



August 2014

Reference Document:
CLHIA STANDARDIZED MGA COMPLIANCE REVIEW SURVEY

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CLHIA Standardized MGA Compliance Review Survey

Instructions

Introduction

The MGA Compliance Review Survey (CRS) is a standardized survey that CLHIA member companies (Companies) have agreed to use to assist in assessing the performance of compliance functions that are carried out by Managing General Agencies (Agencies). It is divided into 11 sections.

1. General Information about the Agency
2. Screening Advisors for Suitability
3. Ongoing Monitoring of Advisors for Suitability
4. Reporting and Investigating Concerns about Advisors
5. Managing Conflicts of Interest
6. Privacy
7. Anti-money Laundering/Anti-Terrorist Financing
8. Doing Business in Quebec
9. Internal Audit/Independent Review of Compliance Program
10. Company-specific Questions
11. Agency assertion/sign-off

This survey will be reviewed and updated on an as-needed basis to reflect changes in industry practices, new statutory requirements and interpretations with respect to the applicability of existing statutory requirements.

Use by the Company

Companies should check the CLHIA website to confirm that the current version is being used.

A number of questions ask about changes since the last survey. Accordingly, Companies should advise the Agency if an updated version of the survey is being used.

The Company should use a risk-based approach to determine how frequently to administer the survey and whether to seek responses to some or all of the questions. Note, however, that CLHIA Guideline G18 *Insurer-MGA Relationships* which comes into effect on January 1, 2015 advises that Companies should require that MGAs complete and submit the CRS or a similar survey on an annual basis.

If a Company does not wish to receive a response to a specific question or group of questions, the Company may mark Not Applicable in the answer field

Apart from adding “Not Applicable” in the answer field, the questions in Sections 1-9 cannot be added to or otherwise modified.

If a Company wishes to ask additional questions related to one of the sections, these should be added in Section 10. Additional questions should be kept to a minimum, usually two or three and no more than ten.

This survey is intended to be part of a comprehensive compliance monitoring program. In particular, the survey is not designed to assess the extent to which an Agency has implemented specific policies or procedures.

Use by the Agency

Sections 1-9 contain standardized questions that all Companies using the survey have agreed to use.

Some of the questions can be answered with checks or filling in blanks. Many of the questions require brief written descriptions of policies or procedures or attachments.

It is generally assumed that Agencies will have written policies and procedures that address the matters covered in this survey. The Attachment Checklist at the end of these instructions provides an outline of what, at a minimum, should be covered in the Agency's compliance policies and procedures.

Where the Agency has a comprehensive set of up-to-date written policies and procedures, it will generally be sufficient to attach these and note beside each question in the CRS the relevant section in the policies and procedures that addresses the question. Where the Agency does not have written policies and procedures or the policies and procedures do not address the specific question, a written description of relevant practices should be provided in the response.

Once an Agency has prepared responses to the survey questions, these responses can be sent to for more than one Company provided the responses are accurate and up-to-date.

For example, if Company A and Company B both conduct the survey on the same date, identical responses for the questions in Section 1-9 can be sent to both companies. If Company C then conducts the survey three months later, the responses should be checked to confirm that they remain up-to-date. If nothing has changed, the identical responses

can be sent to Company C. Similarly, if Company A repeats the survey in the future, all that is required of the Agency is to update any responses where changes have occurred.

A number of questions ask about changes since the last survey. Accordingly, Agencies should keep a record of responses to individual Companies and the date when the most recent responses were provided. Agencies should also confirm with the Company that the survey is the same version as the one most recently completed.

Section 8 only needs to be completed if the Agency is operating in Quebec.

This survey is intended to be part of a comprehensive compliance monitoring program. In particular, the survey is not designed to assess the extent to which an Agency has implemented specific policies or procedures.

Generally, there are no “correct” answers. An Agency’s response to a specific question will be interpreted within the context of the Agency’s overall compliance system. As well, each Company will evaluate the responses based on the specific provisions in the contract between it and the Agency completing the survey.

Please read the explanatory notes at the beginning of the sections carefully before completing the survey. These will assist in ensuring that the intent of the questions is accurately understood. Agencies may also wish to refer to the CLHIA Reference Document *MGA Compliance* for more information about insurer expectations and industry practices.

