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CIRO Proficiency Model for Approved Persons under the Investment Dealer and Partially Consolidated Rules

Executive Summary

The Canadian Securities Administrators (**CSA**) have approved amendments to Rules 2500 to 2800 of the Investment Dealer and Partially Consolidated Rules (**IDPC Rules**), which establish an assessment centric proficiency model with some mandatory education and training requirements (the **Amendments**).

The Amendments and relevant guidance will be effective January 1, 2026, as indicated in section 5 of this bulletin.

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1. Background

1.1 History

Over the last few years, CIRO, through one of its predecessor organizations, the Investment Industry Regulatory Organization of Canada (IIROC), undertook a multi-year initiative to enhance its proficiency regime with the intention of launching the new standards in 2026.

In July 2023, we subsequently published an initial Consultation Paper to solicit feedback on CIRO's proposal to shift from a course centric model with exams tied to courses, to an assessment centric model with some mandatory education and training. Following the publication, we completed a review of our Investment Dealer Member-related rules, which resulted in the proposed amendments published in [Bulletin 24-0206](#).

The objectives of the Amendments, as originally proposed, are intended to deliver the following benefits:

- raise the proficiency bar and enhance the proficiency regime applicable to Approved Persons,
- allow for greater currency and relevancy, and more responsiveness to industry changes,
- enable greater alignment with firm training,
- create opportunities for better learner experience,
- lower the cost of licensing and entry barriers to end-users, and
- greater role for CIRO in the development and design of its proficiency requirements.

1.2. Previous publications

The Amendments are the subject of two separate publications:

- Bulletin [23-0094](#), published on July 7, 2023, which contained the initial Consultation Paper intended to ensure that we considered our current proficiency model, and any changes that need to be made, before proceeding with any rule amendments, and
- Bulletin [24-0206](#), published on July 4, 2024, which contained the proposed amendments, modified to address issues raised and suggestions received following the initial publication.

2. Comments received

We received 17 public comment letters in response to Bulletin 24-0206. We provide a summary of these comments and our response in [Appendix 4](#).

3. The Amendments

The Amendments are contained in Rules 2500 to 2800, where we have:

- Repealed current mandated course-based provisions and replaced them with new exam-based provisions.
- Added new relevant baseline education and experience provisions for some Approved Person categories.
- Added new provisions relating to Conduct Training by CRO.
- Repealed current firm training provisions and added new provisions to better align with the proficiency principle and competency profiles.
- Added transitional rules and exemptions, which govern the coming into force of the new requirements, and their application on dealers and Approved Persons.
- Repealed related course-based exemptions, including recognition of qualifications with other SROs (e.g., Financial Industry Regulatory Authority (FINRA), National Futures Association (NFA)), and added new exemptions consistent with new exam-based provisions.
- Adopted a single derivatives product approach for consistency with Derivatives Rules Modernization Project, Stage 1.
- Added new mandated annual continuing education training specifically prescribed by CRO.
- Streamlined continuing education requirements for all Supervisors, to reflect development of a single competency profile for all Supervisors.
- Repealed current course-based validity provisions and replaced them with new exam-based provisions.
- Added consequential changes to Rules 2700 and 2800 for consistency with Amendments in 2600, which repeal the current mandated course-based requirements.
- Repealed carry forward provisions.

A detailed table guide of the Amendments is set out in **Appendix 5**.

3.1 Additional non-material changes

Following our publication in July 2024 and comments received by the CSA, the following non-material changes were made:

- Addition of unpublished sections in Rule 2500, which require references to relevant rule subsections to be renumbered. We have made additional non-material changes to amend subsections 2551(8), 2553(4), 2553(5), 2553(6), and subsections 2555(1), 2555(2) and 2555(3) to update rule references for the renumbered subsections.
- Addition of a new section 2605, to clarify the application of the Amendments to Registered Representatives (RR) and Investment Representatives (IR) dealing only in mutual funds who are subject to upgrade requirements to become a RR/IR securities for consistency with the requirements applicable to other RR/IR securities.¹
- We have made additional non-material changes to amend subsection 2625(1) to update rule references for consistency with the new section.
- Addition of unpublished section 2803, which requires references to relevant rule subsections to be renumbered.
- Removal of the term “product” to remain consistent with use of the current references to “security, derivative and precious metals bullion”.
- Non-substantive drafting and formatting changes to clarify or correct the intention of new provisions.

A blackline of these non-material changes is set out in **Appendix 3**. Furthermore, the changes to each provision in comparison to current IDPC Rules is shown in Appendix 2.

4. Guidance

Concurrent with this bulletin, we are publishing Guidance Note:

- Guidance on the new CIRO Proficiency Model for Approved Persons of Investment Dealers – Exemptions, Recognition, Transition and Validity Provisions, and
- Guidance on Dealer Member training for Registered Representatives and Investment Representatives.

We will be publishing further guidance relating to the relevant education and experience as part of the Amendments. We will also be publishing further guidance and updates, including updates to our existing proficiency guidance in the coming months.

¹ Appendix C includes the rules applicable to RRs and IRs dealing only in mutual funds that are subject to upgrade requirements, which have been repealed in current section 2603 and added in new section 2605.

5. Implementation

The Amendments and Guidance Notes will be effective on **January 1, 2026**

6. Appendices

Appendix 1 – Clean copy of the Amendments

Appendix 2 – Blackline comparison of the Amendments to current rules

Appendix 3 – Blackline comparison of the Amendments to last publication

Appendix 4 – Summary of public comments received

Appendix 5 – Table guide of Amendments

Appendix 6 – Guidance on the new CIRO Proficiency Model for Approved Persons of Investment Dealers – Exemptions, Recognition, Transition and Validity Provisions

Appendix 7 – Guidance on Dealer Member training for Registered Representatives and Investment Representatives

SERIES 1000 | INTERPRETATION AND PRINCIPLES RULES

...

RULE 1400 | STANDARDS OF CONDUCT

...

...

SERIES 2000 | DEALER MEMBER ORGANIZATION AND INDIVIDUAL APPROVAL RULES

...

RULE 2500 | DEALER MEMBER DIRECTORS AND EXECUTIVES, AND APPROVAL OF INDIVIDUALS

...

PART A - DEALER MEMBER DIRECTORS AND EXECUTIVES**2502. General requirements for Directors**

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- (2) At least 40% of the *Dealer Member's Directors* must:
- (i) either:
 - (a) be *actively engaged in the business of the Dealer Member* and spend the majority of their time in the *securities or derivatives* industry, except those on active government service, or who for health reasons are prevented from such active engagement, or
 - (b) occupy a position equivalent to an *Executive* or a *Director* at a related or *affiliated* firm registered with a *securities regulatory authority*, an *affiliated* foreign securities dealer or advisor, or an *affiliated* Canadian financial institution,
 - (ii) satisfy the applicable proficiency requirements of subsection 2603(1), and
 - (iii) have at least five years of experience in the financial services industry, or such lesser period as may be acceptable to the *Corporation*.
- (3) The remaining *Directors* who do not meet subsection 2502(2) must, if *actively engaged in the business of the Dealer Member* or its *related company*, meet the applicable proficiency requirements of subsection 2603(1).

2503. General requirements for Executives

- (1) A *Dealer Member's Executives* must:
- ...
- (ii) satisfy the applicable proficiency requirements of subsection 2603(1).
- (2) Notwithstanding the applicable proficiency requirements in subsection 2603(1), at least 60% of the *Dealer Member's Executives* must have at least five years of experience in the financial services industry, or such lesser period as may be acceptable to the *Corporation*.

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2505. Chief Financial Officer

- (1) A Dealer Member must designate a *Chief Financial Officer* who must:
- (i) be designated as an *Executive* and meet the general requirements for *Executives* set out in section 2503, and
 - (ii) satisfy the applicable proficiency requirements of subsection 2603(1).

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- (4) When an acting *Chief Financial Officer* is designated:
- (i) that *individual* must satisfy the applicable proficiency requirements of subsection 2603(1) and be designated as *Chief Financial Officer*, or

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2506. Chief Compliance Officer

- (1) A Dealer Member must designate a *Chief Compliance Officer* who must:
- (i) be designated as an *Executive* and meet the general requirements for *Executives* set out in section 2503, and
 - (ii) satisfy the applicable proficiency requirements of subsection 2603(1).

...

- (5) When an acting *Chief Compliance Officer* is designated:
- (i) the *individual* must satisfy the applicable proficiency requirements of subsection 2603(1) and be designated as *Chief Compliance Officer*, or

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2507. Ultimate Designated Person

- (1) A Dealer Member must designate an *Ultimate Designated Person* who must be designated as an *Executive* and meet the applicable proficiency requirements in subsection 2603(1) and the general requirements for *Executives* set out in section 2503.

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PART B - APPROVAL OF INDIVIDUALS

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2551. Individual approval

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- (8) Where an *individual*:
- (i) is approved as a *Registered Representative* dealing in mutual funds only pursuant to subsection 2605(3), and

- (ii) acts as an *agent* of a *Dealer Member* in compliance with the requirements set out in Rule 2300,

any *remuneration*, gratuity, benefit or other consideration in respect of business conducted by the *individual* on behalf of the *Dealer Member* may be paid by the *Dealer Member* to a corporation that is not registered under *securities laws* provided:

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2552. Compliance with the proficiency requirements or other conditions

- (1) Each *Approved Person* must:
 - (i) meet the applicable pre-approval proficiency requirements set out in sections 2603 and 2605 before *Corporation* approval is granted, and
 - (ii) complete the applicable post-approval proficiency requirements of sections 2604 and 2605 after receiving *Corporation* approval.
- (2) The *Corporation* will automatically suspend an *Approved Person* if they do not complete the applicable post-approval proficiency requirements in the *Approved Persons* category as set out in clauses 2604(1)(i), 2604(2)(i), 2604(2)(ii), subsections 2605(1), 2605(2), or section 2630.

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2553. Approval of Registered Representatives, Investment Representatives, Portfolio Managers and Associate Portfolio Managers and their obligations

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- (3) A *Registered Representative*, *Investment Representative*, *Portfolio Manager* or *Associate Portfolio Manager* may not conduct on behalf of a *Dealer Member*, and a *Dealer Member* may not permit the *Approved Person* to conduct on its behalf, the type of business as set out in clause 2553(3)(iv) and deal with a type of customer as set out in clauses 2553(3)(i) and (ii), unless the *Dealer Member* complies with the following:

...

- (iv) The *Dealer Member* must notify the *Corporation* which of its *individuals* approved as a *Registered Representative*, *Investment Representative*, *Portfolio Manager* or *Associate Portfolio Manager* will deal in or advise in:
 - ...
 - (b) *derivatives* subject to the limitations set out in subsection 2625(3), and
 - (c) general *securities* business; including equities, fixed income and other investment products not listed above.
- (4) An *individual* applying for approval as a *Registered Representative* or *Investment Representative* dealing only in mutual funds must comply with the applicable proficiency requirements in subsections 2605(1), 2605(2) or 2605(3).
- (5) The post-approval proficiency requirements in subsections 2605(1) or 2605(2) do not apply to a *Registered Representative* or *Investment Representative* approved prior to September 28, 2009

and registered in provinces or territories which allowed the *individual* to be restricted to only mutual funds, provided they remain in the same restricted category of approval in the same provinces/territories.

- (6) The approval of an *individual* qualified to deal only in mutual funds is automatically suspended if the *individual* fails to satisfy the post-approval requirements in subsections 2605(1) or 2605(2) in accordance with subsections 2552(2) and 2552(3).

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2555. Approval of investors

- (1) Any investor who owns or holds a *beneficial ownership* interest in a *significant equity interest* in the *Dealer Member* or special warrants or other *securities* that are convertible into a *significant equity interest* in the *Dealer Member* must:
 - (i) be approved by the *Corporation*, and
 - (ii) if applicable, meet the proficiency requirements of subsections 2555(2) and 2555(3).
- (2) A *Dealer Member's Director* who, directly or indirectly, owns or controls a voting interest of a *Dealer Member* of 10% or more must satisfy the proficiency requirements of sub-clause 2603(1)(i)(j).
- (3) Any *individual*, other than a *Dealer Member's Director*, who:
 - (i) is *actively engaged in the business of the Dealer Member*, and
 - (ii) directly or indirectly owns or controls a voting interest in a *Dealer Member* of 10% or more, must satisfy the proficiency requirements of sub-clause 2603(1)(i)(j).

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RULE 2600 | PROFICIENCY REQUIREMENTS AND EXEMPTIONS FROM PROFICIENCIES

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PART A - PROFICIENCY REQUIREMENTS

2602. Proficiency principle

- (1) An *Approved Person* must not perform an activity that requires approval unless the *Approved Person* has satisfied the applicable proficiency requirements set out in Rule 2600 and has the education, experience and training that a reasonable person would consider necessary to perform the activity competently, including understanding the structure, features and risks of each *security, derivative* and *precious metals bullion* the *Approved Person* deals with, recommends or supervises.
- (2) The *Dealer Member* must ensure that an *individual* does not perform an activity that requires *Corporation* approval unless the *individual* has satisfied the applicable proficiency requirements set out in Rule 2600 and has the education, experience and training that a reasonable person would consider necessary to perform the activity competently, including understanding the structure, features and risks of each *security, derivative* and *precious metals bullion*, the *individual* deals with, recommends or supervises.

2603. Proficiency requirements prior to approval

- (1) Each applicant in an *Approved Person* category must meet the applicable proficiency requirements prescribed below before the *Corporation* will grant approval, unless an exemption has been granted from the applicable requirements:
- (i) An applicant for approval, who is eligible to complete a prescribed exam, must at a minimum successfully complete the following before the *Corporation* will grant approval in the following categories:
- (a) *Investment Representative* dealing with *securities*: Canadian Investment Regulatory Exam
 - (b) *Investment Representative* dealing with *derivatives*: Canadian Investment Regulatory Exam and Derivatives Exam,
 - (c) *Registered Representative* (retail) dealing with *securities*: Canadian Investment Regulatory Exam and Retail Securities Exam,
 - (d) *Registered Representative* (retail) dealing with *derivatives*: Canadian Investment Regulatory Exam and Retail Securities Exam and Derivatives Exam,
 - (e) *Registered Representative* (institutional) dealing with *securities*: Canadian Investment Regulatory Exam and Institutional Securities Exam,
 - (f) *Registered Representative* (institutional) dealing with *derivatives*: Canadian Investment Regulatory Exam and Institutional Securities Exam and Derivatives Exam,
 - (g) *Associate Portfolio Manager*: Level 1 of the Chartered Financial Analyst (CFA) program administered by the CFA Institute, or either the Canadian Investment Manager Designation or the Chartered Investment Manager Designation (CIM®) administered by CSI Global Education Inc., and
 - (l) If managing accounts with *derivatives*, the Derivatives Exam,
 - (h) *Portfolio Manager*: a CFA Charter administered by the CFA Institute, or either the Canadian Investment Manager Designation or the Chartered Investment Manager Designation (CIM®) administered by CSI Global Education Inc., and
 - (l) If managing accounts with *derivatives*, the Derivatives Exam,
 - (i) *Supervisor*: Supervisor Exam, and
 - (l) If supervising trading in, or accounts for those who trade in *securities*, *derivatives*, or *managed accounts*, the exam requirements applicable to the *individuals* being supervised listed in sub-clauses 2603(1)(i)(a) to (f), and (h) except:
 - (A) the Canadian Investment Regulatory Exam is not required if the *Supervisor* satisfies the experience requirements in sub-clause 2603(1)(ii)(d),
 - (j) *Director*, where required in section 2502: Director and Executive Exam,
 - (k) *Ultimate Designated Person* and *Executive* other than those in sub-clause 2603(1)(i)(l) or (m): Director and Executive Exam,
 - (l) *Chief Compliance Officer*: Chief Compliance Officer Exam,

- (m) *Chief Financial Officer*: Chief Financial Officer Exam,
 - (n) *Trader*: Trader Exam in addition to any exam mandated by the applicable marketplace.
- (ii) An applicant for approval must have the following minimum education or experience before the *Corporation* will grant approval in the following categories:
- (a) *Registered Representative*: A relevant diploma or degree from an accredited post secondary institution, or minimum four years of relevant experience acceptable to the *Corporation*,
 - (b) *Associate Portfolio Manager*: Minimum two years of relevant investment management experience acceptable to the *Corporation* within three years prior to the date of application for approval,
 - (c) *Portfolio Manager*:
 - (I) If Canadian Investment Manager Designation or Chartered Investment Manager Designation (CIM®) is completed, at least four years of relevant investment management experience acceptable to the *Corporation*, of which one year was gained within the three years prior to the date of application for approval,
 - (II) If CFA Charter is completed, at least one year of relevant investment management experience acceptable to the *Corporation* within the three years prior to the date of application for approval,
 - (d) *Supervisor*: Minimum two years of relevant experience acceptable to the *Corporation*,
 - (e) *Ultimate Designated Person and Executive*: Minimum two years of relevant experience acceptable to the *Corporation*,
 - (f) *Chief Compliance Officer*:
 - (I) Five years working for an investment dealer or registered advisor, or affiliated Financial Industry Regulatory Authority (FINRA) dealer, with at least three years in a compliance or supervisory capacity, or
 - (II) Three years providing professional services in the *securities* industry, with at least 12 months experience working at an investment dealer or registered advisor in a compliance or supervisory capacity,
 - (g) *Chief Financial Officer*:
 - (I) A financial accounting designation, finance related university degree or diploma or equivalent work experience as may be acceptable to the *Corporation*.

2604. Post-approval proficiency requirements

- (1) *Dealer Member* training
 - (i) A *Dealer Member* must, as prescribed by the *Corporation*, provide training to its *Registered Representatives* and *Investment Representatives* within 90 days after approval considering the type of client and product the *Approved Person* will be dealing with, and

- (a) The *Dealer Member* must notify the *Corporation* of completion of the training within 90 days after approval.
 - (ii) A *Dealer Member* who sponsors an *Approved Person* must ensure that the *individual* has received the appropriate training relevant for its business type including its client and product type to ensure compliance with the proficiency principle in section 2602.
 - (a) A *Dealer Member* may permit an *Approved Person* to apply on-going training to meet prescribed continuing education requirements.
 - (iii) In addition to any training prescribed in Rule 2600, a *Dealer Member* must provide on-going training to its *Approved Persons* on compliance with *Corporation requirements, securities laws, and applicable laws* including, without limitation, the obligations relating to conflicts of interest, know-your-client, account appropriateness, product due diligence, know-your-product, and suitability determination.
 - (a) A *Dealer Member* may permit an *Approved Person* to apply on-going training to meet prescribed continuing education requirements.
 - (iv) The *Dealer Member* must keep a record of all training provided, as prescribed in Rule 2600, and provide the record to the *Corporation* on request to demonstrate compliance with the proficiency principle.
- (2) Conduct training
- (i) Each *Approved Person* must complete the conduct training prescribed by the *Corporation* within 30 days after approval, and
 - (a) The *Dealer Member* must notify the *Corporation* of completion of the training within 30 days after approval.
 - (ii) Each *Approved Person* not captured by (i), approved as of the date of these Rules, must complete the conduct training prescribed by the *Corporation* by no later than December 31, 2026, and
 - (a) The *Dealer Member* must notify the *Corporation* of completion of the training by no later than December 31, 2026.

2605. Mutual funds only Registered Representatives and Investment Representatives

- (1) An applicant for approval, or an *individual* approved as a *Registered Representative* dealing only in mutual funds who is an *employee* of a firm registered as an investment dealer and not registered as a mutual fund dealer must:
 - (i) Complete any of the following prior to approval:
 - (a) Requirements in sub-clause 2603(1)(i)(c),
 - (b) The Canadian Securities Course administered by CSI Global Education Inc.,
 - (c) Canadian Investment Funds Course administered by the IFSE Institute, or
 - (d) Investment Funds in Canada Course administered by CSI Global Education Inc.
 - (ii) Complete the requirements in sub-clause 2603(1)(i)(c) and clause 2604(2)(i) within 270 days of approval.
 - (iii) Complete the training requirement in clause 2604(1)(i) within 18 months after initial

approval date, notwithstanding the timeline set out in clause 2604(1)(i).

- (iv) Upgrade within 18 months of initial approval.
- (2) An applicant for approval or an *individual* approved as an *Investment Representative* dealing only in mutual funds who is an *employee* of a firm registered as an investment dealer and not registered as a mutual fund dealer must:
- (i) Complete any of the following prior to approval:
 - (a) Requirements in sub-clause 2603(1)(i)(a),
 - (b) The Canadian Securities Course administered by CSI Global Education Inc.,
 - (c) Canadian Investment Funds Course administered by the IFSE Institute, or
 - (d) Investment Funds in Canada Course administered by CSI Global Education Inc.
 - (ii) Complete the requirements in sub-clause 2603(1)(i)(a) and clause 2604(2)(i) within 270 days of approval.
 - (iii) Complete the training requirement in clause 2604(1)(i) within 18 months after initial approval date, notwithstanding the timeline set out in clause 2604(1)(i).
 - (iv) Upgrade within 18 months of initial approval.
- (3) An applicant for approval, or an *individual* approved as a *Registered Representative* dealing only in mutual funds who is an *employee* of a firm registered as both an investment dealer and a mutual fund dealer must:
- (i) Complete any of the following prior to approval:
 - (a) The Canadian Securities Course administered by CSI Global Education Inc.,
 - (b) Canadian Investment Funds Course administered by the IFSE Institute, or
 - (c) Investment Funds in Canada Course administered by CSI Global Education Inc.
 - (ii) Complete the training requirement in clause 2604(1)(i) within 90 days after initial approval date.
- (4) An applicant for approval, or an *individual* approved, as a *Registered Representative* dealing in mutual funds only, or an *Investment Representative* dealing in mutual funds only, will be also permitted to trade in exchange-traded funds that meet the definition of a mutual fund provided the *individual*:
- (i) was permitted to trade in exchange-traded funds within the 90 days prior to these Rules coming into effect, or
 - (ii) complies with the relevant proficiency requirements in subsections 2605(1), 2605(2) or 2605(3), and has successfully completed one of the following within the timeline prescribed in subsection 2628(1):
 - (a) the ETFs for Mutual Fund Representatives course administered by CSI Global Education Inc., or
 - (b) the Exchange-Traded Funds Course administered by the IFSE Institute, or
 - (c) the Exchange Traded Funds for Representatives of Mutual Fund Dealers course administered by the Smarten Up Institute.
- (5) The following terms have the meaning set out below when used in subsection 2605(6):

<i>“alternative mutual fund”</i>	The same meaning as the definition in National Instrument 81-102, <i>Investment Funds</i> .
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<i>“bridge course”</i>	<p>Either:</p> <ul style="list-style-type: none"> (i) the Investing in Alternative Mutual Funds and Hedge Funds course administered by the IFSE Institute, or (ii) the Hedge Funds and Liquid Alternatives for Mutual Fund Representatives course administered by CSI Global Education Inc.
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- (6) An applicant for approval, or an *individual* approved, as a *Registered Representative* dealing in mutual funds only, or an *Investment Representative* dealing in mutual funds only, will be also permitted to trade in *alternative mutual funds* provided the *individual*:
- (i) was permitted to trade in alternative mutual funds within the 90 days prior to these Rules coming into effect, or
 - (ii) complies with the relevant proficiency requirements in subsections 2605(1), 2605(2) or 2605(3), and has successfully completed one of the following within the timeline prescribed in subsection 2628(1):
 - (a) the *bridge course*,
 - (b) the Derivatives Fundamentals Course administered by CSI Global Education Inc.,
 - (c) the Canadian Securities Course administered by CSI Global Education Inc., or
 - (d) the courses required to be registered as a Portfolio Manager – Advising Representative pursuant to section 3.11 of National Instrument 31-103, *Registration Requirements, Exemptions and Ongoing Registrant Obligations*.

2606. – 2624. Reserved.

PART B - EXEMPTIONS FROM PROFICIENCY REQUIREMENTS

2625. Specific exemptions

- (1) An applicant seeking approval as a *Supervisor* in relation to activities of *individuals* approved to deal in mutual funds only, including those in subsection 2605(4) is exempt from the pre-approval exam requirements in clause 2603(1)(i) provided the *individual*:
- (i) was designated by a member of the Mutual Fund Dealers Association of Canada as a branch manager, within 90 days prior to these Rules coming into effect, or
 - (ii) has successfully completed the following within the timelines prescribed in subsection 2628(1):
 - (a) instead of the applicable requirements described in paragraph 2603(1)(i)(i)(I), either the:
 - (I) Canadian Investment Funds Course administered by the IFSE Institute, or
 - (II) Investment Funds in Canada Course administered by CSI Global Education Inc.
 - (b) instead of the Supervisor Exam, either the:
 - (I) Mutual Fund Branch Managers’ Examination Course administered by the IFSE Institute, or
 - (II) Branch Compliance Officers Course administered by CSI Global Education Inc.

- (2) Any *individuals* approved prior to December 31, 2025, are exempt from any new proficiency requirements, other than the requirements in subsection 2604(2), introduced as of January 1, 2026, in Rule 2600, provided the *Approved Person* continues in the same role.
- (i) Notwithstanding subsection 2625(2), an applicant for approval is not required to complete the Canadian Investment Regulatory Exam prescribed in subsection 2603(1) if the *individual* has minimum two years of prior experience in the same *Approved Person* category within three years prior to the date of application for approval and satisfies other prescribed requirements under sections 2603 and 2604 for their category of approval.
- (3) Any *Approved Person* who would be required to complete the Derivatives Exam under Rule 2600 pursuant to subsection 2603(1), and who is exempt from such requirement pursuant to subsection 2625(2), may only deal in, as applicable, legacy options or futures contract, futures contract options, and must ensure that the scope of their permitted activities are clear in all their communication and in all their dealings.

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2627. Exemptions from completing the required exams

- (1) An applicant for approval is exempt from writing the Canadian Investment Regulatory Exam if they satisfy the following:
- (i) previously registered with FINRA in a similar capacity within three years prior to the date of application for approval, and have completed the applicable FINRA requirements for that registration category.
- (2) An applicant for approval is exempt from writing the Derivatives Exam if they satisfy the following:
- (i) previously registered and dealing in options and futures with FINRA and the National Futures Association (NFA) within three years prior to the date of application for approval, and
- (ii) completed the Series 3 and Series 7 exams offered by FINRA.
- (3) An applicant for approval is exempt from writing the Canadian Investment Regulatory Exam and the Retail Securities Exam and Institutional Securities Exam if the applicant has satisfied the requirements in sub-clauses 2603(1)(i)(g) or (h) applicable to *Associate Portfolio Managers* or *Portfolio Managers* respectively.

2628. Exam validity

- (1) An *individual* is deemed to have successfully completed an exam if:
- (i) the *individual* successfully completed the prescribed exam within three years prior to the date of application for approval,
- (ii) the *individual* who successfully completed the prescribed exam was previously approved in the same *Approved Person* category, or another category which required the same exam, within three years prior to the date of application for approval, or
- (iii) the *individual* who successfully completed the prescribed exam gained one year of relevant

securities industry experience, acceptable to the *Corporation*, within three years prior to the date of application for approval.

- (2) For the purposes of determining exam validity, an *Approved Person* is not considered to have been approved during any period in which the *Approved Person's* approval was suspended or the *individual* was otherwise not conducting any activities requiring *Corporation* approval on behalf of the *Dealer Member*.
- (3) The validity periods do not apply to the Canadian Investment Manager Designation, the Chartered Investment Manager Designation (CIM®) and the CFA Charter provided the holders of these designations continue to have the right to use the designation and the designation has not been revoked or otherwise restricted.

2629. Transition from courses prescribed prior to January 1, 2026

- (1) An *individual* is exempt from the requirements in section 2603 if all of the following apply:
 - (i) the *individual* enrolls in a course offered by CSI Global Education Inc. prescribed under the rules prior to January 1, 2026,
 - (ii) the *individual* successfully completes the course and its exam prior to January 1, 2027,
 - (iii) the *individual* would satisfy the proficiency requirements applicable to the same approval category prior to January 1, 2026, upon completion of the course completed in clause (ii), and
 - (iv) the sponsoring *Dealer Member* submits an application for approval for the *individual*, prior to January 1, 2027.
- (2) If an *individual* is required to complete the Wealth Management Essentials (WME) course as of December 31, 2025, the *individual* may complete either of the following:
 - (i) WME by earlier of December 31, 2026, or the required completion date prescribed under the rules that were in effect prior to January 1, 2026, or
 - (ii) Retail Securities Exam by the required completion date prescribed under the rules that were in effect prior to January 1, 2026.

2630. Transition of Advising Representatives and Associate Advising Representatives into the Portfolio Manager and Associate Portfolio Manager approval category

- (1) An *individual* registered as an advising representative or associate advising representative by a *securities regulatory authority* within the 90 days prior to the date of application as a *Portfolio Manager* or *Associate Portfolio Manager* has 90 days after the date of approval by the *Corporation* to complete the conduct training in clause 2604(2)(i), and
 - (i) The *Dealer Member* must notify the *Corporation* of completion of the training within 90 days after approval.

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PART A - THE CONTINUING EDUCATION PROGRAM AND CONTINUING EDUCATION REQUIREMENTS

2703. The continuing education program

- (1) The *continuing education program* consists of three parts:
- (i) a compliance course requirement, which is training covering ethical issues, regulatory developments and rules governing investment dealer conduct,
 - (ii) a professional development course requirement, which is training that fosters learning and development in areas relevant to investment dealer business, and
 - (iii) mandated annual continuing education training specifically prescribed by the *Corporation* which may satisfy clauses (i) or (ii) above as prescribed by the *Corporation*.

...

2704. Continuing education requirements

- (1) In each *continuing education program* cycle, a *continuing education participant* must meet the continuing education requirements for the applicable *Approved Person* category, regardless of product type, as set out in the following table.

Approved Person Category	Client Type	Compliance course requirement	Professional development course requirement
<i>Registered Representative</i>	<i>retail client</i>	Yes	Yes
<i>Registered Representative</i>	<i>institutional client</i>	Yes	No
<i>Investment Representative</i>	<i>retail client or institutional client</i>	Yes	No
<i>Portfolio Manager</i>	<i>retail client or institutional client</i>	Yes	Yes
<i>Associate Portfolio Manager</i>	<i>retail client or institutional client</i>	Yes	Yes
<i>Trader</i>	N/A	Yes	No
<i>Supervisor</i>	<i>retail client or institutional client</i>	Yes	No
<i>Ultimate Designated Person</i>	N/A	Yes	No
<i>Chief Compliance Officer</i>	N/A	Yes	No

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...

PART B – CONTINUING EDUCATION PROGRAM COURSES AND ADMINISTRATION

2715. The compliance course

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- (3) The *Corporation* will accredit ethics courses that a *continuing education participant* can repeat and count towards fulfillment of the compliance course requirement in two *continuing education program* cycles.

2716. The professional development course

- (1) A *continuing education participant* subject to the professional development course requirement:
 - (i) may receive continuing education credit for a professional development course with an examination, only if the *continuing education participant* successfully passes the examination.

2717. Dealer Member’s administration of the continuing education program

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- (3) A *Dealer Member* may allow a *continuing education participant* to use mandatory conduct training prescribed in subsection 2604(2) towards compliance course requirement in clause 2703(1)(i).

...

RULE 2800 | THE NATIONAL REGISTRATION DATABASE

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2803. Dealer Member obligations for the National Registration Database

...

