

ASC NOTICE 33-706 (Revised) POLICY AND PROCEDURES MANUAL – REFERENCE RESOURCE FOR EXEMPT MARKET DEALERS (INCLUDING THOSE WITH MULTIPLE REGISTRATION CATEGORIES)

First published June 12, 2019, revised December 9, 2020 and September 20, 2022

September 20, 2022

In order to maintain an effective compliance system, a registered firm must have a detailed policy and procedures manual (**PPM**), a system of internal controls, day-to-day and systemic monitoring, and active supervision and training of its employees. A PPM is the foundation of a strong compliance system. A PPM creates a record of a firm's tailored compliance framework, which is the result of consideration of relevant securities laws, a firm's business model and related risks, and how a firm chooses to comply with legal and business requirements given unique aspects of its business. A PPM provides guidance to a firm's employees on how to conduct themselves in a way that complies with securities legislation and should reflect all aspects of the firm's business model, such as the firm's size, type of clients, products, and sales practices. A PPM serves the dual purpose of educating its developers and users about securities laws and how to navigate matters specific to a firm on a day-to-day basis.

Upon receipt of an application for registration and during subsequent compliance examinations, staff at the Alberta Securities Commission (ASC staff or we) will review a firm's PPM in order to ensure that the document explains that the firm has sufficient controls in place to comply with securities law requirements. Additionally, during oversight examinations, we will test a firm's performance against the policies and procedures that a firm has established in its PPM.

A PPM should be updated regularly to reflect changes in securities law requirements and internal business-related changes to the operations of a firm. Employees should be required to review their firm's PPM as well as any subsequent changes to it. A firm should also confirm that employees have completed their review of a firm's PPM.

Given its function, drafting an effective PPM is critical to setting a firm up for compliance-related success. We recognize that drafting an effective PPM is time consuming. Given the expected positive effects a PPM will have on the conduct of a firm's employees, and ultimately on investors' experience with the financial markets, we are of the view that the benefits of an effective PPM outweigh the costs. Some of the expected positive benefits of having an effective PPM include:

- consistency in conduct by a firm's employees;
- increased knowledge and awareness of requirements and tailored procedures required of a firm's employees;

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- reduced non-compliance as a result of increased awareness of expectations and a resultant decrease in costs related to non-compliance; and
- ultimately, an improved client experience.

We provide the attached document, *Policy and Procedures Manual – Reference Resource for Exempt Market Dealers (Including Those with Multiple Registration Categories)* (the **PPM Reference Resource**) in an attempt to help firms draft and maintain their PPMs. The PPM Reference Resource will be updated periodically to reflect relevant new additions and amendments to published securities laws and guidance related to registrants. This Notice is intended to serve two purposes: first, to assist firms in keeping informed of new securities laws and guidance published during a given year, by reference to one centralized source, and second, to therefore aid firms in their initial and ongoing drafting of PPMs.

NOTE: This Notice and the attached Policy and Procedures Manual – Reference Resource for Exempt Market Dealers (Including Those with Multiple Registration Categories) are intended to provide firms with helpful information about securities law and policies. They are not intended to provide legal or other professional advice. Readers are urged to consult with their own professional advisers before taking action based on any information appearing in these documents. The information contained in these documents is believed to be accurate and complete at the time of publication.

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POLICY AND PROCEDURES MANUAL – REFERENCE RESOURCE FOR EXEMPT MARKET DEALERS (INCLUDING THOSE WITH MULTIPLE REGISTRATION CATEGORIES)

Effective date: September 20, 2022¹

NOTE: This document is intended to provide firms with helpful information about securities law and policies. It is not intended to provide legal or other professional advice. Readers are urged to consult with their own professional advisers before taking action based on any information appearing in this document. The information contained in this document is believed to be accurate and complete at the time of publication.

Definitions:

CCO – Chief Compliance Officer

UDP – Ultimate Designated Person

NI – National Instrument

CP – Companion Policy

KYC – Know Your Client

KYP – Know Your Product

Notes:

The policy and procedures manual should reflect the firm's policies and procedures tailored to its business covering the areas listed below, and any other areas of securities law and guidance that may apply to the firm. Procedures should include information about who does what when, including delegation of authority during absences.

