Identity emerging sectors that may be vulnerable ▶ 1.2.1a: Conduct a scan on best practices, trends, & actions ▶ 1.2.1b: Undertake analysis of cryptocurrency and potential vulnerabilities ▶ 1.2.1c: Work with federal partners on risks and opportunities with fintech disruptions (e.g. open banking) Strategy: 1.2.2: Provide better opportunities for public reporting on ML activities ▷ 1.2.2a: Create a public web portal and telephone tip line for the anonymous reporting > 1.2.2b: Work with Crime Stoppers to understand how they can support this strategy Strategy: 1.2.3: Ensure that success of AML efforts are researched and evaluated ▶ 1.2.3a: Develop a performance measurement framework ▶ 1.2.3b: Create a robust evaluation framework > 1.2.3c: Consider the creation of a publicly available Provincial Risk Assessment Strategy 1.2.4: Review and consider any recommendations resulting from the independent commission of inquiry into money laundering activities within BC ▷ 1.2.4b: Review and align with findings of final report, as needed Strategy 1.2.5: Remove the ability to hide identities behind numbered companies and trusts ▶ 1.2.5a: Require owners of land to disclose beneficial ownership in a registry ▶ 1.2.5b: Require corporations to keep a registry of beneficial owners ▶ 1.2.5c: Create a publicly searchable registry of beneficial owners of corporations > 1.2.5d: Continue to monitor activities and develop preventative actions Strategy 1.2.6: Develop data analytic capabilities to identify money laundering activities in real estate Strategy: 1.2.7: Assess impact and degree of sectors currently affected Strategy 1.3.1: Protect the financial system from organized crime ▷ 1.3.1a: Identify sector weaknesses with regulators/agencies ▶ 1.3.1b: Implement reporting rules for cash transactions ★ Strategy 1.3.2: Create a strong AML framework and outline appropriate regulator functions for priority sectors ▶ 1.3.2a: Engage regulators on solutions and outline roles of regulator ▶ 1.3.2b: Add AML to the mandates of financial sector regulators ▶ 1.3.2c: Add AML to the mandates of other agencies/regulators ▶ 1.3.2d: Develop policies to assist regulators on reporting processes for compliance/enforcement ▶ 1.3.2e: Work with the BC Law Society to establish a framework for enhanced disclosure from lawyers in BC Strategy 1.3.3: Develop a secure system for information sharing between regulators to analyze data for the development of trends for future prevention and compliance ▶ 1.3.3a: Take an inventory of data accessible by government (DM2 focus) LEGEND ▶ 1.3.3b Take an inventory of data accessible by gov. (all sector focus) STRATEGIC PRIORITY\* EST. FUNDING ASK\* Other ▷ 1.3.3c: Determine the strength of data and identify gaps ★ Legislative Amend. > 1.3.3d: Develop a system that combines anonymized regulatory and non-regulatory data for the purpose of red-flag analysis, trends, and possible investigation ▶ 1.3.3e: Develop an IM/IT system capable of doing the above, which includes cyber security standards Should do Operatina ▶ 1.3.3f: Obtain and analyze anonymized data from regulators/agencies ▶ 1.3.3g: Strengthen regulatory data integrity and analytics ● Cap/Op Split Nice to do ▶ 1.3.3h:Create a system that provides regulators with visibility outside their work & a common approach to data utility

All strategies will require existing provincial resources. AMLS will need support or dedicated resources to achieve goal.

▶ 1.3.3i: Develop a system that provides regulators with an avenue to communicate across sector boundaries