- (2) The following list describes the submission requirements as prescribed by *securities laws*.
 - (i) A *Dealer Member* must make the following submissions using the *National Registration Database* on the *National Registration Database* form specified, within the time period prescribed by National Instrument 33-109.

Type of submission	Form
(a) an application for approval of an <i>individual</i> under any <i>Corporation requirement</i>	Form 33-109F4 - Registration of Individuals and Review of Permitted Individuals
(b) a notification of any change in the type of business which an <i>Approved Person</i> will conduct	Form 33-109F2 - Change or Surrender of Individual Categories
(c) (I) an application for different or additional approval under <i>Corporation requirements</i> for any <i>Approved Person</i> , (II) a surrender of existing approval	Form 33-109F2 - Change or Surrender of Individual Categories
(d) a report of a change of information	Form 33-109F5 - Change of Registration

Type of submission	Form
regarding an <i>Approved Person</i> previously submitted in Form 33-109F4	Information
(e) an application for an exemption from a proficiency requirement in sections 2603, 2604 or 2605, as applicable, for an <i>Approved Person</i> or applicant for approval	"Apply for an Exemption" submission on the <i>National Registration Database</i>
(f) a notification by a <i>Dealer Member</i> of the end of an employee's <i>Approved Person</i> status	Form 33-109F1 - Notice of End of Individual Registration or Permitted Individual Status
(g) a notification of a <i>business location</i> opening or closing under section 2202	Form 33- 109F3 - Business locations other than head office
(h) a notification of change of address, type of location or supervision of any <i>business location</i>	Form 33-109F3 - Business locations other than head office
(i) notification of reinstatement of <i>individual</i> approval.	Form 33-109F7 - Reinstatement of Registered Individuals and Permitted Individuals (see section 2808 for eligible criteria before making this filing).

- (ii) Before filing a notice of change of business type under sub-clause 2803(2)(i)(b) above, a *Dealer Member* must notify the *Corporation* through the *National Registration Database* that either:
- (a) the *Approved Person* has completed the necessary proficiency requirements under sections 2603, 2604 or 2605, as applicable, to undertake the type of business, or
 - (b) the *Approved Person* has been granted an exemption from the proficiency requirements under sections 2625 through 2628.

...

SERIES 1000 | INTERPRETATION AND PRINCIPLES RULES

...

RULE 1400 | STANDARDS OF CONDUCT

...

~~1407. Training~~

~~(1) — A Dealer Member must provide training to its Approved Persons on compliance with Corporation requirements, securities laws, and applicable laws including, without limitation, the obligations relating to conflicts of interest, know your client, account appropriateness, product due diligence, know your product, and suitability determination.~~

...

SERIES 2000 | DEALER MEMBER ORGANIZATION AND INDIVIDUAL APPROVAL RULES

...

RULE 2500 | DEALER MEMBER DIRECTORS AND EXECUTIVES, AND APPROVAL OF INDIVIDUALS

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PART A - DEALER MEMBER DIRECTORS AND EXECUTIVES**2502. General requirements for Directors**

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- (2) At least 40% of the *Dealer Member's* Directors must:
- (i) either:
 - (a) be *actively engaged in the business of the Dealer Member* and spend the majority of their time in the *securities or derivatives* industry, except those on active government service, or who for health reasons are prevented from such active engagement, or
 - (b) occupy a position equivalent to an *Executive* or a *Director* at a related or *affiliated* firm registered with a *securities regulatory authority*, an *affiliated* foreign securities dealer or advisor, or an *affiliated* Canadian financial institution,
 - (ii) satisfy the applicable proficiency requirements of ~~clause 2602(3)(xxix)~~ [subsection 2603\(1\)](#), and
 - (iii) have at least five years of experience in the financial services industry, or such lesser period as may be acceptable to the *Corporation*.
- (3) The remaining *Directors* who do not meet subsection 2502(2) must, if *actively engaged in the business of the Dealer Member* or its *related company*, meet the [applicable proficiency](#) requirements of sub-~~clause 2502(2)(i)(b) and clause 2502(2)(i)~~ [section 2603\(1\)](#).

2503. General requirements for Executives

- (1) A *Dealer Member's* Executives must:

...

- (ii) satisfy the applicable proficiency requirements of ~~clause 2602(3)(xxviii)~~[subsection 2603\(1\)](#).
- (2) ~~At~~[Notwithstanding the applicable proficiency requirements in subsection 2603\(1\), at](#) least 60% of the *Dealer Member's Executives* must have at least five years of experience in the financial services industry, or such lesser period as may be acceptable to the *Corporation*.

...

2505. Chief Financial Officer

- (1) A *Dealer Member* must designate a *Chief Financial Officer* who must:
- (i) be designated as an *Executive* and meet the general requirements for *Executives* set out in section 2503, and
 - (ii) satisfy the applicable proficiency requirements of ~~clause 2602(3)(xxx)~~[subsection 2603\(1\)](#).

...

- (4) When an acting *Chief Financial Officer* is designated:
- (i) that *individual* must satisfy the applicable proficiency requirements of ~~clause 2602(3)(xxx)~~[subsection 2603\(1\)](#) and be designated as *Chief Financial Officer*, or

...

...

2506. Chief Compliance Officer

- (1) A *Dealer Member* must designate a *Chief Compliance Officer* who must:
- (i) be designated as an *Executive* and meet the general requirements for *Executives* set out in section 2503, and
 - (ii) satisfy the applicable proficiency requirements of ~~clause 2602(3)(xxxi)~~[subsection 2603\(1\)](#).

...

- (5) When an acting *Chief Compliance Officer* is designated:
- (i) the *individual* must satisfy the applicable proficiency requirements of ~~clause 2602(3)(xxx)~~[subsection 2603\(1\)](#) and be designated as *Chief Compliance Officer*, or

...

...

2507. Ultimate Designated Person

- (1) A *Dealer Member* must designate an *Ultimate Designated Person* who must be designated as an *Executive* and meet the [applicable proficiency requirements in subsection 2603\(1\)](#) and the general requirements for *Executives* set out in section 2503.

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PART B - APPROVAL OF INDIVIDUALS

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2551. Individual approval

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(8) Where an *individual*:

- (i) is approved as a *Registered Representative* dealing in mutual funds only pursuant to ~~clause subsection 2602(3)(vii)~~ 2605(3), and
- (ii) acts as an *agent* of a *Dealer Member* in compliance with the requirements set out in Rule 2300,

any *remuneration, gratuity, benefit* or other consideration in respect of business conducted by the *individual* on behalf of the *Dealer Member* may be paid by the *Dealer Member* to a corporation that is not registered under *securities laws* provided:

...

...

2552. Compliance with the proficiency requirements or other conditions

(1) Each *Approved Person* must:

- (i) meet the applicable pre-approval proficiency requirements set out in ~~Rule 2600~~ sections 2603 and 2605 before *Corporation* approval is granted, and
- (ii) complete the applicable post-approval proficiency requirements of ~~subsection 2602(3)~~ sections 2604 and 2605 after receiving *Corporation* approval.

(2) The *Corporation* will automatically suspend an *Approved Person* if they do not complete ~~all~~ the applicable post-approval proficiency requirements in the *Approved Persons* category as set out in ~~Rule 2600~~ clauses 2604(1)(i), 2604(2)(i), 2604(2)(ii), subsections 2605(1), 2605(2), or section 2630.

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2553. Approval of Registered Representatives, Investment Representatives, Portfolio Managers and Associate Portfolio Managers and their obligations

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(3) A *Registered Representative, Investment Representative, Portfolio Manager* or *Associate Portfolio Manager* may not conduct on behalf of a *Dealer Member*, and a *Dealer Member* may not permit the *Approved Person* to conduct on its behalf, the type of business as set out in clause 2553(3)(iv) and deal with a type of customer as set out in clauses 2553(3)(i) and (ii), unless the *Dealer Member* complies with the following:

...

- (iv) The *Dealer Member* must notify the *Corporation* which of its *individuals* approved as a *Registered Representative, Investment Representative, Portfolio Manager* or *Associate Portfolio Manager* will deal in or advise in:

...

- (b) ~~options or similar derivatives~~, subject to the limitations set out in subsection 2625(3), and
 - (c) ~~futures contracts, forward contracts, contracts for difference, futures contract options or similar derivatives, other than in any province where approval is required, and~~
 - (~~dc~~) general *securities* business; including equities, fixed income and other investment products not listed above.
- (4) An *individual* applying for approval as a *Registered Representative* or *Investment Representative* dealing only in mutual funds must comply with the applicable proficiency requirements in ~~clauses 2602(3)(vi), 2602(3)(vii)~~ subsections 2605(1), 2605(2) or 2602(3)(xiii)2605(3).
- (5) The post-approval proficiency requirements in ~~clauses 2602(3)(vi)2605(1) or 2602(3)(xiii)2605(2)~~ subsections 2605(1) or 2605(2) do not apply to a *Registered Representative* or *Investment Representative* approved prior to September 28, 2009 and registered in provinces or territories which allowed the *individual* to be restricted to only mutual funds, provided they remain in the same restricted category of approval in the same provinces/territories.
- (6) The approval of an *individual* qualified to deal only in mutual funds is automatically suspended if the *individual* fails to satisfy the post-approval requirements in ~~clauses 2602(3)(vi)2605(1) or 2602(3)(xiii)2605(2)~~ subsections 2605(1) or 2605(2) in accordance with subsections 2552(2) and 2552(3).

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2555. Approval of investors

- (1) Any investor who owns or holds a *beneficial ownership* interest in a *significant equity interest* in the *Dealer Member* or special warrants or other *securities* that are convertible into a *significant equity interest* in the *Dealer Member* must:
- (i) be approved by the *Corporation*, and
 - (ii) if applicable, meet the proficiency requirements of subsections 2555(2) and 2555(3).
- (2) A *Dealer Member's Director* who, directly or indirectly, owns or controls a voting interest of a *Dealer Member* of 10% or more must satisfy the proficiency requirements of sub-clause 2602(3)2603(1)(xxxiii)(j).
- (3) Any *individual*, other than a *Dealer Member's Director*, who:
- (i) is *actively engaged in the business of the Dealer Member*, and
 - (ii) directly or indirectly owns or controls a voting interest in a *Dealer Member* of 10% or more, must satisfy the proficiency requirements of sub-clause 2602(3)(xxxii) applicable to approved investors2603(1)(i)(j).

...

RULE 2600 | PROFICIENCY REQUIREMENTS AND EXEMPTIONS FROM PROFICIENCIES

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PART A - PROFICIENCY REQUIREMENTS

2602. Proficiency ~~requirements for Approved Persons and approved investors~~ principle

- (1) An *Approved Person* must not perform an activity that requires approval unless the *Approved Person* has satisfied the applicable proficiency requirements set out in Rule 2600 and has the education, ~~training and~~ experience and training that a reasonable person would consider necessary to perform the activity competently, including understanding the structure, features and risks of each *security, derivative and precious metals bullion* the *Approved Person* deals with, recommends or supervises.
- (2) The *Dealer Member* must ensure that an *individual* does not perform an activity that requires *Corporation* approval unless the *individual* has satisfied the applicable proficiency requirements set out in Rule 2600 and has the education, ~~training provided in accordance with section 1407 and~~ experience and training that a reasonable person would consider necessary to perform the activity competently, including understanding the structure, features and risks of each *security, derivative and precious metals bullion,* the *individual* deals with, recommends or supervises.

2603. Proficiency requirements prior to approval

- (31) Each applicant in an *Approved Person* ~~category or approved investor~~ category must meet the ~~proficiency requirements set out below for that category unless an exemption has been granted from the~~ applicable proficiency requirements prescribed below before the *Corporation* will grant approval. ~~Unless otherwise stated, the Canadian Securities Institute administers the courses and examinations noted below,~~ unless an exemption has been granted from the applicable requirements:

Registered Representative and Investment Representative
Registered Representative dealing with retail clients (other than a Registered Representative dealing in derivatives or only in mutual funds)
Registered Representative dealing with institutional clients (other than a Registered Representative dealing in derivatives or only in mutual funds)
Registered Representative dealing in options or similar derivatives with retail clients
Registered Representative dealing in options or similar derivatives with institutional clients
Registered Representative dealing in futures contracts, forward contracts, contracts for difference, futures contract options or similar derivatives with retail or institutional clients
Registered Representative dealing in mutual funds only who is an employee of a firm registered as an investment dealer and not registered as a mutual fund dealer
Registered Representative dealing in mutual funds only who is an employee of a firm registered as both an investment dealer and a mutual fund dealer
Investment Representative dealing with retail clients (other than an Investment Representative dealing in derivatives or only in mutual funds)
Investment Representative dealing with institutional clients (other than an Investment Representative dealing in derivatives or only in mutual funds)
Investment Representative dealing in options or similar derivatives with retail clients
Investment Representative dealing in options or similar derivatives with institutional clients

<ul style="list-style-type: none"> — <i>Investment Representative</i> dealing in futures contracts, forward contracts, contracts for difference, futures contract options or similar <i>derivatives</i> with <i>retail</i> or <i>institutional</i> clients
<ul style="list-style-type: none"> — <i>Investment Representative</i> dealing in mutual funds only who is an <i>employee</i> of a firm registered as an investment dealer and not registered as a mutual fund dealer
<p>Associate Portfolio Manager and Portfolio Manager</p>
<ul style="list-style-type: none"> — <i>Associate Portfolio Manager</i> providing discretionary portfolio management for <i>managed accounts</i>
<ul style="list-style-type: none"> — <i>Portfolio Manager</i> providing discretionary portfolio management for <i>managed accounts</i>
<p>Trader</p>
<ul style="list-style-type: none"> — <i>Trader</i>
<ul style="list-style-type: none"> — <i>Trader</i> on the Montréal Exchange
<p>Supervisor — Retail or Institutional</p>
<ul style="list-style-type: none"> — <i>Supervisor of Registered Representatives or Investment Representatives</i> (other than supervising <i>derivatives</i>)
<ul style="list-style-type: none"> — <i>Supervisor of Registered Representatives or Investment Representatives</i> dealing with clients in options or similar <i>derivatives</i>
<ul style="list-style-type: none"> — <i>Supervisor of Registered Representatives or Investment Representatives</i> dealing with clients in futures contracts, forward contracts, contracts for difference, futures contract options or similar <i>derivatives</i>
<p>Designated Supervisor</p>
<ul style="list-style-type: none"> — <i>Supervisor</i> designated to be responsible for the opening of new accounts and supervision of account activity
<ul style="list-style-type: none"> — <i>Supervisor</i> designated to be responsible for the supervision of <i>discretionary accounts</i>
<ul style="list-style-type: none"> — <i>Supervisor</i> designated to be responsible for the supervision of <i>managed accounts</i>
<ul style="list-style-type: none"> — <i>Supervisor</i> designated to be responsible for the supervision of option and similar <i>derivative</i> accounts
<ul style="list-style-type: none"> — <i>Supervisor</i> designated to be responsible for the supervision of futures contract, forward contract, contracts for difference, futures contract option and similar <i>derivative</i> accounts
<ul style="list-style-type: none"> — <i>Supervisor</i> designated to be responsible for the pre-approval of <i>advertising, sales literature</i> and <i>correspondence</i>
<ul style="list-style-type: none"> — <i>Supervisor</i> designated to be responsible for the supervision of <i>research reports</i>
<p>Executive and Director</p>
<ul style="list-style-type: none"> — <i>Executive</i> (including <i>Ultimate Designated Person</i>)
<ul style="list-style-type: none"> — <i>Director</i>
<ul style="list-style-type: none"> — <i>Chief Financial Officer</i>
<ul style="list-style-type: none"> — <i>Chief Compliance Officer</i>
<p>Approved investor</p>
<ul style="list-style-type: none"> — <i>Approved investor</i>

Approved Person category	Pre-approval requirements	Post-approval requirements	Experience and other proficiency-related requirements
Registered Representative and Investment Representative			
<p>(i) Registered Representative dealing with retail clients (other than a Registered Representative dealing in derivatives or only in mutual funds)</p>	<p>(a) (I) Either:</p> <p style="padding-left: 40px;">(A) Canadian Securities Course,</p> <p style="padding-left: 40px;">or,</p> <p style="padding-left: 40px;">(B) Level I or higher of the CFA Program administered by the CFA Institute,</p> <p>(II) Conduct and Practices Handbook Course,</p> <p style="padding-left: 40px;">and</p> <p style="padding-left: 40px;">(III) 90-day training program after completion of the requirements in paragraph 2602(3)(i)(a)(I),</p> <p>or,</p> <p>(b) If previously registered or approved with a recognized foreign regulatory organization in a similar capacity within three years before requesting approval, New Entrants Course.</p>	<p>(c) Completion of Wealth Management Essentials Course within 30 months after initial approval date as a Registered Representative in accordance with subsection 2552(2).</p>	<p>(d) Six months of supervision from initial approval date in accordance with section 3947.</p>
<p>(ii) Registered Representative dealing with institutional clients (other than a Registered Representative dealing in options, futures contracts and futures contract options or only in mutual funds)</p>	<p>(a) (I) Either:</p> <p style="padding-left: 40px;">(A) Canadian Securities Course,</p> <p style="padding-left: 40px;">or,</p> <p style="padding-left: 40px;">(B) Level I or higher of the CFA Program administered by the CFA Institute,</p> <p style="padding-left: 40px;">and,</p> <p>(II) Conduct and Practices Handbook Course,</p> <p>or,</p> <p>(b) If previously registered or approved with a recognized foreign regulatory organization in a similar capacity within three years before requesting approval, New Entrants Course.</p>		
<p>(iii) Registered Representative dealing in options or similar derivatives with retail clients</p>	<p>(a) (I) Requirements in sub-clause 2602(3)(i)(a),</p> <p style="padding-left: 40px;">and,</p> <p>(II) Either:</p>	<p>(c) Requirements in sub-clause 2602(3)(i)(c).</p>	<p>(d) Six months of supervision from initial approval date in accordance with section 3947.</p>

Approved Person category	Pre-approval requirements	Post-approval requirements	Experience and other proficiency-related requirements
	<p>(A) Derivatives Fundamentals Course and the Options Licensing Course,</p> <p>or,</p> <p>(B) Derivatives Fundamentals and Options Licensing Course,</p> <p>or,</p> <p>(b) If previously registered with the Financial Industry Regulatory Authority in a similar capacity and dealing in options or similar derivatives within three years before requesting approval:</p> <p>(I) New Entrants Course,</p> <p>(II) Securities Industry Essentials Exam administered by the Financial Industry Regulatory Authority,</p> <p>and,</p> <p>(III) Series 7 Exam administered by the Financial Industry Regulatory Authority.</p>		
<p>(iv) Registered Representative dealing in options or similar derivatives with institutional clients</p>	<p>(a) (I) Requirements in sub-clause 2602(3)(ii)(a),</p> <p>and,</p> <p>(II) Either:</p> <p>(A) Derivatives Fundamentals Course and the Options Licensing Course,</p> <p>or,</p> <p>(B) Derivatives Fundamentals and Options Licensing Course,</p> <p>or,</p> <p>(b) If previously registered with the Financial Industry Regulatory Authority in a similar capacity and dealing in options or similar derivatives within three years before requesting approval:</p> <p>(I) New Entrants Course,</p>		

Approved Person category	Pre-approval requirements	Post-approval requirements	Experience and other proficiency-related requirements
	<p>(II) Securities Industry Essentials Exam administered by the Financial Industry Regulatory Authority,</p> <p>and,</p> <p>(III) Series 7 Exam administered by the Financial Industry Regulatory Authority.</p>		
<p>(v) <i>Registered Representative dealing in futures contracts, forward contracts, contracts for difference, futures contract options or similar derivatives with retail clients or institutional clients</i></p>	<p>(a) Futures Licensing Course,</p> <p>(b) Conduct and Practices Handbook Course,</p> <p>and,</p> <p>(c) Any of the following:</p> <p>(I) Derivatives Fundamentals Course,</p> <p>(II) Derivatives Fundamentals and Options Licensing Course,</p> <p>or,</p> <p>(III) If previously registered with the National Futures Association in a similar capacity and dealing in futures contracts, forward contracts, contracts for difference, futures contract options or similar derivatives within three years before requesting approval, Series 3 Exam administered by the Financial Industry Regulatory Authority (on behalf of the National Futures Association).</p>		<p>(d) Six months of supervision from initial approval date for those dealing with <i>retail clients</i> in accordance with section 3947.</p>
<p>(vi) <i>Registered Representative dealing only in mutual funds who is an employee of a firm registered as an investment dealer and not registered as a mutual fund dealer</i></p>	<p>(a) (I) Any of the following:</p> <p>(A) Requirements in sub-paragraph 2602(3)(i)(a)(I)(A),</p> <p>(B) Canadian Investment Funds Course administered by the Investment Funds Institute of Canada,</p> <p>or,</p> <p>(C) Investment Funds in Canada Course.</p>	<p>(b) (I) Completion of the requirements in sub-paragraph 2602(3)(i)(a)(I)(A) and paragraph 2602(3)(i)(a)(II) within 270 days after initial approval date,</p> <p>and,</p>	<p>(c) The <i>individual</i> must upgrade to <i>Registered Representative</i> within 18 months of initial approval, and</p> <p>(d) Six months of supervision from initial approval date in accordance with section 3947.</p>

Approved Person category	Pre-approval requirements	Post-approval requirements	Experience and other proficiency-related requirements
		(II) Completion of the 90-day training program within 18 months after initial approval date in accordance with 2553(6).	
(vii) Registered Representative dealing only in mutual funds who is an employee of a firm registered as both an investment dealer and a mutual fund dealer	(a) (I) Any of the following: (A) Requirements in subparagraph 2602(3)(i)(a)(I)(A), (B) Canadian Investment Funds Course administered by the Investment Funds Institute of Canada, or, (C) Investment Funds in Canada Course.	(b) Completion of the 90-day training program within 90 days after initial approval in accordance with 2553(6).	(c) Six months of supervision from initial approval date in accordance with section 3947.
(viii) Investment Representative dealing with retail clients (other than an Investment Representative dealing in derivatives or only in mutual funds)	(a) (I) Either: (A) Canadian Securities Course, or, (B) Level I or higher of the CFA Program administered by the CFA Institute, (II) Conduct and Practices Handbook Course, and, (III) 30-day training program after completing the requirements in paragraph 2602(3)(viii)(a)(I), or, (b) If previously registered or approved with a recognized foreign regulatory organization in a similar capacity within three years before requesting approval, New Entrants Course.		(c) Six months of supervision from initial approval date in accordance with section 3947.
(ix) Investment Representative dealing with institutional clients (other than an Investment	(a) (I) Either: (A) Canadian Securities Course, or,		

Approved Person category	Pre-approval requirements	Post-approval requirements	Experience and other proficiency-related requirements
<i>Representative dealing in derivatives or dealing only in mutual funds)</i>	<p>(B) Level I or higher of the CFA Program administered by the CFA Institute,</p> <p>and,</p> <p>(II) Conduct and Practices Handbook Course,</p> <p>or,</p> <p>(b) If previously registered or approved with a <i>recognized foreign regulatory organization</i> in a similar capacity within three years before requesting approval, New Entrants Course.</p>		
(x) — Investment Representative dealing in options or similar derivatives with retail clients	<p>(a) (I) Requirements in sub-clause 2602(3)(viii)(a),</p> <p>and,</p> <p>(II) Either:</p> <p>(A) Derivatives Fundamentals Course and the Options Licensing Course,</p> <p>or,</p> <p>(B) Derivatives Fundamentals and Options Licensing Course,</p> <p>or,</p> <p>(b) If previously registered with the Financial Industry Regulatory Authority in a similar capacity and dealing in options or similar derivatives within three years before requesting approval:</p> <p>(I) New Entrants Course,</p> <p>(II) Securities Industry Essentials Exam administered by the Financial Industry Regulatory Authority,</p> <p>and,</p> <p>(III) Series 7 Exam administered by the Financial Industry Regulatory Authority.</p>		(c) Six months of supervision from initial approval date in accordance with section 3947.
(xi) — Investment Representative	(a) (I) Requirements in sub-clause 2602(3)(ix)(a),		

Approved Person category	Pre-approval requirements	Post-approval requirements	Experience and other proficiency-related requirements
<p>dealing in <i>options</i> or similar <i>derivatives</i> with <i>institutional clients</i></p>	<p>and, (II) Either: (A) Derivatives Fundamentals Course and the Options Licensing Course, or, (B) Derivatives Fundamentals and Options Licensing Course, or, (b) If previously registered with the Financial Industry Regulatory Authority in a similar capacity and dealing in options or similar derivatives within three years before requesting approval: (I) New Entrants Course, (II) Securities Industry Essentials Exam administered by the Financial Industry Regulatory Authority, and (III) Series 7 Exam administered by the Financial Industry Regulatory Authority.</p>		
<p>(xii) Investment Representative dealing in <i>futures contracts</i>, forward contracts, contracts for difference, <i>futures contract options</i> or similar <i>derivatives</i> with <i>retail clients</i> or <i>institutional clients</i></p>	<p>(a) Futures Licensing Course, (b) Conduct and Practices Handbook Course, and, (c) Any of the following: (I) Derivatives Fundamentals Course, (II) Derivatives Fundamentals and Options Licensing Course, or, (III) if previously registered with the National Futures Association in a similar capacity and dealing in futures contracts, forward contracts, contracts for difference, futures contract options or similar derivatives within three years before</p>		<p>(d) Six months of supervision from initial approval date for those dealing with retail clients in accordance with section 3947.</p>

Approved Person category	Pre-approval requirements	Post-approval requirements	Experience and other proficiency-related requirements
	requesting approval, Series 3 Exam administered by the Financial Industry Regulatory Authority (on behalf of the National Future Association).		
<p>(xiii) — Investment Representative dealing only in mutual funds who is an employee of a firm registered as an investment dealer and not registered as a mutual fund dealer</p>	<p>(a) — Any of the following:</p> <ul style="list-style-type: none"> (i) — Requirements in sub-paragraph 2602(3)(viii)(a)(i)(A), (ii) — Canadian Investment Funds Course administered by the Investment Funds Institute of Canada, <p>or,</p> <ul style="list-style-type: none"> (iii) — Investment Funds in Canada Course. 	<p>(b) — (i) — Completion of the requirements in sub-paragraph 2602(3)(viii)(a)(i)(A) and paragraph 2602(3)(viii)(a)(ii) within 270 days after initial approval date,</p> <p>and,</p> <p>(ii) — Completion of the 30-day training program within 18 months after initial approval date in accordance with 2553(6).</p>	<p>(c) — The individual must upgrade to Investment Representative within 18 months of initial approval, and</p> <p>(d) — Six months of supervision from initial approval date in accordance with section 3947.</p>
Associate Portfolio Manager and Portfolio Manager			
<p>(xiv) — Associate Portfolio Manager providing discretionary portfolio management for managed accounts</p>	<p>(a) — (i) — Conduct and Practices Handbook Course, and</p> <p>(ii) — Any of the following:</p> <ul style="list-style-type: none"> (A) — Canadian Investment Manager Designation, (B) — Chartered Investment Manager Designation, <p>or,</p> <ul style="list-style-type: none"> (C) — CFA Level I or higher of the CFA Program administered by the CFA Institute, <p>or,</p>		<p>(d) — Two years of relevant investment management experience acceptable to the Corporation within three years before requesting approval.</p>

Approved Person category	Pre-approval requirements	Post-approval requirements	Experience and other proficiency-related requirements
	<p>(b) If managing options or similar derivative accounts:</p> <p>(I) Requirements in sub-clause 2602(3)(xiv)(a),</p> <p>and,</p> <p>(II) Either:</p> <p>(A) Requirements in paragraph 2602(3)(iii)(a)(II),</p> <p>or,</p> <p>(B) Requirements in sub-clause 2602(3)(iii)(b),</p> <p>or,</p> <p>(c) If managing futures contract, forward contract, contracts for difference, futures contract option or similar derivative accounts:</p> <p>(I) Requirements in sub-clause 2602(3)(xiv)(a),</p> <p>(II) Requirements in sub-clause 2602(3)(v)(a),</p> <p>and,</p> <p>(III) Requirements in sub-clause 2602(3)(v)(c).</p>		
<p>(xv) — Portfolio Manager providing discretionary portfolio management for managed accounts</p>	<p>(a) (I) Conduct and Practices Handbook Course,</p> <p>and,</p> <p>(II) Any of the following:</p> <p>(A) Canadian Investment Manager Designation,</p> <p>(B) Chartered Investment Manager Designation,</p> <p>or,</p> <p>(C) CFA Charter administered by the CFA Institute,</p> <p>or,</p> <p>(b) If managing options or similar derivative accounts:</p>		<p>(d) If Canadian Investment Manager Designation or Chartered Investment Manager Designation is completed at least four years of relevant investment management experience, one year of which was gained within the three years before requesting approval acceptable to the Corporation,</p>

Approved Person category	Pre-approval requirements	Post-approval requirements	Experience and other proficiency-related requirements
	<p>(I) Requirements in sub-clause 2602(3)(xv)(a), and, (II) Either: (A) Requirements in paragraph 2602(3)(iii)(a)(II), or, (B) Requirements in sub-clause 2602(3)(iii)(b), or, (c) If managing futures contract, forward contract, contracts for difference, futures contract option or similar derivative accounts: (I) Requirements in sub-clause 2602(3)(xv)(a), (II) Requirements in sub-clause 2602(3)(v)(a), and, (III) Requirements in sub-clause 2602(3)(v)(c).</p>		<p>or, (e) If CFA Charter is completed, at least one year of relevant investment management experience within the three years before requesting approval acceptable to the Corporation.</p>
Trader			
{xvi} Trader	(a) Trader Training Course, unless otherwise determined by the marketplace on which the Trader will be trading.		
{xvii} Trader on the Montréal Exchange	(a) Proficiency requirements determined to be acceptable by the Montréal Exchange.		
Supervisor – Retail or Institutional			
{xviii} Supervisor of Registered Representatives or Investment Representatives (other than supervising derivatives)	<p>(a) Investment Dealer Supervisors Course, and, (b) (I) Either: (A) Canadian Securities Course, or, (B) CFA Level I or higher of the CFA Program administered by the CFA Institute, and, (II) Conduct and Practices Handbook Course, or,</p>		<p>(d) Two years of relevant experience working for an investment dealer, (e) Two years of relevant experience working for a Mutual Fund Dealer Member, portfolio manager, or an entity governed by a recognized foreign regulatory organization,</p>

Approved Person category	Pre-approval requirements	Post-approval requirements	Experience and other proficiency-related requirements
	<p>(c) If previously registered or approved with a <i>recognized foreign regulatory organization</i> within three years before requesting approval and as an alternative to sub-clause 2602(3)(xviii)(b), New Entrants Course</p>		<p>or, (f) Such other equivalent experience acceptable to the Corporation.</p>
<p>(xix) Supervisor of Registered Representatives or Investment Representatives dealing with clients in options or similar derivatives</p>	<p>(a) Options Supervisors Course, and, (b) (I) Conduct and Practices Handbook Course, and, — (II) Either: (A) Derivatives Fundamentals Course and the Options Licensing Course, or, (B) Derivatives Fundamentals and Options Licensing Course, or, (c) If previously registered with the Financial Industry Regulatory Authority and dealing in <i>options</i> or similar <i>derivatives</i> within three years before requesting approval: (I) New Entrants Course, and (II) Securities Industry Essentials Exam administered by the Financial Industry Regulatory Authority, and (III) Series 7 Exam administered by the Financial Industry Regulatory Authority.</p>		<p>(d) Two years of relevant experience working for an investment dealer, (e) Two years of relevant experience working for a Mutual Fund Dealer Member, portfolio manager, or an entity governed by a <i>recognized foreign regulatory organization</i>, or, (f) Such other equivalent experience acceptable to the Corporation.</p>
<p>(xx) Supervisor of Registered Representatives or Investment Representatives dealing with clients in futures</p>	<p>(a) Canadian Commodity Supervisors Exam, and, (b) (I) Futures Licensing Course, (II) Conduct and Practices Handbook Course,</p>		<p>(c) Two years of relevant experience working for an investment dealer, (d) Two years of relevant experience working for a</p>

