

Compliance Questionnaire - Real Estate Sector

Part A - continued

A9 Does your company/organization have the capability to file electronically with FINTRAC? Yes No

Part B - Compliance Regime

B1 Have you fully implemented a compliance regime in your company/organization? Yes No

B2 If you answered **no** to question B1, please explain what aspects of the compliance regime you have not implemented. If there is not enough room below, attach a separate sheet to provide all the relevant information. Make sure to indicate that this information belongs in answer B2.

Part C - Compliance Officer

C1 Have you appointed a compliance officer responsible for implementing your compliance regime to meet your reporting, record-keeping and client identification obligations? Yes No

C2 If you answered **yes** to question C1, provide the compliance officer's name.

C3 Does your compliance officer report directly to the broker/nominee/owner? Yes No

C4 How does your company/organization keep up with any changes in reporting, record-keeping or client identification obligations?

- | | |
|---|---|
| <input type="checkbox"/> FINTRAC's Web site | <input type="checkbox"/> Media (newspaper, television, etc.) |
| <input type="checkbox"/> Web sites other than FINTRAC's | <input type="checkbox"/> Seminars, training or conferences |
| <input type="checkbox"/> Via industry association | <input type="checkbox"/> Other ways of keeping current
(If other, specify _____) |

Part D - Compliance Policies and Procedures

D1 Do you have policies and procedures to ensure your reporting, record keeping and client identification requirements are being met? Yes No

D2 Are these policies and procedures in writing? Yes No

D3 Has your company/organization conducted financial transactions within the last 12 months with individuals or entities based in any of the countries on the Financial Action Task Force (FATF) List of Non-Cooperative Countries or Territories? For information about this list, please refer to FINTRAC's advisories at http://www.fintrac.gc.ca/publications/avs/advisory_e.asp or go to www.realtorlink.ca and select the "Money Laundering Compliance Centre" link which also links to FINTRAC's advisories. Yes No

D4 If you answered **yes** to question D3, which countries were involved and approximately how many transactions were conducted with each country? If there is not enough room below, attach a separate sheet to provide all the relevant information. Make sure to indicate that this information belongs in answer D4.

D5 Does your company/organization cross-reference the names of clients with any anti-terrorism lists of names published by the Canadian government? For more information about these, please refer to the List of Names Subject to the *Regulations Establishing a List of Entities* made under subsection 83.05(1) of the *Criminal Code* or the *United Nations Suppression of Terrorism Regulations* provided by the Office of the Superintendent of Financial Institutions (OSFI) at <http://www.osfi-bsif.gc.ca> or go to www.realtorlink.ca and select the "Money Laundering Compliance Centre" link which also links to the OSFI website. Yes No

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Part E - Review of Compliance Policies and Procedures

E1	Have you implemented a process for reviewing your compliance policies and procedures to determine their effectiveness?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
E2	Has such a review already been conducted for your company/organization?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
E3	If you answered yes to question E2, how often do you plan on conducting a review?		
	<input type="checkbox"/> More than once a year	<input type="checkbox"/> Once a year	<input type="checkbox"/> Less than once a year
E4	If you answered yes to question E2, the review was conducted by: (Check all that apply)		
	<input type="checkbox"/> Your Compliance Officer	<input type="checkbox"/> Other Internal Auditor	
	<input type="checkbox"/> External Auditor	<input type="checkbox"/> Other _____	
E5	If you answered yes to E2, when was the review completed? _____		
E6	Are the results of the review documented?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Part F - Ongoing Compliance Training

F1	Does your company/organization provide training about your reporting, record keeping and client identification obligations?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	If you answered yes to question F1, answer question F2 .		
F2	Describe how your training is delivered. Include information about the mode and frequency of delivery as well as a general description of who is required to take the training. If there is not enough room below, attach a separate sheet to provide all the relevant information. Make sure to indicate that this information belongs in answer F2.		
<p>Mode of training</p> <input type="checkbox"/> In a classroom with trainer/Seminar <input type="checkbox"/> Self-directed <input type="checkbox"/> Computer-based <input type="checkbox"/> Other (If other, specify _____)		<p>Frequency of training</p> <input type="checkbox"/> Yearly <input type="checkbox"/> More often than yearly (e.g., seasonally, quarterly, etc.) <input type="checkbox"/> When new staff is hired <input type="checkbox"/> In special circumstances (Specify circumstances _____) _____) <input type="checkbox"/> Other (If other, specify _____)	
<p>Who receives the training</p> <input type="checkbox"/> All Staff <input type="checkbox"/> Brokers / Nominees / Managers <input type="checkbox"/> Sales Representatives <input type="checkbox"/> Other (If other, specify _____)		<p>Type of material</p> <input type="checkbox"/> Handouts <input type="checkbox"/> Test <input type="checkbox"/> Presentation or group discussion <input type="checkbox"/> Other (If other, specify _____)	