Attachment Checklist

A number of questions ask the Agency to attach specific documents. The following checklist of attachments can be used to check for completeness of survey responses. The relevant question in the survey is noted for each item requested.

	Yes	No	N/A
Organization chart for Agency, Q.7	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Organization chart for compliance structure, Q.8	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Third-party outsourcing agreement(s), Q.15	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sample contract/agreement between the Agency and its advisors, Q.17	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Policies and procedures for screening, Q.19	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Policies and procedures for monitoring, Q.24	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Code of conduct, Q.30	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Complaint handling policy, Q.33	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Complaint log, Q.33	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Process for notifying Company of complaints, Q.34	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Supporting documents related to process of investigating allegations of advisor misconduct, Q.35	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Advisor disclosure template, Q.38	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Needs-based selling materials, Q.40	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Policies and procedures related to privacy, Q.42	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Record retention and destruction policy, Q.46	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Privacy breach policy, Q.47	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Policies and procedures related to AML/ATF, Q.50	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Complaint handling policy (Quebec), Q.57	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

1. General Information about the Agency

Question	Response
1. Identify the Agency.	Full Legal Name: Mailing Address:
2. Who can respond to questions about the answers to this survey?	Name: Title: Contact Information:
3. Who is the most senior Compliance Officer in the Agency?	Name: Title: Contact Information:
4. Who is the Privacy Officer in the Agency.	Name: Title: Contact Information:
5. Who is the Chief Anti-Money Laundering Officer	Name: Title: Contact Information:
6. Briefly describe the ownership structure of the Agency.	
7. Briefly describe the organizational structure of the Agency or provide a current organization chart of the Agency's leadership.	
8. Describe the Agency's life insurance compliance organization and attach an organizational chart.	
9. Briefly describe how the Agency distributes life insurance products.	
10. Have any changes occurred in the Agency that would affect the distribution of life insurance products since the last review, for example the addition of new distribution methods or capacity?	Yes <input type="checkbox"/> If yes, provide details No <input type="checkbox"/>
11. Briefly describe the process (transaction flow) from the time the representative completes an application with a client until submission to the Company.	
12. In which jurisdictions does the Agency currently hold insurance licenses? Check all that apply.	<div> Alberta <input type="checkbox"/> British Columbia <input type="checkbox"/> Manitoba <input type="checkbox"/> New Brunswick <input type="checkbox"/> Nfld & Labrador <input type="checkbox"/> NWT <input type="checkbox"/> Nova Scotia <input type="checkbox"/> </div> <div> Nunavut <input type="checkbox"/> Ontario <input type="checkbox"/> PEI <input type="checkbox"/> Quebec <input type="checkbox"/> (see Section 8) Saskatchewan <input type="checkbox"/> Yukon <input type="checkbox"/> </div>
13. Have there been any changes in jurisdictions since the last review?	Yes <input type="checkbox"/> If yes, provide details No <input type="checkbox"/>
14. Are any changes in jurisdictions planned in the next 12 months?	Yes <input type="checkbox"/> If yes, provide details. No <input type="checkbox"/>

Reference Document:

15. Has the Agency outsourced any aspect of its processes with the result that client information is handled by a 3 rd party (e.g., back office administration)?	Yes <input type="checkbox"/> If yes, describe and provide a copy of agreement No <input type="checkbox"/>
16. What is (are) the existing relationships between the Agency and the Agency's advisors? Check all that apply.	Employee <input type="checkbox"/> Independent Agent <input type="checkbox"/> Attached to the Agency (Quebec) <input type="checkbox"/> Other <input type="checkbox"/> If other, describe
17. Is there an agreement/contract in place that governs the relationship between the Agency and the advisor?	Yes <input type="checkbox"/> If yes, provide a sample No <input type="checkbox"/>

2. Screening Advisors for Suitability

Prior to offering a contract to an advisor, an Agency will typically assess his or her suitability to act as a licensed life agent. A variety of reasons make this a matter of prudent business practices. First, an Agency may be held financially responsible for things such as charge backs or other debts to insurers if an advisor is insolvent. In some circumstances, an Agency may be accountable if the advisor engages in transactions that violate statutory requirements related to things like money laundering or privacy.