Approved Person category	Pre-approval requirements	Post-approval requirements	Experience and other proficiency-related requirements
contracts, forward contracts, contracts for difference, futures contract options or similar derivatives	and, (III) Any of the following: (A) Derivatives Fundamentals Course, (B) Derivatives Fundamentals and Options Licensing Course, or, (C) If previously registered with National Futures Association dealing in futures contracts, forward contracts, contract for difference, futures contract options or similar derivatives within three years before requesting approval, the Series 3 Exam administered by the Financial Industry Regulatory Authority (on behalf of the National Futures Association)		Mutual Fund Dealer Member, portfolio manager or an entity governed by a recognized foreign regulatory organization, or, (e) Such other equivalent experience acceptable to the Corporation.
Designated Supervisor			
(xxi) Supervisor designated to be responsible for the opening of new accounts and account supervision and activity related policies and procedures	(a) Investment Dealer Supervisors Course.		(b) Two years of relevant experience working for an investment dealer, (c) Two years of relevant experience working for a Mutual Fund Dealer Member, portfolio manager, or an entity governed by a recognized foreign regulatory organization, or, (d) Such other equivalent experience acceptable to the Corporation.
(xxii) Supervisor designated to be responsible for	(a) Investment Dealer Supervisors Course.		(b) Two years of relevant experience

Approved Person category	Pre-approval requirements	Post-approval requirements	Experience and other proficiency-related requirements
<p>the supervision of <i>discretionary accounts</i></p>			<p>working for an investment dealer, (c) Two years of relevant experience working for a Mutual Fund Dealer Member, portfolio manager or an entity governed by a <i>recognized foreign regulatory organization</i>, or, (d) Such other equivalent experience acceptable to the Corporation.</p>
<p>(xxiii) Supervisor designated to be responsible for the supervision of <i>managed accounts</i></p>	<p>(a) Investment Dealer Supervisors Course, and, (b) Any of the following: (i) Canadian Investment Manager Designation, (ii) Chartered Investment Manager Designation, or (iii) CFA Charter administered by the CFA Institute (c) If supervising <i>options and similar derivative accounts</i>: (i) Requirements in sub-clauses 2602(3)(xxiii)(a) and 2602(3)(xxiii)(b), and, (ii) Requirements in clause 2602(3)(xxiv), (d) If supervising futures contract, forward contract, contracts for difference, futures contract option and similar <i>derivative accounts</i>: (i) Requirements in sub-clauses 2602(3)(xxiii)(a) and 2602(3)(xxiii)(b), and,</p>		<p>(e) Two years of relevant experience working for an investment dealer, (f) Two years of relevant experience working for a portfolio manager or an entity governed by a <i>recognized foreign regulatory organization</i>, or, (g) Such other equivalent experience acceptable to the Corporation.</p>

Approved Person category	Pre-approval requirements	Post-approval requirements	Experience and other proficiency-related requirements
	(II) Requirements in clause 2602(3)(xxv).		
(xxiv) Supervisor designated to be responsible for the supervision of option and similar derivative accounts	(a) Options Supervisors Course, and (b) Any of the following: (i) Derivatives Fundamentals Course and the Options Licensing Course, (ii) Derivatives Fundamentals and Options Licensing Course, or, (iii) If previously registered with the Financial Industry Regulatory Authority dealing in options within three years before requesting approval: (A) New Entrants Course, (B) Securities Industry Essentials Exam administered by the Financial Industry Regulatory Authority, and, (C) Series 7 Exam administered by the Financial Industry Regulatory Authority.		(c) Two years of relevant experience working for an investment dealer, (d) Two years of relevant experience working for a Mutual Fund Dealer Member, portfolio manager, or an entity governed by a recognized foreign regulatory organization, or, (e) Such other equivalent experience acceptable to the Corporation.
(xxv) Supervisor designated to be responsible for the supervision of futures contract, forward contract, contract for difference, futures contract option and similar derivative accounts	(a) Canadian Commodity Supervisors Exam, (b) Futures Licensing Course, and, (c) Any of the following: (i) Derivatives Fundamentals Course, (ii) Derivatives Fundamentals and Options Licensing Course, or, (iii) If previously registered with the National Futures Association and dealing in futures within three years before requesting approval, the Series 3 Exam administered by the Financial Industry Regulatory Authority (on behalf of the National Futures Association).		(d) Two years of relevant experience working for an investment dealer, (e) Two years of relevant experience working for a Mutual Fund Dealer Member, portfolio manager, or an entity governed by a recognized foreign regulatory organization, or, (f) Such other equivalent experience

Approved Person category	Pre-approval requirements	Post-approval requirements	Experience and other proficiency-related requirements
			acceptable to the Corporation.
(xxvii) Supervisor designated to be responsible for the pre-approval of advertising, sales literature and correspondence	(a) Investment Dealer Supervisors Course.		(b) Two years of relevant experience working for an investment dealer, (c) Two years of relevant experience working for a Mutual Fund Dealer Member, portfolio manager, or an entity governed by a recognized foreign regulatory organization, or, (d) Such other equivalent experience acceptable to the Corporation.
(xxvii) Supervisor designated to be responsible for the supervision of research reports	(a) Conduct and Practices Handbook Course, and, (b) Any of the following: (i) CFA Level II or higher of the CFA Program administered by the CFA Institute, (ii) Partners, Directors and Senior Officers Course, (iii) Investment Dealer Supervisors Course, or (iv) If previously registered with the Financial Industry Regulatory Authority within three years before requesting approval: (A) Securities Industry Essentials Exam and Series 86/87 Exam administered by the Financial Industry Regulatory Authority, or,		(c) Two years of relevant experience working for an investment dealer or registered advisor, (d) Two years of relevant experience working for an entity governed by a recognized foreign regulatory organization, or, (e) Such other equivalent experience acceptable to the Corporation.

Approved Person category	Pre-approval requirements	Post-approval requirements	Experience and other proficiency-related requirements
	(B) Series 16 Exam administered by the Financial Industry Regulatory Authority.		
Executive and Director			
(xxviii) Executive (including Ultimate Designated Person)	(a) Partners, Directors and Senior Officers Course.		(b) Experience in accordance with subsection 2503(2), if applicable.
(xxix) Director	(a) Partners, Directors and Senior Officers Course.		(b) Experience in accordance with clause 2502(2)(iii), if applicable.
(xxx) Chief Financial Officer	(a) Partners, Directors and Senior Officers Course, and, (b) Chief Financial Officers Qualifying Examination.		(c) A financial accounting designation, finance related university degree or diploma or equivalent work experience as may be acceptable to the Corporation.
(xxxi) Chief Compliance Officer	(a) Partners, Directors and Senior Officers Course, and, (b) Chief Compliance Officers Qualifying Examination.		(c) Five years working for an investment dealer or registered advisor, with at least three years in a compliance or supervisory capacity, or, (d) Three years providing professional services in the securities industry, with at least 12 months experience working at an investment dealer or registered advisor in a compliance or supervisory capacity.

Approved Person category	Pre-approval requirements	Post-approval requirements	Experience and other proficiency-related requirements
Approved investor			
(xxxii) Approved investor (under subsections 2555(2) and 2555(3))	(a) Partners, Directors and Senior Officers Course.		

2603

- (i) An applicant for approval, who is eligible to complete a prescribed exam, must at a minimum successfully complete the following before the Corporation will grant approval in the following categories:
- (a) Investment Representative dealing with securities: Canadian Investment Regulatory Exam
 - (b) Investment Representative dealing with derivatives: Canadian Investment Regulatory Exam and Derivatives Exam,
 - (c) Registered Representative (retail) dealing with securities: Canadian Investment Regulatory Exam and Retail Securities Exam,
 - (d) Registered Representative (retail) dealing with derivatives: Canadian Investment Regulatory Exam and Retail Securities Exam and Derivatives Exam,
 - (e) Registered Representative (institutional) dealing with securities: Canadian Investment Regulatory Exam and Institutional Securities Exam,
 - (f) Registered Representative (institutional) dealing with derivatives: Canadian Investment Regulatory Exam and Institutional Securities Exam and Derivatives Exam,
 - (g) Associate Portfolio Manager: Level 1 of the Chartered Financial Analyst (CFA) program administered by the CFA Institute, or either the Canadian Investment Manager Designation or the Chartered Investment Manager Designation (CIM®) administered by CSI Global Education Inc., and
 - (l) If managing accounts with derivatives, the Derivatives Exam,
 - (h) Portfolio Manager: a CFA Charter administered by the CFA Institute, or either the Canadian Investment Manager Designation or the Chartered Investment Manager Designation (CIM®) administered by CSI Global Education Inc., and
 - (l) If managing accounts with derivatives, the Derivatives Exam,
 - (i) Supervisor: Supervisor Exam, and
 - (l) If supervising trading in, or accounts for those who trade in securities, derivatives, or managed accounts, the exam requirements applicable to the

individuals being supervised listed in sub-clauses 2603(1)(i)(a) to (f), and (h) except:

(A) the Canadian Investment Regulatory Exam is not required if the Supervisor satisfies the experience requirements in sub-clause 2603(1)(ii)(d),

(j) Director, where required in section 2502: Director and Executive Exam,

(k) Ultimate Designated Person and Executive other than those in sub-clause 2603(1)(i)(l) or (m): Director and Executive Exam,

(l) Chief Compliance Officer: Chief Compliance Officer Exam,

(m) Chief Financial Officer: Chief Financial Officer Exam,

(n) Trader: Trader Exam in addition to any exam mandated by the applicable marketplace.

(ii) An applicant for approval must have the following minimum education or experience before the Corporation will grant approval in the following categories:

(a) Registered Representative: A relevant diploma or degree from an accredited post secondary institution, or minimum four years of relevant experience acceptable to the Corporation,

(b) Associate Portfolio Manager: Minimum two years of relevant investment management experience acceptable to the Corporation within three years prior to the date of application for approval,

(c) Portfolio Manager:

(I) If Canadian Investment Manager Designation or Chartered Investment Manager Designation (CIM®) is completed, at least four years of relevant investment management experience acceptable to the Corporation, of which one year was gained within the three years prior to the date of application for approval,

(II) If CFA Charter is completed, at least one year of relevant investment management experience acceptable to the Corporation within the three years prior to the date of application for approval,

(d) Supervisor: Minimum two years of relevant experience acceptable to the Corporation,

(e) Ultimate Designated Person and Executive: Minimum two years of relevant experience acceptable to the Corporation,

(f) Chief Compliance Officer:

(I) Five years working for an investment dealer or registered advisor, or affiliated Financial Industry Regulatory Authority (FINRA) dealer, with at least three years in a compliance or supervisory capacity, or

(II) Three years providing professional services in the securities industry, with at least 12 months experience working at an investment dealer or registered advisor in a compliance or supervisory capacity,

(g) Chief Financial Officer:

(l) A financial accounting designation, finance related university degree or diploma or equivalent work experience as may be acceptable to the Corporation.

2604. Post-approval proficiency requirements

(1) Dealer Member training

(i) A Dealer Member must, as prescribed by the Corporation, provide training to its Registered Representatives and Investment Representatives within 90 days after approval considering the type of client and product the Approved Person will be dealing with, and

(a) The Dealer Member must notify the Corporation of completion of the training within 90 days after approval.

(ii) A Dealer Member who sponsors an Approved Person must ensure that the individual has received the appropriate training relevant for its business type including its client and product type to ensure compliance with the proficiency principle in section 2602.

(a) A Dealer Member may permit an Approved Person to apply on-going training to meet prescribed continuing education requirements.

(iii) In addition to any training prescribed in Rule 2600, a Dealer Member must provide on-going training to its Approved Persons on compliance with Corporation requirements, securities laws, and applicable laws including, without limitation, the obligations relating to conflicts of interest, know-your-client, account appropriateness, product due diligence, know-your-product, and suitability determination.

(a) A Dealer Member may permit an Approved Person to apply on-going training to meet prescribed continuing education requirements.

(iv) The Dealer Member must keep a record of all training provided, as prescribed in Rule 2600, and provide the record to the Corporation on request to demonstrate compliance with the proficiency principle.

(2) Conduct training

(i) Each Approved Person must complete the conduct training prescribed by the Corporation within 30 days after approval, and

(a) The Dealer Member must notify the Corporation of completion of the training within 30 days after approval.

(ii) Each Approved Person not captured by (i), approved as of the date of these Rules, must complete the conduct training prescribed by the Corporation by no later than December 31, 2026, and

(a) The Dealer Member must notify the Corporation of completion of the training by no later than December 31, 2026.

2605. ~~Permitted activities of mutual~~ Mutual funds only Registered Representatives and Investment

Representatives

~~(1)~~

(1) An applicant for approval, or an *individual* approved as a *Registered Representative* dealing only in mutual funds who is an *employee* of a firm registered as an investment dealer and not registered as a mutual fund dealer must:

(i) Complete any of the following prior to approval:

(a) Requirements in sub-clause 2603(1)(i)(c),

(b) The Canadian Securities Course administered by CSI Global Education Inc.,

(c) Canadian Investment Funds Course administered by the IFSE Institute, or

(d) Investment Funds in Canada Course administered by CSI Global Education Inc.

(ii) Complete the requirements in sub-clause 2603(1)(i)(c) and clause 2604(2)(i) within 270 days of approval.

(iii) Complete the training requirement in clause 2604(1)(i) within 18 months after initial approval date, notwithstanding the timeline set out in clause 2604(1)(i).

(iv) Upgrade within 18 months of initial approval.

(2) An applicant for approval or an *individual* approved as an *Investment Representative* dealing only in mutual funds who is an *employee* of a firm registered as an investment dealer and not registered as a mutual fund dealer must:

(i) Complete any of the following prior to approval:

(a) Requirements in sub-clause 2603(1)(i)(a),

(b) The Canadian Securities Course administered by CSI Global Education Inc.,

(c) Canadian Investment Funds Course administered by the IFSE Institute, or

(d) Investment Funds in Canada Course administered by CSI Global Education Inc.

(ii) Complete the requirements in sub-clause 2603(1)(i)(a) and clause 2604(2)(i) within 270 days of approval.

(iii) Complete the training requirement in clause 2604(1)(i) within 18 months after initial approval date, notwithstanding the timeline set out in clause 2604(1)(i).

(iv) Upgrade within 18 months of initial approval.

(3) An applicant for approval, or an *individual* approved as a *Registered Representative* dealing only in mutual funds who is an *employee* of a firm registered as both an investment dealer and a mutual fund dealer must:

(i) Complete any of the following prior to approval:

(a) The Canadian Securities Course administered by CSI Global Education Inc.,

(b) Canadian Investment Funds Course administered by the IFSE Institute, or

(c) Investment Funds in Canada Course administered by CSI Global Education Inc.

(ii) Complete the training requirement in clause 2604(1)(i) within 90 days after initial approval date.

(4) An applicant for approval, or an *individual* approved, as a *Registered Representative* dealing in mutual funds only, or an *Investment Representative* dealing in mutual funds only, will be also permitted to trade in exchange-traded funds that meet the definition of a mutual fund provided the *individual*:

- (i) was permitted to trade in exchange-traded funds within the 90 days prior to these Rules coming into effect, or
- (ii) complies with the relevant proficiency requirements in ~~clauses 2602(3)(vi), 2602(3)(vii) and 2602(3)(xiii)~~ subsections 2605(1), 2605(2) or 2605(3), and has successfully completed one of the following within the timeline prescribed in subsection 2628(1):
 - (a) the ETFs for Mutual Fund Representatives course administered by CSI Global Education Inc., or
 - (b) the Exchange Traded Funds ~~course~~ Course administered by the ~~Investment Funds~~ IFSE Institute ~~of Canada~~, or
 - (c) the Exchange Traded Funds for ~~Mutual Fund~~ Representatives of Mutual Fund Dealers course administered by the Smarten Up Institute.

~~(2) — An applicant for approval, or an individual approved, as a Registered Representative dealing in mutual funds only, or an Investment Representative dealing in mutual funds only, will be also permitted to trade in exempt market products provided the individual:~~

- ~~(i) — was permitted to trade in exempt market products within the 90 days prior to these Rules coming into effect, or~~
- ~~(ii) — complies with the relevant proficiency requirements in clauses 2602(3)(vi), 2602(3)(vii) and 2602(3)(xiii), and has successfully completed one of the following within the timeline prescribed in subsection 2628(1):~~
 - ~~(a) — the Exempt Markets Proficiency Course administered by the IFSE Institute, or~~
 - ~~(b) — the Canadian Securities Course, or~~
 - ~~(c) — Level I or any higher level of the CFA Program administered by the CFA Institute.~~

~~(3)~~ (3.5) The following terms have the meaning set out below when used in subsection ~~2603(4)~~ 2605(6):

<i>“alternative mutual fund”</i>	The same meaning as the definition in National Instrument 81-102, <i>Investment Funds</i> .
<i>“bridge course”</i>	Either: <ul style="list-style-type: none"> (i) the Investing in Alternative Mutual Funds and Hedge Funds course administered by the IFSE Institute, or (ii) the Hedge Funds and Liquid Alternatives for Mutual Fund Representatives course administered by CSI Global Education Inc.

~~(4) — An applicant for approval, or an individual approved, as a Registered Representative dealing in mutual funds only, or an Investment Representative dealing in mutual funds only, 6) An applicant for approval, or an individual approved, as a Registered Representative dealing in mutual funds only, or an Investment Representative dealing in mutual funds only, will be also permitted to trade in alternative mutual funds provided the individual:~~

- (i) was permitted to trade in alternative mutual funds within the 90 days prior to these Rules coming into effect, or
- (ii) complies with the relevant proficiency requirements in ~~clauses 2602(3)(vi), 2602(3)(vii) and 2602(3)(xiii)~~ subsections 2605(1), 2605(2) or 2605(3), and has successfully completed one of the following within the timeline prescribed in subsection 2628(1):

- (a) the *bridge course*, ~~or~~
- (b) the Derivatives Fundamentals Course administered by CSI Global Education Inc., ~~or~~
- (c) the Canadian Securities Course administered by CSI Global Education Inc., or
- (d) the courses required to be registered as a Portfolio Manager – Advising Representative pursuant to section 3.11 of National Instrument 31-103, *Registration Requirement*~~Requirements~~, *Exemptions and Ongoing Registrant Obligations*.

~~2604~~2606. – 2624. Reserved.

PART B - EXEMPTIONS FROM PROFICIENCY REQUIREMENTS

2625. Specific exemptions

- (1) ~~A Chief Compliance Officer~~An applicant seeking approval as a *Supervisor* ~~of a producing Supervisor~~ is exempt from the proficiencies required under 2602(3)(xviii) for the purposes of being approved in this capacity, if the ~~producing Supervisor~~ is an *Approved Person* who is:
 - ~~(i) a Supervisor of a Registered Representative or Investment Representative and~~
 - ~~(ii) actively engaged as a Registered Representative dealing with retail clients.~~
- ~~(2) An applicant seeking approval as a Supervisor~~ in relation to activities of *individuals* approved to deal in mutual funds only, including those in ~~subsections 2603(1) and 2603(2)~~,subsection 2605(4) is exempt from the pre-approval ~~course~~exam requirements in ~~clauses 2602(3)(xviii) and 2602(3)(xxi)~~clause 2603(1)(i) provided the *individual*:
 - (i) was designated by a member of the Mutual Fund Dealers Association of Canada as a branch manager, within 90 days prior to these Rules coming into effect, or
 - (ii) has successfully completed the following within the timelines prescribed in subsection 2628(1):
 - (a) instead of the ~~Canadian Securities Course~~, either the:
 - ~~(i) Canadian Investment Funds Course administered by the Investment Funds Institute of Canada, or~~
 - ~~(ii) Investment Funds in Canada Course.~~
 - ~~(b) instead of the Investment Dealers Supervisors Course~~applicable requirements described in paragraph 2603(1)(i)(i)(I), either the:
 - (I) Canadian Investment Funds Course administered by the IFSE Institute, or
 - (II) Investment Funds in Canada Course administered by CSI Global Education Inc.
 - ~~(b) instead of the Supervisor Exam~~, either the:
 - (I) Mutual Fund Branch Managers' Examination Course administered by the Investment Funds~~IFSE~~ Institute of Canada, or
 - (II) Branch Compliance Officers Course administered by CSI Global Education Inc.

~~(32)~~ ~~With the exception of Any individuals who were required to transition to the Portfolio Manager and Associate Portfolio Manager approval categories, individuals~~ approved prior to December 31, ~~2021~~2025, are exempt from any new proficiency requirements ~~introduced as at December 31, 2021~~, other than the requirements in subsection ~~2602(3)~~2604(2), introduced as of January 1, 2026, in Rule 2600, provided the *Approved Person* continues in the same role.

(i) Notwithstanding subsection 2625(2), an applicant for approval is not required to complete the Canadian Investment Regulatory Exam prescribed in subsection 2603(1) if the individual has minimum two years of prior experience in the same Approved Person category within three years prior to the date of application for approval and satisfies other prescribed requirements under sections 2603 and 2604 for their category of approval.

(3) Any Approved Person who would be required to complete the Derivatives Exam under Rule 2600 pursuant to subsection 2603(1), and who is exempt from such requirement pursuant to subsection 2625(2), may only deal in, as applicable, legacy options or futures contract, futures contract options, and must ensure that the scope of their permitted activities are clear in all their communication and in all their dealings.

...

2627. Exemptions from completing the required courses

~~(1) — As set out in the table below, an~~exams

(1) An applicant for approval is exempt from writing the Canadian Investment Regulatory Exam if they satisfy the following:

(i) previously registered with FINRA in a similar capacity within three years prior to the date of application for approval, and have completed the applicable FINRA requirements for that registration category.

(2) An applicant ~~or Approved Person~~for approval is exempt from ~~completing a required course~~writing the Derivatives Exam if they satisfy the following:

(i) previously registered and dealing in options and futures with FINRA and the National Futures Association (NFA) within three years prior to the date of application for approval, and

(ii) completed the Series 3 and Series 7 exams offered by FINRA.

(3) An applicant ~~meets the applicable exemption criteria~~for approval is exempt from writing the Canadian Investment Regulatory Exam and the Retail Securities Exam and Institutional Securities Exam if the applicant has satisfied the requirements in sub-clauses 2603(1)(i)(g) or (h) applicable to *Associate Portfolio Managers* or *Portfolio Managers* respectively.

Required course	Course required for exemption	Exemption criteria
(i)(a) 90-day Training Program	(b) none	(c) Request approval within three years of being approved or registered in a capacity allowing trading of, or advising in, securities for <i>retail clients</i> either:

Required course	Course required for exemption	Exemption criteria
		(I) by a <i>recognized foreign regulatory organization</i> , or (II) as an advising representative or associate advising representative by a <i>Canadian securities regulatory authority</i>
(ii)(a) 30-day Training Program	(b) none	(c) Request approval within three years of being approved or registered in a capacity allowing trading of, or advising in, securities for <i>retail clients</i> either: (I) by a <i>recognized foreign regulatory organization</i> , or (II) as an advising representative or associate advising representative by a <i>Canadian securities regulatory authority</i>

2628. Course Exam validity and exemptions from rewriting or repeating courses

~~(1) — Courses are valid for~~

(1) An individual is deemed to have successfully completed an exam if:

(i) the individual successfully completed the prescribed exam within three years from prior to the date of successful completion.

~~(2) — An applicant application for approval must rewrite or repeat a course if the applicant has not been,~~

(ii) the individual who successfully completed the prescribed exam was previously approved in at the same *Approved Person* category listed in subsection 2602(3) or registered by a *Canadian securities regulatory authority* in a similar, or another category requiring which required the coursesame exam, within three years prior to the last three years.

~~(3) — The courses and examinations listed in Rule 2600 includes every prior and successor course or examination, provided that they do not have a significantly reduced scope and content, as determined by the Corporation. date of application for approval, or~~

(iii) the individual who successfully completed the prescribed exam gained one year of relevant securities industry experience, acceptable to the Corporation, within three years prior to the date of application for approval.

- (42) For the purposes of determining course exam validity, an *Approved Person* is not considered to have been approved during any period in which the *Approved Person's* approval was suspended or the *individual* was otherwise not conducting any activities requiring *Corporation* approval on behalf of the *Dealer Member*.
- (53) The validity periods do not apply to the Canadian Investment Manager Designation, the Chartered Investment Manager Designation (CIM®) and the CFA Charter provided the holders of these designations continue to have the right to use the designation and the designation has not been revoked or otherwise restricted.

2629. Transition from courses prescribed prior to January 1, 2026

- (61) An *individual* is exempt from ~~rewriting or repeating the courses as set out in the table below if the *individual* has met the current status criteria and exemption criteria.~~ the requirements in section 2603 if all of the following apply:

Course	Individual's current status	Exemption criteria
(i)(a) Partners, Directors and Senior Officers Course	(b) has previously been approved as an <i>officer</i> (prior to September 28, 2009) and surrendered registration with the introduction of the <i>Corporation</i> approval category of <i>Executive</i>	(c) applicant for approval who has maintained continuous employment with a <i>Dealer Member</i> in a senior capacity and remained in the corporate registry of a <i>Dealer Member</i> as an <i>officer</i> since September 28, 2009
(ii)(a) Chief Financial Officers Qualifying Examination	(b) has never been approved as a <i>Chief Financial Officer</i>	(c) applicant for approval has demonstrated to the <i>Corporation's</i> satisfaction that the applicant has been working closely with and assisting the <i>Chief Financial Officer</i> since the completion of the Chief Financial Officers Qualifying Examination
(iii)(a) Derivatives Fundamentals Course	(b) an applicant for approval or <i>Approved Person</i> who will be dealing with clients in <i>futures contracts, forward contracts, contracts for difference, futures contract options</i> or similar <i>derivatives</i> supervising <i>Approved Persons</i> who deal with such clients	(c) applicant seeking approval or filing a notice within three years of passing the Futures Licensing Course or the Canadian Commodity Supervisors Exam
(iv)(a) Derivatives Fundamentals Course	(b) an applicant for approval or an <i>Approved Person</i> dealing with clients, in <i>options</i> or similar	(c) applicant seeking approval or filing a notice within three years of completing the Options Licensing

Course	Individual's current status	Exemption criteria
	<i>derivatives, or supervising Approved Persons who deal with such clients</i>	Course or the Options Supervisors Course
(v)(a) Derivatives Fundamentals and Options Licensing Course	(b) an applicant for approval or an <i>Approved Person</i> dealing with clients, in options, or supervising <i>Approved Persons</i> who deal with such clients	(c) applicant seeking approval or filing a notice within three years of completing the Options Licensing Course
(vi)(a) Wealth Management Essentials Course	(b) an applicant for approval or <i>Approved Person</i> who will be dealing with <i>retail clients</i> in securities	(c) applicant seeking approval or filing a notice within three years of completing all three levels of the CFA Program or the CFA Charter administered by the CFA Institute which continues to be in good standing
(vii)(a) 90-day Training Program	(b) an applicant for approval or <i>Approved Person</i>	(c) applicant seeking approval or filing a notice within three years of being approved or registered in a capacity allowing trading of, or advising in, securities for <i>retail clients</i> either: (I) by a <i>recognized foreign regulatory organization</i> , -or (II) as an advising representative or associate advising representative by a <i>securities regulatory authority</i>

2629.—Reserved

- (i) the individual enrolls in a course offered by CSI Global Education Inc. prescribed under the rules prior to January 1, 2026,
- (ii) the individual successfully completes the course and its exam prior to January 1, 2027,
- (iii) the individual would satisfy the proficiency requirements applicable to the same approval category prior to January 1, 2026, upon completion of the course completed in clause (ii), and
- (iv) the sponsoring Dealer Member submits an application for approval for the individual, prior to January 1, 2027.

(2) If an individual is required to complete the Wealth Management Essentials (WME) course as of December 31, 2025, the individual may complete either of the following:

(i) WME by earlier of December 31, 2026, or the required completion date prescribed under the rules that were in effect prior to January 1, 2026, or

(ii) Retail Securities Exam by the required completion date prescribed under the rules that were in effect prior to January 1, 2026.

2630. Transition of Advising Representatives and Associate Advising Representatives into the Portfolio Manager and Associate Portfolio Manager approval category

(1) An individual registered as an advising representative or associate advising representative by a securities regulatory authority within the 90 days prior to the date of application as a *Portfolio Manager* or *Associate Portfolio Manager* has ~~three months~~90 days after the date of approval by the Corporation to complete the ~~Conduct and Practices Handbook Course~~conduct training in clause 2604(2)(i), and

~~(2) The Corporation will:~~

~~(i) automatically suspend the approval of the *Portfolio Manager* or *Associate Portfolio Manager* if he or she does not complete the Conduct and Practices Handbook Course within the timeframe set out in 2630(1), and~~

~~(ii) reinstate the *Portfolio Manager* or *Associate Portfolio Manager* once he or she has successfully completed the Conduct and Practices Handbook Course and has notified the Corporation~~

(i) The Dealer Member must notify the Corporation of completion of the training within 90 days after approval.

...

RULE 2700 | CONTINUING EDUCATION REQUIREMENTS FOR APPROVED PERSONS

...

PART A - THE CONTINUING EDUCATION PROGRAM AND CONTINUING EDUCATION REQUIREMENTS

2703. The continuing education program

(1) The *continuing education program* consists of ~~two~~three parts:

(i) a compliance course requirement, which is training covering ethical issues, regulatory developments and rules governing investment dealer conduct, ~~and~~

(ii) a professional development course requirement, which is training that fosters learning and development in areas relevant to investment dealer business, and

(iii) mandated annual continuing education training specifically prescribed by the Corporation which may satisfy clauses (i) or (ii) above as prescribed by the Corporation.

...

2704. Continuing education requirements

- (1) In each *continuing education program* cycle, a *continuing education participant* must meet the continuing education requirements for the applicable *Approved Person* category, regardless of product type, as set out in the following table.