If the registrant (applicant) does not engage in or allow a certain kind of activity covered by the law or guidance, the policy should be a simple statement to that effect; for example "No leveraged trades are permitted."

All procedures should be detailed enough to inform the registrant's (applicant's) staff of their duties and responsibilities.

The PPM should be dated, and each amendment should be dated, such that the reader knows how current the PPM is, and when new obligations were effective. Keeping a log of amendments is a useful reference document.

All national instruments and related companion policies can be found at <u>Alberta Securities</u> Commission/Securities Law & Policy/Regulatory Instruments

The September 20, 2022 update includes references to the "Client Focused Reforms" to NI 31-103 Registration Requirements, Exemptions and Ongoing Registrant Obligations (NI 31-103) and its

¹ This document will be updated periodically. In the interim, please review <u>Regulatory Updates</u>. See Appendix I for tracking of updates since initial publication June 12, 2019 – Update 1 and Update 2.

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associated CP (the Client Focused Reforms, or CFRs²). In particular, the update includes references to amendments concerning conflicts of interest, which came into effect on June 30, 2021, and to new requirements concerning KYC, KYP, suitability, relationship disclosure information, and misleading communications, which came into effect on December 31, 2021. The update also includes references to the guidance published by the Canadian Securities Administrators (CSA), the Investment Industry Regulatory Organization of Canada and the Mutual Fund Dealers Association of Canada related to the Client Focused Reforms in the form of Frequently Asked Questions.

In addition, the September 20, 2022 update includes references related to amendments to NI 31-103 to enhance protection of older and vulnerable clients through introduction of requirements related to trusted contact persons and temporary holds, which came into effect on December 31, 2021.

TOPIC & REFERENCE	POLICIES & PROCEDURES MANUAL LOCATION
Framework references • Rules giving rise to the need for a policy and procedures manual	
 NI 31-103 S.11.1 Compliance System & CP guidance Overarching duty of care Act S.75.2 Duty of Care 	
 Description of roles and responsibilities of the UDP & CCO UDP: NI 31-103, S.5.1, S.11.2, S.11.4 & CP CCO: NI 31-103, S.5.2, S.11.3, S.11.4 & CP ASC Registrant Outreach and Education Seminars – Spring 2017 – EMD Compliance for CCOs ASC Notice 33-705 Review of Exempt Market Dealers (ASC Notice 33-705) CSA Staff Notice 31-358 Guidance on Registration Requirements for Chief Compliance Officers and Request for Comments 	
 Know your client and trusted contact person NI 31-103, S. 1 (definition of "trusted contact person"), S.13.2, S.13.2.01, S.13.3.1 & CP, Appendix G of CP, and Client Focused Reforms Client Focused Reforms Frequently Asked Questions NI 45-106, Division 1: Capital Raising exemptions; CP S.1.9 Responsibility for compliance and verifying purchaser status 	

² For detailed information about the Client Focused Reforms, please visit the ASC's website at the following link: https://www.asc.ca/en/registrant-and-market-regulation/registrant-toolkit/cfr-implementation.

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- CSA Staff Notice 31-336 Guidance for Portfolio Managers, Exempt Market Dealers and Other Registrants on the Know-Your-Client, Know-Your-Product and Suitability Obligations (CSA Staff Notice 31-336)
- ASC Notice 33-705
- ASC Notice 31-701 Account Opening Assistance
- CSA Staff Notice 31-354 Suggested Practices for Engaging with Older or Vulnerable Clients (CSA Staff Notice 31-354)
- FINTRAC: Anti money laundering expectations of registrants
- Proceeds of Crime (Money Laundering) and Terrorist Financing Act Part 1, s. 5 & 6.1
- ASC Registrant Outreach and Education Seminars 2019 <u>Engaging</u> with older and vulnerable clients
- ASC Registrant Outreach and Education Seminars 2022 <u>Client</u> Focused Reforms