Separate and apart from this, in the contract between an Agency and an insurer, the Company may delegate certain screening functions to the Agency. In delegating these functions, the Company may rely entirely on the Agency to carry them out or it may use the Agency as a “second set of eyes” to complement its own screening. Where an Agency recommends an advisor to the Company, the Company expects that the Agency has taken all reasonable steps to confirm the suitability of the advisor.

As part of a comprehensive strategy to manage reputation risk, a Company will assess, generally, how an Agency carries on business and, specifically, its capability to carry out functions delegated to it by the Company.

The following questions are designed to help the Company determine whether the Agency’s system for screening meets the standards set out in CLHIA Guideline G8 *Screening Agents for Suitability and Reporting Unsuitable Agents* and the Company’s policy.

Question	Response
18. Who is responsible for the screening and suitability assessment of advisors?	Name: Title: Contact Information:
19. Are the Agency's written policies and procedures related to screening advisors for suitability up-to-date and complete?	Yes <input type="checkbox"/> If yes, attach a copy No <input type="checkbox"/> If no, provide a description of screening practices
20. Do these screening policies and procedures include the following:	Background and reference checks Yes <input type="checkbox"/> No <input type="checkbox"/> Credit checks (including bankruptcy history) Yes <input type="checkbox"/> No <input type="checkbox"/> Prior work or business experience confirmation Yes <input type="checkbox"/> No <input type="checkbox"/> Review of debt to other insurers and industry participants Yes <input type="checkbox"/> No <input type="checkbox"/> Review of industry market conduct history Yes <input type="checkbox"/> No <input type="checkbox"/> Licensing confirmation Yes <input type="checkbox"/> No <input type="checkbox"/> Errors & Omissions confirmation Yes <input type="checkbox"/> No <input type="checkbox"/> Criminal record check Yes <input type="checkbox"/> No <input type="checkbox"/>
21. For each of the items in Question 20, does your Agency’s screening policies and procedures include prescribed actions to be taken when deficiencies are noted?	Background and reference checks Yes <input type="checkbox"/> No <input type="checkbox"/> Credit checks (including bankruptcy history) Yes <input type="checkbox"/> No <input type="checkbox"/> Prior work or business experience confirmation Yes <input type="checkbox"/> No <input type="checkbox"/>

Reference Document:

	Review of debt to other insurers and industry participants Yes <input type="checkbox"/> No <input type="checkbox"/> Review of industry market conduct history Yes <input type="checkbox"/> No <input type="checkbox"/> Licensing confirmation Yes <input type="checkbox"/> No <input type="checkbox"/> Errors & Omissions confirmation Yes <input type="checkbox"/> No <input type="checkbox"/> Criminal record check Yes <input type="checkbox"/> No <input type="checkbox"/>
22. Does the screening policy provide for exceptions in the screening process?	Yes <input type="checkbox"/> If yes, name and title of person with authority to grant exceptions No <input type="checkbox"/>

3. On-going Monitoring of Advisors for Suitability

Assessing an advisor's suitability is an on-going process. However, on-going monitoring differs from initial screening in at least two respects.

First, reflecting the risk-based nature of compliance practices, monitoring will generally be more targeted. Second, whereas screening is intended to determine an advisor's suitability, monitoring is primarily intended to find signs that there might be a concern.

As is the case for initial screening, a Company will assess, generally, how an Agency monitors its advisors and, specifically, how it carries out functions delegated to it by the Company.

Suitability refers to the general conduct and the sales practices of the advisor. In assessing sales practices (e.g., managing conflicts of interest, following needs-based sales practices, etc.), an Agency is in a position to look for patterns in transactions at a macro level and indirect evidence (e.g., documentation) of the advisor's practices.

The following questions are designed to help the Company determine whether the Agency has a reasonable system in place to ensure advisors comply with regulations, industry guidelines and Company Policy.