Approved Person Category	Client Type	Compliance course requirement	Professional development <u>course</u> requirement
<i>Registered Representative</i>	<i>retail client</i>	Yes	Yes
<i>Registered Representative</i>	<i>institutional client</i>	Yes	No
<i>Investment Representative</i>	<i>retail client or institutional client</i>	Yes	No
<i>Portfolio Manager</i>	<i>retail client or institutional client</i>	Yes	Yes
<i>Associate Portfolio Manager</i>	<i>retail client or institutional client</i>	Yes	Yes
<i>Trader</i>	N/A	Yes	No
<i>Supervisor of Registered Representatives</i>	<i>retail client</i>	Yes	Yes
<i>Supervisor of Investment Representatives</i>	<i>retail client</i>	Yes	No
<i>Supervisor of Registered Representatives or Investment Representatives</i>	<u><i>retail client or institutional client</i></u>	Yes	No
<i>Supervisor designated to be responsible for the supervision of option and similar derivative accounts</i>	<i>retail client or institutional client</i>	Yes	No
<i>Supervisor designated to be responsible for the supervision of futures contract, forward contract, contracts for difference, futures contract option and similar derivative accounts</i>	<i>retail client or institutional client</i>	Yes	No

Approved Person Category	Client Type	Compliance course requirement	Professional development course requirement
<i>Supervisor designated to be responsible for the supervision of managed accounts</i>	<i>retail-client or institutional-client</i>	Yes	No
<i>Supervisor designated to be responsible for the opening of new accounts and account supervision and activity related policies and procedures</i>	<i>retail-client or institutional-client</i>	Yes	No
<i>Supervisor designated to be responsible for the supervision of discretionary accounts</i>	<i>retail-client or institutional-client</i>	Yes	No
<i>Supervisor designated to be responsible for the pre-approval of advertising, sales literature and correspondence</i>	N/A	Yes	No
<i>Supervisor designated to be responsible for the supervision of research reports</i>	N/A	Yes	No
<i>Ultimate Designated Person</i>	N/A	Yes	No
<i>Chief Compliance Officer</i>	N/A	Yes	No

...

...

PART B – CONTINUING EDUCATION PROGRAM COURSES AND ADMINISTRATION

2715. The compliance course

...

- (3) The Corporation will accredit ethics courses that a *continuing education participant* can repeat and count towards fulfillment of the compliance course requirement in two *continuing education program* cycles.

2716. The professional development course

- (1) A *continuing education participant* subject to the professional development [course](#) requirement:
 - (i) ~~may, upon satisfying professional development requirements in the current cycle, carry forward a maximum of 10 hours of a single professional development course of at least 20 hours and completed in the last six months of the current continuing education program~~

~~cycle to satisfy a portion of his or her professional development course requirement in the following continuing education program cycle,~~

~~(ii) may receive continuing education credit for successful completion of the Wealth Management Essentials Course, where completed to satisfy the post approval proficiency requirement for Registered Representatives dealing with retail clients, in the continuing education program cycle in which the course is completed, and~~

~~(iii) —~~

may receive continuing education credit for a professional development course with an examination, only if the *continuing education participant* successfully passes the examination.

2717. Dealer Member's administration of the continuing education program

...

(3) A Dealer Member may allow a continuing education participant to use mandatory conduct training prescribed in subsection 2604(2) towards compliance course requirement in clause 2703(1)(i).

...

RULE 2800 | THE NATIONAL REGISTRATION DATABASE

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2803. Dealer Member obligations for the National Registration Database

...

(2) The following list describes the submission requirements as prescribed by *securities laws*.

(i) A Dealer Member must make the following submissions using the *National Registration Database* on the *National Registration Database* form specified, within the time period prescribed by National Instrument 33-109.

Type of submission	Form
(a) an application for approval of an <i>individual</i> under any <i>Corporation requirement</i>	Form 33-109F4 - Registration of Individuals and Review of Permitted Individuals
(b) a notification of any change in the type of business which an <i>Approved Person</i> will conduct	Form 33-109F2 - Change or Surrender of Individual Categories
(c) (I) an application for different or additional approval under <i>Corporation requirements</i> for any <i>Approved Person</i> , (II) a surrender of existing approval	Form 33-109F2 - Change or Surrender of Individual Categories
(d) a report of a change of information regarding an <i>Approved Person</i> previously	Form 33-109F5 - Change of Registration Information

Type of submission	Form
submitted in Form 33-109F4	
(e) an application for an exemption from a proficiency requirement of section 2602 <u>in sections 2603, 2604 or 2605, as applicable,</u> for an <i>Approved Person</i> or applicant for approval	“Apply for an Exemption” submission on the <i>National Registration Database</i>
(f) a notification by a <i>Dealer Member</i> of the end of an employee’s <i>Approved Person</i> status	Form 33-109F1 - Notice of End of Individual Registration or Permitted Individual Status
(g) a notification of a <i>business location</i> opening or closing under section 2202	Form 33- 109F3 - Business locations other than head office
(h) a notification of change of address, type of location or supervision of any <i>business location</i>	Form 33-109F3 - Business locations other than head office
(i) notification of reinstatement of <i>individual</i> approval.	Form 33-109F7 - Reinstatement of Registered Individuals and Permitted Individuals (see section 2808 for eligible criteria before making this filing).

- (ii) Before filing a notice of change of business type under sub-clause 2803(2)(i)(b) above, a *Dealer Member* must notify the *Corporation* through the *National Registration Database* that either:
- ~~(a)~~ (a) the *Approved Person* has completed the necessary proficiency requirements under ~~section 2602(3)~~ sections 2603, 2604 or 2605, as applicable, to undertake the type of business, or
 - ~~(b)~~ (b) the *Approved Person* has been granted an exemption from the proficiency requirements under sections 2625 through 2628.

...

This Appendix 3 includes provisions that were not previously published on July 4, 2024. For information on the specific changes to each of these provisions, please refer to the Bulletin of Approval 25-0110 and Appendix 2.

SERIES 1000 | INTERPRETATION AND PRINCIPLES RULES

...

RULE 1400 | STANDARDS OF CONDUCT

...

SERIES 2000 | DEALER MEMBER ORGANIZATION AND INDIVIDUAL APPROVAL RULES

...

RULE 2500 | DEALER MEMBER DIRECTORS AND EXECUTIVES, AND APPROVAL OF INDIVIDUALS

...

PART A - DEALER MEMBER DIRECTORS AND EXECUTIVES

2502. General requirements for Directors

...

- (2) At least 40% of the *Dealer Member's* Directors must:
 - (i) either:
 - (a) be *actively engaged in the business of the Dealer Member* and spend the majority of their time in the *securities or derivatives* industry, except those on active government service, or who for health reasons are prevented from such active engagement, or
 - (b) occupy a position equivalent to an *Executive* or a *Director* at a related or *affiliated* firm registered with a *securities regulatory authority*, an *affiliated* foreign securities dealer or advisor, or an *affiliated* Canadian financial institution,
 - (ii) satisfy the applicable proficiency requirements of subsection 2603(1), and
 - (iii) have at least five years of experience in the financial services industry, or such lesser period as may be acceptable to the *Corporation*.
- (3) The remaining *Directors* who do not meet subsection 2502(2) must, if *actively engaged in the business of the Dealer Member* or its *related company*, meet the applicable proficiency requirements of subsection 2603(1).

2503. General requirements for Executives

- (1) A *Dealer Member's* Executives must:
 - (ii) satisfy the applicable proficiency requirements of subsection 2603(1).
- (2) Notwithstanding the applicable proficiency requirements in subsection 2603(1), at least 60% of the *Dealer Member's* Executives must have at least five years of experience in the financial services industry, or such lesser period as may be acceptable to the *Corporation*.

...

2505. Chief Financial Officer

- (1) A Dealer Member must designate a *Chief Financial Officer* who must:
- (i) be designated as an *Executive* and meet the general requirements for *Executives* set out in section 2503, and
 - (ii) satisfy the applicable proficiency requirements of subsection 2603(1).

...

- (4) When an acting *Chief Financial Officer* is designated:
- (i) that *individual* must satisfy the applicable proficiency requirements of subsection 2603(1) and be designated as *Chief Financial Officer*, or

...

...

2506. Chief Compliance Officer

- (1) A Dealer Member must designate a *Chief Compliance Officer* who must:
- (i) be designated as an *Executive* and meet the general requirements for *Executives* set out in section 2503, and
 - (ii) satisfy the applicable proficiency requirements of subsection 2603(1).

...

- (5) When an acting *Chief Compliance Officer* is designated:
- (i) the *individual* must satisfy the applicable proficiency requirements of subsection 2603(1) and be designated as *Chief Compliance Officer*, or

...

...

2507. Ultimate Designated Person

- (1) A Dealer Member must designate an *Ultimate Designated Person* who must be designated as an *Executive* and meet the [applicable](#) proficiency requirements in subsection 2603(1) and the general requirements for *Executives* set out in section 2503.

...

...

PART B - APPROVAL OF INDIVIDUALS

...

...

2551. Individual approval

...

- (8) Where an *individual*:

- (i) is approved as a *Registered Representative* dealing in mutual funds only pursuant to clause

2605(3), and

(ii) acts as an agent of a Dealer Member in compliance with the requirements set out in Rule 2300,

any remuneration, gratuity, benefit or other consideration in respect of business conducted by the individual on behalf of the Dealer Member may be paid by the Dealer Member to a corporation that is not registered under securities laws provided:

...

2552. **Compliance with the proficiency requirements or other conditions**

(1) Each *Approved Person* must:

- (i) meet the applicable pre-approval proficiency requirements set out in ~~Rule 2600~~sections 2603 and 2605 before *Corporation* approval is granted, and
- (ii) complete the applicable post-approval proficiency requirements of ~~section~~sections 2604 and 2605 after receiving *Corporation* approval.

(2) The *Corporation* will automatically suspend an *Approved Person* if they do not complete the applicable post-approval proficiency requirements in the *Approved Persons* category as set out in clauses 2604(1)(i), 2604(2)(i), 2604(2)(ii), subsections 2605(1), 2605(2), or section 2630 ~~if the Dealer Member fails to notify the Corporation of completion within the prescribed timeline.~~

...

2553. **Approval of Registered Representatives, Investment Representatives, Portfolio Managers and Associate Portfolio Managers and their obligations**

...

~~(2)~~ A *Registered Representative, Investment Representative, Portfolio Manager* or *Associate Portfolio Manager* may not conduct on behalf of a *Dealer Member*, and a *Dealer Member* may not permit the *Approved Person* to conduct on its behalf, the type of business as set out in clause 2553(3)(iv) and deal with a type of customer as set out in clauses 2553(3)(i) and (ii), unless the *Dealer Member* complies with the following:

...

(iv) The *Dealer Member* must notify the *Corporation* which of its *individuals* approved as a *Registered Representative, Investment Representative, Portfolio Manager* or *Associate Portfolio Manager* will deal in or advise in:

...

- (b) ~~derivatives~~ subject to the limitations set out in subsection 2625(3), and
- (c) general *securities* business; including equities, fixed income and other investment products not listed above.

...

(4) An individual applying for approval as a Registered Representative or Investment Representative dealing only in mutual funds must comply with the applicable proficiency requirements in

subsections 2605(1), 2605(2) or 2605(3).

- (5) The post-approval proficiency requirements in subsections 2605(1) or 2605(2) do not apply to a Registered Representative or Investment Representative approved prior to September 28, 2009 and registered in provinces or territories which allowed the individual to be restricted to only mutual funds, provided they remain in the same restricted category of approval in the same provinces/territories.
- (6) The approval of an individual qualified to deal only in mutual funds is automatically suspended if the individual fails to satisfy the post-approval requirements in subsections 2605(1) or 2605(2) in accordance with subsections 2552(2) and 2552(3).

...

2555. Approval of investors

- (1) Any investor who owns or holds a beneficial ownership interest in a significant equity interest in the Dealer Member or special warrants or other securities that are convertible into a significant equity interest in the Dealer Member must:
- (i) be approved by the Corporation, and
 - (ii) if applicable, meet the proficiency requirements of subsections 2555(2) and 2555(3).
- (2) A Dealer Member's Director who, directly or indirectly, owns or controls a voting interest of a Dealer Member of 10% or more must satisfy the proficiency requirements of sub-clause 2603(1)(i)(j).
- (3) Any individual, other than a Dealer Member's Director, who:
- (i) is actively engaged in the business of the Dealer Member, and
 - (ii) directly or indirectly owns or controls a voting interest in a Dealer Member of 10% or more, must satisfy the proficiency requirements of sub-clause 2603(1)(i)(j).

...

RULE 2600 | PROFICIENCY REQUIREMENTS AND EXEMPTIONS FROM PROFICIENCIES

...

PART A - PROFICIENCY REQUIREMENTS

2602. Proficiency principle

- (1) An *Approved Person* must not perform an activity that requires approval unless the *Approved Person* has satisfied the applicable proficiency requirements set out in Rule 2600 and has the education, experience and training that a reasonable person would consider necessary to perform the activity competently, including understanding the structure, features and risks of each ~~product~~ security, derivative and precious metals bullion the *Approved Person* deals with, recommends or supervises.
- (2) The *Dealer Member* must ensure that an *individual* does not perform an activity that requires *Corporation* approval unless the *individual* has satisfied the applicable proficiency requirements ~~of~~ set out in Rule 2600 and has the education, experience and training that a reasonable person would consider necessary to perform the activity competently, including understanding the

structure, features and risks of each ~~product~~security, derivative and precious metals bullion, the *individual* deals with, recommends or supervises.

2603. Proficiency requirements prior to approval

- (1) Each applicant in an *Approved Person* category must meet the applicable proficiency requirements prescribed below before the *Corporation* will grant approval, unless an exemption has been granted from the applicable requirements:
- (i) An applicant for approval, who is eligible to complete a prescribed exam, must at a minimum successfully complete the following before the *Corporation* will grant approval in the following categories:
 - ~~(a)~~ *Investment Representative* dealing with *securities*: Canadian Investment Regulatory Exam
 - ~~(CIRE),~~ ~~b)~~ *Investment Representative* dealing with *derivatives*: Canadian Investment Regulatory Exam ~~(CIRE)~~ and Derivatives Exam,
 - (c) *Registered Representative* (retail) dealing with *securities*: Canadian Investment Regulatory Exam ~~(CIRE)~~ and Retail Securities Exam,
 - (d) *Registered Representative* (retail) dealing with *derivatives*: Canadian Investment Regulatory Exam ~~(CIRE)~~ and Retail Securities Exam and Derivatives Exam,
 - (e) *Registered Representative* (institutional) dealing with *securities*: Canadian Investment Regulatory Exam ~~(CIRE)~~ and Institutional Securities Exam,
 - (f) *Registered Representative* (institutional) dealing with *derivatives*: Canadian Investment Regulatory Exam ~~(CIRE)~~ and Institutional Securities Exam and Derivatives Exam,
 - (g) *Associate Portfolio Manager*: Level 1 of the Chartered Financial Analyst (CFA) program administered by the CFA Institute, or either the Canadian Investment Manager ~~designation~~Designation or the Chartered Investment Manager Designation (CIM)[®] administered by ~~the Canadian Securities Institute~~CSI Global Education Inc., and
 - (l) If managing accounts with *derivatives*, the Derivatives Exam,
 - (h) *Portfolio Manager*: a CFA Charter administered by the CFA Institute, or either the Canadian Investment Manager ~~designation~~Designation or the Chartered Investment Manager Designation (CIM)[®] administered by ~~the Canadian Securities Institute~~CSI Global Education Inc., and
 - (l) If managing accounts with *derivatives*, the Derivatives Exam,
 - (i) *Supervisor*: Supervisor Exam, and
 - (l) If supervising trading in, or accounts for those who trade in *securities, derivatives, or managed accounts*, the ~~same~~ exam requirements applicable to the *individuals* being supervised listed in sub-clauses 2603(1)(i)(a) to (f), and (h) except:

- (A) the Canadian Investment Regulatory Exam (~~CIRE~~) is not required if the *Supervisor* satisfies the experience requirements in sub-clause 2603(1)(ii)(d),
- (j) *Director*, where required in section 2502: Director and Executive Exam,
- (k) *Ultimate Designated Person* and ~~Executives~~*Executive* other than those in sub-clause 2603(1)(i)(l) or (m): Director and Executive Exam,
- (l) *Chief Compliance Officer*: Chief Compliance Officer Exam,
- (m) *Chief Financial Officer*: Chief Financial Officer Exam,
- (n) *Trader*: Trader Exam in addition to any exam mandated by the applicable marketplace.
- (ii) An applicant for approval, must have the following minimum education or experience before the *Corporation* will grant approval in the following categories:
 - (a) *Registered Representative*: A relevant diploma or degree from an accredited post secondary institution, or minimum four years of relevant experience acceptable to the *Corporation*,
 - (b) *Associate Portfolio Manager*: Minimum two years of relevant investment management experience acceptable to the *Corporation* within three years prior to the date of application for approval,
 - (c) *Portfolio Manager*:
 - (I) If Canadian Investment Manager Designation or Chartered Investment Manager Designation (CIM)[®] is completed, at least four years of relevant investment management experience acceptable to the Corporation, of which one year of which was gained within the three years prior to the date of application for approval ~~acceptable to the Corporation~~,
 - (II) If CFA Charter is completed, at least one year of relevant investment management experience acceptable to the Corporation within the three years prior to the date of application for approval ~~acceptable to the Corporation~~,
 - (d) *Supervisor*: Minimum two years of relevant experience acceptable to the *Corporation*,
 - (e) *Ultimate Designated Person* and *Executives*: Minimum two years of relevant experience acceptable to the *Corporation*,
 - (f) *Chief Compliance Officer*:
 - (I) Five years working for an investment dealer or registered advisor, or affiliated Financial Industry Regulatory Authority (FINRA) dealer, with at least three years in a compliance or supervisory capacity, or
 - (II) Three years providing professional services in the *securities* industry, with at least 12 months experience working at an investment dealer or registered advisor in a compliance or supervisory capacity,
 - (g) *Chief Financial Officer*:

- (l) A financial accounting designation, finance related university degree or diploma or equivalent work experience as may be acceptable to the *Corporation*.

2604. Post-approval proficiency requirements

- (1) *Dealer Member* training
 - (i) A *Dealer Member* must, as prescribed by the *Corporation*, provide training to its *Registered Representatives* and *Investment Representatives* within 90 days ~~of~~after approval considering the type of client and product the *Approved Person* will be dealing with, and
 - (a) The *Dealer Member* must notify the *Corporation* of completion of the training within 90 days after approval.
 - (ii) A *Dealer Member* who sponsors an *Approved Person* must ensure that the *individual* has received the appropriate training relevant for its business type including its client and product type to ensure compliance with the proficiency principle in section 2602.
 - (a) A *Dealer Member* may permit an *Approved Person* to apply on-going training to meet prescribed continuing education requirements.
 - (iii) In addition to any training prescribed in Rule 2600, a *Dealer Member* must provide on-going training to its *Approved Persons* on compliance with *Corporation requirements, securities laws, and applicable laws* including, without limitation, the obligations relating to conflicts of interest, know-your-client, account appropriateness, product due diligence, know-your-product, and suitability determination.
 - (a) A *Dealer Member* may permit an *Approved Person* to apply on-going training to meet prescribed continuing education requirements.
 - (iv) The *Dealer Member* must keep a record of all training provided, as prescribed in Rule 2600, and provide the record to the *Corporation* on request to demonstrate compliance with the proficiency principle.
- (2) Conduct training
 - (i) Each ~~new applicant or an individual~~ *Approved Person* must complete the conduct training prescribed by the *Corporation* within 30 days ~~of~~after approval, and
 - (a) The *Dealer Member* must notify the *Corporation* of completion of the training within 30 days ~~of~~after approval.
 - (ii) Each *Approved Person* not captured by (i), approved as of the date of these ~~rules~~Rules, must complete the conduct training prescribed by the *Corporation* by no later than December 31, 2026, and
 - (a) The *Dealer Member* must notify the *Corporation* of ~~the~~ completion ~~prior to~~of the training by no later than December 31, 2026.

...

2605. Mutual funds only Registered Representatives and Investment Representatives

- (1) An applicant for approval, or an individual approved as a Registered Representative dealing only in

mutual funds who is an *employee* of a firm registered as an investment dealer and not registered as a mutual fund dealer must:

- (i) Complete any of the following prior to approval:
 - (a) Requirements in sub-clause 2603(1)(i)(c),
 - (b) The Canadian Securities Course administered by CSI Global Education Inc.,
 - (c) Canadian Investment Funds Course administered by the IFSE Institute, or
 - (d) Investment Funds in Canada Course administered by CSI Global Education Inc.
- (ii) Complete the requirements in sub-clause 2603(1)(i)(c) and clause 2604(2)(i) within 270 days of approval.
- (iii) Complete the training requirement in clause 2604(1)(i) within 18 months after initial approval date, notwithstanding the timeline set out in clause 2604(1)(i).
- (iv) Upgrade within 18 months of initial approval.

(2) An applicant for approval or an *individual* approved as an *Investment Representative* dealing only in mutual funds who is an *employee* of a firm registered as an investment dealer and not registered as a mutual fund dealer must:

- (i) Complete any of the following prior to approval:
 - (a) Requirements in sub-clause 2603(1)(i)(a),
 - (b) The Canadian Securities Course administered by CSI Global Education Inc.,
 - (c) Canadian Investment Funds Course administered by the IFSE Institute, or
 - (d) Investment Funds in Canada Course administered by CSI Global Education Inc.
- (ii) Complete the requirements in sub-clause 2603(1)(i)(a) and clause 2604(2)(i) within 270 days of approval.
- (iii) Complete the training requirement in clause 2604(1)(i) within 18 months after initial approval date, notwithstanding the timeline set out in clause 2604(1)(i).
- (iv) Upgrade within 18 months of initial approval.

(3) An applicant for approval, or an *individual* approved as a *Registered Representative* dealing only in mutual funds who is an *employee* of a firm registered as both an investment dealer and a mutual fund dealer must:

- (i) Complete any of the following prior to approval:
 - (a) The Canadian Securities Course administered by CSI Global Education Inc.,
 - (b) Canadian Investment Funds Course administered by the IFSE Institute, or
 - (c) Investment Funds in Canada Course administered by CSI Global Education Inc.
- (ii) Complete the training requirement in clause 2604(1)(i) within 90 days after initial approval date.

(4) An applicant for approval, or an *individual* approved, as a *Registered Representative* dealing in mutual funds only, or an *Investment Representative* dealing in mutual funds only, will be also permitted to trade in exchange-traded funds that meet the definition of a mutual fund provided the *individual*:

- (i) was permitted to trade in exchange-traded funds within the 90 days prior to these Rules coming into effect, or

(ii) complies with the relevant proficiency requirements in subsections 2605(1), 2605(2) or 2605(3), and has successfully completed one of the following within the timeline prescribed in subsection 2628(1):

(a) the ETFs for Mutual Fund Representatives course administered by CSI Global Education Inc., or

(b) the Exchange-Traded Funds Course administered by the IFSE Institute, or

(c) the Exchange Traded Funds for Representatives of Mutual Fund Dealers course administered by the Smarten Up Institute.

(5) The following terms have the meaning set out below when used in subsection 2605(6):

<u>"alternative mutual fund"</u>	<u>The same meaning as the definition in National Instrument 81-102, <i>Investment Funds</i>.</u>
<u>"bridge course"</u>	<u>Either:</u> <u>(i) the Investing in Alternative Mutual Funds and Hedge Funds course administered by the IFSE Institute, or</u> <u>(ii) the Hedge Funds and Liquid Alternatives for Mutual Fund Representatives course administered by CSI Global Education Inc.</u>

(6) An applicant for approval, or an individual approved, as a Registered Representative dealing in mutual funds only, or an Investment Representative dealing in mutual funds only, will be also permitted to trade in alternative mutual funds provided the individual:

(i) was permitted to trade in alternative mutual funds within the 90 days prior to these Rules coming into effect, or

(ii) complies with the relevant proficiency requirements in subsections 2605(1), 2605(2) or 2605(3), and has successfully completed one of the following within the timeline prescribed in subsection 2628(1):

(a) the bridge course,

(b) the Derivatives Fundamentals Course administered by CSI Global Education Inc.,

(c) the Canadian Securities Course administered by CSI Global Education Inc., or

(d) the courses required to be registered as a Portfolio Manager – Advising Representative pursuant to section 3.11 of National Instrument 31-103, *Registration Requirements, Exemptions and Ongoing Registrant Obligations*.

2606. – 2624. Reserved.

PART B - EXEMPTIONS FROM PROFICIENCY REQUIREMENTS

2625. Specific exemptions

(1) An applicant seeking approval as a Supervisor in relation to activities of individuals approved to deal in mutual funds only, including those in subsection 2605(4) is exempt from the pre-approval exam requirements in clause 2603(1)(i) provided the individual:

(i) was designated by a member of the Mutual Fund Dealers Association of Canada as a branch manager, within 90 days prior to these Rules coming into effect, or

(ii) has successfully completed the following within the timelines prescribed in subsection 2628(1):

(a) instead of the applicable requirements described in paragraph 2603(1)(i)(i)(I), either the:

(I) Canadian Investment Funds Course administered by the IFSE Institute, or

(II) Investment Funds in Canada Course administered by CSI Global Education Inc.

(b) instead of the Supervisor Exam, either the:

(I) Mutual Fund Branch Managers' Examination Course administered by the IFSE Institute, or

(II) Branch Compliance Officers Course administered by CSI Global Education Inc.

- (2) Any *individuals* approved prior to December 31, 2025, are exempt from any new proficiency requirements, other than the requirements in subsection 2604(2), introduced as of January 1, 2026, in Rule 2600, provided the *Approved Person* continues in the same role.
- (i) Notwithstanding subsection 2625(2), an applicant for approval is not required to complete the Canadian Investment Regulatory Exam ~~(CIRE)~~ prescribed in subsection 2603(1) if the *individual* has minimum two years of prior experience in the same *Approved Person* category within three years prior to the date of application for approval and satisfies other prescribed requirements under sections 2603 and 2604 for their category of approval.
- (3) Any *Approved Person* who would be required to complete the Derivatives Exam under Rule 2600 pursuant to subsection 2603(1), and who is exempt from such requirement pursuant to subsection 2625(2), may only deal in ~~the~~, as applicable, legacy options or futures contract, futures contract options, and must ensure that the scope of their permitted activities are clear in all their communication and in all their dealings.

...

2627. Exemptions from completing the required exams

- (1) An applicant for approval is exempt from writing the Canadian Investment Regulatory Exam ~~(CIRE)~~ if they satisfy the following:
- (i) previously registered with FINRA in a similar capacity within three years prior to the date of application for approval, and have completed the applicable FINRA requirements for that registration category.
- (2) An applicant for approval is exempt from writing the Derivatives Exam if they satisfy the following:
- (i) previously registered and dealing in options and futures with FINRA and the National Futures Association (NFA) within three years prior to the date of application for approval, and
- (ii) completed the Series 3 and Series 7 exams offered by FINRA.
- (3) An applicant for approval is exempt from writing the Canadian Investment Regulatory Exam ~~(CIRE)~~ and the Retail Securities Exam and Institutional Securities Exam if the applicant has

satisfied the requirements in sub-clauses ~~2603~~2603(1)(i)(g) or (h) applicable to *Associate Portfolio Managers* or *Portfolio Managers* respectively.

2628. Exam validity

- (1) An *individual* is deemed to have successfully completed an exam if:
 - (i) ~~The~~the *individual* successfully completed the prescribed exam within three years prior to the date of application for approval, ~~or~~
 - (ii) ~~The~~the *individual* who successfully completed the prescribed exam was previously approved in the same *Approved Person* category, or another category which required the same exam, within three years prior to the date of application for approval, or
 - (iii) ~~The~~the *individual* who successfully completed the prescribed exam gained one year of relevant *securities* industry experience, acceptable to the *Corporation*, within three years prior to the date of application for approval.
- (2) For the purposes of determining exam validity, an *Approved Person* is not considered to have been approved during any period in which the *Approved Person's* approval was suspended or the *individual* was otherwise not conducting any activities requiring *Corporation* approval on behalf of the *Dealer Member*.₇
- (3) The validity periods do not apply to the Canadian Investment Manager Designation, the Chartered Investment Manager Designation (CIM)[®] and the CFA Charter provided the holders of these designations continue to have the right to use the designation and the designation has not been revoked or otherwise restricted.

2629. Transition from courses prescribed prior to January 1, 2026

- (1) An *individual* is exempt from the requirements in section 2603 if all of the following apply:
 - (i) ~~The~~the *individual* enrolls in a course offered by ~~the Canadian Securities Institute (CSI)~~CSI Global Education Inc. prescribed under the rules prior to January 1, 2026,
 - (ii) ~~The~~the *individual* successfully completes the course and its exam prior to January 1, 2027,
 - (iii) ~~The~~the *individual* would satisfy the proficiency requirements applicable to the same approval category prior to January 1, 2026, upon completion of the course completed in ~~subclause~~clause (ii), and
 - (iv) The sponsoring *Dealer Member* submits an application for approval for the *individual*, prior to January 1, 2027.
- (2) If an *individual* is required to complete the Wealth Management Essentials (WME) course as of December 31, 2025, the *individual* may complete either of the following:
 - (i) WME by earlier of December 31, 2026, or the required completion date prescribed under the rules that were in effect prior to January 1, 2026, or
 - (ii) Retail Securities Exam by the required completion date prescribed under the rules that were in effect prior to January 1, 2026.

2630. Transition of Advising Representatives and Associate Advising Representatives into the Portfolio Manager and Associate Portfolio Manager approval category

- (1) An individual registered as an advising representative or associate advising representative by a securities regulatory authority within the 90 days prior to the date of application as a *Portfolio Manager* or *Associate Portfolio Manager* has ~~three months~~90 days after the date of approval by the *Corporation* to complete the conduct training in clause 2604(2)(i), and
- (i) The *Dealer Member* must notify the *Corporation* of ~~the~~ completion of the training within 90 days ~~of~~after approval.

...

RULE 2700 | CONTINUING EDUCATION REQUIREMENTS FOR APPROVED PERSONS

...

PART A - THE CONTINUING EDUCATION PROGRAM AND CONTINUING EDUCATION REQUIREMENTS

2703. The continuing education program

- (1) The *continuing education program* consists of three parts:
- (i) a compliance course requirement, which is training covering ethical issues, regulatory developments and rules governing investment dealer conduct, ~~and~~
- (ii) a professional development course requirement, which is training that fosters learning and development in areas relevant to investment dealer business, ~~and~~ and
- (iii) ~~Mandated~~mandated annual continuing education training specifically prescribed by the *Corporation* which may satisfy clauses (i) or (ii) above as prescribed by the *Corporation*.

...

2704. Continuing education requirements

- (1) In each *continuing education program cycle*, a *continuing education participant* must meet the continuing education requirements for the applicable *Approved Person* category, regardless of product type, as set out in the following table.

Approved Person Category	Client Type	Compliance course requirement	Professional development <u>course</u> requirement
<i>Registered Representative</i>	<i>retail client</i>	Yes	Yes
<i>Registered Representative</i>	<i>institutional client</i>	Yes	No
<i>Investment Representative</i>	<i>retail client or institutional client</i>	Yes	No
<i>Portfolio Manager</i>	<i>retail client or institutional client</i>	Yes	Yes

Approved Person Category	Client Type	Compliance course requirement	Professional development course requirement
<i>Associate Portfolio Manager</i>	<i>retail client or institutional client</i>	Yes	Yes
<i>Trader</i>	N/A	Yes	No
<i>Supervisor</i>	Retail retail client or institutional client	Yes	No
<i>Ultimate Designated Person</i>	N/A	Yes	No
<i>Chief Compliance Officer</i>	N/A	Yes	No

...

...

PART B – CONTINUING EDUCATION PROGRAM COURSES AND ADMINISTRATION

2715. The compliance course

...

- (3) The *Corporation* will accredit ethics courses that a *continuing education participant* can repeat and count towards fulfillment of the compliance course requirement in two *continuing education program* cycles.

