

Linamar Corporation

Anti-Money Laundering and Sanction Policy

Linamar Corporation (“Linamar”) is committed to maintaining an effective enterprise-wide Anti-Money Laundering (AML) program designed to deter, detect and report suspicious activity, including the misuse of its products, services and delivery channels related to money laundering or terrorist financing, bribery, corruption, or other activities that may violate applicable economic sanctions.

A General Legal Counsel and Senior Legal Counsel have been appointed to oversee the design, content and implementation of Linamar’s global AML program which covers money laundering, terrorist financing, bribery, corruption, and applicable economic sanctions (collectively known as “AML program”). The program is designed to mitigate the risk of Linamar products or services being used for financial crime, and to ensure compliance with the laws and regulations across the multiple jurisdictions in which Linamar operates.

Linamar’s AML program defines the roles and responsibilities of employees within the three lines of defence in managing risk and ensuring the relevant policies, practices and procedures are appropriately documented and accessible. In turn, the AML program’s enterprise-wide policies and procedures define Linamar’s respective risk appetite and establish the minimum requirements for managing the associated risks, including:

- Inherent Risk Assessments, and ongoing assessment of risk associated with client relationships; products and services; technology; jurisdiction/geography, and other financial crimes risks;
- Client due diligence and enhanced due diligence;
- Monitoring of transactions to detect and report suspicious activity;

- Reporting transactional activity as prescribed by the applicable laws and regulations;
- Delivery of ongoing training to employees, contractors and relevant stakeholders;
- Recordkeeping and retention in accordance with applicable laws and regulations

The effectiveness of Linamar’s AML program is regularly evaluated to ensure it remains current and is aligned with business activities, regulatory developments, industry standards and best practices. By doing so, Linamar adheres to all applicable laws and regulatory requirements in the jurisdictions in which it operates, including the guidance provided by the Office of the Superintendent of Financial Institutions (OSFI) and the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC), and by the recommendations published by the Financial Action Task Force (FATF).