Question	Response
23. Who is responsible for the Agency's on-going monitoring of advisors?	Name: Title: Contact Information:
24. Are the Agency's written policies and procedures related to monitoring advisors complete and up-to-date?	Yes <input type="checkbox"/> If yes, attach a copy No <input type="checkbox"/> If no, provide description of monitoring practices
25. Does the Agency's policies and procedures regarding monitoring of sales practices and conduct of advisors address the following?	Protection of personal information Yes <input type="checkbox"/> No <input type="checkbox"/> Holding out as a life and/or A&S insurance agent, representations and advertising standards, including websites Yes <input type="checkbox"/> No <input type="checkbox"/> Unfair trade practices, including rebating Yes <input type="checkbox"/> No <input type="checkbox"/> Managing conflicts of interest, including needs-based sales practices and use of advisor disclosure Yes <input type="checkbox"/> No <input type="checkbox"/> Unresolved criminal charges and/or regulatory investigations or disciplinary actions Yes <input type="checkbox"/> No <input type="checkbox"/> Financial health, including garnishments, bankruptcy or insolvency of advisor Yes <input type="checkbox"/> No <input type="checkbox"/> Licensing requirements, including E&O and CE Yes <input type="checkbox"/> No <input type="checkbox"/> Legislated compliance requirements, including the replacement of life insurance policies Yes <input type="checkbox"/> No <input type="checkbox"/> Sales practices, including misrepresentation Yes <input type="checkbox"/> No <input type="checkbox"/> Sales trends, including conservation and persistency where available Yes <input type="checkbox"/> No <input type="checkbox"/>

26. Does the Agency ensure that advisors are licensed and carry adequate E&O insurance in the jurisdictions where they do business?	Yes <input type="checkbox"/> If yes, describe the procedure No <input type="checkbox"/>
27. Does the Agency have a policy that requires advisor to report to the Agency if they have had their licence or E&O insurance cancelled or failed to renew?	Yes <input type="checkbox"/> If yes, describe the procedure if E&O not in force No <input type="checkbox"/>
28. Does the Agency ensure that advisors are complying with supervision requirements in jurisdictions that have such requirements, i.e., BC, MB, QC and SK?	Yes <input type="checkbox"/> If yes, describe the procedure No <input type="checkbox"/>
29. Are there any products or services that the Agency does not permit advisors to promote and/or sell?	Yes <input type="checkbox"/> If yes, what products or services? Yes <input type="checkbox"/> If yes, how is this enforced? No <input type="checkbox"/>
30. Does the Agency have a Code of Conduct for employees and advisors?	Yes <input type="checkbox"/> If yes, attach copy No <input type="checkbox"/>
31. Describe the procedure for communicating standards of conduct to your Agency's advisors.	

4. Reporting and Investigating Concerns about Advisors

Consistent with the idea that monitoring is primarily intended to find signs that there might be a concern about the suitability of an advisor, the intention of reporting is to make the relevant Company (or Companies) aware of these concerns.

The Company does not delegate regulatory reporting of unsuitable advisors.

The Company expects the Agency to have a process to respond to allegations and signs of advisor misconduct. This process should include fact-finding or investigation. The Company requires notification of:

- client complaints about an advisor's conduct in relation to the sale of the Company's products
- evidence of possible misconduct by the advisor in relation to the sale of the Company's products
- conclusions (by the Agency or a regulatory/governing organization) that an advisor has contravened regulations, rules or applicable codes of conduct in relation to the sale of any financial services product.

Generally, the Company will use information about complaints and possible misconduct to determine if further investigation is warranted. If it decides further investigation is required, it will direct the investigation and advise the Agency of specific steps.

For concerns that do not involve a Company, the Agency will need to make decisions about when and how to investigate. The Agency also needs to be able to make decisions on its own about when and how to elevate the risk-based monitoring it does once it detects a concern.

The following questions are designed to help the Company determine if the Agency's processes are sufficient and designed to make the Company aware of concerns about an advisor's suitability.

Question	Response
32. Are the Agency's advisors required to report client complaints to the Agency?	Yes <input type="checkbox"/> No <input type="checkbox"/> If no, explain why
33. Does the Agency have a documented complaint handling policy?	Yes <input type="checkbox"/> If yes, attach a copy Yes <input type="checkbox"/> If yes, attach a sample complaint log No <input type="checkbox"/> If no, describe the process
34. Does the Agency have a documented process to inform the Company of concerns, including client complaints, about an advisor's conduct related to the Company's products?	Yes <input type="checkbox"/> If yes, attach a copy No <input type="checkbox"/> If no, describe the process
35. Does the Agency have a documented process for investigating concerns about an advisor's possible misconduct regardless of the source of the concern?	Yes <input type="checkbox"/> If yes, attach a copy No <input type="checkbox"/> If no, describe the process
36. Are the Agency's advisors required to report regulatory inquiries or investigations to the Agency?	Yes <input type="checkbox"/> No <input type="checkbox"/> If no, explain why
37. What is your process for notifying the Company if an advisor is no longer contracted / employed by the Agency?	