2716. The professional development course

- (1) A *continuing education participant* subject to the professional development [course](#) requirement: ~~(i)~~ may receive continuing education credit for a professional development course with an examination, only if the *continuing education participant* successfully passes the examination.

2717. Dealer Member's administration of the continuing education program

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- (3) A *Dealer Member* may allow a *continuing education participant* to use mandatory conduct training prescribed in ~~section~~[subsection](#) 2604(2) towards compliance course requirement in clause 2703(1)(i).

...

RULE 2800 | THE NATIONAL REGISTRATION DATABASE

...

2803. Dealer Member obligations for the National Registration Database

...

(2) The following list describes the submission requirements as prescribed by *securities laws*.

(i) A Dealer Member must make the following submissions using the *National Registration Database* on the *National Registration Database* form specified, within the time period prescribed by National Instrument 33-109.

<u>Type of submission</u>	<u>Form</u>
<u>(a) an application for approval of an individual under any Corporation requirement</u>	<u>Form 33-109F4 - Registration of Individuals and Review of Permitted Individuals</u>
<u>(b) a notification of any change in the type of business which an Approved Person will conduct</u>	<u>Form 33-109F2 - Change or Surrender of Individual Categories</u>
<u>(c) (I) an application for different or additional approval under Corporation requirements for any Approved Person, (II) a surrender of existing approval</u>	<u>Form 33-109F2 - Change or Surrender of Individual Categories</u>
<u>(d) a report of a change of information regarding an Approved Person previously submitted in Form 33-109F4</u>	<u>Form 33-109F5 - Change of Registration Information</u>
<u>(e) an application for an exemption from a proficiency requirement in sections 2603, 2604 or 2605, as applicable, for an Approved Person or applicant for approval</u>	<u>"Apply for an Exemption" submission on the National Registration Database</u>
<u>(f) a notification by a Dealer Member of the end of an employee's Approved Person status</u>	<u>Form 33-109F1 - Notice of End of Individual Registration or Permitted Individual Status</u>
<u>(g) a notification of a business location opening or closing under section 2202</u>	<u>Form 33- 109F3 - Business locations other than head office</u>
<u>(h) a notification of change of address, type of location or supervision of any business location</u>	<u>Form 33-109F3 - Business locations other than head office</u>
<u>(i) notification of reinstatement of individual approval.</u>	<u>Form 33-109F7 - Reinstatement of Registered Individuals and Permitted Individuals (see section 2808 for eligible criteria before making this filing).</u>

(ii) Before filing a notice of change of business type under sub-clause 2803(2)(i)(b) above, a

Dealer Member must notify the Corporation through the National Registration Database that either:

- (a) the Approved Person has completed the necessary proficiency requirements under sections 2603, 2604 or 2605, as applicable, to undertake the type of business, or
- (b) the Approved Person has been granted an exemption from the proficiency requirements under sections 2625 through 2628.

...

Comments received in response to Bulletin 24-0206 – Administration Bulletin – Rule amendments - Request for comments – Proposed Proficiency Model – Approved Persons under the Investment Dealer and Partially Consolidated Rules

On July 4, 2024, CIRO issued Administrative Bulletin [24-0206](#) requesting comments on the Rule amendments - Proposed Proficiency Model for Approved Persons under the Investment Dealer and Partially Consolidated Rules. We received 17 letters from the following commenters:

Canadian Advocacy Council (CFA)

Canadian Bankers Association (CBA)

Canadian Independent Finance and Innovation Counsel (CIFIC)

Canada Life (CL)

Edwards Jones (EJ)

Federation of Independent Dealers (FID)

Financial Planning Association of Canada (FPAC)

FP Canada (FP)

IG Wealth Management (IGWM)

Investment Funds Institute of Canada (IFIC)

Investment Industry Association of Canada (IIAC)

Kenmar Associates

Learnedly

PFSL Investments Canada Ltd. (PFSL)

Portfolio Management Association of Canada (PMAC)

Renno & Co (RC)

TMX Group (TMX)

A copy of these comment letters are publicly available on CIRO’s website ([Consultations](#)). The following table summarizes these comments and our responses:

SUMMARY OF COMMENTS	CIRO RESPONSE
General Comments	
<p>1. One commenter supports the proposed Proficiency proposal’s objectives and urges CIRO to provide timely, clear and fulsome information and guidance throughout the implementation and transition periods in order to (i) proactively identify and address policy and implementation challenges, and (ii) ensure that the policy, procedural, training and technology changes that the Proficiency proposal will require are implemented as efficiently and effectively as possible. (IFIC)</p>	<p>We acknowledge the comments.</p> <p>We have started the process of consulting with stakeholders on implementation and transition matters and plan to provide further information and guidance throughout the implementation and transition periods as needed.</p>
<p>2. One commenter is broadly in favour of the new proficiency model for Approved Persons and notes the importance to provide clarity and guidance to education providers, firms, and other stakeholders seeking to develop training and courses in preparation for the exams to meet minimum standard for knowledge and competency.</p> <p>The same commenter recommends CIRO develop and publish a technical Body of Knowledge to provide additional clarity about the types and level of knowledge required by Approved Persons. (FP)</p>	<p>See response in #1.</p> <p>As discussed in the Bulletin, exams for each Approved Person category will be based on the published competency profiles. These competency profiles and detailed reference documents have already been published and are available as a resource to education providers, firms, and other stakeholders. Please visit Bulletin 23-0138 Competency Profiles for Approved Persons (Investment Dealers) for further information.</p> <p>Additionally, for each exam we will develop and publish an exam blueprint or syllabus, which will be mapped back to the applicable competency profile.</p> <p>Note that we will use syllabus going forward although we have used blueprint and syllabus interchangeably to date.</p>

SUMMARY OF COMMENTS	CIRO RESPONSE
<p>3. Commenters are supportive of the changes made to CIRO's proposed proficiency model. (TMX, RC)</p> <p>Periodic renewal of proficiency requirements for Canada's investment professionals helps to ensure that market participants continue to meet high standards of education, skill and competence, all of which help to ensure the proper functioning and efficiency of Canada's investment industry and capital markets. (RC)</p> <p>One of the commenters particularly support the changes proposed to the Trader category to have a single profile and proposal to extend the proficiency requirement to include competencies on derivatives, in addition to training mandated by a marketplace. (TMX)</p>	<p>We acknowledge the comments.</p>
<p>4. One commenter urges CIRO to consider all the various regulatory changes that are underway and look for ways to reduce the impact on dealers and Approved Persons.</p> <p>The same commenter also suggests that CIRO establish a formal implementation committee with industry stakeholders to help identify and address questions and concerns on an ongoing basis as this important initiative is rolled out. They also question how the new proficiency model will affect CE, including any changes to CE reporting requirements. (CBA)</p>	<p>We are continuously considering the impact of changes. We also actively consult with various industry groups including working group set up to consult and review exam delivery needs of dealers and have started the process of recruiting industry subject matter experts for our syllabus and exams. Similarly, we will be consulting with the industry for other implementation related matters such as setting out a guidance for relevant experience.</p>
<p>5. One commenter thanks CIRO for the many positive amendments to the proficiency model and makes recommendations including harmonization for all CIRO members, exam content, study guides and competency profiles be subject to expert preparation and</p>	<p>We acknowledge the comments and suggestions.</p> <p>Competency profiles have been finalized and published. We are on target to launch the new proposed model on January 1, 2026. We are working towards implementing the new model to commence on January 1, 2026.</p>

SUMMARY OF COMMENTS	CIRO RESPONSE
<p>annual review, and suggestions to expand the CIRO Proficiency Committee.</p> <p>The same commenter also commends CIRO's efforts to address proficiency requirements on a strict timeline. As revised exams and exam content are being carefully considered across registration categories, and competencies have not yet been finalized, they recommend a revised start date with corresponding amendments to currently proposed dates. Should CIRO wish to align the revised start date to CE cycle, they suggest that a revised start date may be January 1, 2028. (IIAC)</p>	
<p>6. One commenter fundamentally agrees with the approach taken by the CIRO for determination of proficiency among Approved Persons. They believe an open process focusing on competency, assessed by well-designed and well-administered exams, will make the Canadian securities sector more efficient and fairer to its consumers.</p> <p>The commenter also strongly supports the proficiency model allowing prospective Approved Persons and firms select from the widest possible range of paths to learn the requisite material, with CIRO's focus being on the delivery of valid exams.</p> <p>(FPAC)</p>	<p>We acknowledge the comments.</p>
<p>7. We recommend CIRO host a recorded webinar once the new proficiency requirements are finalized and should thoroughly explain the new proficiency model; registration categories; CIRO's new role in exam administration; training; grandfathering; transition plans; and continuing education (CE) credits — essentially covering all the proposed changes. A question-and-answer period at the end of the webinar as well as an FAQ (and</p>	<p>We acknowledge the comments. We will consider the comments when deciding on the appropriate means of communication.</p>

SUMMARY OF COMMENTS	CIRO RESPONSE
<p>recording) posted to the CIRO website would also be valuable tools for Investment Dealers, who could then provide additional, firm-specific training as needed. (CIFIC)</p>	
<p>8. One commenter notes that there does not appear to be any guidance outlining the requirements for transition between Approved Person categories (i.e., IR to RR, RR to APM or PM, mutual fund to RR, etc.). The commenter questions whether the transition will involve a combination of exams and firm-led training? (CBA)</p>	<p>We are not clear on which transition the commenter is referring to. We have proposed a couple of transitional related provisions under Part B of proposed Rule 2600.</p>
<p>Comments on no mandatory courses tied to exams</p>	
<p>9. One commenter strongly supports the proposal for no mandatory courses. They believe any exam writer should have access to choice in the market and note there are numerous private and non-profit entities in Canada today capable of delivering education based on a widely understood proficiency model and some degree of transparency about exam processes. This model has worked in other markets, including the United States.</p> <p>The commenter encourages CIRO to consider specific steps such as conducting an annual conference or similar activity to communicate trends and patterns of exam takers to those entities supporting prospective Approved Persons. For the exams that are likely to see so few writers that the private sector might not consider course development worthwhile, find a way to subsidize course development costs. (FPAC)</p>	<p>We acknowledge the comments. We will consider the comments when deciding on the appropriate means of communicating updates. We will also consider the comment, following implementation of the model and assessing where there are gaps with respect to opportunities to learn.</p>

SUMMARY OF COMMENTS	CIRO RESPONSE
<p>10. One commenter would like to see a core syllabus or list of mandatory topics to ensure a standardized baseline of knowledge is delivered through all training providers. (FID)</p>	<p>We will be providing an exam syllabus for each exam which will provide clarity about the types and level of knowledge required for each exam.</p>
<p>11. One commenter is happy to see that CIRO has responded to previously raised concerns and will introduce an exam blueprint or syllabus with information such as topic weightings and sample exams to assist preparing candidates. (CFA)</p> <p>The same commenter notes that CIRO should be mindful of the economic incentives of the industry of exam preparatory vendors that will develop around the exams, as they have residual concerns about misleading representations and advertising to industry aspirants as to their job prospects relating to the passage of one or more exams in isolation. They urge CIRO to explore this reality further and consider publishing a roadmap for industry aspirants that they may consider when deciding on investing in exam preparation. (CFA)</p> <p>Another commenter also suggests that CIRO should consider preparing a guide on how students select a course provider (Kenmar)</p>	<p>We acknowledge the comments.</p> <p>We are mindful of the economic incentives mentioned. We plan to prepare a guide with information on how individuals can prepare for exams, including what to look for when considering a prep provider.</p> <p>We will not oversee preparatory courses or course providers, in keeping with best practice for regulators to adhere to a regulatory mandate to only oversee licensure examinations, instead of dealing with or even recommending commercial preparatory courses and providers. This is to ensure we avoid any potential for scope creep.</p>
<p>12. One commenter recommends CIRO accredit or endorse select courses or institutions and notes that in a model without accreditation, they recommend that CIRO produce study guides that define the body of knowledge associated with the competencies for each exam. Study guides will also help discourage low quality preparatory courses from being developed. It is the combination of knowledge, examination, experience and CE that will contribute to increased retail investor confidence and protection. (Kenmar)</p>	<p>At this time, we will not be considering the accreditation of preparatory courses or providers. We may consider this at a later time after the proficiency model has launched and we have had time to review and evaluate the model and are in a better position to evaluate prep course providers.</p> <p>For each exam, we plan to make available the following in both English and French:</p> <ul style="list-style-type: none"> • An exam syllabus,

SUMMARY OF COMMENTS	CIRO RESPONSE
	<ul style="list-style-type: none"> • Applicable CIRO Approved Person competency profile, • A sample exam.
<p>13. One commenter agrees that a more demanding exam coupled with a higher passing mark could result in an increase in the probability of proficient practicing RRs but the regulatory standard itself is not being raised.</p> <p>Enhanced CE should also help increase the percentage of RRs that are proficient to meet the existing standards, rules and regulations. (Kenmar)</p>	<p>We acknowledge the comment and disagree with the comment that the regulatory standard is not being raised. The model is intended to raise the proficiency bar, and improve alignment with firm training, and improve program currency and relevancy, being more responsive to industry change. As noted in the bulletin, we plan to provide 1 to 3 hours of mandatory CE on an annual basis for all Approved Persons to ensure that they keep up to date with those matters which we find are of utmost importance in a given year.</p>
<p>14. One commenter agrees that the general exam requirement is the appropriate outcome. They believe the exam should be based on a competency profile developed based on best practices. The competency profile should be widely available. It should be updated at least triennially.</p> <p>The competency profile should be rigorous. It should discriminate between those who will do the best thing for their clients and those who will not. It should assure a level of knowledge roughly equivalent to the securities-specific knowledge that a graduate of a four-year undergraduate degree in finance would demonstrate.</p> <p>The exam should be based on psychometric best practices. There should be substantial transparency about the exam and its outcomes.</p> <p>(FPAC)</p>	<p>We acknowledge the comments. The competency profiles are available and will be updated periodically.</p> <p>CIRO examinations will be designed according to psychometric best practices and use the competency profiles as the source of truth. To ensure transparency and alignment between the competency profiles and the assessments, CIRO will develop an examination syllabus (also referred to as a blueprint). The syllabus will describe in detail: the measurable learning outcomes derived from the competencies, the level of difficulty</p>

SUMMARY OF COMMENTS	CIRO RESPONSE
	<p>of each learning outcome against Bloom’s learning hierarchy (a widely used and research validated learning taxonomy), examination coverage, and examination question weightings. In addition, CIRO will produce a sample exam. These outputs will allow stakeholders to clearly see the chain of logic linking the competency profiles with the examination used to assess proficiency.</p>
<p>15. One commenter supports CIRO’s proposed general exam and active involvement in the exam design process, and notes that exam governance must be robust regarding design, questions, security, time to complete, location, administration and grading. A large question bank is needed to prevent repetition. The governance regime should be made public.</p> <p>The same commenter suggest that exams should utilize computer-adaptive testing technology. A computerized adaptive test is a computer-based exam that uses algorithms to tailor its test question difficulty levels to the individual test taker, depending on that examinee’s previous correct and incorrect answers. (Kenmar)</p>	<p>Over the course of the next year, we will be finalizing our exam development process, (i.e., structure, administration and standard score setting), and the overall exam governance process starting from the initial build through to the on-going maintenance and periodic updates to reflect changes to regulatory requirements. Details relating to exams will be available once we are further along in our exam development process. We will also ensure that there is a reasonable question bank for each exam to ensure the integrity and security of the exams being offered. We will be working with a vendor with expertise to assist us with certain elements of the services required, including exam design and governance. We expect to provide more relevant details in due course.</p>
<p>16. One commenter disagrees that an exam blueprint and competency profile alone are considered acceptable materials to create an opportunity for learning; they provide a foundation on which to build learning materials but they are not sufficient to deliver a memorable learning experience.</p> <p>They believe that a structured education program or formalized education program is necessary for an assessment-based proficiency model. Even if it is not mandatory, a comprehensive study program should be made available for industry students,</p>	<p>We have considered other regulatory approaches and the appropriate model for our regulatory framework. While there will not be mandatory courses and the exams will be based on published competency profiles, as previously noted, we will be publishing syllabuses, including exam parameters (i.e. exam governance, types and structures) and sample exams, and guides to candidates. Those who wish to provide prep courses, or candidates who choose to self-study, can leverage off the materials provided.</p>

SUMMARY OF COMMENTS	CIRO RESPONSE
<p>member firms, and post-secondary institutions. For context, within the ASIC framework (Australia), exam participants are provided with a compendium of reading resources; and within the MAS framework (Singapore), exams are accompanied by authoritative study manuals which are recognized by the regulator. (Learnedly)</p>	
<p>17. One commenter recommends a Roundtable be held with stakeholders to discuss and debate select components of the proposed proficiency model, either before and/or after the consultation closes. (Kenmar)</p>	<p>We have been consulting on the proficiency model and will continue to consult on various parts of the model as noted in this document. We will consider whether a roundtable discussion would be beneficial.</p>
<p>Comments on APM and PM proficiencies</p>	
<p>18. One commenter supports the proposal to continue to require APMs and PMs be subject to the same proficiency requirements as AARs and ARs as prescribed in NI 31-103 in the Proposed Amendments, and CIRO's proposal that if an APM or PM will manage a portfolio that includes derivatives, that they be required to complete the derivatives exam contemplated in the Proposed Amendments. (PMAC)</p>	<p>We acknowledge the comments.</p>
<p>19. One commenter noted concerns that CIRO is delegating at least some authority to the CFA Institute (with regards to the CFA Charter) and to CSI (with regards to the CIM® designation). They believe this is only appropriate to the extent that those entities</p>	<p>We disagree with the comment on delegation of authority. As noted in the Bulletin, we are aligning the requirements with those under NI 31-103.</p> <p>The same relevant investment management experience as currently prescribed in IDPC and NI 31-103 are included in the</p>

SUMMARY OF COMMENTS	CIRO RESPONSE
<p>demonstrate that they are meeting similar standards to the standards adopted by CIRO as part of this overall process.</p> <p>(FPAC)</p>	<p>proposed rules and individuals' relevant investment management experience (RIME) must be acceptable to the Corporation.</p>
<p>Comments on derivative proficiencies</p>	
<p>20. One commenter suggests that the exemption in 2625(3) may be further clarified by referring to the same (as opposed to legacy) options or futures contract, futures contract options. Also, in efforts to consolidate regulatory expectations within the rules, CIRO's expectation, as set out in its executive summary to this Consultation, that these individuals qualify their titles with "options only" or "futures only," should be included in the rule. (IIAC)</p>	<p>We acknowledge the comment and do not agree that "same" is more clear than "legacy". The proposed rule was drafted for consistency with Derivatives Rules Modernization. We do not agree that specifics of titles should be included in the rule; dealers and Approved Persons have an obligation to use titles that are not misleading.</p>
<p>21. One commenter notes that the derivatives exam relates to some of the riskiest instruments available. They hope that the difficulty is directly correlated to the harm that can be done to a client with this exam and other CIRO exams. They believe that a person should demonstrate the highest possible level of competency with derivatives and leverage before they can engage in any business with derivatives.</p> <p>(FPAC)</p>	<p>We plan to have exams that will appropriately assess the competencies of our published competency profiles. Our competency profiles are for highly competent and compliant Approved Persons from a regulatory perspective. Over the course of the next year, we will be finalizing our exam development process and will ensure that the exam designed is robust and set at an appropriate level to ensure those who understand all derivatives principles are successful in passing the exam. We also note that, irrespective of whether an individual passes an exam, whether they can trade in futures will continue to depend on whether their dealer is permitted to trade in futures, and whether the dealer permits the individual to trade in futures upon approval. Additionally, under the new proficiency model, we have introduced a baseline education/experience requirement for RRs, which is raising the bar.</p>

SUMMARY OF COMMENTS	CIRO RESPONSE
Comments on firm sponsorship	
<p>22. Commenters welcome the removal of the firm sponsorship requirement in order to be eligible to write an Approved Person exam. (FID, CIFIC, IGWM)</p> <p>Another commenter notes that as firm sponsorship is no longer required, Rule 2604(1)(ii) does not appear necessary and adds avoidable administration. (IIAC)</p>	<p>We acknowledge the comments.</p> <p>Rule 2604(1)(ii) is not related to firm sponsorship in order to be eligible to write a CIRO exam. Rule 2604(1)(ii) clarifies the dealer’s obligation to ensure the individual has received the appropriate training for the business and client type to reflect the proficiency principle and ongoing training requirement. Ongoing training may be applied to meet prescribed Continuing Education Requirements.</p>
<p>23. One commenter questions the appropriateness of firm sponsorship letters for Approved Persons before writing an exam. They believe Approved Persons should be able to exercise mobility between firms and by requiring sponsorship letters, they fear that Approved Persons, especially those early in their careers, may feel that their mobility is restricted. Employers should not be able to restrict an employee’s career potential. (FPAC)</p>	<p>Contrary to our original proposal, we will not require confirmation of firm sponsorship as part of the eligibility criteria and instead will rely on confirmation from individuals who enroll in CIRO exams that they intend to take the exams in order to test their competencies that are required in connection with the work they do or plan to do with a CIRO dealer.</p>
<p>Specific requests for feedback:</p> <p>The practicality of the proposed grandfathering provision</p>	
<p>24. Commenters support this proposed grandfathering provision. (IFIC, IGWM)</p>	<p>We acknowledge the comments. We will consider the comments when deciding on the appropriate means of communicating updates.</p>

SUMMARY OF COMMENTS	CIRO RESPONSE
<p>One commenter notes they reviewed the proposed provisions for grandfathering and transition and have no material concerns. (CFA)</p> <p>Another commenter generally agrees with the proposed grandfathering provisions, noting that as the industry transitions to the new model, there might be a period where educational providers are creating and/or adjusting their programs, potentially presenting a limited availability of course options. CIRO should coordinate with education providers to ensure a smooth transition in this area. (FID)</p>	<p>As discussed in the Bulletin, exams for each Approved Person category will be based on the published competency profiles. These competency profiles and detailed reference documents have already been published and are available as a resource to education providers, firms, and other stakeholders. Please visit Bulletin 23-0138 Competency Profiles for Approved Persons (Investment Dealers) for further information. We also plan to publish additional guidance and information in advance of the implementation date to assist further in a smooth transition in this area. As noted in our timeline, Proficiency Canadian Investment Regulatory Organization, we plan on information session(s) with education providers to ensure they have the necessary information.</p>
<p>25. Commenters support the proposed grandfathering and transitioning concepts where existing Approved Persons are not required to requalify or take an additional exam to remain registered, provided they continue in the same role.</p> <p>Several commenters have expressed concerns on the lapse in approval considered for someone to continue in the same role and notes that 90 days is insufficient. Commenters have recommended CIRO extend the time period. Suggestions include extending to 120 days, no more than one year, or to a year. One commenter also recommended CIRO consider for individuals who were previously registered for a period of at least four years in good standing, they</p>	<p>We acknowledge the comments.</p> <p>We recognize that any changes to our current proficiency model will require a robust transition plan considering all stakeholders involved. We reviewed some internal statistics and found over a period of two years 67% of individuals were reapproved on average under 90 days, another 22% were reapproved within 91 to 120 days, and 10% were reapproved 121 to 180 days, and 1% reapproved over 181 days or more after cessation. While the majority of individuals were</p>

SUMMARY OF COMMENTS	CIRO RESPONSE
<p>should not be required to requalify. While another commenter notes there should be no requirement for existing qualified Approved Persons to requalify with exams unless there are discipline issues.</p> <p>Commenters provided various reasons for the extension including to reduce regulatory burden on registrants who transition between firms, experience health issues, take time away for personal reasons, or suffer from a lack of employment opportunity. One commenter notes the time limit of 90 days is an unnecessary and prejudicial standard for grandfathering that creates barriers for re-entry, contrary to CIRO's objective as stated in the Consultation. Another commenter notes that ongoing CE requirements should be sufficient.</p> <p>(CL, EJ, CIFIC, CBA, IIAC)</p>	<p>reapproved under 90 days, we agree that it is important to facilitate a smooth transition within the industry while raising the bar and as such will extend this time period to 180 days.</p> <p>We are of the view that this proposed approach will allow us to grandfather in the existing Approved Persons, while also taking a step forward towards raising the bar by not grandfathering individuals indefinitely when they cease to be an Approved Person. We have also proposed that anyone who has two or more years of experience in the last three years, prior to requesting approval, will not be required to complete the general exam even if they are not captured by the grandfathering provision.</p>
<p>26. One commenter notes that the exemption contemplated in draft 2625(2)(i) is unclear as it appears to refer to both an applicant for approval and an individual who has experience in an Approved Person category and has met proficiency requirements. (IIAC)</p>	<p>To clarify we have proposed an additional grandfathering provision for those that may not qualify for the general grandfathering provision. Previously Approved Persons who have a minimum of two years of experience in the same Approved Person category within the past three years, will not be required to complete the CIRE. For example, an individual previously approved as an RR, will not be required to complete the CIRE, if they have two years of experience as an RR within the three years prior to reapproval as an RR. Prior to reapproval, this individual would only need to complete the RR securities exam.</p>

SUMMARY OF COMMENTS	CIRO RESPONSE
<p>27. One commenter notes they expect grandfathered Approved Persons to perform, be evaluated and supervised in accordance with CIRO proficiency standards and comply with the CIRO Code of Conduct. In any event, they note that dealers must be held accountable for the actions, inactions and negligence of their Registered Representatives. (Kenmar)</p>	<p>We acknowledge the comment. To clarify, new and existing Approved Persons are subject to CIRO’s Rules, including any standard of conduct within the rules and proposed code of conduct training.</p>
<p>Specific requests for feedback: The practicality of the proposed transition provision for those who have enrolled in a CSI exam prior to January 1, 2026, and not yet completed the course and related exam</p>	
<p>28. One commenter strongly supports the concept that those currently enrolled in Canadian Securities Institute (CSI) courses should be allowed to continue with minimal disruption. (CL)</p> <p>However, several commenters urge CIRO to reconsider the transition timeline so that courses completed remain valid for three years similar to the course validity under the existing model. For example, instead of having until January 1, 2027, individuals should be given the full three years to complete the exam, satisfy other proficiency requirements and submit their application for registration. (IFIC, CL, IGWM).</p>	<p>We acknowledge the comments.</p> <p>We will not be mandating any courses as prerequisites for our prescribed CIRO exams. Accordingly, the course validity provision, applicable to current courses, under the current model have been proposed to be repealed. Instead, we have proposed an exam validity provision with respect to the proposed prescribed exams. In the proposed model and similar to the existing course validity periods, we have proposed a three-year validity period for the proposed exams, with an additional validity provision to recognize one year of relevant experience during the three-year period prior to the date of application for approval.</p> <p>In the proposed Rule 2629 for individuals that may have started a course prior to the new model, we are providing them with the added flexibility to complete their existing course or they can choose to take the new required CIRO exam.</p> <p>Extending our recognition of these courses would be contrary to our objective to raise the proficiency bar under our new robust proficiency model.</p>

SUMMARY OF COMMENTS	CIRO RESPONSE
<p>29. One commenter notes these transition provisions raise a number of practical questions that CIRO should publish guidance on, including whether the CPH is required if someone enrolls in the CSC before Jan 1, 2026 or is the mandatory conduct training replacing the CPH requirement. Another practical question is whether CIRO will reconsider the condition requiring the sponsoring firm to apply for approval by January 1, 2027 as the approval process is yet to be defined, creates unnecessary burden for the firm, and, as a practical matter, includes a deadline occurring during the holiday season which will risk delays in meeting prescribed timelines. (CBA)</p>	<p>Thank you for your comments and specific questions. We will consider them as part of transition related information that we will provide in advance of the implementation.</p> <p>If an individual completed both the CSC and CPH, they could request approval under provision 2629. However, they would still be subject to the post approval training in 2604 including conduct training.</p> <p>With the expiry of the CSI contract as of December 31, 2025, individuals who enroll for a CSI course will have up until December 31, 2026, to complete the exam offered through the CSI. The transition provision in 2629 is providing an opportunity for individuals who have already enrolled in a CSI course before January 1, 2026, to complete the course and related exam, and have it recognized irrespective of the fact that the new model does not otherwise consider them as acceptable proficiencies. Rule 2629 sets out the conditions under which the CSI courses would be acceptable and that includes “the individual would satisfy the proficiency requirements applicable to the same approval category prior to January 1, 2026, upon completion of the course completed in subclause ii.” The proposed rules reflect this approach. We believe this proposal provides flexibility to individuals who are in the midst of completing their courses under the existing proficiency model. We disagree that having the condition that the firm apply for approval by January 1, 2027, creates a burden as firms would already be preparing to apply for approval once an individual has completed their proficiencies. We will provide additional communication and information to dealers with regards to transition matters in advance of the deadline.</p>

SUMMARY OF COMMENTS	CIRO RESPONSE
<p>30. One commenter provides by way of housekeeping, draft Rule 2629 should refer to necessary courses (in the plural) where applicable. (IIAC)</p>	<p>We acknowledge the comment.</p>
<p>Specific requests for feedback: The practicality of the proposed transition provision for those who are required to complete the Wealth Management Essentials course</p>	
<p>31. One commenter notes that to ensure a level playing field, the RR retail exam should be available at least 35 months prior to the effective date of the rule change. Condensing the period for completion (i.e., for individuals enrolling in 2025) may jeopardize the registration of Approved Persons. Firms will need systems implemented to ensure registrants in this transition period are clear on their choices and deadlines. Significant time and resources will need to be dedicated to creating a system for managing post-licensing requirements (i.e., WME) during the transition period. (CBA)</p>	<p>In proposed rule 2629(2), we proposed that if an individual is subject to the WME post licensing, they be provided with the following options in order to ensure there is a fair level playing field for individuals whose pre-approval proficiencies were under one regime and post approval requirements under the new regime:</p> <ul style="list-style-type: none"> • Complete the WME by the required due date or December 31, 2026, whichever is earlier, or • Complete the new RR retail exam by the required due date. <p>As discussed in the Bulletin, we aim to publish the final rules for implementation by the second half of 2025 to ensure the launch of January 1, 2026, and to provide stakeholders time to finalize their preparations.</p>
<p>32. One commenter supports this proposal but urges CIRO to publish information that will clarify what “required due date” means. (IFIC)</p>	<p>Under IDPC Rules, RRs have 30-months after their approval date as an RR to complete the WME. The required due date refers to the specific month/day/year that a particular RR must complete their WME by.</p>
<p>33. One commenter suggests CIRO consider providing the additional option of completing the remaining levels of CFA Program instead of the WME, consistent with the exemption available under s. 2929(6)(vi)(a) of the existing IDPC Rules. (CFA)</p>	<p>We acknowledge the comment. We note that the existing exemption under IDPC Rule 2628(6)(vi)(a) is for those individuals who have already completed the WME course and provides an exemption for those that qualify from having to rewrite the course. The discretionary exemption process is</p>