Year 0 (In progress)	Year 1 (2020/2021)	Year 2 (2021/2022)	Year 3 (2022/2023)	Years 4+		
GOAL 1: A coherent and agile approach to the identif	fication and prevention of money laundering					
	▶ 1.3.3j: Define an agreed upon data governance and sharing model to enable the overall strategy ●					
	Strategy 1.3.4: Create of strong regulatory framework and outline appro					
	▶ 1.3.4a: Conduct robust legal analysis of privacy legislation and the Char					
	▷ 1.3.4b: Conduct robust legal analysis of privacy legislation and the Char					
		D 1.3.4c: Explore non-criminal sanctions - DM2 sectors				
Strategy 1.3.5: Ensure adequate regulation in the real estate sector						
> 1.3.5a: Rewrite the Mortgage Brokers Act to be more up to date	*					
> 1.3.5b: Create a single regulator for real estate						
> 1.3.5c: Ensure an efficient real estate regulatory framework	N 1 2 Ed. Causiday if year, lateny about as any user, ived for day, alamout		dans .			
	▷ 1.3.5d: Consider if regulatory changes are required for developers, h	nome inspectors, real estate appraisers, and unregulated len	Strategy 1.4.1: Engage Feds. to develop report	ing for house, goods		
			> 1.4.1a: Identify scope of luxury goods			
			Strategy 1.4.2:Identify opportunity for no	A A D. A. D. BARROLL SECTION		
			<ul> <li>▶ 1.4.2a: Develop guidelines for non-reg</li> <li>▶ 1.4.2b: Review non-regulated industry</li> <li>that should be provincially regulated</li> </ul>	gulated market		
Strategy 1.4.3: Develop a provincial framework for regulating Money	GARAGO CON GRANDE CONTRACTOR CONT					
> 1.4.3a: Conduct industry consultations to understand diversity of bu	D 1.4.3b: Develop options for an appropriate framework					
Goal 2: Implementation of a coordinated compliance	& enforcement regime to make BC the most difficult juriso	diction in Canada in which to launder money				
	Strategy 2.1.1: Develop dedicated AML compliance and enforcement un	its				
		> 2.1.1a: Establish provincial criminal financial intelligence	and investigative units	•		
	> 2.1.1b: Establish a provincial regulatory centre that provides a space to sha		nse, educate, and work in parallel with crimina	l enforcement		
	Strategy 2.1.2: Increase provincial expertise and dedicated resources for	r prosecutions and policing to combat ML				
	<ul> <li>≥ 2.1.2a: Consider a fenced funding model for policing AML</li> <li>≥ 2.1.2b: Undertake research of existing AML models and disruption stra</li> </ul>	tagias				
	2.1.2b. Office take research of existing AIVE models and disruption stra		h BC post secondary institutions			
		> 2.1.2d: Develop a AML and financial crime training progr				
			in AML			
		Strategy 2.2.1: Develop a framework for regulators to imp	oose penalties and cumulative fines for non	n-compliance		
		▷ 2.2.1b: Empower regulators to impose multiple and cum     ▷ 2.2.1c: Review and change policies that may prevent reg				
		2.2.1c. Neview and change policies that may prevent reg	> 2.2.1d: Review regulatory reporting m			
			compliance to monitor when to impose	penalties		
		Strategy 2.2.2: Increase provincial expertise and resourcin	AT THE RESIDENCE OF THE PARTY O			
Strategy 2.2.3: Enhance tools and the use of civil forfeiture to target u			with rederal ACE teams			
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LEGEND STRATEGIC PRIORITY\* EST. FUNDING ASK\* Other\* Must do Capital ★ Legislative Amend. Should do Operating Nice to do Cap/Op Split

Year 2 (2021/2022) Year 0 (In progress) Year 1 (2020/2021) Year 3 (2022/2023) Years 4+ Goal 3: Government, partners, and stakeholders prioritize AML efforts and take an integrated and coordinated approach to combat Money Laundering Strategy 3.1.1: Create an engagement strategy with all impacted stakeholders ▷ 3.1.1a: Determine stakeholders that might be immediately impacted ▷ 3.1.1b: Keep above stakeholders informed through one-on-one communication ⇒ 3.1.1c: Determine future meetings and engagement activities Strategy 3.1.2: Develop appropriate incentives to support prioritization for all involved parties > 3.1.2a: Consider whistleblower awards to be provided by regulators (e.g. Ontario Securities Commission) Strategy 3.2.1: Undertake a communications campaign ≥ 3.2.1a: Development of a website page-to provide updates on actions to date ≥ 3.2.1b: Publish progress reports on implementation of AML Strategy Strategy 3.2.2: Identify tools to keep British Columbians aware of actions to combat ML ⇒ 3.2.2a: Education campaign to understand the difference between POC and ML

■

STRATEGIC PRIORITY\*

EST. FUNDING ASK\*

Other\*

Must do

Capital

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Operating

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Cap/Op Split

Strategy 3.2.3: Create greater awareness of negative impacts of ML on the economy