5. Managing Conflicts of Interest

In June 2006, the Canadian Council of Insurance Regulators endorsed three principles for managing conflicts of interest. According to these principles, advisors should:

1. Give priority to the client's interests
2. Disclose conflicts or potential conflicts of interest, and
3. Recommend products and services based on the needs of the client

To address the second principle, in 2005 Advocis, CAILBA, CLHIA and IFB released a reference document designed to assist advisors in creating appropriate and compliant disclosure about themselves and their business relationships for delivery to their clients. Advisors should maintain evidence that appropriate disclosure has been made. The disclosure protocol covers six elements:

1. Companies that the advisor represents
2. Nature of the relationship with the companies represented
3. How the advisor is compensated (e.g., commission or salary)
4. If the advisor is or may be eligible for additional compensation such as a travel incentive or bonus
5. Conflict of interest disclosure if required
6. Invitation to the client to ask for more information

To address the third principle, in 2007 CLHIA released a reference document, entitled *The Approach*, that describes needs-based sales practices. In 2013 CLHIA released a reference document entitled *IVIC Suitability* that builds on *The Approach* by describing its specific application in transactions involving IVICs or segregated funds as they are commonly called.

These reference documents are posted on the CLHIA website (www.clhia.ca) under Materials for Financial Advisors.

Question	Response
38. Does the Agency provide an advisor disclosure template that covers the six areas of disclosure described above?	Yes <input type="checkbox"/> If yes, attach a copy No <input type="checkbox"/>
39. What is the Agency's process for ensuring that advisors are providing appropriate disclosure to their clients?	
40. Does the Agency provide training or materials to its advisors to assist them with needs-based selling?	Yes, training <input type="checkbox"/> If yes, describe recent programs Yes, materials <input type="checkbox"/> If yes, attach copies No <input type="checkbox"/>
41. How does the Agency verify that advisors maintain adequate documentation of needs-based selling?	

6. Privacy

The Agency is subject to privacy legislation in Canada. Privacy legislation in Canada is based on 10 principles which business must follow:

1. Accountability
2. Identifying purposes
3. Consent
4. Limiting collection
5. Limiting use, disclosure and retention
6. Accuracy
7. Safeguards
8. Openness
9. Individual access
10. Challenging compliance

Question	Response
42. Are the Agency's written policies and procedures related to privacy complete and up-to-date?	Yes <input type="checkbox"/> If yes, attach a copy No <input type="checkbox"/> If no, provide a description of the privacy practices
43. How does the Agency ensure the effectiveness of these procedures?	
44. How does the Agency communicate with and train its employees on this policy?	
45. How does the Agency communicate with and train advisors on this policy?	
46. Does the Agency have policies and procedures for retention and destruction of information?	Yes <input type="checkbox"/> If yes, attach a copy No <input type="checkbox"/> If no, describe the process
47. Does the Agency have a privacy breach policy and procedure?	Yes <input type="checkbox"/> If yes, attach a copy No <input type="checkbox"/> If no, describe the process
48. How does the Agency notify the Company of any privacy breach involving information collected in the course of selling the Company's product and serving the Company's clients?	If notification is included in the breach policy, identify the specific provisions. Otherwise, describe the notification process.
49. Is client data stored with a third-party?	Yes, inside Canada <input type="checkbox"/> Yes, outside Canada <input type="checkbox"/> No <input type="checkbox"/>

7. Anti-money laundering and Anti-terrorist Financing (AML/ATF)

The Agency is subject to the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* and associated Regulations. As required under the Act, the Agency must have a compliance regime to comply with reporting, record keeping and client identification requirements.

