



Section 5: Training Records

EMPLOYEE COMPLIANCE TRAINING LOG

Training must be provided to all employees (new and existing) before conducting MSB transactions, and, at a minimum, must include:

- Review of all requirements in this AML Compliance Program
- Verifying customer identification
- All relevant transaction processing requirements
- Identifying money laundering, fraud, elder/senior financial abuse, suspicious activity and structured transactions
- Reporting requirements related to all transactions
- Recordkeeping requirements

Additional training should be provided regularly to all employees based on, but not limited to, changes in government regulations, your Compliance Program requirements, or MoneyGram procedures and policies.

You should also train and test employees to confirm that they are compliant with the overall requirements of your Compliance Program.

All training must be documented and retained in employee personnel files, other related AML files, or with the *Training Log* in the **TRAINING RECORDS** section of the *MoneyGram Agent Compliance Training Resource*.

An employee should also receive additional AML training in the event of a performance issue related to an AML incident.

Section 1 of this Agent Compliance Training Resource can be used to help train employees. Additional employee and Compliance Officer training is available at www.moneygramu.com.

All training is documented and retained in employee personnel files, other related AML files, or on the *Training Log* in this section.

What do I do with the completed *Training Logs*?

Once the Training Log has been completed, please keep/file/store it with your Compliance related documents for at least 5 years or leave it in this section.

Please make extra copies of the blank Training Log and do not use your last blank one.