Anti Mon	ey Launde	ring Strate	gic Timeline: Three Year Plan - <mark>Fina</mark>			
Year 0 (In p	rogress)		Year 1 (2020/2021)	Year 2 (2021/22)	Year 3 (2022/23)	Years 4+
GOAL 1: A cohe	erent and agile app	proach to the identif	fication and prevention of money laundering	The second second		
Strategy 1.1.1: Idea	ntify a governing body w	with responsibility for AM				
D 1.1.1a: Analyze ne	eed for independent bod	dy to oversee AML 🖈				
			▶ 1.1.1b: Develop a recruitment plan to ensure strong future provincial cap	pacity and AML expertise in BC		
					▷ 1.1.1c: Set expectations with stake	holders
		other jurisdictions on best	***************************************			
D 1.1.2b: Develop re	elationships with leading	the BC Canada working gr g AML experts and agencie				
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			▶ 1.2.1b: Undertake analysis of cryptocurrency and potential vulnerabilitie	s •		
▷ 1.2.1c: Work with	federal partners on risk	s and opportunities with f	intech disruptions (e.g. open banking)			
				Strategy: 1.2.2: Provide better opportunities		
					phone tip line for the anonymous reporting	
				▶ 1.2.2b: Work with Crime Stoppers to understand how they can support this strategy		
				Strategy: 1.2.3: Ensure that success of AML efforts are researched and evaluated		
			Strategy 1.2.4: Review and consider any recommendations resulting from 1.2.4: Align with findings of interim report	om the independent commission of inquiry in	ito money laundering activities within BC	
			□ 1.2.4a: Align with findings of interim report	> 1.2.4b: Review and align with findings of fi	nal report, as needed	
Strategy 1 2 5: Dem	ove the ability to hide in	dentities behind numbere	d companies and trusts	,		
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THE RESERVE AND ADDRESS OF THE PARTY OF THE	Contraction of the Contraction o	ry of beneficial owners of				
					develop preventative actions	
Strategy 1.2.6: Deve	elop data analytic capab	ilities to identify money k	aundering activities in real estate			
			Strategy: 1.2.7: Assess impact and degree of sectors currently affected			
			Strategy 1.3.1: Protect the financial system from organized crime	7-		
					transactions *	
			Strategy 1.3.2: Create a strong AML framework and outline appropriate re			
			Strately 1.5.2. create a strong Airie framework and buttine appropriate it	Sulator functions for priority sectors	▶ 1.3.2a: Engage regulators on solutions and outl	line
			▷ 1.3.2b: Add AML to the mandates of financial sector regulators		roles of regulator	
				▶ 1.3.2c: Add AML to the mandates of other	agencies/regulators	
			▷ 1.3.2d: Develop policies to assist regulators on reporting processes for co	ompliance/enforcement		
		▷ 1.3.2e: Work with the BC Law Society to establish a framework for enhance	Contract to the contract to th			
			Strategy 1.3.3: Develop a secure system for information sharing between	The state of the s	t of trends for future prevention and compliance	
	LEGEND		▷ 1.3.3a: Take an inventory of data accessible by government (DM2 focus)			
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iviust do	Capital	X Legislative Ameria.			lysis, trends, and possible investigation  of doing the above, which includes cyber security stands	ards
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Drown Fr	A. (2.1)			2 213.31 Ostali una unalyze unonymizea dat	▶ 1.3.3g: Strengthen regulatory data	integrity and analytics
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*Cost impacts unknown, subject to All strategies will require existing pr	change rovincial resources. AMLS will need support	t or dedicated resources to achieve goals			ulators with an avenue to communicate across sector b	

