

Compliance Questionnaire - MSB/FX Sector

Part A - General Information Cont'd

- A9 How many employees are there in your organization? _____
- A10 Please indicate the approximate annual value of all currency exchange and money services business you conduct. \$ _____
- A11 Does your organization provide currency exchange and/or wire transfer services to other Money Services Businesses or Foreign Exchange Dealers? Yes No

A12 What is your organization's primary bank / credit union / caisse populaire / trust company?

A13 What is your organization's secondary bank / credit union / caisse populaire / trust company?

A14 Is your organization a subsidiary of any other entity subject to the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* and Regulations? If so, what is the name and address of the parent organization? Yes No

A15 Does your organization own any other entities that are subject to the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* and Regulations? If so, what are the name and address of these entities? If there is not enough room here, attach a separate sheet to provide all the relevant information. Make sure to indicate that this information belongs in answer A15. Yes No

A16 Please indicate if you are licensed in any of the following sectors. Check all that apply.

Life Insurance Securities Real Estate Accounting None applicable

Part B - Compliance Regime

B1 Have you fully implemented a compliance regime in your organization (which includes the appointment of a compliance officer, development and application of compliance policies and procedures, review of your compliance policies and procedures as necessary, and ongoing compliance training)? Refer to FINTRAC's website Guideline 4 at http://www.fintrac.gc.ca/publications/guide/Guide4/4_e.asp Yes No

B2 If you answered no to question B1, at what stage of implementation is your compliance regime? 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.

B3 Have you appointed a compliance officer to meet your reporting, record keeping and client identification obligations? Yes No

B4 If you answered yes to question B3, please provide the name and telephone number of the compliance officer.

B5 Does your compliance officer report directly to senior management of the organization? (Senior management could be the owner or chief operating officer of the business, any senior executive or any member of senior management or the board of directors) Yes No

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Part B - Compliance Regime Cont'd

B6 How does your organization keep up with any changes in reporting, record keeping or client identification obligations? (check all that apply)

- Media (newspaper, television, etc.) Seminars, training or conferences
 FINTRAC's Web site Other (If other, specify _____)
 Other web sites

B7 Have you consulted the FINTRAC Guidelines? Yes No

B8 If you answered yes to question B7, do you find them useful? Yes No

B9 Do you have any suggestions for improving the guidelines? _____

Part C - Compliance Policies and Procedures

C1 Do you have policies and procedures to ensure your reporting, record keeping and client identification requirements are being met? Yes No

C2 Are your policies and procedures in writing? Yes No

C3 Within the last twelve months, has your organization conducted financial transactions 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/2005-02-16_e.asp Yes No

C4 If you answered yes to question C3, 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 C4.

C5 Does your 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 at <http://www.osfi-bsif.gc.ca> Yes No

Part D - Review of Compliance Policies and Procedures

D1 Have you implemented a process for reviewing your organization's compliance policies and procedures to determine their effectiveness? Yes No

D2 Has such a review already been conducted for your organization? Yes No

D3 If you answered yes to question D2, how often do you conduct a review?

- More than once a year Once a year Less than once a year

D4 If you answered yes to question D2, the review was conducted by: (Check all that apply)

- Compliance officer Internal Audit External Audit Consultant Other _____

D5 If you answered yes to question D2, when was the review completed? _____

D6 Are the results of the review documented? Yes No

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Part E - Ongoing Compliance Training

E1 Does your organization provide training about your reporting, record keeping and client identification obligations? Yes No

E2 If you answered yes to question E1, 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 E2.

Mode of training

- In a classroom with trainer/Seminar
- Self-directed
- Computer-based
- Other
(If other, specify _____)

Frequency of training

- Annually
- More often than annually (quarterly, etc.)
- When new staff is hired
- In special circumstances
(Specify circumstances _____)
- Other
(If other, specify _____)

Who receives the training

- Only those in contact with clients
- All staff
- Managers
- Corporate security
- Agents
- Other
(If other, specify _____)

Type of material

- Handouts
- Test administered with pass or fail mark
- Presentation or group discussion
- Other
(If other, specify _____)