SUMMARY OF COMMENTS	CIRO RESPONSE
	available to those individuals who wish to apply to CIRO to consider whether the individual’s experience and/or completion of other alternative exams or courses is an acceptable alternative to the WME requirement.
<p>Specific requests for feedback:</p> <p>The amount of time your dealer needs to update their RR and IR training programs, keeping in mind that the published competency profiles and related sub-competencies will be utilized for providing guidance on the training programs proposed to be completed within 90 days of approval</p>	
<p>34. Commenters encourage CIRO to publish as soon as possible, detailed guidance on firm training including CIRO’s expectations on content, permitted activities during training, and reporting. They note that timing is important as dealers would not be able to update their programs until the guidance is provided. (EJ, CBA)</p> <p>One commenter notes that making available a standard or minimum curriculum will significantly ease the burden of creating educational content from scratch at each dealer and external provider. (FID)</p>	<p>As discussed in the Bulletin, rather than rely on prescriptive criteria, we are of the view that dealers need to leverage the published competencies and sub-competencies for retail RRs and IRs to ensure they provide training in each of the sub-competency areas applicable to their business model, and the role of the RRs and IRs at their firm. The guidance that we will provide will be in alignment with published competency profiles which is already publicly available for dealers to start considering. To clarify, we expect dealers to train on each sub-competency area outlined. However, the level of detail and chosen approach to training may be tailored based on their business model. We are of the view that taking this principle-based approach will increase compliance with the proficiency principle as dealers will have the flexibility and responsibility to decide what is appropriate training.</p>
<p>35. Several commenters provided their estimated timeframes which ranged from a minimum period of nine months, one year, to 18 months to give dealers enough time to update or create their training programs. (CIFIC, EJ, IFIC, CBA)</p>	<p>We acknowledge the comments. See response #34. We also plan on publishing additional guidance on dealer training in advance of the implementation date to provide additional clarity. Please refer to the published timeline which will be</p>

SUMMARY OF COMMENTS	CIRO RESPONSE
<p>One of the commenters noted the estimated timeframe will allow dealers to make the necessary operational adjustments, create proper training materials (or select the right third-party vendor) and implement additional relevant compliance procedures, including policies for reporting completion of dealer-led training to CIRO. (CIFIC)</p> <p>Another commenter noted this process includes but is not limited to retaining technical writers, evaluating third-party service providers, designing the curriculum, compliance review, quality assurance testing, and developing a record retention framework. Given the need to create programs tailored to each Approved Person category, the amount of time required may be longer than 18 months. (CBA)</p>	<p>updated as needed Proficiency Canadian Investment Regulatory Organization</p>
Other comments related to dealer training	
<p>36. One commenter notes that CIRO’s alignment with dealer training is positive ensuring there are no gaps, inconsistencies or misinterpretation of securities laws and regulations.</p> <p>The same commenter recommends that training is client focused and include training about vulnerable clients. (Kenmar)</p>	<p>We acknowledge the comment. As discussed in the Bulletin, rather than rely on prescriptive criteria, we are of the view that dealers need to leverage the published competencies and sub-competencies to ensure they provide training in each of the sub-competency areas applicable to their business model, and the role of the RRs and IRs at their firm.</p>
<p>37. One commenter questions the proposal of firm training for the institutional RRs and IRs and requests the proposal be withdrawn. They do not see the practical benefits firm training would bring to the institutional market that would warrant the cost and burden of such programs are not clear. We are also not aware of any issues or concerns arising to date that would require such training programs to be imposed for this market. (CBA)</p>	<p>We are of the view that dealer training is integral to a dealer’s compliance with the proficiency principle. Dealer training is also an integral part of an Approved Person’s proficiency and facilitates their continuous competency in designated roles. Dealers have an on-going obligation to ensure compliance with the proficiency principle and, as such, are required to provide training to their Approved Persons, as needed, to ensure they</p>

SUMMARY OF COMMENTS	CIRO RESPONSE
<p>Another commenter notes that RRs who deal only with institutional clients should be exempted from retail focused training courses. Training needs may vary on a dealer-by-dealer basis. (IIAC)</p>	<p>remain proficient at all times relative to their respective roles. Currently, RRs and IRs who deal with institutional clients do not have a pre-approval training requirement. We are of the view that new RRs and IRs dealing with institutional clients should also be required to complete a dealer training program that is aligned with the competency profile and supports the proficiency principle.</p>
<p>38. One commenter notes that the Investment Dealers they represent believe the 90-day period for completion of dealer firm training is too short and should be extended to 120 days after receiving CIRO approval. (CIFIC)</p>	<p>Currently dealers are required to provide a prescriptive 90-day training prior to approval. We have proposed a more principle-based approach and extended that to “within 90 days of approval” We are unclear of why the extended timeline in comparison to the current requirement is too short.</p>
<p>39. One commenter suggests CIRO have further public consultations on the proposed content and structure of the firm training modules. The commenter notes that the proposed requirement to provide training “within 90 days of approval” and report training completion to CIRO “within 90 days” would be administratively burdensome and impractical compared to the current process, which would avoid the unintended consequences of automatic suspensions. The Consultation (which was limited to investment dealers) states in part: “We find that we have an opportunity to create greater alignment between our competencies and firm training and take a more principle-based approach to firm training in alignment with the Mutual Fund Dealer rules. We note that Mutual Fund Dealer Rules 1.2.4 and 100 do not include a provision for automatic suspension. Alternatively, it would be more practical for dealers to report specific non-compliance to CIRO rather than impose automatic suspensions. (IIAC)</p>	<p>We acknowledge the comments.</p> <p>We have proposed that training be completed “within 90 days of approval” to provide dealers with flexibility in determining the appropriate timing and training for their RRs and IRs based on the published competencies. For example, dealers may have an internal policy to only apply for registration approval after the training program is completed. We would however require that the training be completed and reported to CIRO no later than the 90th day after approval.</p> <p>See response in #58 about automatic suspensions.</p>

SUMMARY OF COMMENTS	CIRO RESPONSE
<p>Specific requests for feedback:</p> <p>We are interested to know if dealers will take an active role in training their new hires to prepare for the exams.</p>	
<p>40. Commenters note they need more information on the exam framework to make an informed decision, including the form and substance of the exam, timeline for providing exam blueprints and sample exams, availability of third-party training providers, whether CIRO will examine dealer and/or third-party courses/training content, and how CIRO will address any gaps in training if for example, there is a shortage of third-party/non-dealer course providers. (CBA, IFIC)</p>	<p>At this time, we will not be considering the accreditation of preparatory courses or providers. We may consider this at a later time after the proficiency model has launched and we have had time to review and evaluate the model and are in a better position to evaluate prep course providers.</p> <p>We believe there will be adequate opportunities for students to learn and prepare for the CIRO exams through the competitive market. As noted earlier in this document, we will be providing materials such as syllabuses, guides and sample exams to provide that opportunity.</p>
<p>41. One commenter notes they provide training when onboarding individuals and on an ongoing basis. The commenter also encourages individuals to complete professional designations, and fully supports their financial advisors and other associates throughout their career with the dealer. (EJ)</p>	<p>We acknowledge the comment.</p>
<p>42. One commenter notes the absence of mandatory courses creates an opportunity for dealers to do more to help candidates meet the requirements; however, smaller dealers have limited resources. Third-party vendors may need to be engaged to help in that regard and the cost should remain reasonable. (CIFIC)</p>	<p>The proposal does not mandate that dealers train individuals to prepare for exams, although we acknowledge that some dealers may choose to do so. We also understand that some small dealers already do not hire individuals who are new to the industry because there are training requirements that they would need to provide, so instead, they choose to hire individuals who are already qualified. We will consider the comment and plan to publish the relevant materials in advance.</p>

SUMMARY OF COMMENTS	CIRO RESPONSE
<p>43. One commenter believes dealers and educators will need 12 months, at a minimum, after CIRO has published its exam resources to develop education programs and be ready for the transition. The commenter urges CIRO to prioritize the development of its exam-related resources without delay to allow time for stakeholders to develop their respective training and resources, which will also allow time for CIRO to adjust the assessment tools. (Learnedly)</p>	<p>See response in #42. As discussed in the Bulletin, exams for each Approved Person category will be based on the published competency profiles. These competency profiles and detailed reference documents have already been published and are available as a resource to education providers, firms, and other stakeholders. Please visit Bulletin 23-0138 Competency Profiles for Approved Persons (Investment Dealers) for further information.</p>
<p>Specific requests for feedback: We are interested to receive comments on the relevant experience proposed and the types of experiences that dealers find common and relevant.</p>	
<p>44. One commenter notes hiring decisions should rest with the dealer who is best placed to select the most fitting job candidates from its available options. The commenter recommends CIRO defer to a dealer’s professional judgment in their determination of an individual’s relevant education and experience and has also suggested updating language in the proposed Rules. (IIAC)</p>	<p>We acknowledge the comment. Dealers may be in the best position to determine the relevant experience and education that best suits their specific unique business needs. This should not be conflated with CIRO’s gatekeeper function. CIRO has an important regulatory function to assess proficiency and ensure only qualified individuals are approved. We will provide guidance on what CIRO considers as acceptable, to help streamline the process for when dealers are considering an individual and applying for approval.</p>
<p>45. Commenters request CIRO provide guidance and additional information about “relevant experience” for RRs well in advance of the implementation date of the new proficiency program. (CIFIC, CL, IFIC, EJ, Kenmar, CBA) One of the commenters have also noted that CIRO has not articulated why it was deemed necessary to double the proposed</p>	<p>We understand that dealers would likely benefit from some guidance on what would be relevant experience and we plan to publish such guidance in advance of the implementation of the new proficiency program. We have prioritized the need for those who have core regulatory responsibilities to have a certain level of education or experience before undertaking an Approved Person role. In</p>

SUMMARY OF COMMENTS	CIRO RESPONSE
<p>baseline experience requirement for RRs to four years, rather than two years as originally proposed. It is difficult to assess the reasonableness of the increase as this would depend on what “relevant experience” would mean, which has not yet been clarified through proposed guidance. (CBA)</p> <p>Another commenter supports the alternative experience requirement for RRs; however, recommends that CIRO retain the original two-year experience requirement. (IFIC)</p>	<p>particular, we are of the view that a baseline education (i.e., accredited diploma or degree), or four years of relevant experience, is a necessary first step before being approved in a role as an RR. A baseline education requirement for RRs will specifically enhance our proficiency regime and is consistent with our public interest mandate, which includes investor protection. While it is important to raise the proficiency bar, it is also important to ensure that we do not create unnecessary barriers to entry by limiting the types of individuals who may work as an RR to those who have specific types of degrees. Individuals from diverse backgrounds may be competent to serve the investing public considering that, in addition to the baseline education or experience proposed, the individuals will also have to demonstrate their competence by completing the prescribed exams and training. The objective is to raise the bar without creating unnecessary barriers. We are of the view that the proposed approach strikes this balance.</p>
<p>46. One commenter remains unconvinced that the typical Dealer operating environment can replicate the rigor of a university experience. A number of jurisdictions including Australia (ASIC) apparently agree by requiring a relevant degree.</p> <p>The same commenter is concerned that four years of investment industry experience is not a reliable proxy to ensure individuals have the communication, critical thinking analytical and problem-solving skills and competencies afforded through achievement of a relevant degree from an accredited university. Experience may be limited due to a Dealer's business model, product shelf, service offering, training program, reward system or corporate culture. Experience should be continuous, not staggered over different times and Dealers. (Kenmar)</p>	<p>We have proposed to require a diploma or degree from an accredited post-secondary institution on the basis that many types of post-secondary education may offer a candidate the required skills and meet our objective. We have also proposed four years of relevant experience acceptable to the Corporation as described in the Bulletin. We looked at the ASIC model as part of our review of relevant proficiency related standards and best practices taken up by other regulatory bodies, as described in the Consultation Paper. We concluded that ASIC model, which publishes a list of approved degrees and equivalent qualifications, is not aligned with the principle-based approach offered through the proposed model and our view on the application of the proficiency principle. We are of the view that with the proposed approach, we strike the right</p>

SUMMARY OF COMMENTS	CIRO RESPONSE
	balance between raising the bar and not creating unnecessary barriers to entry by mandating specific types of diplomas or degrees. As noted above, CIRO will continue to exercise its gatekeeper responsibilities.
<p>47. One commenter notes that in addition to experience advising on the sale of securities gained at a dealer member, experience in financial services such as financial planning, insurance, or advising on the sale of mutual funds gained at a mutual fund dealer, must qualify as relevant experience for RRs. (CL)</p>	<p>We acknowledge the comments. We will consider the comment in advance of publication of the guide relating to relevant experience.</p>
Comments on baseline education for RRs	
<p>48. Commenters requests clarification and guidance on which educational degrees would be relevant, including a definition of relevant education streams. For example, disciplines such as finance, economics, quantitative methods, law and business administration may be considered relevant. Would those obtained outside of Canada or through non-traditional educational pathways also be considered relevant or would an exemption be required. Guidance on relevant experience should be unambiguous so that dealers can have as much certainty as possible during their hiring process.(EJ, RC, Kenmar)</p>	<p>We will consider the comments and provide information as part of the related guidance on this requirement in advance of the implementation. We propose to accept diplomas and degrees from either foreign or domestic accredited post-secondary institutions, which demonstrate a baseline level of analytical and communication skills that will allow an individual to understand and apply the competencies relevant to their Approved Person role.</p>
<p>49. Two commenters recommend CIRO to reconsider the educational requirement for RRs noting several reasons, including it:</p> <ul style="list-style-type: none"> ○ creating a barrier to entry, ○ imposes significant time and financial burdens, ○ creates inequity in the industry, ○ disproportionately affects immigrants 	<p>We acknowledge the comments. See our response in #44 and #45</p>

SUMMARY OF COMMENTS	CIRO RESPONSE
<ul style="list-style-type: none"> ○ most degrees or diplomas having no relation to the industry <p>One of the commenters note that licensing exams and continuing education are sufficient baseline requirements, an exam-centric model ensures consistency and diverse pathways enrich the industry. Many RRs hold multiple licenses, such as in investments and life insurance, which provide them with the expertise to better serve their clients—far more relevant than an unrelated degree or diploma. They believe it is the dealer’s responsibility to assess an individual’s competency and suitability to perform the role of an RR and serve the investing public in a competent, ethical, and compliant manner.</p> <p>(FID, PFSL)</p>	
<p>50. One commenter views the proposal for a degree or diploma from an accredited post-secondary institution to be inconsistent with the stated principles and may unnecessarily exclude individuals who would otherwise possess the required maturity and skills.</p> <p>The commenter strongly urges CIRO to similarly consider applying a principles-based approach to the assessment of RRs experience profile as CIRO does for APM and PMs experience. Experiences should also be considered broadly to determine whether they provide or demonstrate maturity, analytical skills or communication skills.</p> <p>The commenter acknowledges that CIRO’s existing exemption process may potentially mitigate some of the issues raised but the process can be lengthy, complex and costly. They encourage CIRO to publish all proficiency exemption decisions to enhance transparency and also strongly recommends CIRO develop and publish clear and comprehensive guidance, relating to the</p>	<p>We acknowledge the comments. See our response in #45.</p>

SUMMARY OF COMMENTS	CIRO RESPONSE
assessment of both baseline education and relevant experience. (IFIC)	
51. One commenter raised some concerns about education and remote areas and Indigenous communities. They note there is some evidence to suggest that Indigenous Canadians are underrepresented among post-secondary graduates. They believe CIRO intends to follow the spirit of Truth and Reconciliation and hopes that we will not implement policies that are contrary to this. The commenter suggests that CIRO could allow those who can demonstrate First Nations heritage an exemption to any education requirements. (FPAC)	We acknowledge the comment and will consider it as part of our review of the relevant experience discussions and guidance.
Comments on experience for Executives	
52. Commenters request CIRO provide guidance and additional information about “relevant experience” for Executives, and UDPs well in advance of the implementation date of the new proficiency program. (CIFIC, CL, IFIC, EJ, CBA)	We plan to provide guidance in advance of the implementation of the model. We hope to publish this in Spring of 2025. However, we remind dealers that the competency profile and detailed reference document for the Executive including UDP have already been published and are available as a resource.

SUMMARY OF COMMENTS	CIRO RESPONSE
<p>53. Commenters express concerns that what is considered “relevant” experience for Executives including the UDP may have unintended consequences including limiting the potential pool of candidates as well as candidate diversity if the two years of experience is too narrowly construed or confined to the same business type or even another Executive role within the same investment dealer.</p> <p>Commenters recommend that CIRO revises the proposal to mitigate the potential unintended consequences and provide greater flexibility for experience requirements. Diversity of experience can bring strength to an executive management team.</p> <p>One of the commenters also recommend that directors and officers who are not involved in the day-to-day management of the business be exempted from this new requirement.</p> <p>(CL, IFIC, CBA)</p>	<p>We are of the view that each Executive at the dealer, including the UDP, should have experience that is, at a minimum, the same in duration as the experience applicable to Supervisors in addition to the general experience requirement set out in IDPC Rule 2503. The objective is to raise the bar without creating unnecessary barriers or unintended consequences. We plan to provide guidance well in advance of the implementation to assist dealers with determining relevance of experience for Executives.</p> <p>We have not proposed any new baseline experience requirements for Directors.</p>
<p>54. One commenter notes that the experience requirement for Executives unnecessarily limits the ability to hire from the universities. We generally agree with the 60% rule, but with this addition of every executive needing to have two years of experience, it intentionally restricts candidates from being onboarded, trained (and supervised) at the executive level.</p> <p>(FID)</p>	<p>See response in #53</p>

SUMMARY OF COMMENTS	CIRO RESPONSE
<p>55. While we agree that all Executives should have a base level of proficiency, we believe that particularly in the case of the Ultimate Designated Person (UDP), specific industry experience is not only unnecessary but will also detrimentally limit the pool of potential candidates.</p> <p>A strong CEO does not need specific industry experience if they are surrounded by a team of Executives (including a CCO and CFO) who have the necessary experience and technical knowledge to be able to provide the required support. Furthermore, firm leadership may benefit from outside perspective that a non-industry CEO can bring. (RC)</p>	<p>We have proposed that each Executive, including the UDP, at a dealer should have the two years of relevant experience. We are of the view that this would not create unnecessary barriers. As noted in the Bulletin, while CIRO Staff will consider the relevance of an applicant’s education or experience as part of the fit and proper review, we expect dealers to assess this considering the proficiency principle and only put forward candidates who have the appropriate level of experience consistent with their obligations under the proficiency principle. To help streamline the process, we plan to provide guidance in advance of the implementation of the model.</p>
<p>56. Several commenters are concerned that this requirement might create a barrier for executives who, for all other purposes, are sufficiently qualified through transferrable experience and skillsets.</p> <p>Dealers should also be given the flexibility to hire people with specific expertise (i.e., technology), as long as there is a sufficient complement of other Executives with relevant experience in the industry.</p> <p>Commenters encourage CIRO to expand its considerations on what is considered ‘relevant’ experience for Executives.</p> <p>(EJ, WS, IGWM, RC)</p>	<p>We acknowledge the comments.</p> <p>See responses #53 and 55</p>
<p>57. One commenter is uncertain why the acceptance of FINRA experience for CCOs would be constrained to an ‘affiliated’ dealer. If FINRA experience is acceptable, it should be widely acceptable for all dealers to utilize in their pool of prospective candidates, rather than just for dealers with U.S. affiliates. (FID)</p>	<p>CCOs currently have experience requirements under the IDPC Rules, which we proposed to keep with one additional change of recognizing experience with an affiliated FINRA dealer. This addition reflects inquiries that CIRO has received from firms concerning exemptive relief applications because several CIRO investment dealers employ individuals registered with affiliated</p>

SUMMARY OF COMMENTS	CIRO RESPONSE
	<p>FINRA firms to conduct similar activities domestically. In response, we have proposed to include this experience.</p> <p>For other FINRA experience that the dealer thinks may be relevant for the CCO, the dealer may choose to apply for a discretionary exemption.</p>
Comments on automatic suspensions, reporting and NRD	
<p>58. Several commenters recommend CIRO reconsider the proposal for automatic suspension due to failure by an investment dealer to notify CIRO of completion of proficiency requirements within the prescribed timeline.</p> <p>Commenters propose that CIRO implement a reasonable grace period of at least ten business days to submit the training completion notification to avoid unintentionally suspending an otherwise qualified Approved Person.</p> <p>One of the commenters also request that CIRO clarify the reinstatement process for those suspended.</p> <p>(CBA, CL, IFIC, IGWM)</p>	<p>The proposal for automatic suspension due to failure by a dealer to notify CIRO within the prescribed timeline is not a new requirement. In fact, it is status quo to other reporting requirements currently in place under the existing proficiency model for post-approval requirements and for completion of CE requirements. Registration Staff will have procedures and checks and balances in place to avoid unnecessary suspensions of Approved Persons. The reinstatement process will be the same as under the current proficiency model.</p> <p>We encourage dealers to have their Approved Persons complete their required conduct training and firm training earlier rather than later and for dealers to build into their processes time for notification to CIRO.</p> <p>We will publish additional information in due course.</p>

SUMMARY OF COMMENTS	CIRO RESPONSE
<p>59. One commenter notes that since the employees of Approved Participants of the Bourse must be duly licensed when trading, they believe that Approved Participants of the Bourse will be impacted by this proposed change as they will have to establish policies and procedures to manage access to the Bourse in the case of a suspension. They will give due consideration to such situations as work progresses on the revamp of the regulatory framework applicable to employees of Approved Participants of the Bourse. (TMX)</p>	<p>We acknowledge the comments.</p>
<p>60. One commenter asks for clarification on reporting responsibilities and NRD, including whether responsibility for reporting completion of CIRE and Approved Person exams rest with CIRO or the individual?</p> <p>Will the NRD application still be required and at what point in the process? Will it be part of the approval/registration process after the completion of the CIRE and Approved Person Exam?</p> <p>What completion looks like for the CIRE and Approved Person exams (i.e., will a completion certificate be provided, to be included in the NRD application?)</p> <p>(CBA)</p>	<p>Individuals will be responsible for notifying and providing proof to their dealer on completion of required exams as they currently do with their course completions. Dealers must ensure timely and accurate filings on NRD.</p> <p>NRD will continue to be the official record where proficiencies are reported.</p> <p>We will be finalizing our exam development process, Details relating to exams will be available once we are further along in our exam development process. We are working on exam delivery and portals and will provide further information as it is available.</p>
<p>Validity periods and extended license retention</p>	
<p>61. One commenter requests CIRO to extend the course validity period beyond the proposed three-year validity period to five years and recommends CIRO create a new framework that allows individuals with extensive experience to easily put their license on hold for an extended period of time. The framework could</p>	<p>We are not mandating any courses as prerequisites for our prescribed CIRO exams. Accordingly, course validity under the current model will expire and be replaced by exams subject to our approach to grandfathering, described in the Bulletin. In the proposed model and similar to the existing course</p>

SUMMARY OF COMMENTS	CIRO RESPONSE
<p>include an annual fee for a license that is on hold and some mandatory continuing education similar to the FINRA maintaining qualifications program.</p> <p>CIRO could also consider implementing a similar requirement to the CPA's annual acknowledgement, to ensure all professionals under its purview consistently reaffirm their commitment to the ethical practices and principles that guide our industry. (CIFIC)</p>	<p>validity periods, we have proposed a three-year validity period for the proposed exams, with an additional validity provision to recognize one year of relevant experience during the three-year period prior to the date of application for approval. We are currently reviewing the downstream effects of our proposed model on Continuing Education (CE) as it may apply to exam validity.</p> <p>All regulated persons are subject to IDPC Rules including the general standards of conduct. We will review whether a code of conduct should form part of the existing Standards of Conduct rules or a guidance to these rules in alignment with the requirements being developed along with or following our Rule Consolidation Project.</p>
<p>62. One commenter suggests for exam validity, that CIRO consider continuing Regular or Affiliate membership in good standing in CFA Institute (similar to that held by a CFA charterholder in good standing) should cure the 'expiry' period of three years from exam completion for passers of the CFA Level 1 exam who later become applicants for approval. (CFA)</p>	<p>We acknowledge the comment. We will review and analyze this further.</p>
<p>Comments on mandatory conduct training and mandatory continuing education</p>	
<p>63. One commenter is generally pleased with the published competency profiles and the proposed mandatory conduct training on ethics and strongly suggests CIRO introduce training and CE on issues related to:</p> <ul style="list-style-type: none"> ○ the effects of artificial intelligence on industry practice and clients, ○ diversity, equity, inclusion, and 	<p>As discussed in the Bulletin, we plan to provide 1 to 3 hours of mandatory CE on an annual basis for all Approved Persons to ensure that they keep up to date with those matters which we find are of utmost importance in a given year. We thank you for your suggestions and will consider them when developing our mandatory CE.</p>

SUMMARY OF COMMENTS	CIRO RESPONSE
<ul style="list-style-type: none"> ○ Indigenous reconciliation in the Canadian context, ○ ESG and climate-related issues, and ○ other emergent developments relevant to the competency profiles, reflecting the ever-evolving nature of what constitutes full competence. (CFA) <p>Another commenter suggest that mandatory CE for RRs should include regular ethical/conduct content and use information derived from an analysis of client complaints. They also suggest CIRO have a dedicated course for client complaint handlers and investigators. (Kenmar)</p>	
<p>64. One commenter appreciates CIRO's intention to conduct mandatory conduct training, however it is important that CIRO maintains its regulatory role and ensures the quality of a baseline educational standard without becoming the primary or default provider itself, as this will limit diversity in educational offerings. (FID)</p>	<p>We acknowledge the comment. We are mindful of the potential for 'scope creep' and will continue to work only subject to our regulatory mandate and within our regulatory perimeter.</p>
<p>65. One commenter strongly supports the use of case-based learning for conduct training. For cases to be valuable, they should be based on real-life cases that present ethical grey areas to Approved Persons and have the opportunity for learning, and not just be an exercise in memorizing a code of ethics or similar device. (FPAC)</p>	<p>We acknowledge the comments. As discussed in the Bulletin, we plan to include some form of assessment throughout the interactive training to ensure that the individual is learning the information, rather than passively listening. We also plan to include scenarios and case-based learning.</p>
<p>66. One commenter suggests the conduct training should be a pre-approval requirement and a protocol needs to be in place to ensure that the person taking the online conduct training course is in fact, the correct person.</p>	<p>We are mindful of maintaining the balance between raising the bar and not creating any unnecessary barriers. We have proposed that mandatory professional conduct training be completed within 30 days of approval to allow the individual to be in the role when they receive the training. This will also</p>

SUMMARY OF COMMENTS	CIRO RESPONSE
<p>They are pleased that all existing Approved Persons must complete the conduct training by December 31, 2026, and also suggests that it might be a good idea to offer such training to senior executives and Board members, the root cause of so many issues.</p> <p>CIRO should publish a Code of Conduct outlining how RR's should conduct themselves when carrying out their regulatory responsibilities and in their relationships.</p> <p>(Kenmar)</p>	<p>ensure that individuals receive the training once it has been determined that they are suitable for approval.</p> <p>All regulated persons are subject to IDPC Rules including the general standards of conduct. We will review whether a code of conduct should form part of the existing Standards of Conduct rules or a guidance to these rules in alignment with the requirements being developed along with or following our Rule Consolidation Project.</p>
<p>67. One commenter notes the 30-day period to complete the conduct training for new Approved Persons is too short and should be extended, at a minimum, to 60 days after approval.</p> <p>Furthermore, ethics and conduct training should not be required for existing Approved Persons as their prior training covered ethics and conduct.</p> <p>(CIFIC)</p>	<p>We disagree that the 30-day period is too short to complete the conduct training as it will be readily available for Approved Persons to complete, and the planned length of the training is under a few hours.</p> <p>We are of the view that mandated conduct training is an important and integral part of a robust proficiency model. We have also proposed that all existing Approved Persons complete the mandatory conduct training by December 31, 2026, and may utilize this training towards meeting their mandatory CE requirement for the first year of the new program.</p>
<p>68. One commenter notes that exams should include professional conduct content which would eliminate the need for mandatory professional conduct training. Alternatively, any proposed conduct training content by CIRO and its structure should be published for comment with details of CIRO's approach to ensure it will not result in duplicative efforts.(IIAC)</p> <p>Another commenter thinks the conduct training will overlap with existing conduct training the dealer provides and suggests CIRO</p>	<p>We are of the view that assessments based on published competencies are an appropriate tool to verify the competency of those who apply to be an Approved Person. The exams will include content relating to conduct and ethics. However, specific and targeted training on ethics and conduct are also an integral part of a robust proficiency regime.</p>

SUMMARY OF COMMENTS	CIRO RESPONSE
<p>consider withdrawing the requirement or exempt firms who already provide such training. (CBA)</p>	
Other comments not related to the proposed model	
<p>69. One commenter had some other questions as follows:</p> <ul style="list-style-type: none"> • Can you share a timeline of when the additional exam resources will be published? • Do you anticipate any further adjustments to the published Competency Profiles? If not, can you confirm that the existing competency profiles are final? • Will there be a term limit on the contract with the selected exam service provider? • Can you provide the expected price for each exam sitting, the mandatory conduct training program, and the mandatory CE courses? If not, can you provide the cost assumptions used in the planning process? • Will CIRO permit education providers to host and deliver CIRO’s mandatory Compliance Training Program and mandatory CE courses, similar to FINRA’s approach? (Learnedly) 	<p>We will provide relevant information at a later date.</p>
<p>70. One commenter suggests that concurrent and similar changes should be made to the proficiency regime relating to the mutual fund dealers, which should be consolidated with and administered by CIRO. Similarly, we welcome an integrated CE model through</p>	<p>Consideration of any future changes to the proficiency regime relating to mutual fund dealers will be done in collaboration with the CSA, which registers dealers and individuals in this registration category.</p>

SUMMARY OF COMMENTS	CIRO RESPONSE
<p>CIRO. The sufficiency of proficiency requirements recognized through the MFDA should continue to be recognized. (IIAC)</p> <p>On the other hand, a commenter encourages CIRO to keep the MFDR proficiency and registration requirements separate from the IR and RR categories for Investment Dealer firms, such that it does not impede a continuous flow of qualified new registrants and thus limit the ability for investors to access qualified advice. They understand that CIRO is ending its contract with CSI, but we encourage CIRO to not prematurely terminate contracts in the MFDR industry such as the contract with Canadian Institute of Financial Planning (CIFP) and the IFSE Institute. (CBA)</p>	<p>Mutual Fund Dealing Representatives related proficiencies are directly with the CSA and set out in NI 31-103. The proposed proficiency model is with respect to Investment Dealer Approved Persons as the related rules are set out in IDPC and are linked to the CSI contract expiring at the end of December 31, 2025.</p>
<p>71. One commenter strongly urges the CSA and CIRO to proactively engage and consult with impacted mutual fund firms before formulating potential revisions to the proficiency regime for mutual fund dealers and their Approved Persons. (IFIC)</p>	<p>See response in #70</p>
<p>72. We also received an out-of-scope comment about exploring the possibility of creating a streamlined process or a flexible registration category specifically tailored to the needs of industry professionals that cannot or do not want to remain permanently employed by an Investment Dealer. A new category for “Independent Approved Persons” (for example) could be created and used when a professional is no longer associated with an Investment Dealer but wishes to put their license on hold. (CIFIC)</p>	<p>We acknowledge the comments and will consider them for future projects.</p>

Table guide of amendments (updated from last publication)