Know your product

- NI 31-103, S.3.4(1), 13.2.1 & CP and Client Focused Reforms Client Focused Reforms Frequently Asked Questions
- CSA Staff Notice 31-336
- CSA Staff Notice 33-315 Suitability Obligation and Know Your Product (CSA Staff Notice 33-315)
- ASC Notice 33-705
- IIROC Notice 14-0299 Guidance respecting underwriting due diligence
- ASC Registrant Outreach and Education Seminars Spring 2018 Know-Your-Product – Issues
- ASC Registrant Outreach and Education Seminars 2013 <u>Product Due Diligence in the Exempt Market</u>
- ASC Registrant Outreach and Education Seminars 2019 <u>Valuation-the real risk to mortgage fund investors</u>
- ASC Registrant Outreach and Education Seminars 2022 <u>Client</u> Focused Reforms

Suitability

- NI 31-103, S.13.3, S.13.3.1 & CP and Client Focused Reforms Client Focused Reforms Frequently Asked Questions
- CSA Staff Notice 31-336
- CSA Staff Notice 33-315
- ASC Notice 33-705
- CSA Staff Notice 31-354
- ASC Registrant Outreach and Education Seminars 2019 <u>Engaging</u> with older and vulnerable clients
- ASC Registrant Outreach and Education Seminars 2022 <u>Client Focused Reforms</u>

Permitted clients

• NI 31-103, S.1.1 (definition of "permitted client"), S.13.2(5), S.13.3(3), S.13.13.1; S. 13.13(2), S.13.16(8); S.14.2(6); S.14.2.1(2); S.14.4(3); S.14.5.2(7)(d); S.14.14.1(6); S.14.14.2(6); S.14.17(5); S.14.18(5)(c) & CP

Temporary Holds

- NI 31-103, S.1.1 (definitions of "financial exploitation," "temporary hold," and "vulnerable client"), and S.13.19 & CP and Appendix G of CP
- CSA Staff Notice 31-354

Conflicts of interest

- NI 31-103, Part 13 Division 2 & CP and Client Focused Reforms Client Focused Reforms Frequently Asked Questions
- NI 33-105 Underwriting Conflicts & CP
- CSA Staff Notice 31-343 Conflicts of Interest in Distributing Securities of Related or Connected Issuers
- CSA Staff Notice 33-318 Review of Practices Firms Use to Compensate and Provide Incentives to their Representatives
- ASC Notice 33-705
- ASC Registrant Outreach and Education Seminars Fall 2017 Conflicts of Interest
- ASC Registrant Outreach and Education Seminars 2020 <u>Exempt</u> Market Dealer Sales Practices
- ASC Registrant Outreach and Education Seminars 2022 <u>Client</u> Focused Reforms

Complaints

- NI 31-103, S. 11.5 and Part 13 Division 5 & CP
- CSA Staff Notice 31-338 Guidance on Dispute Resolution Services Client Disclosure for Registered Dealers and Advisers that are not Members of a Self-Regulatory Organization
- CSA Staff Notice 31-351 IIROC Notice 17-0229, MFDA Bulletin #0736-M Complying with requirements regarding the Ombudsman for Banking Services and Investments
- CSA Staff Notice 31-354
- OBSI Joint Regulators Committee Annual Reports for 2014 through 2020 and related CSA Staff Notices 31-340; 344; 348; 353; 355; 359; 361
- ASC Notice 33-705
- ASC Registrant Outreach and Education Seminars 2014 <u>CSA Staff</u> Notice 31-338
- ASC Registrant Outreach and Education Seminars 2019 <u>Engaging</u> with older and vulnerable clients
- ASC Registrant Outreach and Education Seminars 2019 <u>Supervision</u> and training of ARs and DRs

