

Proposed Service Offerings



| Requirement | The AML Shop Proposed Approach | AMBA Pricing ¹ | Standard Pricing |
|---|---|--|---|
| Compliance Officer | <p>The AML Shop will provide compliance training seminars (3.5 hours in total) targeted towards staff that are responsible for implementing and/or overseeing the compliance program. The seminars cover all obligations under federal anti-money laundering legislation, as they apply to the mortgage sector. Trainees are provided with a certificate of completion.</p> | <p>CAD 1,000 for up to five attendees; CAD 75 for each additional attendee</p> | <p>CAD 1,500 for up to five attendees; CAD 100 for each additional attendee</p> |
| Risk Management | <p>The AML Shop will prepare a customized risk assessment and risk management plan that includes:</p> <ul style="list-style-type: none"> • an assessment of members' inherent money laundering risks relating to: <ul style="list-style-type: none"> - Products, services and delivery channels - Relevant geographic risk exposure - Business relationships - Relationships with associated partnerships (e.g., sub-servicers, referring brokerages) - New and emerging technologies • an assessment of the effectiveness of the broker/lender/administrator's mitigating controls • an assessment of the residual money laundering risk that remains after the application of mitigating controls • and methodology for assessing the risk of individual clients | <p>Pricing will depend on the number of the following products/services</p> <ul style="list-style-type: none"> • Mortgage broker services • Lending services • Loan administration services • Investment products <p>Single service - CAD 5,500 Two services - CAD 7,000 Three services - CAD 8,000 Four services - CAD 9,250</p> | <p>Pricing will depend on the number of the following products/services</p> <ul style="list-style-type: none"> • Mortgage broker services • Lending services • Loan administration services • Investment products <p>Single service - CAD 6,250 Two services - CAD 8,000 Three services - CAD 9,000 Four services - CAD 10,250</p> |
| Policies and Procedures | <p>The AML Shop will work with AMBA members to ensure that their AMBA policy and procedures template is customized to align with members' operational practices.</p> | <p>Charged hourly at 80% of The AML Shop's prevailing hourly rate</p> | <p>Current hourly rate is CAD 460</p> |
| Keeping Compliance Program Up-to-Date ² | <p>The AML Shop will conduct bi-annual updates of members risk assessment and policies and procedures to address changes:</p> <ul style="list-style-type: none"> • to geographic risk source information • to legislation and/or FINTRAC guidance • to standardized industry compliance forms | <p>CAD 700/year (based on a 3-year contract)</p> | <p>Typically charged hourly (estimated two hours of effort per year)</p> |
| Training | <p>The AML Shop will provide a series of pre-recorded training modules that can be used to deliver training to members' staff. At a minimum training will cover the following topics:</p> <ul style="list-style-type: none"> • What is money laundering and terrorist financing? • Who is FINTRAC? • Penalties for non-compliance • Verifying clients' identity • Third party relationships • Beneficial ownership of legal entities • Politically exposed persons • Suspicious transactions <p>Members will additionally be provided with a questionnaire that can be used to assess trainees' understanding of the training materials.</p> | <p>CAD 1,000</p> | <p>CAD 2,000</p> |

¹ Pricing is non-inclusive of applicable taxes and a 6% administrative fee

² Members may request other changes to their compliance program documents, which will be charged hourly at 80% of our prevailing rate.