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**Financial Transactions and
Reports Analysis Centre of Canada**

**Centre d'analyse des opérations
et déclarations financières du Canada**

Ongoing Compliance Training Program Plan

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Purpose and Regulatory Alignment

BACKGROUND

This Compliance Training Program is designed to ensure that CSS meets its obligations under the Financial Transactions and Reports Analysis Centre of Canada and the Proceeds of Crime (Money Laundering) and Terrorist Financing Act (PCMLTFA).

FINTRAC requires all reporting entities to:

- Maintain a written, ongoing compliance training program
- Document a formal training plan
- Deliver training to all relevant personnel

This program forms a core pillar of CSS AML/ATF compliance framework and supports audit readiness, regulatory reporting accuracy, and risk mitigation.

Governance and Accountability

COMPLIANCE OFFICER TRAINING (CAMLI)

All designated Compliance Officers will complete formal certification and ongoing education through CAMLI.

Training focus:

- Regulatory interpretation (PCMLTFA & FINTRAC guidance)
- Risk assessment methodologies
- AML/ATF typologies and trends
- Audit and examination readiness

FIRM-WIDE TRAINING (ABC SOLUTIONS COMPLY-LMS)

All employees will complete structured AML/ATF training through ABC solutions COMPLY-LMS.

The Compliance Officer retains ultimate accountability for:

- Training design oversight
- Completion monitoring
- Content relevance and updates

Training Program Structure

CORE TRAINING COMPONENTS (FINTRAC-ALIGNED)

Training content will explicitly cover:

- Overview of AML/ATF legislation and FINTRAC obligations
- Money laundering and terrorist financing concepts and typologies

- CSS specific risk exposure and vulnerabilities
- Internal policies and procedures
- Reporting obligations (STRs, etc.)
- Know Your Client (KYC) and record-keeping requirements
- Identity may be verified remotely using the Government-Issued Photo Identification Method or Dual Process where FINTRAC authentication requirements are satisfied.
- Roles and responsibilities in identifying suspicious activity

These elements are explicitly required by FINTRAC guidance for training programs.

ROLE-BASED TRAINING MODEL

Training will be tailored based on role:

Role Group	Training Focus
Compliance Officers	Advanced regulatory interpretation, audits, risk frameworks
Senior Management	Governance, oversight responsibilities, risk appetite
Operations / Client-Facing Staff	KYC, transaction monitoring, escalation
Support Staff	Awareness, red flags, reporting obligations

FINTRAC and global AML standards emphasize role-specific training as a best practice.

Training Frequency and Delivery

FREQUENCY

- **New hires:** Mandatory onboarding training (within 30 days)
- **All staff:** Annual refresher training (minimum)
- **Compliance Officer:** Ongoing continuing education (CAMLII)
- **Ad hoc:** Triggered by:
 - Regulatory updates
 - Internal audit findings
 - Identified risk changes

Ongoing training is a regulatory requirement and should be continuous, not one-time.

DELIVERY METHOD

Method	Platform
eLearning modules	COMPLY-LMS
Certification programs	CAMLII
Internal workshops	Compliance Officer-led

Documentation and Recordkeeping

CSS will maintain comprehensive training records, including:

- Training materials and versions
- Completion records (by employee)
- Assessment/test results (if applicable)
- Attendance logs
- Evidence of remediation for missed training

Documentation is required to demonstrate compliance during FINTRAC examinations.

Monitoring and Reporting

The Compliance Officer will:

- Monitor completion rates via COMPLY-LMS
- Report quarterly to senior management:
 - Completion status
 - Overdue training
 - Identified knowledge gaps
- Escalate non-compliance

Continuous Improvement and Updates

The training program will be reviewed and updated:

- Annually (content refresh)
- Upon regulatory changes
- Following internal or external audit findings
- Based on evolving ML/TF risks

Effectiveness Testing (Regulatory Requirement)

CSS will conduct a formal **effectiveness review at least every two years**, assessing:

- Training adequacy
- Staff understanding
- Alignment with risk profile
- Integration with policies and procedures

This review is a mandatory FINTRAC requirement.

Integration with Compliance Program

This training program is integrated with the broader AML compliance framework:

- Risk Assessment
- Policies & Procedures
- Monitoring and Reporting
- Independent Review

Training must reflect the firm's actual risk environment and controls, not generic content.

Key Success Metrics

CSS will track:

- 100% training completion rate
- Assessment pass rates
- Reduction in compliance errors
- Audit findings related to training
- Time-to-remediation for gaps

Summary

This program ensures that CSS:

- Meets FINTRAC's mandatory training requirements
- Maintains a documented and auditable training framework
- Embeds compliance awareness across all levels of the organization
- Supports a risk-based, defensible AML program
- This program will be reviewed yearly