Proposed rule number	Current requirements	Provision	Comment
2502-2507	2502-2507	Dealer Member Directors and Executives	Updated rule references to reflect new pre-approval proficiency requirements in 2603(1)
2552	2552	Post approval suspension	Updated rule references to reflect new post approval requirements in 2604
2553(3)(iv)	2553(3)(iv)	Approval of Registered Representatives, Investment Representatives, Portfolio Managers and Associate Portfolio Managers and their obligations	Updated to reflect single derivatives product approach
2553(4)-(6)	2553(4)-(6)	Approval of Registered Representatives, Investment Representatives, Portfolio Managers and Associate Portfolio Managers and their obligations	Updated rule references to reflect proficiency requirements for mutual funds only in 2605
2555	2555	Approval of investors	Updated rule references to reflect new pre-approval proficiency requirements in 2603(1)(i)(j) for Directors
2602(1)-(2)	2602	Proficiency principle	Updated language for proficiency principle to apply to all Approved Persons
2603(1)	2602(3)	Proficiency requirements prior to approval	Language based on 2602(3) updated to reflect the new proficiency model
2603(1)(i)(a): IR securities – retail or inst. exam requirement	2602(3)(viii)(a)-(b): IR securities - retail 2602(3)(ix)(a)-(b): IR securities - inst.	IR proficiency requirements prior to approval	New to reflect new exam requirements for IRs securities and derivatives.
2603(1)(i)(b): IR derivatives - retail or inst. exam requirement	2602(3)(x)(a)-(b): IR options - retail 2602(3)(xi)(a)-(b): IR options – inst.		
			Current requirements in 2602(3) listed repealed to reflect the new proficiency model except:

Proposed rule number	Current requirements	Provision	Comment
	2602(3)(xii)(a)-(c): IR fc/fco - retail or inst.		Equivalency/auto exemption for Level I or higher of the CFA Program administered by the CFA Institute included in 2627(3)
2603(1)(i)(c): RR securities – retail exam requirement	2602(3)(i)(a)-(c): RR securities - retail	RR proficiency requirements prior to approval	New to reflect new exam requirements for RRs securities and derivatives. Current requirements listed relating to FINRA related qualifications amended to reflect the new proficiency model, included in 2627 Other current requirements repealed to reflect the new proficiency model except: Equivalency/auto exemption for Level I or higher of the CFA Program administered by the CFA Institute included in 2627(3)
2603(1)(i)(d): RR derivatives – retail exam requirement	2602(3)(iii)(a)-(c): RR options - retail		
2603(1)(i)(d): RR derivatives – retail or inst. exam requirement	2602(3)(v)(a)-(c): RR fc/fco - retail or inst.		
2603(1)(i)(e): RR securities – inst. exam	2602(3)(ii)(a)-(b): RR securities – inst.		
2603(1)(i)(f): RR derivatives – inst. exam requirement	2602(3)(iv)(a)-(b): RR options – inst.		
2603(1)(i)(g): APM requirement	2602(3)(xiv)(a): APM	APM proficiency requirements prior to approval	No substantive changes. Current requirements for APM related proficiencies remain the same to reflect the model except: Repeal of the CPH course to be replaced by mandatory conduct training in 2604(2)
2603(1)(i)(g)(I): APM - derivatives exam requirement	2602(3)(xiv)(b): APM options	APM proficiency requirements prior to approval – options and fc/fco	New to reflect the new derivatives product approach. Repeal existing requirement except: Equivalency/auto exemption for FINRA registered individuals amended to reflect
	2602(3)(xiv)(c): APM fc/fco		

Proposed rule number	Current requirements	Provision	Comment
			the new proficiency model included in 2627(2)
2603(1)(i)(h): PM requirement	2602(3)(xv)(a): PM	PM proficiency requirements prior to approval	No substantive changes. Current requirements for PM related proficiencies remain the same to reflect the model except: Repeal of the CPH course to be replaced by mandatory conduct training in 2604(2)
2603(1)(i)(h)(I): PM - derivatives exam requirement	2602(3)(xv)(b): PM options 2602(3)(xv)(c): PM fc/fco	PM proficiency requirements prior to approval – options and fc/fco	New to reflect the new derivatives product approach. Repeal existing requirement except: Equivalency/auto exemption for FINRA registered individuals amended to reflect the new proficiency model included in 2627(2)
2603(1)(i)(n) – Trader exam requirement	2602(3)(xvi): Trader 2602(3)(xvii): MX Trader	Trader proficiency requirements prior to approval	Net new to reflect new exam requirements for Traders
2603(1)(i)(i) – Supervisor exam	2602(3)(xviii)(a)-(c): Sup. RRs/IRs 2602(3)(xxi)(a): Sup. new accts/act P&Ps 2602(3)(xxii)(a): Sup. discr. accts 2602(3)(xxvi)(a): Sup. ads, sales lit. and correspondence 2602(3)(xxvii)(a)-(b): Sup. reports	Supervisor proficiency requirements prior to approval	Net new to reflect new exam requirements for Supervisors
2603(1)(i)(i)(I) – Supervisor exam and derivatives exam requirements	2602(3)(xix)(a)-(b): Sup. RRs/IRs – options 2602(3)(xx)(a)-(b): Sup. RRs/IRs fc/fco	Supervisor proficiency requirements prior to approval - options and fc/fco	New to reflect the new derivatives product approach

Proposed rule number	Current requirements	Provision	Comment
	2602(3)(xxiv)(a)-(b): Sup. - options accts		
	2602(3)(xxv)(a)-(c): Sup. fc/fco accts		
2603(1)(i)(i)(l) – Supervisor exam requirement and APM/PM requirements	2602(3)(xxiii)(a)-(b): Sup. mgd. accts	Supervisor proficiency requirements prior to approval – mgnaged. accts	No substantive changes. Based on current requirements listed
2603(1)(i)(i)(l) – Supervisor exam, APM/PM requirements and derivatives exam requirements	2602(3)(xxiii)(c): Sup. mgd. accts – options	Supervisor proficiency requirements prior to approval – mgnaged. accts, derivatives	Amended to reflect the new derivatives product approach
	2602(3)(xxiii)(d): Sup. mgd. accts – fc/fco		
2603(1)(i)(k) – UDP and Executive exam requirement	2602(3)(xxviii): Executive	Executive (including UDP) proficiency requirements prior to approval	New to reflect new exam requirements for UDPs and Executives
2603(1)(i)(j) – Director exam requirement	2602(3)(xxix): Director	Director proficiency requirements prior to approval	New to reflect new exam requirements for Directors
2603(1)(i)(m) – CFO exam requirement	2602(3)(xxx): CFO	CFO proficiency requirements prior to approval	New to reflect new exam requirements for CFOs
2603(1)(i)(l) – CCO exam requirement	2602(3)(xxxi): CCO	CCO proficiency requirements prior to approval	New to reflect new exam requirements for CCOs
2603(1)(ii)(a)	--	Baseline education/experience requirement for RR	New to reflect new baseline education/experience requirement for RRs
2603(1)(ii)(b)	2602(3)(xiv)(d): APM	APM experience requirements	No substantive changes. Current experience requirements for APM remain the same
2603(1)(ii)(c)	2602(3)(xv)(d)-(e): PM	PM experience requirements	No substantive changes. Current experience requirements for PM remain the same

Proposed rule number	Current requirements	Provision	Comment
2603(1)(ii)(d)	2602(3)(xviii)(d)-(f): Sup. RRs/IRs	Supervisor experience requirements	Current experience requirements for Supervisors remain the same except language streamlined.
	2602(3)(xix)(d)-(f): Sup. RRs/IRs – options		
	2602(3)(xx)(c)-(e): Sup. RRs/IRs fc/fco		
	2602(3)(xxi)(b)-(d): Sup. new accts/act P&Ps		
	2602(3)(xxii)(b)-(d): Sup. discr. accts		
	2602(3)(xxiii)(e)-(g): Sup. mgd. accts		
	2602(3)(xxiv)(c)-(e): Sup. - options accts		
	2602(3)(xxv)(d)-(f): Sup. fc/fco		
	2602(3)(xxvi)(b)-(d): Sup. ads, sales lit. and correspondence		
	2602(3)(xxvii)(c)-(e): Sup. reports		
2603(1)(ii)(e)	--	UDP and Executives experience requirement	New to reflect new baseline education/experience requirement for Executives (including UDP)
2603(1)(ii)(f)	2602(3)(xxxi)	CCO experience requirement	Current experience requirements for CCO remains the same with one addition (substantive change) acceptance of affiliated FINRA dealer experience
2603(1)(ii)(g)	2602(3)(xxx)	CFO experience	Current education and experience requirements for CFO remains the same
2604(1)(i)	2602(3)(i)(a)(III) – new RR securities training	Post approval proficiency requirements -Dealer Member Training	Substantive change to reflect new model shift from pre-approval to a post-approval
	2602(3)(iii)(a)(I) – new RR options training		

Proposed rule number	Current requirements	Provision	Comment
	2602(3)(iii)(a)(I) – new RR fc/fco training 2602(3)(viii)(a)(III) – new IR securities training 2602(3)(x)(a) - new IR options training 2602(3)(xii)(a) - new IR fc/fco training		requirement for retail RRs and IRs, within 90 days of approval, and new required training for institutional RRs/IRs
2604(1)(ii)	--	On-going training towards CE	New to add Dealer obligation to ensure the individual has received the appropriate training for the business and client type to reflect the proficiency principle and on-going training requirement, New to clarify that on-going training may be applied to meet prescribed Continuing Education Requirements
2604(1)(iii)	1407 - Training	Post approval proficiency requirements -Dealer Member Training	No substantive change. Moved from 1407 to clarify training requirements belong with proficiency rules and clarify dealer's obligation to ensure compliance with the proficiency principle to provide on-going training. New to clarify that on-going training may be applied to meet prescribed Continuing Education Requirements
2604(1)(iv)		Record of training	New to reflect the general record keeping requirements
2604(2)(i)	--	Conduct training for all new APs	New to add mandatory training for all APs provided

Proposed rule number	Current requirements	Provision	Comment
			by CIRO and prescribed dealer reporting requirements
2604(2)(ii)		Conduct training for all existing APs	New to add mandatory training for all APs who are otherwise grandfathered in within one year of the effective date of the rules
2605	2603	Mutual funds only Registered Representatives and Investment Representatives	No substantive changes. Updated rule references to reflect proficiency requirements for mutual funds only in sections 2603, 2604 and 2605.
2625(2)	2625(2)	Specific exemptions - Grandfathering of existing Approved Persons	Amended to reflect the application of new proficiency requirements to all Approved Persons to facilitate transition to new model
2625(2)(i)	--	Specific exemptions - Grandfathering of existing Approved Persons	New to exempt individuals who have two years of experience within three years of approval, from CIRE if required
2625(3)	--	Specific exemptions - Grandfathering and transition of existing APs that deal in options or futures only	New to exempt existing APs dealing in options or futures based on derivatives product approach
2627(1)	2602(3) – FINRA registered individuals	Exemption from completing a required exam - Exemption from writing the general industry exam for certain FINRA registrants	Amendment to reflect the existing equivalency/exemption currently captured in 2602(3) for individuals who are registered with FINRA three years prior to seeking approval.

Proposed rule number	Current requirements	Provision	Comment
			Amended to have equivalency apply to general industry exam to reflect new model included in 2627(1)
2627(2)	2602(3) – Approved Persons required to complete either options and fc/fco proficiencies	Exemption from completing a required exam - derivatives exam	Existing equivalency/exemption currently captured in 2602(3) for individuals required to complete options or fc/fco proficiencies that have been registered with either FINRA or NFA for a prescribed period. Amendment to reflect the new derivatives approach included in 2627(2)
2627(3)	See also 2553(1)	Exemption from completing prescribed IR/RR exams for APMs/PMs	Not a substantive change Moved to 2627(3) reflect the existing requirement in 2602(3)(i)(a)(B), (ii)(a)(I)(B), (viii)(a)(I)(B), and (ix)(a)(I)(B), consistent with 2553, and language updated to refer to the new provisions in 2603(1)(i)(g) or (h) applicable to APMs/PMs.
2628	2628	Exam validity	Updated language to reflect new exam requirements, and alignment with National Instrument 31-103 modified to recognize the approval categories under the IDPC
2629(1)	--	Transition from courses prescribed prior to January 1, 2026 – Pre-approval courses	New transition provision to accept previously prescribed courses for those in the midst of completing them

Proposed rule number	Current requirements	Provision	Comment
2629(2)	--	Transition from courses prescribed prior to January 1, 2026 - Post approval courses	New transition provision for those in the midst of a post-approval requirement
2630	2630	Transition of AR and AAR into PM and APM categories	Amended to reflect the new conduct training requirements in 2604 and deleted the reference to the CPH. Redundant language in current 2630(2) deleted as captured under section 2552. Added the notification requirement for the purpose of section 2552.
2703(1)(iii)	--	Continuing education program requirements	New to add mandatory CE provided by CIRO
2704(1)	2704(1)	Continuing education requirements for APs	Updated to streamline the CE requirements applicable to Supervisors
2716	2716	Professional Development	Substantive change: Amended to delete provisions that include reference to courses to reflect new model. This includes carry forwards that no longer apply in new model.
2717(3)	2717(3)	Mandatory conduct training and CE	New to clarify that mandatory conduct training provided by CIRO in 2604(2) to be counted towards CE
2803(2)(i)-(ii)	2803(2)(i)-(ii)	Dealer Member obligations for the National Registration Database	Updated rule references to reflect proficiency requirements in sections 2603, 2604 and 2605.
3947 [added for clarification]	2602(3)(i)(d): RR securities – retail and 3947	RR/IR supervision requirement	Post-approval supervision requirement for new RRs/IRs continues to apply. Remains in 3947.
	2602(3)(iii)(d): RR options – retail and 3947		

Proposed rule number	Current requirements	Provision	Comment
	2602(3)(v)(d): RR fc/fco - retail or inst. and 3947		
	2602(3)(viii)(d): IR securities - retail and 3947		
	2602(3)(x): IR options - retail		
	2602(3)(xii): IR fc/fco - retail or inst.		

Legend:

RR – Registered Representative

IR – Investment Representative

APM – Associate Portfolio Manager **PM** – Portfolio Manager

Sup. – Supervisor

Inst. - Institutional

FC/FCO – Futures contract/Futures contract options

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Guidance on the new CIRO Proficiency Model for Approved Persons of Investment Dealers – Exemptions, Recognition, Transition and Validity Provisions

Executive Summary

On January 1, 2026, Canadian Investment Regulatory Organization (**CIRO**) will implement new rules to establish an assessment centric proficiency model with some mandatory education and training requirements (**proficiency model**).

The purpose of this Guidance Notice is to assist Dealer Members (**dealers**), existing Approved Persons and individuals seeking approval, prepare for the new rules in advance of the implementation date. This guidance will continue to be relevant beyond January 1, 2026.

In this Guidance Notice, we specifically discuss the application of provisions relating to:

- specific exemptions within the rules,
- the recognition of proficiencies that will apply to those approved as of January 1, 2026,
- transitions to single derivatives product proficiencies,
- transitions from the previously mandated courses and exams, and
- validity of exams.

We also provide Frequently Asked Questions (**FAQs**) in the Appendix to illustrate scenarios that may fall within these provisions. We remind dealers that there are specific Investment Dealer and Partially Consolidated (**IDPC**) Rules that deal with, or refer to, proficiency obligations at an investment dealer, and that this Guidance Notice should be read in conjunction with those rules.

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1. Background

Background and history leading to implementation of the proficiency model is described in:

- Bulletin [23-0094](#), published on July 7, 2023, which contained the initial Consultation Paper intended to ensure that we considered our current proficiency model, and any changes that need to be made, before proceeding with any rule amendments, and
- Bulletin [24-0206](#), published on July 4, 2024, which contained the proposed amendments, modified to address issues raised and suggestions received following the initial publication.

Additional details on the amendments are included in approval Bulletin [25-0110](#).

2. Overview and applicability

This Guidance Notice covers and describes the application of provisions relating to:

- the recognition of proficiencies that will apply to those approved as of January 1, 2026,
- specific exemptions within the rules,
- transitions to single derivatives product proficiencies,
- transitions from the previously mandated courses and exams, and
- validity of exams.

Dealers should consider the applicable requirements, including CIRO rules and securities laws, when sponsoring individuals who must meet our prescribed proficiency requirements to be approved by CIRO. They should also update applicable policies and procedures, as needed, keeping in mind the implementation date of January 1, 2026.

Dealers are reminded that there are specific IDPC Rules that deal with, or refer to, proficiency obligations at an investment dealer, and that this Guidance Notice should be read in conjunction with those rules.

3. Relevant Rules

The relevant rules which fall within Part B of the IDPC Rule 2600 include:

- partial completion of courses or exams prescribed prior to December 31, 2025¹,
- individuals who are currently in the midst of a post approval requirement and will continue to be subject to its completion as of January 1, 2026²,
- transitional relief for any individuals who have a minimum of two years of experience³,
- transition of Approved Persons who trade in either options or futures under new single derivatives-product proficiency requirements⁴, and

¹ Subsection 2629(1)

² Subsection 2629(2)

³ Clause 2625(2)(i)

⁴ Subsection 2625(3)

- validity of CIRO exams⁵.

3.1. Continuing in the same role

Individuals approved prior to January 1, 2026 will not be subject to the proficiency requirements in effect as of January 1, 2026 if they continue in the same role⁶. It is important to note that the individual would still be required to complete the conduct training as prescribed under subsection 2604(2).

We will deem an individual to have continued in the same role as long as their approval did not cease for a period longer than 180 days. If an individual ceases to be approved for 180 days or less and returns to the same role at a dealer, they will be exempted from completing the proficiency requirements in force as of January 1, 2026.⁷ If the individual returns to the same role, longer than 180 days, they will be subject to the new proficiency requirements.

For the exemption to apply, registration staff will consider an individual's Approved Person category. If the individual returns within the 180-day period but to an Approved Person category that does not require the same baseline proficiencies, they will not qualify for the exemption from the new proficiencies.

We have attached FAQs to provide examples of types of scenarios that may fall within this provision. Please refer to questions #1 to 9.

3.1.1. Exemption from the CIRE

Individuals are exempt from having to complete the Canadian Investment Regulatory Exam (**CIRE**) provided they have minimum two years prior experience in the same Approved Person category within the last three years prior to the date of application for approval. It is important to note that the individual must still satisfy the other prescribed pre-approval and post-approval proficiency requirements for their category of approval.⁸

This provision provides an exemption from having to complete the CIRE if an individual does not satisfy the conditions in subsection 2625(2) described in 3.1 above. If an individual ceases to be approved for longer than 180 days, as stated above, they will be subject to the proficiency requirements. However, if they have over two years of experience within the same Approved Person category, in the three years prior to the date of application, they will not have to complete the CIRE.

We have attached FAQs to provide examples of types of scenarios that may fall within this provision. Please refer to question #9.

3.2. Transition to derivatives proficiencies

⁵ Section 2628

⁶ Subsection 2625(2)

⁷ Conduct training in subsection 2604(2) will still apply. See section 3.8 for more information.

⁸ Clause 2625(2)(i)

We have combined the product types of options, futures contract and futures contract options into one consolidated product type to capture all derivatives. Existing Approved Persons who trade in either only options or only futures will be exempted into their existing categories⁹. They are still subject to complete the conduct training as prescribed under section 2604(2). An individual approved to either deal only in options or futures will be able to continue to do so once the new rules are implemented.¹⁰ Accordingly, the product type provided will change from either options to options (legacy), or futures to futures (legacy). The titles of these product types will be updated accordingly on the National Registration Database (**NRD**) as described in section 4.1 below.

These individuals are not approved to deal in a single derivatives product type and will need to ensure any communications, including titles, are clear about being restricted to dealing only in either options only or futures only. We encourage dealers to remind their Approved Persons the importance of communicating their legacy approval to avoid any misunderstanding or confusion to clients.

These Approved Persons will not be required to take the new exams, including the Derivatives Exam unless they wish to deal in all derivatives, or, if they cease to be approved for a period of more than 180 days. Individuals who cease to be approved and return after a period of more than 180 days will no longer be considered as continuing in the same role (to deal with the legacy options or futures) and will be subject to the new proficiency requirements, which includes a requirement to complete the Derivatives Exam.

An Approved Person who seeks approval to supervise or deal in any derivatives product must complete the Derivatives Exam. An individual seeking approval to become a Registered Representative (**RR**) dealing in derivatives will be subject to:

- the applicable Retail Securities Exam and the Derivatives Exam,
- the CIRE, if they do not qualify for the exemption discussed in section 3.1.1. above,
- a relevant diploma or degree from an accredited post-secondary institution, or minimum four years of relevant experience acceptable to CIRO, and
- any outstanding post approval requirements.

Individuals currently approved to deal in both options and futures, can continue to do so in the new proficiency model as long as they continue in their role, and they will automatically be mapped over to the new product type of derivatives on NRD. These individuals continuing in the same role are exempt from the new exam requirements, but they are still subject to complete the conduct training as prescribed under subsection 2604(2).

We have attached FAQs to provide examples of types of scenarios that may fall within this provision. Please refer to questions #10 to 11.

⁹ Subsection 2625(3)

¹⁰ Section 3640 - Misleading communications

3.3. Financial Industry Regulatory Authority (FINRA) and National Futures Association (NFA) registrants

3.3.1. Exemption from CIRE for FINRA registrants

Individuals registered with FINRA are exempt from completing the CIRE if:

- previously registered with FINRA in a similar capacity within three years prior to the date of application for approval, and
- have completed the applicable FINRA requirements for that registration category¹¹.

We will consider the activities an individual was conducting in their registered role with FINRA in order to determine 'similar capacity'. For example, an individual registered as a General Securities Representative (**GS**) with FINRA conducts similar activities as an approved RR-securities with CIRO.

We recognize FINRA requirements to be the applicable qualifying exams an individual is required to pass in order to qualify for registration.

While we do not specify a minimum timeframe that an individual would need to be registered for with FINRA, we expect that individuals would have been registered for a reasonable amount of time in order to demonstrate their foundational knowledge needed to deal with clients in the investment industry. Therefore, if an individual was previously registered as a GS with FINRA within three years of applying for RR approval with CIRO, and the individual completed the Securities Industry Essentials Exam (**SIE**) and the Series 7 General Securities Exam, in addition to other relevant requirements, they would be exempt from having to complete the CIRE for RR approval.

3.3.2. Exemption from Derivatives Exam for FINRA and NFA registrants

Individuals who were previously registered with FINRA and the NFA, applying as an RR or Investment Representative (**IR**) dealing in derivatives, or as a Supervisor over these individuals, will be exempt from completing the Derivatives Exam, if they meet the following:

- previously registered and dealing in options and futures with FINRA and the NFA within three years prior to the application for approval, and
- completed the Series 3 and Series 7 exams offered by FINRA¹².

While there is no specific minimum timeframe stated in our rules for dealing in options, experience dealing with options should be meaningful. As a guideline, registration staff will look for a minimum of 12 months of experience dealing in options and futures contract and futures

¹¹ Subsection 2627(1)

¹² Subsection 2627(2)

contract options in addition to other relevant requirements. We will assess this experience on a case-by-case basis.

3.4. Exam Validity

CIRO exams remain valid when an individual is deemed to have successfully completed an exam if:

- the *individual* successfully completed the prescribed exam within three years prior to the date of application for approval,
- the *individual* who successfully completed the prescribed exam was previously approved in the same *Approved Person* category, or another category which required the same exam, within three years prior to the application for approval, or
- the *individual* who successfully completed the prescribed exam gained one year of relevant securities industry experience, acceptable to the *Corporation*, within three years prior to the application for approval.¹³

For the purposes of exam validity, an Approved Person is not considered to have been approved during any period in which they are either suspended or otherwise not conducting activities requiring CIRO approval¹⁴.

3.4.1. Experience gained during a three-year period

We include an additional validity provision to recognize one year of relevant experience during the three-year period prior to the date of application for approval in order to allow an individual who may have taken a CIRO exam not required for their approval category, or an individual who was not in an approval category, to keep the exam valid through their experience, i.e., an individual required by a dealer to complete an exam as per internal dealer policies.

We have taken an approach consistent with guidance set out in National Instrument (**NI**) 31-103 Companion Policy (**CP**), where relevant experience applies to the category sought for approval. The one-year experience requirement does not have to be completed in consecutive months, or with the same dealer. Relevant experience may also include:

- during employment at a CIRO dealer, an investment fund manager or another Canadian Securities Administrators (**CSA**) registered dealer,
- in related investment fields, such as investment banking, securities trading on behalf of a financial institution, securities research, portfolio management, investment advisory services or supervision of those activities,
- in legal, accounting or consulting practices related to the securities industry,
- in other professional service fields that relate to the securities industry, or
- in a securities-related business in a foreign jurisdiction.

¹³ Subsection 2628(1)

¹⁴ Subsection 2628(2)

3.4.2. Training and designations

Dealers and Approved Persons should note that the validity period in section 2628 applies only to CIRO exams. Other courses or qualifications that would have satisfied the proficiency requirements in force prior to January 1, 2026, will only be recognized as set out in section 2625, where applicable, or through discretionary exemption in accordance with any standards in the relevant rule, subject to any terms and conditions CIRO considers appropriate.

Although the validity provision in section 2628 does not apply to the training requirements in section 2604, dealers have an ongoing obligation to ensure their Approved Persons receive the appropriate training relevant to their business type including its client and product type to ensure compliance with the proficiency principle in section 2602. However, if an Approved Person was not approved in the last 3 years, such that their exams would no longer be valid under section 2628, then we would expect dealers to provide appropriate training, including compliance with the training requirement under 2604(1)(i). See [Guidance note GN-2600-25-002 section 2.1.](#)

In addition, validity periods do not apply to the Canadian Investment Manager Designation, the Chartered Investment Manager Designation (CIM®) and the CFA Charter, provided the holders of these designations continue to have the right to use the designation and the designation has not been revoked or otherwise restricted¹⁵. If an individual loses the right to use the CFA Charter, Canadian Investment Manager Designation, or the CIM® Designation, by reason of revocation or otherwise, CIRO may consider the reasons for such a revocation to be relevant in determining an individual's continued fitness for registration. Approved Persons are required to notify CIRO of any change in the status of their CFA Charter or the Canadian Investment Manager Designation, or CIM® Designation, within 10 days of the change, by submitting the applicable form on NRD.

3.5. Transition from courses prescribed prior to January 1, 2026

Individuals in the midst of completing the mandated courses, offered by the Canadian Securities Institute (CSI) in effect prior to January 1, 2026, will have their courses recognized if they meet the criteria set out in section 2629. With the expiry of the CSI contract as of December 31, 2025, individuals who enroll in a CSI course prior to January 1, 2026, will have up until December 31, 2026, to complete any exams offered through the CSI.

3.5.1. Completing course prescribed prior to January 1, 2026

Individuals will be exempt from the requirements in section 2603 if, alternatively, they can satisfy the proficiency requirements in effect prior to January 1, 2026, provided they meet all of the following conditions¹⁶:

- The individual enrolls in a course(s) offered by the CSI prescribed under the rules prior to January 1, 2026,
- The individual successfully completes the course(s) and its exam(s) prior to January 1, 2027,

¹⁵ Subsection 2628(3)

¹⁶ Section 2629

- The individual would satisfy the proficiency requirements applicable to the same Approved Person category being sought prior to January 1, 2026, upon completion of the course(s) and exam(s), and
- The sponsoring dealer submits an application for approval for the individual, prior to January 1, 2027.

Dealers must ensure that if they have candidates they are hiring, or Approved Persons who are in the midst of completing the proficiencies prescribed prior to January 1, 2026, that they communicate the changes to these individuals and that they comply with the above noted conditions including filing an application for approval on NRD prior to January 1, 2027, for individuals if they satisfied the other prescribed conditions.

Individuals may be in the midst of completing a CSI course(s), including but not limited to the following, in order to:

- apply for or add a new approval category or product type,
- complete their RR licensing requirement, or
- upgrade to RR or IR securities from an RR or IR mutual funds only category.

In any of these cases, dealers and Approved Persons should review the above noted conditions to ensure compliance.

We have attached FAQs to provide examples of types of scenarios that may fall within this provision. Please refer to questions #17 to 20.

3.5.2. WME post-approval requirements under the previous proficiency requirements

Subsection 2629(2) provides flexibility to individuals subject to the Wealth Management Essentials course (**WME**) post approval requirements prior to January 1, 2026. RRs that are required to complete the WME course as of December 31, 2025, may choose to either complete:

- the WME by their required completion date or December 31, 2026, whichever date is earlier as prescribed under the rules that were in effect prior to January 1, 2026, or
- the Retail Securities Exam by their completion date prescribed under the rules that were in effect prior to January 1, 2026¹⁷.

An individual approved as an RR-securities, prior to January 1, 2026, would need to complete the WME post-approval requirement within 30-months of approval. If the 30-month date falls after January 1, 2026, the RR will have the flexibility to complete the WME by the completion due date or Dec 31, 2026, whichever date is earlier. Otherwise, they will be required to complete the Retail Securities Exam by their post-approval due date.

¹⁷ Subsection 2629(2)

An important reminder, that if an RR is choosing to complete the WME through the CSI, they must enroll in the course prior to January 1, 2026, as required in subsection 2629(1). The CSI is not obligated to offer CIRO any course enrollments after that date.

Dealers need to review the requirements, and available choices, with individuals at their firms who are subject to the WME to ensure they meet the conditions prescribed. If an individual does not complete their post-approval requirement by their completion date, they would be automatically suspended of their RR-securities retail approval status.

We encourage dealers to review these requirements as soon as possible with their RRs to plan accordingly. Dealers should consider the requirements and time needed to satisfy the prescribed conditions. Dealers are required to notify CIRO on the completion of the RRs post-approval requirement by their required completion due date.

We have attached FAQs to provide examples of types of scenarios that may fall within this provision. Please refer to questions #21 to 23.

3.6. Mandatory conduct training

Individuals approved after January 1, 2026, will have 30 days from the date of their approval to complete the conduct training in clause 2604(2)(i). Dealers must notify CIRO of their Approved Persons' completion of the conduct training within this same 30-day due date.¹⁸

Individuals that are already Approved Persons as of January 1, 2026, will have until December 31, 2026, to complete the conduct training. Dealers must notify CIRO of their Approved Persons' completion of the conduct training by December 31, 2026.¹⁹

CIRO will automatically suspend an Approved Person if they do not complete the conduct training by their prescribed completion date²⁰ as described in section 3.7, below. Once an Approved Person has completed the conduct training and the dealer has notified CIRO of completion, CIRO will lift the suspension and reinstate the individual.²¹

We encourage individuals to enroll in and to complete the conduct training in a timely manner and to notify their dealer upon completion. Individuals may use completion of the mandatory conduct training towards their mandatory Continuing Education (CE) requirement for the first year of the program.

We also encourage firms to review the conduct training obligation and to plan accordingly to notify CIRO within the prescribed time period.

¹⁸ Clause 2604(2)(i)

¹⁹ Clause 2604(2)(ii)

²⁰ Clause 2552(1)(ii) and Subsection 2552(2)

²¹ Subsection 2552(3)

3.6.1. Transition of Advising Representative and Associate Advising Representatives into the Portfolio Manager and Associate Portfolio Manager approval category

An individual registered as an advising representative (**AR**) or associate advising representative (**AAR**) by a securities regulatory authority, within the 90 days prior to the date of application as a Portfolio Manager or Associate Portfolio Manager, has 90 days after the date of approval to complete the conduct training in clause 2604(2)(i), and the dealer must notify CIRO when complete within 90 days of approval.²²

We recognize that an AAR or AR may be conducting the same or similar regulated activity as an APM or PM, respectively, on the CIRO platform. To facilitate a smooth transition, we have introduced a grace period to permit such individuals to complete the conduct training within 90 days from the date of approval as an APM or PM, provided such individual was registered as an AAR or AR within the 90 days prior to the date of approval as an APM or PM.