The following five elements must be included in a compliance regime:

1. The appointment of a compliance officer
2. The development and application of written compliance policies and procedures
3. The assessment and documentation of risks of money laundering and terrorist financing, and measures to mitigate high risks
4. Implemented and documented ongoing training program
5. A documented review of the effectiveness of policies and procedures, training program and risk assessment

Question	Response
50. Are the Agency's written policies and procedures related to AML/ATF complete and up-to-date?	Yes <input type="checkbox"/> If yes, attach a copy No <input type="checkbox"/> If no, describe the AML/AFT practices
51. Has the Agency assessed AML/ATF risks for the Agency and put measures in place to mitigate high risks?	Yes <input type="checkbox"/> No <input type="checkbox"/>
52. How does the Agency communicate with and train its employees regarding AML/ATF obligations?	
53. How does the Agency communicate with and train advisors regarding AML/ATF obligations?	
54. How does the Agency test the effectiveness of its AML/ATF compliance regime?	

8. Doing Business in Quebec

Firms and representatives registered to sell insurance products in Quebec are subject to specific statutory requirements. These include:

- Act respecting the distribution of financial products and services
- the regulation respecting the pursuit of activities as a representative
- the regulation respecting firms, independent representatives and independent partnerships
- the regulation respecting the keeping and preservation of books and registers
- the code of ethics of the Chambre de la sécurité financière
- the regulation governing compulsory professional development Chambre de la sécurité financière
- the regulation respecting information to be provided to consumers
- Quebec language laws

Answer Questions 53-57 only if Agency operates in the Province of Quebec.

Question	Response
55. How does the Agency ensure its advisors comply with their obligations to conduct a needs analysis and provide the client with the required documentation?	
56. How does the Agency make sure client records are maintained (or kept) in Quebec and/or readily available at the principal establishment in Quebec?	
57. Does the Agency have a policy for Client Complaint Handling?	Yes <input type="checkbox"/> If yes, attach a copy No <input type="checkbox"/> If no, describe the process
58. How is the policy for Client Complaint Handling communicated to the Agency's members and advisors?	
59. Are all the Agency's policies and procedures available in French?	Yes <input type="checkbox"/> No <input type="checkbox"/>

9. Internal Audit/Independent Reviews of Compliance Program

Question	Response
60. Is a regular review of the Agency's compliance program and its effectiveness conducted?	Yes <input type="checkbox"/> No <input type="checkbox"/>
61. How often is the review conducted?	
62. Who conducts the review?	Name: Title: Contact Information:
63. Are any significant changes planned for the Agency's compliance program?	Yes <input type="checkbox"/> If yes, briefly describe No <input type="checkbox"/> If no, explain why

10. Company-Specific Questions

This section is reserved for additional questions an individual Company may wish to ask. These questions may relate to one of the previous sections or to other matters of interest to the Company.

61. The MGA is responsible for compliance at any AGAs – Equitable Life of Canada expects that the MGA knows that the AGA has adopted the MGAs policies or the MGA knows that the AGA has comparable policies and that the MGA audits the AGAs to ensure this is true.

Response:

62. For operations in applicable provinces, such as British Columbia, provincial rules require the supervision of new agents. Please describe your implementation of this requirement, if applicable.

Response:

63 Please confirm that you are aware of Canada's Anti-Spam "Electronic Commerce Protection Regulations" (effective July 1, 2014).

Response:

64 Regulations Amending the Proceeds of Crime (Money Laundering) and Terrorist Financing Regulations

FINTRAC published updated guidance in 2014 regarding application of the Regulations. Please describe your training program relating to this change in legislation.

Response:

Assertion

I have knowledge of the information provided in this Survey and attest that it fairly represents the policies and procedures followed by the Agency and is, to the best of my knowledge, accurate.

I, the person who has typed their name below, confirm that I am authorized to make the statements and answer the questions contained herein on behalf of the Agency to which this Survey relates. I further confirm and agree, personally and on behalf of the Agency, that adding my electronic signature by typing my name in the space indicated below and sending this electronic form via email to the Company, binds the Agency to the statements and answers I have provided.

[Name of Agency]_____

Per:[type name]_____

[title and email address]_____

To be completed by the person responsible
for the Agency's compliance programs:

To be completed by the person with overall
responsibility for the Agency:

Name:_____

Name:_____

Title:_____

Title:_____

Signature:_____

Signature:_____

Date:_____

Date:_____