PART C – ONGOING MONITORING AND REASSESSMENT

Referencing the CSS Risk Assessment Manual.

1. ONGOING CLIENT RELATIONSHIP

Purpose:
Maintain an ongoing understanding of the client and the nature of the business relationship.

Key Activities:
- Monitor changes in client circumstances
- Maintain current client information
- Observe for unusual activity
- Review services being provided
- Consider emerging risk factors

2. COMPLETE MONITORING RECORD

USE:
Appendix D – CSS Monitoring Record.

Key Activities:
- Client activity
- Monitoring observations
- Changes in ownership or control
- Changes in services provided
- Geographic changes
- Source of funds concerns
- Any unusual or suspicious activity
- Risk assessment observations

3. HAS A TRIGGER EVENT OCCURRED?

Examples of Trigger Events::
- Change in ownership
- Change in beneficial ownership
- Significant change in business activities
- Request for additional services
- Foreign expansion/international activities
- Adverse media/reputational concerns
- Sanctions-related concerns
- PEP/HIO status changes
- Source-of-funds concerns
- Unusual transactions or activity
- Monitoring concerns
- Any material change in the Firm's understanding of the client

NO

CONTINUE MONITORING

Actions:
- Continue monitoring based on current risk classification
- Maintain existing review schedule
- Update Monitoring Record as required
- Escalate concerns if identified (See Part E – High-Risk Indicator & Escalation Workflow)

YES

4. REASSESS CLIENT RISK

Review and Update:
- Client information
- Ownership structure
- Beneficial ownership
- Geographic exposure
- Services provided
- Source of funds information
- Risk indicators

Document Findings

5. CHANGE TO RISK RATING REQUIRED?

Review whether the trigger event changes the client's:
- Risk classification
- Monitoring requirements
- Due diligence requirements
- Escalation requirements

NO

CONTINUE EXISTING MONITORING

Outcome:
- Risk classification remains unchanged
- Existing monitoring schedule remains in place
- Continue documenting monitoring activities

YES

APPLY NEW RISK CLASSIFICATION & DUE DILIGENCE

Actions:
- Assign updated risk rating
- Apply appropriate due diligence requirements
- Adjust monitoring frequency
- Complete additional reviews if required
- Escalate where necessary
- Document rationale for changes

Posible outcomes
- Low Risk → Medium Risk
- Medium Risk → High Risk
- High Risk → Enhanced Monitoring
- Any other risk reclassification supported by assessment

DOCUMENT ALL DECISIONS

Record in FINTRAC/Client File:
- Trigger event identified
- Reassessment completed
- Reasoning and analysis
- Updated risk classification (if applicable)
- New monitoring requirements
- Due diligence actions completed
- Escalation decisions
- Reviewer sign-off