

— THE TRAINING PROGRAM

If anyone works or acts for you, FINTRAC expects you to train them

The rule asks for a written, ongoing training program, a documented plan to deliver it, and a record that it was delivered. FINTRAC has cited the training program in 11 penalties published since May 2025. One firm had trained its staff verbally and had nothing on paper to show for it.

11

Penalties published since May 2025 that cite the training program

5 of 11

Where FINTRAC found no record that training was delivered

\$20M

Maximum penalty for one very serious violation, from 26 March 2026. Was \$500,000.

Sources: PCMLTF Regulations, s. 156(1)(d) and (e); FINTRAC public notices of administrative monetary penalties, May 2025 to September 2026; PCMLTFA Administrative Monetary Penalties Regulations, s. 5; FINTRAC penalty policy.

A program, a plan and a record, and every two years a test that they work

For every reporting entity with employees, agents or anyone else authorized to act for it.

1 Write the program down, and keep it running

A written, ongoing training program covering employees, agents and mandataries, and anyone else who acts for you. Only a sole proprietor with no one acting for them is exempt.

2 Document a plan that answers four questions

Who is trained, on which topics and from which materials, by what method, and how often. Frequency can be a calendar, an event such as a new hire or a changed procedure, or both. Then deliver it.

3 Teach your own rules, not a generic course

Your legal requirements, how money laundering and terrorist financing work, where your business is exposed, and your own know-your-client, record and reporting procedures. Training can differ by role.

4 Keep the record an examiner will ask for

The date of each session, who attended and what was covered. Training that was given but not recorded reads to an examiner as training that never happened.

5 Test it every two years

The two-year effectiveness review covers the training program and plan. An entity reports the findings in writing to a senior officer within 30 days of finishing the review.

6 Since 26 March 2026, the program has to work

Compliance programs must now be reasonably designed, risk-based and effective, and some program violations moved from serious to very serious.

In five of 11 training citations, there was no record the training happened

None of the 11 was cited for training alone. Every one also had policy gaps.

MINOR

\$40,000

From 26 March 2026
Was \$1,000

SERIOUS

\$4 million

From 26 March 2026
Was \$100,000

VERY SERIOUS

\$20 million

From 26 March 2026
Was \$500,000

Maximum per violation under the AMP Regulations. Previous maximums from FINTRAC's penalty policy. On 26 March 2026 some compliance program violations moved from serious to very serious.

Penalties that cite the training program

BUSINESS	WHAT FINTRAC FOUND	PENALTY
Northern Isga Foundation Glenevis, AB · Mar 2026	No program, no plan, and no record of any training delivered	\$91,162.50
Manor Windsor Realty Windsor, ON · Feb 2026	Program missing key requirements, no plan, no training records	\$107,250
LeHomes Realty Premier Vancouver, BC · Nov 2025	Program incomplete, no evidence training reached agents	\$149,886
Spence Diamonds Eight cities · Sep 2025	Manual missing know-your-client rules, no proof all staff trained	\$264,000
Crystal Currency Exchange Burnaby, BC · May 2025	No record of who was trained or when, or that any training was given	\$348,067.50

Also cited for training: Global Currency Exchange, \$70,537.50 (Dec 2025); Houston & Associates Realty, \$63,987.50 after appeal, imposed at \$117,975 (Nov 2025); HRA Group, \$132,000 (Oct 2025); Hub Capital, \$99,000 (Jun 2025); Immeubles Village Pointe-Claire, \$36,360, and Immeubles Jack Sera, \$107,250 (May 2025). Northern Isga, Manor Windsor and Crystal Currency have appealed to the Federal Court. Each amount covers every violation in the notice. Dates are FINTRAC publication dates.

Training built from your own risks, with the record already kept

We write it, deliver it and leave the evidence an examiner reads first.

A written program and plan

Who is trained, on what, by which method and how often, set out in the form FINTRAC's guidance describes.

Content drawn from your risk assessment

Your products, clients and channels, and your own know-your-client, record and reporting procedures.

Sessions by role

Front line, agents, compliance and senior management each get the part they act on.
[Confirm delivery format]

Records kept as you go

Date, attendees and topics for every session, including agents who work outside your office.

Refreshers when something changes

A new hire, a changed procedure or a new rule from FINTRAC, picked up before it becomes a gap.

Two-year effectiveness review

An independent review that tests the training program and plan against the effective standard in force since 26 March 2026.

Start with a training file check

We read your program, plan and records against what FINTRAC cited in these 11 notices, and tell you what an examiner would find missing.

[Book an appointment](#)

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