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	ion on lending to or borrowing from clients	
• N	NI 31-103, S.13.12 & CP and Client Focused Reforms	
	ure when recommending leverage	
• N	NI 31-103, S.13.13, S.14.2(d) & CP	
Marketir	ing	
	Act S.92 Prohibited Transaction; S.93 Prohibited Transaction; S.100	
R	Representation or holding out of registration; S.101 Representations	
• N	NI 45-106 S.1.1 and S.2.9(5.2) Offering Memorandum & CP 45-106	
S	S.1.2, S.1.10, S.3.3, S.3.3.1	
• (CSA Staff Notice 31-325 Marketing Practices of Portfolio Managers	
• (CSA Staff Notice 33-321 Cyber Security and Social Media (CSA Staff	
N	Notice 33-321)	
• J	Joint CSA/IIROC Staff Notice 21-330 Guidance for Crypto-Trading	
F	Platforms: Requirements relating to Advertising, Marketing and Social	
	Media Use	
• A	ASC Notice 33-705	
• A	ASC Registrant Outreach and Education Seminars – Fall 2017 –	
<u>N</u>	Marketing	
• A	ASC Registrant Outreach and Education Seminars – 2020 – Exempt	
<u>N</u>	Market Dealer Sales Practices	
Titles		
• N	NI 31-103, S.13.18 & CP	
• (Client Focused Reforms Frequently Asked Questions	
• A	ASC Registrant Outreach and Education Seminars – 2022 – Client	
	Focused Reforms	
Referral	l arrangements	
	NI 31-103, S.11.5, S.13.4, and Part 13 Division 3 & CP and Client	
	Focused Reforms	
• (Client Focused Reforms Frequently Asked Questions	
	ASC Notice 33-705	
Disclosu	ure to clients	
	Relationship disclosure information NI 31-103, S.13.4(4), S.13.4(5), S.	
	13.6, S.14.2, S.14.2.1 & CP and Client Focused Reforms	
	Client Focused Reforms Frequently Asked Questions	
	Fair allocation NI 31-103, S.14.3	
	Relationship with financial institutions NI 31-103, S. 14.4 & CP	
	Non-resident registrants NI 31-103, S.14.5 & CP	
	Act S. 94, S.97, and S.98	
	CSA Staff Notice 31-334 CSA Review of Relationship disclosure	
	Practices	
	ASC Notice 33-705	
	ADC NORCE JJ-/VJ	

- ASC Registrant Outreach and Education Seminars 2013 <u>Relationship</u> <u>Disclosure Information</u>
- ASC Registrant Outreach and Education Seminars 2019 <u>Valuation</u>the real risk to mortgage fund investors
- ASC Registrant Outreach and Education Seminars 2020 Relationship Disclosure Information
- ASC Registrant Outreach and Education Seminars 2020 <u>Exempt Market Dealer Sales Practices</u>
- ASC Registrant Outreach and Education Seminars 2022 <u>Client</u> Focused Reforms

Custody

- NI 31-103, Part 14 Division 3 & CP
- CSA Staff Notice 31-347 *Guidance for Portfolio Managers for Service Arrangements with IIROC Dealer Members* (**CSA Staff Notice 31-347**)

Fair allocation

- NI 31-103, S.13.4, S. 14.3, S.14.10 & CP
- ASC Notice 33-705
- See Disclosure to Clients above

Reporting to clients

- Determining market value NI 31-103, S.14.11.1 & CP
- Trade confirmations NI 31-103, S.14.12, S.14.13 & CP
- Account statements NI 31-103, S.14.14, S.14.14.1, S.14.14.2, S.14.15 & CP;
- Report on charges and other compensation NI 31-103, S.14.17, S.14.20
 & CP
- Investment performance report NI 31-103, S.14.18, S.14.19, S.14.20 & CP
- CSA Staff Notice 31-345 Cost Disclosure, Performance Reporting and Client Statements Frequently Asked Questions and Additional Guidance
- CSA Staff Notice 31-347
- ASC Notice 33-705
- ASC Registrant Outreach and Education Seminars Spring 2017 Client Reporting
- ASC Registrant Outreach and Education Seminars Spring 2018 Performance Reporting Basics
- ASC Registrant Outreach and Education Seminars 2013 <u>CRM2</u> Cost and Performance Reporting Requirements

