

## News & Updates

4 September 2025



Guidance for Lawyers as Title Insurers Become Reporting Entities for the Purposes of Anti-Money Laundering on 1 October 2025

On 1 October 2025, Regulations Amending Certain Regulations made under the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* (PCMLTFA) come into force, introducing regulatory requirements for Title Insurers, including reporting to the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC).

Title Insurers, as reporting entities, will be required to:

- Develop an Anti-Money Laundering compliance program
- Meet identity verification and record-keeping requirements
- Submit reports to FINTRAC, including suspicious transaction and terrorist property reports
- Follow ministerial directives

To meet these requirements, title insurers may rely on agents, including legal professionals, to verify client identity.

Key Considerations for Legal Professionals:

- Obtain client consent before disclosing any confidential information or acting as an agent
- Fully inform clients about what information may be shared and how it could be reported to FINTRAC
- Consider confidentiality and solicitor-client privilege before disclosure
- Document all steps and obtain written consent from clients

It's important to carefully review agency agreements and advise clients of any risks associated with sharing information with title insurers.

To view the full notice, please click here.









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