Year 0 (In progress)	Year 1 (2020/2021)	Year 2 (2021/2022)	Year 3 (2022/2023)	Years 4+		
GOAL 1: A coherent and agile approach to the ident	tification and prevention of money laundering					
	Strategy 1.3.4: Create of strong regulatory framework and outline	e appropriate regulator functions for priority sectors	ce and sharing model to enable the overall strateg	₩ ●		
		► 1.3.4a: Conduct robust legal analysis of privacy legislation and the Charter for priority ssecotrs ID'd by the AML body  ► 1.3.4b: Conduct robust legal analysis of privacy legislation and the Charter for DM2 sectors				
	2 1.3.45. Conduct robust legal analysis of privacy legislation and the	□ 1.3.4c: Explore non-criminal sanctions - DM2 se     □ 1.3.4d Explore non-criminal sanctions - new se				
		▶ 1.3.4e: Explore potential use of civil forfeiture				
Strategy 1.3.5: Ensure adequate regulation in the real estate sector		7 Interest Explore potential and of civil for letter				
<ul> <li>▶ 1.3.5a: Rewrite the Mortgage Brokers Act to be more up to date</li> <li>▶ 1.3.5b: Create a single regulator for real estate</li> <li>▶ 1.3.5c: Ensure an efficient real estate regulatory framework</li> </ul>	* •					
		ppers, home inspectors, real estate appraisers, and unregul				
			Strategy 1.4.1: Engage Feds. to develop report	to be included		
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Goal 2: Implementation of a coordinated compliand	ce & enforcement regime to make BC the most difficult	iurisdiction in Canada in which to launder mo	nev			
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	> 2.1.1b: Establish a provincial regulatory centre that provides a space Strategy 2.1.2: Increase provincial expertise and dedicated resources.		ory response, educate, and work in parallel with crimina	il enforcement		
	≥ 2.1.2a: Consider a fenced funding model for policing AML	rees to, prosecutions and ponenty to compat the		-		
		<ul> <li>≥ 2.1.2b: Undertake research of existing AML models and disruption strategies</li> <li>≥ 2.1.2c: Provide education and hiring in coordination with BC post secondary institutions</li> <li>≥ 2.1.2d: Develop a AML and financial crime training program with post secondary institutions</li> <li>≥ 2.1.2e: Explore hiring of Crown prosecutorial resources in AML</li> </ul>				
		<ul> <li>         ≥ 2.2.1a: Review regulators' powers to impose per period.     </li> <li>         ≥ 2.2.1b: Empower regulators to impose multiple.     </li> </ul>	and the control of th	-		
		2.2.11. Neview and change policies that may pr	≥ 2.2.1d: Review regulatory reporting n  compliance to monitor when to impose	nechanisms on		
		Strategy 2.2.2: Increase provincial expertise and	resourcing for regulators to combat ML	periaries		
			to work with federal ACE teams			
Strategy 2.2.3: Enhance tools and the use of civil forfeiture to target ≥ 2.2.3a: Explore the potential use of unexplained wealth orders	t unlawful activity related to property					
			≥ 2.2.3b: Assess the feasibility of geogra	aphic tracking orders		
LEGEND  STRATEGIC PRIORITY  FOT FUNDING ACUT  Others				The state of the s		
STRATEGIC PRIORITY* EST. FUNDING ASK* Other*						

Must do

Should do

Nice to do

\*Cost impacts unknown, subject to change
All strategies will require existing provincial resources. AMLS will need support or dedicated resources to achieve goals

★ Legislative Amend.

Capital

Operating

Cap/Op Split

Year 2 (2021/2022) Year 0 (In progress) Year 1 (2020/2021) Year 3 (2022/2023) Years 4+ Goal 3: Government, partners, and stakeholders prioritize AML efforts and take an integrated and coordinated approach to combat Money Laundering Strategy 3.1.1: Create an engagement strategy with all impacted stakeholders ▷ 3.1.1a: Determine stakeholders that might be immediately impacted ▷ 3.1.1b: Keep above stakeholders informed through one-on-one communication ⇒ 3.1.1c: Determine future meetings and engagement activities Strategy 3.1.2: Develop appropriate incentives to support prioritization for all involved parties > 3.1.2a: Consider whistleblower awards to be provided by regulators (e.g. Ontario Securities Commission) Strategy 3.2.1: Undertake a communications campaign ≥ 3.2.1a: Development of website landing page-to provide updates on actions to date ▷ 3.2.1b: Publish progress reports on implementation of AML Strategy Strategy 3.2.2: Identify tools to keep British Columbians aware of actions to combat ML

▶ 3.2.2a: Education campaign to understand the difference between POC and ML

STRATEGIC PRIORITY\*

EST. FUNDING ASK\*

Other\*

Must do

Capital

Should do

Operating

Nice to do

Cap/Op Split

Strategy 3.2.3: Create greater awareness of negative impacts of ML on the economy

# Anti Money Laundering Strategic Timeline: Three Year Plan - Minimum Viable Product

Year 0 (In progress)

Year 1 (2020/2021)

Year 2 (2021/22)

Year 3 (2022/23)