Supervision and training of registered employees

- NI 31-103, S. 3.4(1), S.5.1, S.5.2, S.11.1, S.11.5 & CP and Client Focused Reforms
- Client Focused Reforms Frequently Asked Questions

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- CSA Staff Notice 31-349 Change to Standard Form Reports for Close Supervision and Strict Supervision Terms and Conditions (CSA Staff Notice 31-349)
- ASC Notice 33-705
- CSA Staff Notice 31-354
- ASC Registrant Outreach and Education Seminars 2019 <u>Supervision</u> and training of ARs and DRs
- ASC Registrant Outreach and Education Seminars 2019 <u>Engaging</u> with older and vulnerable clients

Books and records

- NI 31-103, Part 11 Division 2 & CP
- Off-book transactions NI 31-103, S.11.5(1)(a); S.11.5(2)(g) & (h); reference can be made to IIROC Member Regulation Notice 0481, July 13, 2007 for relevant, high level concepts in this area (specifics e.g. specific accounting for the transaction may not be applicable)

Financial condition

- NI 31-103 Part 12 & CP
 - Division 1 Working capital; NI 31-103 Appendix B Subordination Agreement, 31-103F1
 - Division 2 Insurance; NI 31-103 Appendix A Bonding and Insurance Clauses
 - o Division 4 Financial reporting
- ASC Registrant Outreach and Education Seminars Fall 2018 Financial Compliance
- ASC Registrant Outreach and Education Seminars 2014 Late Filings

Portfolio Managers & Investment Fund Managers

- Reporting to clients/investors see Reporting to clients above for portfolio managers, and NI 31-103, S.14.15 (IFM)
- Net Asset Value Adjustments (IFM) NI 31-103, S.12.14, 31-103F4
- NI 31-103, S.13.5
- Duty to provide information (IFM) NI 31-103, S.14.1.1 & CP
- Fair allocation NI 31-103, S.13.4, S.14.3, and S.14.10 & CP
- IFM activities Multilateral Policy 31-202 Registration Requirement for Investment Fund Managers
- CSA Staff Notice 31-342 Guidance for Portfolio Managers Regarding Online Advice
- CSA Staff Notice 31-347
- CSA Staff Notice 81-333 Guidance on Effective Liquidity Risk Management for Investment Funds
- ASC Registrant Outreach and Education Seminars Fall 2017 <u>PM and IFM Select Issues</u>

• ASC Registrant Outreach and Education Seminars – 2019 – <u>Valuation</u> -	
the real risk to mortgage fund investors	
ASC Website – <u>Client Relationship Manager Advising Representatives:</u>	
Information and Resources	
National Registration Database (NRD) and other Registration Matters	
NI 33-109 Registration Information & CP	
• CSA Staff Notice 31-349	
CSA Staff Notice 31-352 Monthly Suppression of Terrorism and	
Canadian Sanctions Reporting Obligations	
CSA Staff Notice 33-320 The Requirement for True and Complete	
Applications for Registration	
Cybersecurity and Business Continuity Planning	
• CSA Staff Notice 33-321	
ASC Registrant Outreach and Education Seminars – Spring 2018 –	
Cyber Security	
ASC Registrant Outreach and Education Seminars – Spring 2018 –	
Cyber Security & Alberta Organizations	
Cybersecurity Best Practices Guide for IIROC Dealer Members, IIROC	
& Juno Security	
<u>ee vuito seestrij</u>	
Compliance system, designation of supervisory personnel, and supervision of	
business locations:	
NI 31-103, Part 11, Division 1 Compliance and Division 2 Books and	
Records	
Part 11, Division 1 Compliance of CP	
CSA Staff Notice 31-350 <i>Guidance on Small Firms Compliance and</i>	
Regulatory Obligations	
Outsourcing – guidance in CP:	
Part 11 Internal Controls and Systems	
D (14 D) (1 CD) (1 CO)	
Part 14, Division 5 Reporting to Clients	
General	
• Restriction on acting for another registered firm NI 31-103, S.4.1 & CP	
 Mortgage Investment Entities – CSA Staff Notice 31-323 Guidance 	
Relating to the Registration Obligations of Mortgage Investment Entities	
ASC Notice 33-705	
• ASC Rule 72-501 <i>Distributions to Purchasers Outside Alberta</i> (S.7.) & CP to ASC Rule 72-501	
CSA Staff Notice 31-354 CSA Staff Notice 21-356 Cuidance on Compliance Consultanta Fragged	
CSA Staff Notice 31-356 Guidance on Compliance Consultants Engaged by Firms Following a Pagulatory Decision	
by Firms Following a Regulatory Decision	
Joint CSA/IIROC Staff Notice 21-329 Guidance for Crypto-Asset Trading Platforms Counting a with Page Intern Page in the Page Internation To dive Platforms Counting a with Page Internation To dive Platforms Counting a w	
Trading Platforms: Compliance with Regulatory Requirements	
ASC Registrant Outreach and Education Seminars – 2022 – <u>Client</u> The Seminars – 2022 – <u>Client</u> The Seminars – 2022 – <u>Client</u>	
Focused Reforms	