Failure to complete the conduct training within the 90 days as of the date of approval as an APM or PM will result in an automatic suspension.²³ An individual will be reinstated as an APM or PM once CIRO receives notification from the dealer on the successful completion of the conduct training.

3.7. Automatic Suspensions

Each Approved Person must meet the applicable pre-approval proficiency requirements set out in section 2603 before approval is granted and complete the applicable post-approval proficiency requirements of section 2604 after receiving CIRO approval.

CIRO will automatically suspend an Approved Person if they do not complete the applicable post-approval proficiency requirements in the Approved Persons category²⁴. CIRO will reinstate an Approved Person once they have completed the required post-approval proficiency requirements and CIRO has been notified.

We encourage dealers to have their Approved Persons complete their required post-approval requirements in a timely manner, and for dealers to build into their policies and procedures sufficient time to notify CIRO in order to avoid suspensions.

3.8. Frequently Asked Questions

To assist with some of the transitional questions that dealers and individuals might have when moving from the existing proficiency model to the new proficiency model, we have compiled a list of FAQs attached as an Appendix to this guidance. This is not an exhaustive list. It is only intended to illustrate some of the more common scenarios. However, if you have a specific factual situation that is not addressed in the FAQs, please contact a member of CIRO's registration team.

²² Section 2630

²³ Subsection 2552(2)

²⁴ Subsection 2552(2)

4. Other information and next steps

4.1. Changes to NRD

We have been working with the CSA to make updates to NRD to reflect the new proficiency model and Rules. Some of the updates we are working on are discussed below.

4.1.1. Item 6 – Customer type

For Approved Persons who deal with both retail and institutional clients, NRD is being updated as of January 1, 2026 to allow for simultaneous selection of both retail and institutional customers, where individuals serve both retail and institutional clients and satisfy the requisite proficiency.

For any such individuals who selected retail, dealers need to review NRD in accordance with relevant requirements under IDPC 2803(2)(i)(c) and 2805(1). We remind dealers that the item 10 disclosure should accurately reflect each individual's current activity including customer type(s) regardless of the current selection availability on NRD. In other words, if someone deals with both retail and institutional clients, the item 10 activity should reflect this even though currently only a "retail" selection is available as a customer type.

Further, once the new rules are in effect, dealers need to ensure that the correct customer type is selected for their Approved Persons, if they previously selected "retail" as a way to capture the individual's activities in dealing with both retail and institutional clients. If an individual only deals with institutional client, they would only select "institutional" and if they deal with both client types, they would select the "retail & institutional" if applicable. If an update is required, the dealer would make the update through submitting a Form 33-109F2 *Change or Surrender of Individual Categories (F2)* to reflect the correct customer type of retail and/or institutional.

4.1.2. Item 6 – Product type

There will be a few changes to the product type selection on NRD as follows:

- the existing options product type will be changed to options (legacy),
- the existing futures contracts and futures contract options product type will be changed to futures contracts and futures contract options (legacy), and
- addition of the new product type for the combined Derivatives.

4.1.3. Item 8.1 - Course, examination or designation information and other education

A list of new proficiency selections to appear on NRD will include the nine new CIRO exams, the CIRO Conduct Training and Dealer Member Training.

4.1.4. Item 8.2 – Student numbers

Individuals will be able to specify a Fitch Learning Student number.

4.2. Related Guidance Notes

To further assist dealers, we will be publishing guidance and information on dealer training. Additionally, we plan on publishing information on the relevant experience and education

requirement. We also plan to update our guidance relating to proficiency exemptions. It should be noted that the discretionary exemption process will remain available for those cases where an individual submits a request for an exemption from the proficiency requirements based on their personal circumstances. For a high-level timeline, please visit the proficiency webpage at [Proficiency | Canadian Investment Regulatory Organization](#).

5. Applicable Rules

Rule 2600. Proficiency requirements and exemptions from proficiencies

6. Appendices

[Appendix - Frequently Asked Questions](#)

Guidance on Dealer Member training for Registered Representatives and Investment Representatives

Executive Summary

Effective Date: January 1, 2026

Canadian Investment Regulatory Organization (**CIRO**) is publishing guidance on its Dealer Member (**dealer**) training requirements.

Dealers are responsible for compliance with the proficiency principle¹ and with specific dealer training requirements² (**training obligations**). As part of these requirements, dealers must provide training to Registered Representatives (**RRs**) and Investment Representatives (**IRs**) within 90 days after approval³.

The purpose of this Guidance Notice is to provide guidance to dealers on compliance with their training obligations and to assist dealers understand how to apply published RR/IR competencies when reviewing and updating their current training programs for new RRs and IRs.

We understand that dealers may apply different approaches for compliance with the training obligations. In this Guidance Notice, we are providing information on relevant considerations for complying with these training obligations, which include:

- the proficiency principle as it relates to dealer training,
- compliance with training requirements applicable to new RRs and IRs
- compliance with training requirements applicable to other Approved Persons,
- consideration of RR/IR competencies and their application for dealer training,
- records and reporting requirements for dealers as it relates to dealer training, and
- eligibility of training as Continuing Education.

¹ Subsection 2602(1)

² Subsection 2604(1)

³ Clause 2604(1)(i)

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1. Background

On January 1, 2026 CRO will implement amendments⁴ to the Investment Dealer and Partially Consolidated (IDPC) Rules that will give effect to an enhanced proficiency model that includes:

- exams for each Approved Person category based on the published competency profiles,
- no mandatory courses as prerequisites to exams,
- mandatory conduct training upon approval,
- Continuing Education (CE) training on topics mandated by CRO annually,
- baseline education requirements for some approval categories including a requirement for RRs to have a relevant diploma, degree or four years of work experience, and
- greater role for CRO in new program design and ongoing delivery.

The amendments create greater alignment between published competencies⁵. The enhanced proficiency model highlights the importance of dealer training for RRs/IRs and clarifies a dealer's training obligations⁶.

In our view, dealer training is integral to a dealer's compliance with the proficiency principle⁷. Dealers have an on-going obligation to ensure their Approved Persons' compliance with the proficiency principle, and are required to provide training to their Approved Persons, as needed, to ensure they remain proficient at all times relative to their respective roles. As such we have:

- reinforced the importance of the proficiency principle in section 2602, as well as general training requirements in clause 2604(1)(iii),
- adopted a principles-based approach for compliance with dealer training obligations in clause 2604(1)(i), when hiring new RRs and IRs, or otherwise sponsoring an Approved Person, and 2604(1)(ii), which emphasizes the role of the dealer in considering the appropriate training.

Please note that the enhanced proficiency model is focused solely on individuals at investment dealers approved by CRO under the IDPC rules. Additional background and details on the amendments are included in [Bulletin 24-0206](#) and approval [Bulletin 25-0110](#).

⁴ NTD add link to the new approvals notice and rules

⁵ [Competency Profiles for Approved Persons \(Investment Dealers\) | CRO](#)

⁶ Section 2604

⁷ Section 2602(1) and (2)

1.1. Applicable Rules

Once in effect, the rules will respectively set out:

- Proficiency principle (section 2602),
- Proficiency requirements prior to approval (section 2603), and
- Post-approval proficiency requirements (section 2604) which includes dealer training (subsection 2604(1)).

2. Proficiency principle and training requirements

Dealer training is integral to a dealer's compliance with the proficiency principle. We specifically require a dealer to ensure that an individual does not perform an activity that requires approval unless the individual has the education, training and experience a reasonable person would consider necessary to perform the activity competently.⁸ Dealer compliance with the proficiency principle is ongoing and requires relevant training to be provided in order to ensure all individuals remain proficient at all times relative to their respective roles. A robust training program will also ensure that a dealer's Approved Persons remain compliant with the proficiency principle⁹.

The importance of dealer training, with a principle-based approach, is reflected in section 2604 through the following:

- Post approval training applicable to new RRs and IRs in clause 2604(1)(i), which requires dealers to provide training considering their client and product type. Guidance on relevant considerations for this, in alignment with the applicable competencies, is provided below.
- Clause 2604(1)(ii) requires dealers to consider what, if any, training may be needed for any Approved Person they sponsor considering their business model, including client and product types. Dealers need to consider this from the perspective of the proficiency principle, as to whether the Approved Person has the relevant training respective to their role, and whether additional training is required. Dealers should consider the relevant competency profiles and applicable rules when making this determination.
- Clause 2604(1)(iii) requires dealers to provide on-going training to their Approved Persons in compliance with CIRO requirements, securities laws, and applicable laws including, without limitation, the obligations relating to conflicts of interest, know-your-client, account appropriateness, product due diligence, know-your-product, and suitability determination. Dealers have an on-going obligation to ensure relevant training is provided to their existing Approved Persons. In complying with this requirement, consistent with the proficiency principle, dealers should consider changes in relevant regulatory requirements including CIRO rules and guidance, their own business models and the role of the Approved Person.

⁸ Subsection 2602(2)

⁹ Subsection 2602(1)

2.1. Applicability of clause 2604(1)(i)

With regards to the applicability of the training requirement under clause 2604(1)(i), dealers should note the following:

- If an RR or IR completed the previously required 90 Day Training Program (**DTP**) or 30 DTP, and they continue as an Approved Person such that they are not subject to the new proficiency requirements, prescribed training under 2604(1)(i) is then not applicable, although the dealer needs to consider general training requirements under clauses 2604(2)(ii), 2604(2)(iii) and the proficiency principle.
- If an RR or IR does not qualify under the subsection 2625(2) exemption, and is subject to the new proficiency requirements under sections 2603 and 2604, the dealer can then assess what further training needs to be provided for compliance with clause 2604(1)(i).
- However, if an RR or IR was not registered/approved as an RR or IR in the last 3 years, such that their exams would no longer be valid under section 2628, consistent with the current approach, then we deem them to not have the requisite training under 2604(1)(i) and therefore would be subject to the requirements under clauses 2604(1)(i)-(iii).

3. Training applicable to RRs and IRs upon approval

Dealers must provide training to newly approved RRs/IRs training within 90 days after approval, considering the types of clients and products. The requirement is principles-based. We have not prescribed the specifics and length of the training. However, the level of detail and approach to training needs to align with all applicable published RR/IR competencies and sub-competencies. In section 4, below, we provide information on how dealers can and should utilize the competency profiles as it specifically relates their training requirements under clause 2604(1)(i) applicable to new RRs and IRs.

Dealers should review and update their hiring and training related policies and procedures as needed. Dealers should consider the approach laid out in sections 3.1, 4 and 5, applicable to training of new RRs and IRs, when reviewing their training for all Approved Persons.

3.1. Competency profiles applicable to RRs and IRs

A competency profile is generally a set of knowledge, behaviour and skills that an individual must have to perform effectively in their role. CIRO published competency profiles in order to allow dealers and Approved Persons to better understand the proficiency expectations, and potentially play a more active role in meeting those standards while maintaining the competence of Approved Persons.¹⁰

The retail RR/IR competency profile reflects:

- the general knowledge an RR should have when initiating and maintaining client relationships (relationship skills),
- the specific regulatory obligations an RR should have an in-depth knowledge of (regulatory skills), and
- the technical knowledge an RR should have in order to fulfill their responsibilities (technical skills).

IRs must understand and apply these competencies or provide support as applicable.

In addition, the retail RR/IR competency profile:

- shows the relationship between the 7 categories of high-level competencies,
- describes the underlying sub-competencies,
- clarifies that relationship skills, regulatory skills and technical skills are related and continuous, and
- demonstrates that RRs/IRs need to continue to understand and apply the knowledge within each of the categories.

¹⁰ [Competency Profiles for Approved Persons \(Investment Dealers\) | CIRO](#)

The institutional RR/IR competency profile reflects:

- the general knowledge an RR should have when interacting with institutional clients (relationship skills),
- the specific regulatory obligations an RR should have an in-depth knowledge of (regulatory skills), and
- the technical knowledge an RR should have in order to fulfill their responsibilities (technical skills).

IRs must understand and apply these competencies or provide support as applicable.

In addition, the institutional RR/IR competency profile:

- shows the relationship between the 3 categories of high-level competencies,
- describes the underlying sub-competencies,
- clarifies that relationship skills, regulatory skills and technical skills are related and continuous, and
- demonstrates that RRs/IRs need to continue to understand and apply the knowledge within each of the categories.

4. General considerations for retail and institutional competencies and sub-competencies

With respect to the requirement in clause 2604(1)(i) applicable to new RRs and IRs, dealers should prepare initial or updated training programs¹¹ based on their business model to ensure alignment with the published competency profiles. General guidance is provided in sections 3 and 3.1 above. We have not prescribed the specifics and length of the training which allows dealers to assess their training programs based on their business models, including client and product types. In fact, when assessing the type and level of training to provide in general, or to review existing training programs, dealers should continuously consider:

- applicable regulatory requirements,
- relevant guidance,
- relevancy and applicability to the role of RRs and IRs, and
- internal policies and procedures relating specifically to competencies, or as a general matter of application.

Consideration of these and other applicable factors will have direct influence over the amount of time a dealer will need to dedicate to training on the various competencies. We will expect dealers to perform their own analyses to ensure that training on all applicable sub-competencies are adequately addressed and continuously updated as needed. The dealer's responsibility to provide and oversee training applies even when a dealer retains an external vendor to provide training services on a dealer's behalf.

¹¹ Referred to as the 30 day or 90 day training program under IDPC rules in effect prior to January 1, 2026.

4.1. Specific considerations for retail RR/IR competencies and sub-competencies

The retail RR/IR competency profile specifically covers the following 7 categories of high-level competencies:

- initiating client relationships,
- Know Your Client,
- product and market impact,
- suitability,
- execution and market integrity,
- maintaining client relationships, and
- conflicts and ethics.

Below, we have provided information on each of these competencies and some key considerations for dealers when reviewing each one and its related sub-competencies. Dealers are encouraged to review the applicable competencies, sub-competencies and guidance below in assessing the appropriate training.

We have also attached a comparison table in the **Appendix**. The table is for illustration and reference purposes only. It compares the former 90DTP for RRs, and the 30DTP for IRs, to the retail RR/IR competency profile. The table should be read together with the relevant considerations laid out in section 4, as applicable.

4.2. Initiating client relationships

This competency requires an RR to understand and apply the following sub-competencies, or an IR to understand and apply them to provide support, as applicable, when initiating client relationships:

- Overview of general regulatory framework,
- Prospective client relationships,
- Scope of client relationships, and
- Required documents and disclosures.

When assessing the type and level of training to provide on this competency, dealers should consider:

- the types of client services offered [e.g., advisory vs. Order Execution Only (OEO)],
- the time needed for an RR/IR to competently complete the client initiation stage within the context of the entire relationship with the client,
- the form of communication needed to initiate and support client communications based on the type of client, and
- how to explain to clients the information presented in required documents and disclosures.

Applicable training to be completed for an RR or IR on this competency should be considered based on each of their responsibilities for managing:

- the prospective client type, and
- the scope of client relationships.

4.3. Know Your Client

This competency requires an RR to understand and apply the following sub-competencies, or an IR to understand and apply them to provide support, as applicable, when satisfying the Know Your Client (KYC) requirements:

- Collection of required information,
- Analysis and evaluation of KYC information, and
- Use of KYC information to set financial goals.

[Guidance Notice GN-3400-21-004](#) provides our expectations and views on some acceptable practices relating to KYC obligations for retail clients, and should be considered when providing training on this competency. In addition to the general considerations cited in section 4.1, when assessing the type and level of training to provide on this competency, dealers should specifically consider the differences between the role of the RR, whose responsibility it is to complete the KYC in accordance with the applicable requirements, from that of the IRs who, by comparison, may have a supporting role.

4.4. Product and market impact

This competency requires an RR to understand and apply the following sub-competencies, or an IR to understand and apply them to provide support, as applicable, when analyzing or assessing product and market impact:

- Macroeconomics,
- Industry analysis,
- Company analysis,
- Technical/statistical analysis,
- Overview and characteristics of securities including equities, fixed income, managed products, and others, and
- Overview and characteristics of derivatives.

In addition to the general considerations cited in section 4, when assessing the type and level of training to provide on this competency, dealers should specifically consider:

- the product shelf of the dealer (limited or broad), and
- the breadth of understanding required for RRs in carrying out their regulatory obligations related to performing macroeconomic, industry, company and technical/statistical analysis.

4.5. Suitability

This competency requires an RR to understand and apply the following sub-competencies, or an IR to understand and apply them to provide support, as applicable, when making a suitability determination:

- Know Your Product (KYP),
- Development of comprehensive investment recommendations,
- Investment action recommendations, and
- Client account monitoring and performance.

Guidance Notice GN-3400-21-004 provides our expectations and views on some acceptable practices relating to suitability determination obligations for retail clients, and should be considered when providing training on this competency. In addition to the general considerations cited in section 4, when assessing the type and level of training to provide on this competency, dealers should specifically consider the differences between the role of the RR, whose responsibility it is to make a suitability determination in accordance with the applicable requirements, from that of the IRs who, by comparison, may have a supporting role. They should also consider:

- KYC, KYP, account appropriateness and suitability including on-going suitability,
- the type of business model, keeping in mind that suitability is not applicable for an OEO dealer,
- the types of features and associated costs of different types of accounts that are available to a client,
- client communication obligations,
- the types of products offered,
- how to assess the impact of an investment action on a client's account, and
- how to monitor and maintain ongoing account suitability.

4.6. Execution and market integrity

This competency requires an RR to understand and apply the following sub-competencies, or an IR to understand and apply them to provide support, as applicable, to comply with execution and market integrity obligations:

- Market integrity, trade execution and settlement, and
- Gatekeeping responsibilities.

Responsibilities for RRs and IRs are similar with respect to compliance with execution and market integrity. In addition to the general considerations cited in section 4, when assessing the type and level of training to provide on this competency, dealers should specifically consider:

- Market rules, including Universal Market Integrity Rules (UMIR) obligations on
 - Best execution,
 - Manipulative and deceptive practices,
 - Disruptive trading practices, and
 - Fair and equitable trading practices.

4.7. Maintaining client relationships

This competency requires an RR to understand and apply the following sub-competencies, or an IR to understand and apply them to provide support, as applicable, when maintaining client relationships:

- Communication with clients,
- Relevant changes and updates,
- Documentation requirements and best practices, and
- Client complaint handling and reporting.

In addition to the general considerations cited in section 4, when assessing the type and level of training to provide on this competency, dealers should specifically consider:

- KYC, KYP, account appropriateness, and suitability,
- the types of client services offered (e.g., advisory vs. OEO),
- on-going client communication beyond the client initiation stage, within the context of the entire relationship with the client,
- the form of communication needed to maintain and support client communications based on the type of client, and
- Internal policies and procedures for complaint handling.

4.8. Conflicts and ethics

This competency requires an RR to understand and apply the following sub-competencies, or an IR to understand and apply them to provide support, as applicable, when managing conflicts of interest and applying ethics:

- Conflicts of interest and ethics,
- Outside activities,
- Personal financial dealings, and
- Containment of confidential information.

All Approved Persons including RRs/IRs must comply with the applicable standards of conduct and comply with the requirements relating to conflicts of interest, personal financial dealings with clients, outside activities and containment of confidential information, as applicable.

When providing training on this competency, dealers should consider applicable information provided in the following publications:

- [**Bulletin 23-0113**](#), which includes suggested practices related to the conflicts of interest requirements,
- [**Guidance Notice GN-3500-21-001**](#), which provides guidelines for confidential information containment, and
- [**Guidance Notice GN-2500-22-001**](#), which provides information on disclosure and approval of outside activities.

Dealers should also be aware of consistency with relevant rules, guidance or training by CIRO including CIRO's Conduct Training¹².

We remind dealers that they are required to develop conflicts of interest policies and procedures that highlight applicable scenarios or examples, and these may be used for training.

¹² Subsection 2604(2).

In addition to the general considerations cited in this section and in section 4, when assessing the type and level of training on this competency, dealers should specifically consider:

- how personal financial dealings and outside activities may qualify as material conflicts of interest,
- conflicts identification and management,
- applicable record-keeping and disclosure requirements to the client, and
- internal systems for containing confidential information.

5. Specific considerations for institutional RR/IR competencies and sub-competencies

We expect dealers to train new RRs/IRs using all applicable competencies and sub-competencies covered under the institutional RR/IR competency profile, which covers 3 categories of high-level competencies, which include:

- Conduct and compliance,
- Product and market impact, and
- Execution and market integrity.

Below, we have provided information on each of these competencies and some key considerations for dealers when reviewing each one and its related sub-competencies. Dealers are encouraged to review the applicable competencies, sub-competencies and guidance below.

5.1. Conduct and compliance

This competency requires an RR to understand and apply the following sub-competencies, or an IR to understand and apply them to provide support, as applicable, when managing conduct and compliance matters:

- Overview of general regulatory framework,
- Prospective client relationships,
- Scope of client relationships,
- Required documents and disclosures,
- Client relationship maintenance,
- Containment of confidential information, and
- Conflicts of interest and ethics.

In addition to the general considerations cited in section 4, when assessing the type and level of training on this competency, dealers should specifically consider:

- their institutional account qualification requirements,
- the levels of client sophistication,
- how to respond effectively to client requests and document correspondence,
- how to document compliance with ongoing obligations for account appropriateness, suitability determination, and potential conflicts of interest,
- how personal financial dealings and outside activities may qualify as material conflicts of interest,
- applicable record-keeping and disclosure requirements to the client, and
- internal systems for containing confidential information.

Applicable training to be completed for an RR and IR on this and all other competencies will differ based on:

- the prospective client relationships, and
- the scope of client relationships.

When providing training on this competency, dealers should also consider information provided in the publications cited in section 4.8, when and if they apply to institutional RR/IR competencies,

Dealers should be aware of consistency with relevant rules, guidance or training by CIRO including CIRO's Conduct Training¹³.

We remind dealers that they are required to develop conflicts of interest policies and procedures that highlight applicable scenarios or examples, and these may be used for training.

5.2. Product and market impact

This competency requires an RR to understand and apply the following sub-competencies, or an IR to understand and apply them to provide support, as applicable, when analyzing or assessing product and market impact:

- Macroeconomics,
- Industry analysis,
- Company analysis,
- Technical/statistical analysis,
- Overview and characteristics of securities including equities, fixed income, managed products, and others, and
- Overview and characteristics of derivatives.

In addition to the general considerations cited in section 4, when assessing the type and level of training to provide on this competency, dealers should specifically consider:

- the product shelf of the dealer (limited or broad), and
- the breadth of understanding required for RRs in carrying out their regulatory obligations related to performing macroeconomic, industry, company and technical/statistical analysis.

5.3. Execution and market integrity

This competency requires an RR to understand and apply the following sub-competencies, or an IR to understand and apply them to provide support, as applicable, to comply with execution and market integrity obligations:

- Market integrity, trade execution and settlement, and
- Gatekeeping responsibilities.

Responsibilities for RRs and IRs are similar with respect to compliance with execution and market integrity. In addition to the general considerations cited in section 5, when assessing the type and level of training to provide on this competency, dealers should specifically consider:

- Market rules, including UMIR obligations on
 - Best execution,
 - Manipulative and deceptive practices,
 - Disruptive trading practices, and
 - Fair and equitable trading practices.

¹³ Subsection 2604(2).

6. Timing of training

The requirement in clause 2604(1)(i) allows dealers to provide the training to RRs and IRs within 90 days after approval. This is consistent with the principles-based approach, as we have moved to a more flexible approach where firms can decide, and have the responsibility to determine, the appropriate training and length of time for their training program.

While the dealers have this flexibility in terms of timing of the training, provided it is within 90 days after approval, they need to keep in mind their responsibility to ensure that an individual does not perform an activity unless the individual has the education, training and experience a reasonable person would consider necessary to perform the activity competently.¹⁴ Dealers should also consider the discussion in section 2 on the applicability of the training requirements.

7. Record-keeping and reporting requirements

Sub-clause 2604(1)(i)(a) prescribes that a dealer must notify CISO of completion of the new RR/IR training within 90 days after approval. This must be reported on National Registration Database (**NRD**). Failure to notify CISO of training completion within the 90-day post-approval period will result in automatic suspension¹⁵. Dealers have the flexibility on the timing of the training, provided it is completed no later than the 90th day after approval as that is the last day to report completion.

We expect dealers to keep a record of all training provided, and to provide us with the necessary records, on request, to demonstrate compliance as per clause 2604(1)(iv). For example, supervisor certification by a dealer that a new RR/IR has completed dealer training should form part of the dealer's records. Dealers should note we may request training records for inspection as part of routine compliance examinations, or as otherwise deemed necessary.

8. Eligibility as Continuing Education

We remind dealers that training provided under clauses 2604(1)(ii) or (iii) may satisfy an Approved Person's CE requirements within the cycle when the training is complete. However, dealers should ensure that delivery of their prescribed training programs comply with the applicable CE program obligations.

¹⁴ Subsection 2602(2)

¹⁵ Section 2552

9. RR/IR dealer transfers and IR upgrades

9.1. Movement between dealers

Section 2, above, lays out dealer responsibilities as they apply to ongoing compliance with the proficiency principle and general training requirements. The same responsibilities apply when RRs and IRs move between dealers. Receiving dealers that hire RRs/IRs who move between dealers will need to assess and consider what, if any, training needs to be provided. As part of their hiring due diligence process, dealers need to consider the proficiencies of the applicant and Approved Person, including their experience and training to determine what, if any, other training may be appropriate. For example, if the previous dealer has a limited product shelf or limited lines of business, the receiving dealer should consider whether any additional training is required and relevant to its business type or model, including client base and products offered.

Dealers should review, and update as needed, their hiring and training related policies and procedures. Dealers should consider the approach laid out in sections 3, 4 and 5, above, when reviewing what may be appropriate training for compliance with other training requirements applicable to all Approved Persons.

9.2. Upgrading to Registered Representative

The guidance provided in section 9.1, above, applies when managing IR upgrades to become an RR. To ensure compliance, a dealer will be expected to review the applicable competencies and sub-competencies to provide a relevant training program for RRs based on an assessment of the differences that apply between IR and RR functions, including internal requirements, policies and procedures, types of products, clients and the dealer's business model. The dealer will be responsible for maintaining the necessary records.

10. Applicable Rules

Rule 2600. Proficiency requirements and exemptions from proficiencies

11. Previous Guidance Notes

This Guidance Note replaces:

GN-2500-21-008 Guidelines for the 30-day Training program

GN-2600-21-005 Requirement to Complete the 30 or 90-Day Training Program

GN-2600-21-006 Guidelines for the 90-day Training Program

GN-2600-21-009 Permissible activities for those taking the 30 and 90-Day Training Programs

12. Appendix

The Appendix compares the previous 90DTP for RRs and 30DTP for IRs with retail RR/IR competencies and sub-competencies. Previous guidelines describe several of the same or similar competencies included in the retail RR/IR competency profile. A key distinction is labeling and/or differing categorizations of content, as illustrated in the table below. For example, the previous RR 90DTP includes a section on “product knowledge”. The retail RR/IR competency profile, by similar contrast, includes a sub-competency on “product and market impact” that retail RRs/IRs must know, understand and apply.

As a result of these changes, we expect dealers to perform their own analysis to ensure sub-competencies are adequately addressed and/or updated from the previous training programs.

Previous RR 90-day training program	Previous IR 30-day training program	Current retail RR/IR competency profile
<p>General Background</p> <ul style="list-style-type: none"> • Overview of the Financial Services Industry and the Securities System • Your Positioning in the Financial Services 	<p>General Background</p> <ul style="list-style-type: none"> • Your firm and its position in the industry • Products and services offered • Key relationships such as related financial institutions, introducing/carrying brokers 	<p>Initiate Client Relationships</p> <ul style="list-style-type: none"> • Overview of general regulatory framework • Prospective client relationships • Scope of client relationships • Required documents and disclosures
<p>Product knowledge</p> <ul style="list-style-type: none"> • Fixed income • Equities • Derivatives & hybrid securities • Mutual Funds and other Managed products • Proprietary products and accounts • Capital Markets and the Economy 	<p>Product knowledge</p> <ul style="list-style-type: none"> • Products offered by your firm • Characteristics of and key information regarding each product • Obtaining quotes and other information on each product 	<p>Product and market impact</p> <ul style="list-style-type: none"> • Macroeconomics • Industry analysis • Company analysis • Technical/statistical analysis • Overview and characteristics of securities including equities, fixed income, managed products, and others • Overview and characteristics of derivatives
<p>Portfolio Planning</p> <ul style="list-style-type: none"> • Basic Financial Planning • Tax and Retirement Planning 	<p>Trading for each type of product offered</p> <ul style="list-style-type: none"> • Credit and suitability 	<p>Suitability</p> <ul style="list-style-type: none"> • Know Your Product (KYP)

Previous RR 90-day training program	Previous IR 30-day training program	Current retail RR/IR competency profile
<ul style="list-style-type: none"> Portfolio Theory and Asset Allocation Firm Specific Planning Programs & Services 	<ul style="list-style-type: none"> assessment Prohibitions on advice 	<ul style="list-style-type: none"> Development of comprehensive investment recommendations Investment action recommendations Client account monitoring and performance
<p>Operations and Administration</p> <ul style="list-style-type: none"> Accounts and Client Records Transactions and Settlement Procedures Margin & Credit Policies Commissions/Compensation/Fees Firm Structure Systems & Technology 	<p>Trading for each type of product offered</p> <ul style="list-style-type: none"> Types of orders Required Information Order Entry and marking procedures Disclosure requirements Changing and cancelling orders <p>Transaction and operations</p> <ul style="list-style-type: none"> Firm operations departments and their functions/ Account types, opening, documentation and operation Settlement, margin and credit policies Commission/Transaction trail client records Systems and technology 	<p>Know Your Client and Execution and Market Integrity</p> <p>KYC</p> <ul style="list-style-type: none"> Collection of required information Analysis and evaluation of Know Your Client (KYC) information Use of KYC information to set financial goals <p>Execution and Market Integrity</p> <ul style="list-style-type: none"> Market integrity, trade execution and settlement Gatekeeping responsibilities
<p>Communication Training</p> <ul style="list-style-type: none"> Client Communication Prospecting/Marketing Communication Skills Relationship Management/Practice Management 	<p>Transaction and operations</p> <ul style="list-style-type: none"> Client communications <p>Compliance Issues</p> <ul style="list-style-type: none"> Compliance Rules, Regulations and Procedures 	<p>Maintaining Client Relationships</p> <ul style="list-style-type: none"> Communication with clients Relevant changes and updates Documentation requirements and best practices Client complaint handling and reporting

Previous RR 90-day training program	Previous IR 30-day training program	Current retail RR/IR competency profile
<p>Standards of Conduct & Practice</p> <ul style="list-style-type: none"> • Code of Ethics & Standard of Conduct • Compliance Rules and Regulations • Compliance Procedures • Know Your Client/Suitability • New & Pending legislation/regulation • Broker Liability/Complaint Processes & Penalties 	<p>Compliance Issues</p> <ul style="list-style-type: none"> • Business Ethics • Compliance Rules, Regulations and Procedures • Compliance and credit contacts 	<p>Conflicts and Ethics</p> <ul style="list-style-type: none"> • Conflicts of interest and Ethics • Outside Activities • Personal financial dealings • Containment of confidential information