Years 4+

# GOAL 1: A coherent and agile approach to the identification and prevention of money laundering

# Strategy 1.1.1: Identify a governing body with responsibility for AML

- ▶ 1.1.1a: Analyze need for independent body to oversee AML
- ▶ 1.1.1c: Set expectations with stakeholders

# Strategy 1.1.2: Ongoing engagement with other jurisdictions on best practices in AML

- > 1.1.2a: Continue to work with the feds on the BC Canada working group on ML in real estate
- ▶ 1.1.2b: Develop relationships with leading AML experts and agencies

#### Strategy: 1.2.1: Identity emerging sectors that may be vulnerable

- ▶ 1.2.1a: Conduct a scan on best practices, trends, & actions COMPLETE
- > 1.2.1c: Work with federal partners on risks and opportunities with fintech disruptions (e.g. open banking)

#### Strategy: 1.2.2: Provide better opportunities for public reporting on ML activities

> 1.2.2b: Work with Crime Stoppers to understand how they can support this strategy

## Strategy 1.2.4: Review and consider any recommendations resulting from the independent commission of inquiry into money laundering activities within BC

▷ 1.2.4a: Align with findings of interim report

▷ 1.2.4b: Review and align with findings of final report, as needed

#### Strategy 1.2.5: Remove the ability to hide identities behind numbered companies and trusts

- ▶ 1.2.5a: Require owners of land to disclose beneficial ownership in a registry
- ▶ 1.2.5b: Require corporations to keep a registry of beneficial owners
- > 1.2.5c; Create a publicly searchable registry of beneficial owners of corporations FUNDING TBD

# Strategy 1.3.2: Create a strong AML framework and outline appropriate regulator functions for priority sectors

▷ 1.3.2a: Engage regulator on solutions and outline roles of regulator

▷ 1.3.2b: Add AML to the mandates of financial sector regulators

> 1.3.2e: Work with the BC Law Society to establish a framework for enhanced disclosure from lawyers in BC

Strategy 1.3.3: Develop a secure system for information sharing between regulators to analyze data for the development of trends for future prevention and compliance

Strategy 1.3.4: Create of strong regulatory framework and outline appropriate regulator functions for priority sectors

> 1.3.4b: Conduct robust legal analysis of privacy legislation and the Charter for DM2 sectors

□ 1.3.4e: Explore potential use of civil forfeiture

#### Strategy 1.3.5: Ensure adequate regulation in the real estate sector

- ▷ 1.3.5a: Rewrite the Mortgage Brokers Act to be more up to date
- ▶ 1.3.5b: Create a single regulator for real estate FUNDING TBD

Strategy 1.4.1: Engage Feds. to develop reporting for luxury goods

▶ 1.4.1a: Identify scope of luxury goods to be included

#### Strategy 1.4.3: Develop a provincial framework for regulating Money Service Businesses

▶ 1.4.3a: Conduct industry consultations to understand diversity of business

LEGEND STRATEGIC PRIORITY\* **EST. FUNDING ASK\*** Capital Should do Operating

□ 1.4.3b: Develop options for an appropriate framework

All strategies will require existing provincial resources, AMLS will need support or dedicated resources to achieve goals

Year 0 (In progress)

Year 1 (2020/2021)

Year 2 (2021/2022)

Year 3 (2022/2023)

Years 4+

Goal 2: Implementation of a coordinated compliance & enforcement regime to make BC the most difficult jurisdiction in Canada in which to launder money

Strategy 2.1.2: Increase provincial expertise and dedicated resources for prosecutions and policing to combat ML

≥ 2.1.2b: Undertake research of existing AML models and disruption strategies

≥ 2.1.2e: Explore hiring of Crown prosecutorial resources in AML

#### Strategy 2.2.3: Enhance tools and the use of civil forfeiture to target unlawful activity related to property

▷ 2.2.3a: Explore the potential use of unexplained wealth orders

Goal 3: Government, partners, and stakeholders prioritize AML efforts and take an integrated and coordinated approach to combat Money Laundering

# Strategy 3.1.1: Create an engagement strategy with all impacted stakeholders

▷ 3.1.1a: Determine stakeholders that might be immediately impacted

▷ 3.1.1b: Keep above stakeholders informed through one-on-one communication

> 3.1.1c: Determine future meetings and engagement activities

## Strategy 3.2.1: Undertake a communications campaign

> 3.2.1a: Development of landing page-to provide updates on actions to date

⇒ 3.2.1b: Publish progress reports on implementation of AML Strategy