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- ASC Registrant Outreach and Education Seminars 2020 <u>Common Findings from Compliance Reviews: PM/IFM and EMD</u>
- ASC Registrant Outreach and Education Seminars 2019 <u>Engaging</u> with older and vulnerable clients
- ASC Registrant Outreach and Education Seminars Spring 2017 <u>ASC</u> <u>Exempt Market Dealer Sweep</u>
- ASC Registrant Outreach and Education Seminars Fall 2018 Navigating an ASC Compliance Review
- ASC Registrant Outreach and Education Seminars Fall 2018 The Manual
- ASC Registrant Outreach and Education Seminars 2013 <u>Preparing</u> for an ASC Compliance Review
- Privacy obligations The Freedom of Information and Protection of Privacy Act, Revised Statutes of Alberta 2000 Chapter F-25 (the FOIP Act)
- ASC Website <u>Client Focused Reforms: Information and Resources</u>
- CSA Website <u>Client Focused Reforms</u>
- Electronic Signatures: Variation of ASC Blanket Order 13-503 re: Temporary Exemption from Requirements to Manually Sign Documents (Effective to April 30, 2023)
- Self-Certified Investors Prospectus Exemption: Variation of ASC Blanket Order 45-538 re: Self-Certified Investor Prospectus Exemption (Effective to April 1, 2024)
- Small Business Financing: ASC Blanket Order 45-539 re: Small Business Financing (Effective to September 1, 2024)
- September 17, 2020 CSA Notice of Amendments to National Instrument 45-106 Prospectus Exemptions and National Instrument 31-103 Registration Requirements, Exemptions and Ongoing Registrant Obligations and Changes to related Companion Policies relating to Syndicated Mortgages and Issuers Engaged in Real Estate Activities
- April 28, 2022 CSA and CCIR Joint Notice and Request for Comment Total Cost Reporting for Investment Funds and Segregated Funds

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APPENDIX I

Update 2 – September 20, 2022

Consolidated and updated references throughout the document

Client Focused Reforms

- Updated references related to sections 11.1, 11.5, 13.2, 13.3, 13.4, 13.12, 14.2, 14.2.1 of NI 31-103 and 31-103CP
- Added references to new sections 13.2.1, 13.3.1, 13.18 of NI 31-103 and 31-103CP

Trusted Contact Person and Temporary Holds

- Added "Temporary Holds" section to the table
- Added references to new sections 13.2.01 and 13.19 of NI 31-103, and Appendix G of 31-103CP

Consolidated the "Designation of supervisory personnel" and "Review of business locations' compliance activity" sections into a single "Compliance system, designation of supervisory personnel, and supervision of business locations" section of the table

Added the "Outsourcing" section to the table

August 5, 2021 CSA Staff Notice 31-361 OBSI Joint Regulators Committee Annual Report for 2020

Joint CSA/IIROC Staff Notice 21-329 *Guidance for Crypto-Asset Trading Platforms:* Compliance with Regulatory Requirements

Joint CSA/IIROC Staff Notice 21-330 Guidance for Crypto-Trading Platforms: Requirements relating to Advertising, Marketing and Social Media Use

CSA Staff Notice 81-333 Guidance on Effective Liquidity Risk Management for Investment Funds

ASC Rule 72-501 Distributions to Purchasers Outside Alberta & Companion Policy to ASC Rule 72-501

Electronic Signatures: Variation of ASC Blanket Order 13-503 re: Temporary Exemption from Requirements to Manually Sign Documents (Effective to April 30, 2023)

Self-Certified Investors Prospectus Exemption: Variation of ASC Blanket Order 45-538 re: Self-Certified Investor Prospectus Exemption (Effective to April 1, 2024)

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Small Business Financing: ASC Blanket Order 45-539 re: Small Business Financing (Effective to September 1, 2024)

September 17, 2020 CSA Notice of Amendments to National Instrument 45-106 Prospectus Exemptions and National Instrument 31-103 *Registration Requirements, Exemptions and Ongoing Registrant Obligations* and Changes to related Companion Policies relating to Syndicated Mortgages and Issuers Engaged in Real Estate Activities

April 28, 2022 CSA and CCIR Joint Notice and Request for Comment *Total Cost Reporting for Investment Funds and Segregated Funds*

ASC Registrant Outreach and Education Seminars – Spring 2018 – <u>Cyber Security & Alberta Organizations</u>

ASC Registrant Outreach and Education Seminars – 2022 – Client Focused Reforms

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Update 1 – December 9, 2020

Added Titles section to the table

Client Focused Reforms

- October 3, 2019 CSA Notice of Amendments to National Instrument 31-103 Registration Requirements, Exemptions and Ongoing Registrant Obligations and to Companion Policy 31 103CP Registration Requirements, Exemptions and Ongoing Registrant Obligations (Client Focused Reforms)
- ASC Blanket Order 31-533 Temporary Exemption from Client Focused Reforms Conflict of Interest Provisions of National Instrument 31-103 Registration Requirements, Exemptions and Ongoing Registrant Obligations
- ASC Website Client Focused Reforms: Information and Resources
- CSA Website Client Focused Reforms

June 21, 2019 - CSA Staff Notice 31-354 Suggested Practices for Engaging with Older or Vulnerable Clients

August 15, 2019 CSA Staff Notice 31-355 OBSI Joint Regulators Committee Annual Report for 2018

August 22, 2019 CSA Staff Notice 31-356 Guidance on Compliance Consultants Engaged by Firms Following a Regulatory Decision

Electronic Signatures: Alberta Securities Commission Blanket Order 13-503 re: Temporary Exemption from Requirements to Manually Sign Documents (Effective to April 30, 2021)

July 2, 2020 CSA Staff Notice 31-358 Guidance on Registration Requirements for Chief Compliance Officers and Request for Comments

August 6, 2020 CSA Notice of Amendments to National Instrument 45-106 Prospectus Exemptions and National Instrument 31-103 *Registration Requirements, Exemptions and Ongoing Registrant Obligations* and Changes to related Companion Policies relating to Syndicated Mortgages

August 27, 2020 CSA Staff Notice 31-359 OBSI Joint Regulators Committee Annual Report for 2019

ASC Website – <u>Client Relationship Manager Advising Representatives: Information and Resources</u> - content launched November 2020

ASC Registrant Outreach and Education Seminars – 2020 – Relationship Disclosure Information

ASC Registrant Outreach and Education Seminars – 2020 – <u>Exempt Market Dealer Sales</u> Practices

ASC Registrant Outreach and Education Seminars – 2020 – <u>Common Findings from Compliance</u> Reviews: PM/IFM and EMD

CSA Staff Notice 31-334 CSA Review of Relationship Disclosure Practices